

Dear Members of the Commission,

We urge you to adopt Executive Director Tess Stovall's finding that MNPS's denial of Tennessee Nature Academy's (TNA) amended application was not contrary to the best interests of the students, the local education agency, or the community, and to uphold her recommendation to deny its amended application. MNPS shares the Executive Director's concerns regarding TNA's financial capacity and ability to scale in the future.

Perhaps most troubling is TNA's lack of documentation of sufficient funding to launch the school and sustain it through its initial years. MNPS agrees with the Executive Director's conclusion that TNA's application "does not include a realistic plan sufficient to support the opening of a new charter school." TNA's proposed budget relied heavily on a grant which failed to materialize to the sum of \$233,333.00. As the Executive Director points out, the amended application fails to include documentation of any additional funding that has been secured to fully make up for this loss, leaving questions as to how required costs will be covered. As an example, MNPS's review team noted that TNA's start-up budget did not include any rental costs for facilities or costs for tenant improvements. While improvement costs were included in the Year 1 budget, the plan effectively prohibits improvements on the school facility until after the first year of school, thereby denying any such improvements before the students enter the building.

As a contingency plan, TNA suggests cutting "extras" if additional funding cannot be secured. MNPS agrees with the report's finding that these unspecified "extras" must surely affect the academic programming offered by the school, to the detriment of its students. These students should not shoulder the burden of TNA's lack of financial coordination and planning.

Finally, MNPS shares the Executive Director's apprehension regarding the proposed provision of special education, as required by state and federal law. While MNPS lacks confidence in the accessibility of TNA's programs for certain students with disabilities, TNA states that it plans to have a 1:10 teacher to student ratio for students receiving special education. Despite this, both MNPS and the Executive Director found that TNA's proposed budget lacked sufficient evidence to support the provision of special education and related services. Moreover, MNPS reiterates its concerns regarding staffing and teacher salary – concerns shared by the Executive Director. As the MNPS review team previously found, the financial allocations for teachers' salaries were insufficient and not competitive. TNA's proposal to pay special educators a salary \$10,000 less than other instructional staff is out of touch and unrealistic. It elicits serious questions about its ability to recruit and retain teachers to serve this special population. Failure to adequately serve special education students leaves the most vulnerable children at risk of not being able to fully access their education.

Like the Commission, MNPS holds its charter schools to high standards. TNA's uncertain and unpredictable finances raise grave concerns about their ability to meet those standards. As such, MNPS requests that the Commission adopt the Executive Director's recommendation and uphold the decision to deny the application.