



TO: Tennessee Public Charter School Commission

FROM: Tess Stovall, Executive Director

DATE: January 26, 2024

SUBJECT: Nashville Collegiate Prep Amendment Petition

Background

ReThink Forward, Inc. ("Governing Board") entered into a charter agreement with the Tennessee Public Charter School Commission ("Commission") on December 16, 2020 to establish and operate Nashville Collegiate Prep (NCP) in the Southeast region in Nashville, TN serving kindergarten through fifth in the opening year, with subsequent expansion through the eighth grade through the addition of a grade level annually. In school year 2023-24, the school serves grades K-7 with approximately 618 students. The maximum enrollment under the current agreement is 1,292 when the school is fully serving grades K-8. The school has accommodated as many students as possible until completion of the middle school facility, which will then allow the school to fully enroll all grade levels at their maximum capacity under the current agreement.

NCP's original facility has a maximum capacity of 478, and as the school expanded grade levels, the operator had to be agile and diligent in seeking alternative facility options. In early 2022, NCP's continuous search resulted in identifying a land opportunity that would allow the school to build a new facility, which would house grades 5-8 in the long term. NCP is requesting to continue its grade expansion and create a full K-12 continuum, providing a cohesive academic experience utilizing the same academic model that is offered to current NCP families and students. The amendment petition is requesting to add grade levels 9-12 and increase the maximum student enrollment to 1,892 to accommodate the addition of these grade levels.

Pursuant to T.C.A. 49-13-110(d), the governing body of a public charter school may petition the authorizer to amend the charter agreement. The Commission is charged with determining the timelines for approval of amendment petitions and the process for reviewing these petitions. Under Commission Rule 1185-01-01-.04, a public charter school may petition for the addition or removal of a grade level or levels as well as changes in student enrollment, both being identified as material modifications to the charter agreement. Upon receipt of an amendment petition, the Commission is responsible for reviewing and scoring the amendment application with the Department of Education's scoring rubric and must act on the petition within sixty (60) calendar days of receiving the petition.¹

Commission staff independently reviewed the amendment petition, attachments, and budgets submitted by NCP. After the independent review, staff collectively drafted follow-up questions for the operator related to academics, operations, and financial items. NCP responded to these additional questions on January 8, 2024. The analysis below is based on materials submitted by the school and the conversations between Commission staff and school representatives.

Analysis

The Commission strives to be a first-in-class authorizer, and we desire to support the charter schools in our portfolio to best set them up for success. Recommendations for approval or denial of each amendment requested in

¹ Tenn. Comp. R. & Regs. 1185-01-01-.04(1)(h).

an amendment application will be based on the materials submitted as well as the authorizer's due diligence in accordance with Commission Policy 3.900.

The amendment petition for NCP centers on the operator's desire to provide a consistent and cohesive academic experience for students and families in the Antioch community that includes grades 9-12. The amendment petition incorporates details for how NCP's continuous improvement model for instruction will be implemented, including the use of a personalized educational service model paired with NCP's community model. Additionally, the high school would include career pathways aligned with the major industries of Nashville. The support for the high school expansion is evidenced by letters of support from community members, students, and parents. Upon completion of the new facility, NCP will have adequate space to serve all grade levels at the enrollment counts specified within its charter agreement. Given that the operator has had to creatively navigate facility constraints since opening, the completion of the new facility marks a turning point for the operator to serve families in the Antioch community without being hindered by space limitations.

The Tennessee Department of Education's amendment petition scoring rubric lays out the characteristics of a strong amendment petition, and it is on these characteristics that this recommendation is based. Within the amendment application, NCP has set forth a clear plan for expanding its current academic model to serve grades 9-12 beginning in school year 2025-26. This includes a model similar to what is currently being implemented in the lower and middle grades, where classrooms are set up in communities in which 2-3 teachers provide academic content to the full cohort. This model is used as it allows for the reach of the master teacher in each core content area to be extended. NCP will also utilize the continuous improvement model, which is personalized and intentional in how it structures its class time, use of data, and success block to provide differentiation. The proposed amendment also details the use of innovative instructional practices including offering career pathways aligned to major industries in Nashville, lesson and unit plans that support the mastery of Tennessee state standards, and a continuous improvement model that is community based that focuses on student's individual needs as evidenced by the use of student specific supports and differentiation. The application outlines key academic strategies aligned with the mission of the school, including continuous improvement cycles, personalized learning plans, a collaborative learning model, and social-emotional skill-building. NCP will adjust staffing as needed to ensure adequate services are provided to all students, including students with disabilities and English Learners.

