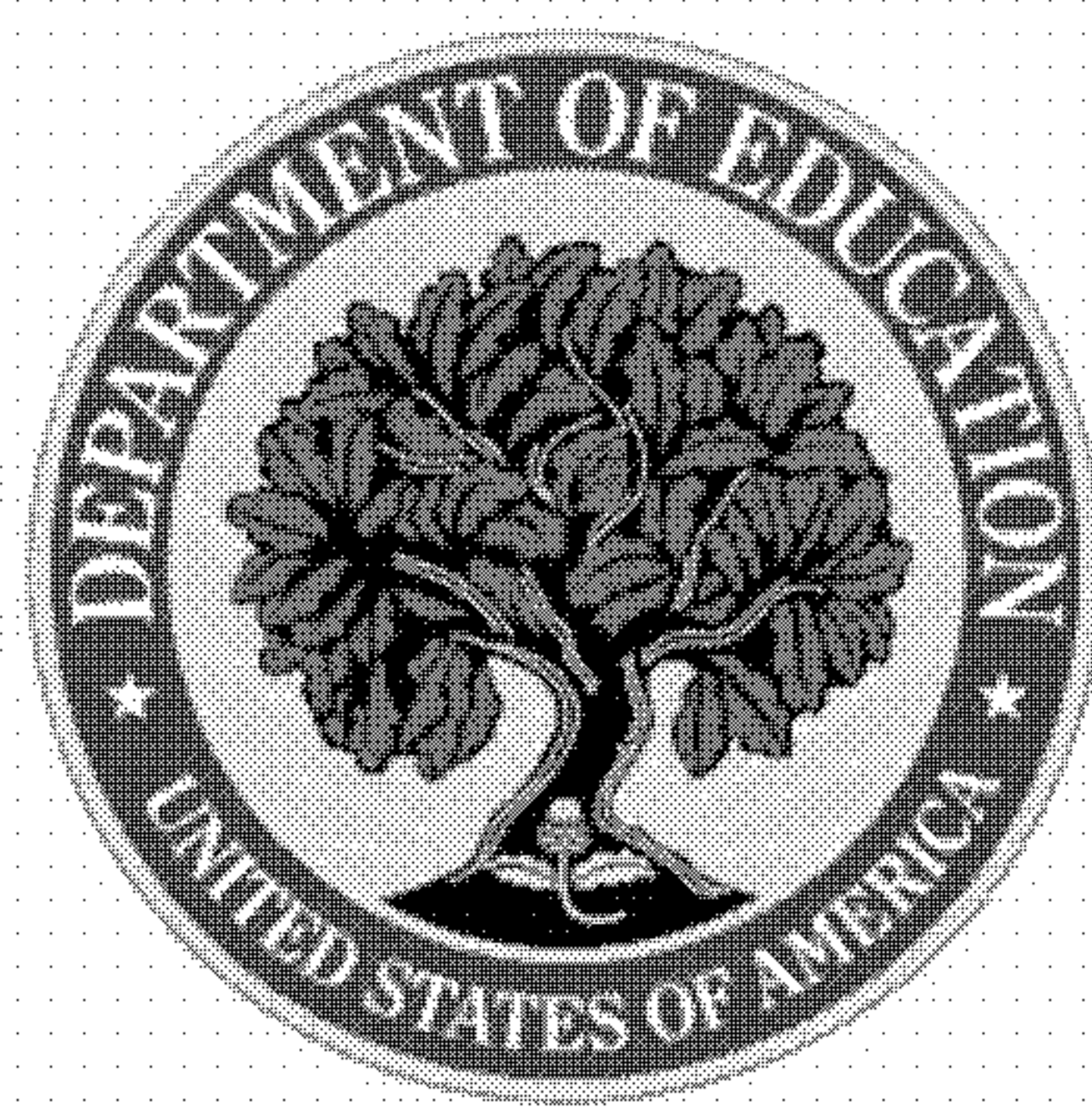

ESEA Flexibility Request



November 14, 2011

U.S. Department of Education
Washington, DC 20202

OMB Number: Approval pending

Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is pending. The time required to complete this information collection is estimated to average 336 hours per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate or suggestions for improving this form, please write to: U.S. Department of Education, Washington, D.C. 20202-4537.

