

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 Nashville Collegiate Prep High School (NCPH), as approval is not in the best interests of the students, the district, or the community. A thorough review of its 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.

As outlined in Tennessee charter statute, the purposes of charter schools are: To improve learning for all students; provide options for parents to meet educational needs of students; encourage use of different and innovative teaching methods; measure performance of students; ensure opportunities to reach academic proficiency on state assessments; and create new professional opportunities for teachers. Nashville Collegiate Prep (NCP) is ill-prepared to rise to this challenge, considering the many struggles it is already facing. The Commission's own 2021-22 annual report determined that NCP's K-5 school did not meet academic performance requirements. The Commission determined that the charter school underperformed English language arts (ELA) and math proficiency and found significantly low student growth on ELA assessments. The Commission also found that in ELA and math, NCP underperformed as compared to MNPS schools and that the school fell "far below" standards in chronic absenteeism, with 26% of its students chronically absent. The Executive Director seems to suggest that being below standards is acceptable considering the context of year 1 charter school. Simply put this is a charter operator that does not currently meet the Commission's academic performance requirements. While the Executive Director believes that there will be success in the future, the school has not demonstrated academic success needed of a charter school under the Commission's own metrics.

It is therefore no surprise that a charter operator which is already struggling, struggled to put together a strong plan to open a high school. The Executive Director's report overlooks crucial concerns regarding staffing at the high school. A required English as a Second Language teacher is not in the applicant's budget, even though the school projects a 30% English learner population. The applicant only has 1 teacher budgeted in years 1 and 2 for non-core courses, despite feedback from the MNPS review team about staffing shortages based on the applicant's own student projections.

Additionally, the Executive Director's minimizes the reality of lack of familial interest and community support. ReThink states, "Current NCP parents are clearly wanting a high school, so their students have continuity and continued excellence and high quality." Yet the applicant provides no evidence to support this claim. When asked at the public hearing why its amended application contained a limited number of letters of support, Commission staff were essentially told not to worry – they can rest assured knowing that the support is there. If this was the case, the applicant would have been able to provide documentation of such. While the applicant speaks of a parent survey indicating such demand, copies of those survey responses are missing from the amended application.

When a school is not meeting requirements, it should not be allowed to expand and enroll hundreds more students. Students deserve better than that and the State owes them more. Accordingly, approving NCPHS' application sets a dangerous precedent. It sends a message that a charter school – even if their current charter school is not meeting academic standards; can expand their operations. This is what ReThink is counting on. Indeed, their letter of intent boasts they have broken ground on a brand-new campus designed to house both the "NCP middle school and NCPHS." They have sent mailers advertising the new facility to MNPS families. It is vital that all schools, including charter schools, must be held accountable for their performance and NCP is no exception. As such, MNPS requests that the Commission overturn the Executive Director's recommendation and uphold the board's decision to deny the application.