The amendment petition incorporates sufficient evidence of community demand that supports NCP's ability to reach its full enrollment target, and the operator has demonstrated the ability to increase enrollment over the past two years of operation. NCP also has a unique opportunity given the land that was purchased in 2022 as there is adequate space to accommodate phase I of construction, which will house middle school grades, and phase II for high school grades. The budget and financial projections provided demonstrate a strong financial position and include the necessary expenditures for implementing the plan outlined within the application. This amendment petition also outlines the emergent nature given the timelines needed to move forward with the current construction timeline in a manner that captures cost efficiencies and enables current seventh grade students to matriculate seamlessly into high school in school year 2025-26.

Moreover, the amendment petition submitted by the operator reflects feedback received by the Commission as a part of the October 2023 appeal process. Specifically, the amendment petition shifts its focus to serving the school's current seventh grade students with a ninth grade opening in school year 2025-26. The application also includes evidence of community support and is grounded in meeting the needs of NCP's current families all the while meeting community demand for an alternative high-quality option at the high school level.

It is important to note here that the school requires an affirmative decision from the Commission and cannot move forward with opening a high school if the Commission vote includes contingencies. A contingency decision

would function as a denial for the purposes of lending funds and hamper the school's ability to move forward with construction. Based on the partnership with the school and operational success, I appreciate the adjustments that the school has made to its plans based on feedback from the Commission in October 2023. I support the school's plan to expand through twelfth grade to not only serve the students and families of NCP but also create a high-quality high school option within Antioch.

1. Alignment of proposed amendment with the school's mission and goals.

The mission of NCP is "to provide a personalized, engaged, supported, and challenging environment that will strengthen students academically, socially, and emotionally." The vision is that "every student will leave NCP with the skills and mindset necessary to not only face reality but create improvements for the next generation." Within the amendment application, NCP demonstrates a compelling argument for the need for the proposed high school in the Antioch Community. The petition states that it has always been the goal of the ReThink Forward board to offer a full K-12 program. NCP's vision for a seamless K-12 educational continuum would enable NCP's current students to have an uninterrupted educational experience through high school. NCP has also articulated the need for the proposed high school in the Antioch community, particularly given the limited performance of other high schools in the area. By adding a high school option, families will have access to a public, innovative high school option that is smaller in size. With the proposed high school being located on the same property as the new middle school campus, students would experience a seamless transition from the middle school to the high school.

2. Academic results provide compelling support for the proposed amendment.

NCP opened in the 2021-22 school year and has experienced mixed academic results in the first two years of operations. Within the amendment petition and the additional information requested by the Commission, the school provided supplemental responses to the school's 2022-23 public accountability data. Commission staff sought to gather additional data from the school to support it as a high-quality academic model for students and to further increase academic achievement. In response to this request, the operator provided additional context concerning the academic results that the school has achieved since opening.

Given that the school is in its first few years of operation, approximately 1 in 3 of NCP's students are new, with the majority coming to the school at least one grade level behind. Internal data indicates that 1 in 5 of these students transitioning to NCP are 2-3 grade levels behind. In response to the significant need to grow students combined with the recent release of prior year academic data, the school spent the past three months evaluating data in the aggregate and by individual student groups. Through this internal analysis, the school learned that they are successfully growing their highest-need students (the new indicator from the state comprised of the lowest performing 25% of students) as evidenced by the school earning a TVAAS Level 3 for this indicator. However, through the data analysis, the operator identified an opportunity for growth in accelerating the growth of students who were higher performing. As a result, leadership has adjusted its process of data-driven instruction to include tracking mastery of standards, and the leadership created plans for reteaching standards where needed. The process has become central in classrooms with teachers and administration no longer solely relying on iReady data to inform instruction. Instead, data will be looked at more broadly and will include weekly data sets so that appropriate decisions related to grouping and remediation can be made in real time. Students are also being provided tutoring to ensure standards mastery. A focus for NCP moving forward will be to increase student academic growth and proficiency for all students.