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COVER SHEET FOR ESEA FLEXIBILITY REQUEST

<p>Legal Name of Requester:</p> <p>Kevin S. Huffman</p>	<p>Requester's Mailing Address:</p> <p>Tennessee Department of Education 6th Floor, Andrew Johnson Tower 710 James Robertson Parkway Nashville, TN 37243</p>
<p>State Contact for the ESEA Flexibility Request</p> <p>Name: Kevin S. Huffman</p> <p>Position and Office: Tennessee Commissioner of Education</p> <p>Contact's Mailing Address: Tennessee Department of Education 6th Floor, Andrew Johnson Tower 710 James Robertson Parkway Nashville, TN 37243 Telephone: 615-741-5158</p> <p>Fax: 615-532-4791</p> <p>Email address: Kevin.S.Huffman@tn.gov</p>	
<p>Chief State School Officer (Printed Name): Kevin Huffman</p>	<p>Telephone: 615-741-5158</p>
<p>Signature of the Chief State School Officer:</p> <p align="center"></p> <p>X _____</p>	<p>Date: November 14, 2011</p>
<p>The State, through its authorized representative, agrees to meet all principles of the ESEA Flexibility.</p>	

WAIVERS

By submitting this flexibility request, the SEA requests flexibility through waivers of the ten ESEA requirements listed below and their associated regulatory, administrative, and reporting requirements by checking each of the boxes below. The provisions below represent the general areas of flexibility requested; a chart appended to the document titled *ESEA Flexibility Frequently Asked Questions* enumerates each specific provision of which the SEA requests a waiver, which the SEA incorporates into its request by reference.

- 1. The requirements in ESEA section 1111(b)(2)(E)-(H) that prescribe how an SEA must establish annual measurable objectives (AMOs) for determining adequate yearly progress (AYP) to ensure that all students meet or exceed the State's proficient level of academic achievement on the State's assessments in reading/language arts and mathematics no later than the end of the 2013–2014 school year. The SEA requests this waiver to develop new ambitious but achievable AMOs in reading/language arts and mathematics in order to provide meaningful goals that are used to guide support and improvement efforts for the State, LEAs, schools, and student subgroups.
- 2. The requirements in ESEA section 1116(b) for an LEA to identify for improvement, corrective action, or restructuring, as appropriate, a Title I school that fails, for two consecutive years or more, to make AYP, and for a school so identified and its LEA to take certain improvement actions. The SEA requests this waiver so that an LEA and its Title I schools need not comply with these requirements.
- 3. The requirements in ESEA section 1116(c) for an SEA to identify for improvement or corrective action, as appropriate, an LEA that, for two consecutive years or more, fails to make AYP, and for an LEA so identified and its SEA to take certain improvement actions. The SEA requests this waiver so that it need not comply with these requirements with respect to its LEAs.
- 4. The requirements in ESEA sections 6213(b) and 6224(e) that limit participation in, and use of funds under the Small, Rural School Achievement (SRSA) and Rural and Low-Income School (RLIS) programs based on whether an LEA has made AYP and is complying with the requirements in ESEA section 1116. The SEA requests this waiver so that an LEA that receives SRSA or RLIS funds may use those funds for any authorized purpose regardless of whether the LEA makes AYP.
- 5. The requirement in ESEA section 1114(a)(1) that a school have a poverty percentage of 40 percent or more in order to operate a schoolwide program. The SEA requests this waiver so that an LEA may implement interventions consistent with the turnaround principles or interventions that are based on the needs of the students in the school and designed to enhance the entire educational program in a school in any of its priority and

focus schools, as appropriate, even if those schools do not have a poverty percentage of 40 percent or more.

