

Dear Members of the Commission:

Metro Nashville Public Schools (MNPS) respectfully requests that you reject the Executive Director's recommendation to overturn its school board's decision to deny the application of Invictus Nashville, as approval is not in the best interests of the students, the district, or the community. A thorough review of the amended application demonstrates that denial of the application was proper under the state board of education's quality public charter school authorizing standards, as well as the scoring rubric of the Tennessee Department of Education.

Perhaps most worrying is the school's lack of financial stability, as demonstrated by the concerns presented in the amended application. The school's proposed budget relies on an extremely low cash balance, and little to no room for required upgrades or tenant improvements, one of which we already know need to be made: the construction of a legally required storm shelter. The school is only one unanticipated cost away from possible financial hardship. While the Executive Director has recognized the application has identified potential funding sources, there is no guarantee that the funding streams will come to fruition. In addition, the Commission's review is limited to the evidence in the record – not promises of what may or may not materialize in the future.

Academically, MNPS disagrees with the Executive Director's support of the proposed curriculum and instructional model as outlined in the amended application. The amended application provides insufficient evidence that the Montessori model proposed is aligned to state standards or that the model encompasses all required state standards. The applicant lacks a budget for an art teacher hindering their ability to meet statutory obligations in the teaching of art standards. The applicant also describes a summer learning program but does not include summer stipend pay for staffing. There is also insufficient evidence in the amended application that the proposed model meets legal requirements regarding services for English learners, as identified by the MNPS review team in its board report.

The applicant, in their proposed academic model, suggests that a second Montessori elementary is needed in a cluster where one already exists. The applicant fails to address how an additional Montessori school in an area already served by a Montessori school is a benefit to the community. Additionally, the application does not provide evidence of a recruitment plan or robust support from potential families – despite feedback from the MNPS review team regarding concerns about lack of community support.

Notwithstanding some promises on paper, it's clear that the application presented by Invictus Nashville is ill-prepared for execution. MNPS was left with many unanswered questions regarding curriculum, staffing, budget, and project-based learning. Because this proposal is not yet ready for execution, MNPS requests that the Commission overturn the Executive Director's recommendation and uphold the board's decision to deny the application.