The expansion of NCP to serve grades 9-12 is supported by analyzing comparative data to other schools within the geographic community of Antioch where NCP is most likely to recruit students. The analysis below considers NCP's academic performance in relation to the available data from school year 2022-23 for these surrounding schools. As

summarized in the chart below, only one school in the geographic region earned a B, with all others earning a C or lower. Most relevant and specific to the amendment petition to expand to offer a high school option, and based on publicly available data, there is a need for more high-quality high school options with all zoned high schools having a letter grade of D or F. Similar to the letter grade, high school options in this region only earned a TVAAS Level 1 or 2. NCP stated that the school's performance is not where the network and board expect it to be, and the school remains committed and focused on accelerating student performance and addressing shortcomings.

Nashville Collegiate Prep				
Name	Grades Served	SY22-23 Success Rate	SY22-23 Composite TVAAS	SY22-23 Letter Grade
Nashville Collegiate Prep	K-6	23.1%	2	D

Neighborhood Elementary Schools				
Name	Grades Served	SY22-23 Success Rate	SY22-23 Composite TVAAS	SY22-23 Letter Grade
Cane Ridge ES	K-5	26.7%	5	C
Eagle View ES	K-5	21.8%	3	C
Cole ES	K-5	17.9%	3	D
A.Z. Kelley ES	K-4	25.2%	5	C
Henry C. Maxwell ES	K-4	21.5%	5	C
May Werthan Shayne ES	K-4	45.7%	5	B
Tusculum ES	K-4	24.4%	5	C

Neighborhood Middle Schools				
Name	Grades Served	SY22-23 Success Rate	SY22-23 Composite TVAAS	SY22-23 Letter Grade
Antioch MS	6-8	11.5%	1	F
Thurgood Marshall MS	5-8	16.9%	2	D
William Henry Oliver MS	5-8	27.1%	3	C
John F. Kennedy MS	5-8	18.1%	5	C
McMurray MS	5-8	13.4%	3	D

Neighborhood High Schools				
Name	Grades Served	SY22-23 Success Rate	SY22-23 Composite TVAAS	SY22-23 Letter Grade
Antioch HS	9-12	9.4%	1	F
Cane Ridge HS	9-12	6.9%	1	F
Glenclyff HS	9-12	6.0%	1	F
Overton HS	9-12	14.5%	2	D

When looking at the school's first two years, the operator has established additional supports and adjusted its academic plan and delivery to build on its success and work towards meeting the standards set forth by the Commission. Nashville Collegiate Prep has proven to be a strong partner with the Commission, is responsive to requests or concerns, and remains compliant with applicable law. While always striving for the highest quality of charter schools under its portfolio, the Commission also recognizes the difficulty of the first few years of a school opening and expects the school to achieve long-term academic success to be renewed at the end of its charter agreement. The Commission also expects schools to support students where they are academically when they enter

the school. The school has shown determination and indicators of academic success such that there is confidence in the school's ability to successfully expand to high school and offer a high-quality option for students and families in Antioch.

3. Realistic and detailed budget that explains the financial impact of the proposed amendment and clear evidence that the financial outlook of the school supports the costs associated with the proposed amendment.

