

Response of Jackson-Madison County Schools (JMCSS) to Executive Director's Recommendation

JMCSS respectfully disagrees with the Executive Director's Recommendation dated October 2, 2023. The Recommendation contains significant inconsistencies when compared to other recommendations from the Executive Director (ED) without any legitimate, non-discriminatory reasons cited for the inconsistencies.

In prior recommendations, the failure of the charter sponsor to identify a location for the school has been cited by the ED as a response for a denial recommendation. For example, the ED, in recommending denial of the Academy of the Arts Charter High School application in October 2021, stated: "[W]ith regard to the facilities plan, the Sponsor has not set forth any *specific location* for the future site of AACHS . . . [T]he Sponsor has yet to put forth any firm commitments to cover the costs of those facility renovations. While the identification of a facility is not a requirement for approval, **reasonable facility options and location options are critical for the success of a school . . .**" The ED, in recommending denial of the Rutherford Collegiate Prep application in January 2022, stated: "Since *no authorizer can approve a school based on contingencies or conditions*, it is required that an approved application be ready to implement **with few substantive details** left for later development . . . the Sponsor needs to clearly delineate its financial modeling, inclusive of facility contingencies . . . to demonstrate long-term viability." The ED, in recommending denial of the Binghampton Community School Appeal application in October 2021, stated: "The applicant's operations plan partially meets standard because the review committee found **the plans and timeline for renovating the temporary space [to be] vague** . . . the review committee was unable to determine whether the timeline and budgeted totals were sufficient." Further, in the ED's October 2, 2023, recommended denial of American Classical Academy Maury (ACAM) application, the ED stated: "Without any specific details related to the facility plans, the review committee was unable to determine whether the plan for financing and renovating the facility aligned with the financial projections." The American Classical Academy Jackson-Madison (ACAJM) application has not identified a location for the proposed school (except a vague reference to East Jackson) which is no different than ACAM's reference to Columbia. Without more than vague references to "possible" sites, how can one evaluate the facility, safety, transportation, or fiscal plans? What are the legitimate, non-discriminatory reasons for requiring more stringent requirements in Maury County than in Madison County?

In recommending denial of the ACAM application, the ED stated that "gaps remain within the academic plan around assessments, services to special populations, and school culture" and that "the application lacks specific information and processes for oversight for students from special populations. RTI and MTSS are identified in the application as a structure to support students needing intervention, but the information is vague and does not indicate[] how and when students will be identified or monitoring processes." These deficiencies were cited by the JMCSS Review Committee and by the JMCSS Board of Education as reasons for denial. The ACAM and ACAJM applications were practically identical. The ED notes the deficiency in the ACAM application but ignores the same deficiency in the ACAJM application. Are the specific needs of special populations of Madison County not as deserving of the same protection as the special populations of Maury County? What is the legitimate, non-discriminatory reason to reach different conclusions in the two applications?

As JMCSS is limited to a one-page response, the above inconsistencies are only a few examples of the inequitable and inconsistent application of the rubric to the ACAJM application. The expectations and standards should be applied in a non-discriminatory manner to all school districts. The ACAJM application does not meet or exceed the standards in all scoring rubric sections. Therefore, the Commission should reject the ED's recommendation and uphold the decision of the JMCSS Board of Education to deny the amended application of ACAJM.

Respectfully submitted,

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