NCP provided a financial projection for the next five (5) fiscal years, assuming approval of the amendment. The school projects that it will maintain a positive net position on an annual basis with revenues exceeding operating expenses. In addition to the projected positive net income, the network is in a strong financial position based on past audits and financial statements as of September 30, 2023. While the audit for the fiscal year ending June 30, 2023 is not yet complete, the school met standards for financial performance on prior years financial performance framework. NCP addressed the need for contingency plans should enrollment not materialize in response to supplemental questions sent to the operator. Within these responses, the school states that the ReThink Forward has been planning for this expansion by building a fund balance to allow for appropriate contingencies. The school estimates to have a fund balance exceeding \$3 million by the end of the 2024-25 school year, and this projection is reasonable based on the school's fund balance in the submitted financial statements as of September 30, 2023, combined with the financial projections included in the amendment petition.

Financing for the construction of the new building is already in place and evidence of funding is included within the application. Furniture, fixtures, and equipment for the high school will be covered by a portion of the fund balance, however, expenses will be managed such that it does not create financial strain on the school. Furthermore, the filing of an amendment petition allows for efficient and responsible use of the school's resources since construction is already underway at the new campus. This financial strategy aligns with the financial projections while supporting the operational systems and supports required for the school's expansion.

The budget that was submitted within the petition reflects the additional facility costs without impacting the expenditures necessary for the educational program. Additionally, the projected budget incorporates reasonable assumptions for compensation, instructional materials, and transportation reflective of the expanded grade levels and instructional model. Although meeting enrollment projections is a common concern for schools, particularly new schools, a significant number of seats proposed will be filled by students matriculating from NCP's currently offered K-8 model. Commission staff regularly meets with the school and will continue to monitor enrollment targets as a part of its ongoing monitoring.

4. Thoughtful and realistic facility plans that accommodate the proposed amendment.

In April 2023, NCP secured a property that will be used to build a new facility. Construction will take place in two separate phases. Phase I of construction will be used to serve students in grades five through eight and will be completed for an August 2024 opening. Phase II would then be constructed contingent on the approval of the amendment petition to expand to serve grades 9-12. Phase II has an estimated completion date of summer 2025, and the timelines for both phases remain on track. Phase II includes classroom space that will be used to implement the current academic model with fidelity and also includes amenities including a gymnasium and sports field. As such, phase II does not only benefit the proposed high school students but will also provide additional amenities for students in grades 5-8.

The applicant provided a detailed and realistic timeline for opening the high school that aligns with the proposed school budget and will put the school on track for a successful opening. A facility site has already been secured, and construction is already in progress and on track for completion in line with the amendment application.

The new high school facility, which is scheduled to be ready for occupancy by July 2025, will be built for the proposed high school and will include traditional classrooms, space for extracurricular activities, and spaces with flexible layouts that will support the school's collaborative learning model.

NCP has gone through many facility reconfigurations over the last three years of operations, with certain grade levels having restricted enrollment totals because of limited building capacity. After the construction of the new facilities, NCP will be fully built out and include the necessary space to serve all grade levels at full capacity. The projected facility plan includes the following details:

- Kindergarten will be housed at NCP's building at 14897 Old Hickory Boulevard. This building is located across the street from the Bell Road campus.
- Grades 1-4 will be served at 1638 Bell Road.
- Phase I of the NCP campus at 14446 Old Hickory Boulevard will serve grades 5-8 from the phase I build projected to be completed in summer 2024.
- Phase II of the NCP campus at 14446 Old Hickory Boulevard will serve grades 9-12 with the project to be completed in summer 2025.

5. Detailed implementation plan with a realistic timeline that addresses the operational impact of the proposed amendment.

Beginning in school year 2025-26, NCP will expand year over year until reaching full enrollment. As the school increases enrollment, the staffing model will adapt to meet the needs of its students, compliance requirements, and enrollment amounts. Included in the application is a staffing matrix that incorporates the necessary positions for effectively operating a school. The school will have a distributive leadership model where the principal will oversee school operations from the systems level. The principal will serve as the leader for all campuses, and then NCP will have a director for each grade span (K-4, 5-8, and 9-12) who will be responsible for the day-to-day operations of their assigned group of students. The school will also have an individual responsible for operations and enrollment and a registrar to ensure effective enrollment and recruitment. The current leader, Teresa Brown, has a track record of success in the charter school space and has previously opened three schools successfully in her tenure. Teacher recruitment is addressed within the application, with NCP understanding the necessity of actively pursuing English as a Second Language (ESL) endorsements. NCP will prioritize hiring teachers with an ESL or Special Education endorsement and ensure all high school core subjects are properly staffed. Through a partnership with Trevecca Nazarene University, the school can leverage its resources to recruit core academic teachers.

The Commission recognizes the importance of ensuring that schools are fully staffed and that teachers are up to date on all licensure requirements. All Commission-authorized schools receive feedback every quarter regarding compliance with these requirements. During the Quarter 1 monitoring for the 2023-2024 school year, NCP was both fully staffed and up to date on all staff licenses. The operator is aware of the licensure requirements and anticipates no licensure issues in the opening of NCP. NCP has also met standards for both years of operation, further supporting the likelihood of continued operational success and stability.

6. Clear evidence of support for the proposed amendment from parents, staff, and community partners.

The amendment petition for NCP demonstrates evidence of support from parents, staff, and community partners. Support for the expanded grade levels was evidenced by survey results expressing a desire for a full K-12 educational option, letters from parents expressing satisfaction with NCP and a desire to keep their student at the school through high school, staff members speaking to the unique academic model and pedagogy, and letters from students describing why they would like an NCP high school. Community support is expected to increase based on

collaboration and notification to community partners, which included local businesses, community centers, parent advocacy groups, and preschools. As a result of the canvassing efforts and communication with parents and community members, the NCP has garnered clear support for the grade level expansion and has received an increased number of intents to enroll as a result. Community support is expected to grow as the new facility is constructed and the middle school moves to the new campus.

7. FOR EMERGENCY PETITIONS ONLY: Compelling evidence of unanticipated extraordinary circumstances supporting the filing of an emergency amendment application.

In justifying the need for an emergency amendment petition, NCP states that to ensure a seamless educational transition for the school's current seventh graders into high school by fall 2025, an emergency amendment is critical due to pressing construction deadlines, permit acquisition processes, and existing space. For the school to move forward with phase II of construction, which includes the high school building, gymnasium, and sports fields, the general contractor requires approval by the school to adhere to the opening schedule for the 2025-26 school year. Waiting for the traditional amendment petition or application window would not allow the school to meet the needed timeline for having the ability to open in the fall of 2025. Additionally, the application details how the school sees this as a way of collaborating with the Commission as the amendment petition is reflective of the feedback provided in the recent appeal process and allows the current seventh graders to matriculate into high school and continue serving students that are currently included in the Commission's portfolio. Lastly, the governing board stated that without this amendment, parents who choose to enroll their children at NCP and want to continue within the model through high school will not be able to do so. The school believes that families choose NCP based on its personalized model, and the high school creates opportunities for students to achieve academic growth to reach proficiency.

Recommendation

Throughout the Commission staff's review of the record of Nashville Collegiate Prep's amendment application, staff focused on the characteristics of a strong response as defined by the Tennessee Department of Education's amendment petition rubric. Through working with the operator since school year 2021-22, NCP has prioritized serving students in the Antioch community and worked diligently to identify a facility that is adequate for serving the expanding grade levels. This process has been extensive, and with the recent purchase of land, NCP has an opportunity to accommodate the addition of grades 9-12. I also acknowledge and commend the NCP's efforts to demonstrate community support, which is evidenced through the letters of support. Additionally, the school listened to feedback from the Commission and adjusted its plans in response. Phase I of construction is already underway, and approval of the amendment petition creates an opportunity for Phase II to be completed in time for the current seventh grade students to begin high school beginning school year 2025-26.

Based on this review, Commission staff recommends approval of the amendment petition for Nashville Collegiate Prep. Upon Commission approval of the amendment petition and the amended charter agreement, if approved, the Commission will permit NCP to expand to serve students in grades kindergarten through twelfth with an enrollment maximum of 1,892 when fully built out.



Tess Stovall, Executive Director
Tennessee Public Charter School Commission

January 26, 2024
Date