- 6. The requirement in ESEA section 1003(a) for an SEA to distribute funds reserved under that section only to LEAs with schools identified for improvement, corrective action, or restructuring. The SEA requests this waiver so that it may allocate section 1003(a) funds to its LEAs in order to serve any of the State's priority and focus schools.
- 7. The provision in ESEA section 1117(c)(2)(A) that authorizes an SEA to reserve Title I, Part A funds to reward a Title I school that (1) significantly closed the achievement gap between subgroups in the school; or (2) has exceeded AYP for two or more consecutive years. The SEA requests this waiver so that it may use funds reserved under ESEA section 1117(c)(2)(A) for any of the State's reward schools.
- 8. The requirements in ESEA section 2141(a), (b), and (c) for an LEA and SEA to comply with certain requirements for improvement plans regarding highly qualified teachers. The SEA requests this waiver to allow the SEA and its LEAs to focus on developing and implementing more meaningful evaluation and support systems.
- 9. The limitations in ESEA section 6123 that limit the amount of funds an SEA or LEA may transfer from certain ESEA programs to other ESEA programs. The SEA requests this waiver so that it and its LEAs may transfer up to 100 percent of the funds it receives under the authorized programs among those programs and into Title I, Part A.
- 10. The requirements in ESEA section 1003(g)(4) and the definition of a Tier I school in Section I.A.3 of the School Improvement Grants (SIG) final requirements. The SEA requests this waiver so that it may award SIG funds to an LEA to implement one of the four SIG models in any of the State's priority schools.

Optional Flexibility:

An SEA should check the box below only if it chooses to request a waiver of the following requirements:

- The requirements in ESEA sections 4201(b)(1)(A) and 4204(b)(2)(A) that restrict the activities provided by a community learning center under the Twenty-First Century Community Learning Centers (21st CCLC) program to activities provided only during non-school hours or periods when school is not in session (*i.e.*, before and after school or during summer recess). The SEA requests this waiver so that 21st CCLC funds may be used to support expanded learning time during the school day in addition to activities during non-school hours or periods when school is not in session.

ASSURANCES

By submitting this application, the SEA assures that:

- 1. It requests waivers of the above-referenced requirements based on its agreement to meet Principles 1 through 4 of the flexibility, as described throughout the remainder of this request.
- 2. It will adopt English language proficiency (ELP) standards that correspond to the State's college- and career-ready standards, consistent with the requirement in ESEA section 3113(b)(2), and that reflect the academic language skills necessary to access and meet the new college- and career-ready standards, no later than the 2013–2014 school year. (Principle 1)
- 3. It will develop and administer no later than the 2014–2015 school year alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities that are consistent with 34 C.F.R. § 200.6(a)(2) and are aligned with the State's college- and career-ready standards. (Principle 1)
- 4. It will develop and administer ELP assessments aligned with the State's ELP standards, consistent with the requirements in ESEA sections 1111(b)(7), 3113(b)(2), and 3122(a)(3)(A)(ii). (Principle 1)
- 5. It will report annually to the public on college-going and college credit-accumulation rates for all students and subgroups of students in each LEA and each public high school in the State. (Principle 1)
- 6. If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and uses achievement on those assessments to identify priority and focus schools, it has technical documentation, which can be made available to the Department upon request, demonstrating that the assessments are administered statewide; include all students, including by providing appropriate accommodations for English Learners and students with disabilities, as well as alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities, consistent with 34 C.F.R. § 200.6(a)(2); and are valid and reliable for use in the SEA's differentiated recognition, accountability, and support system. (Principle 2)
- 7. It will report to the public its lists of reward schools, priority schools, and focus schools at the time the SEA is approved to implement the flexibility, and annually thereafter, it will publicly recognize its reward schools. (Principle 2)

- 8. It will report annually to the public and each LEA will annually report to its SEA and to the public, beginning no later than the 2014–2015 school year, on the aggregate distribution of teachers and principals by performance level, including the percentage of teachers and principals by performance level at the State, LEA, and school level, and by school poverty quartile within the State and LEA. (Principle 3)
- 9. Prior to submitting this request, it provided student growth data on their current students and the students they taught in the previous year to, at a minimum, teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects in a manner that is timely and informs instructional programs, or it will do so no later the deadline required under the State Fiscal Stabilization Fund. (Principle 3)
- 10. It will evaluate and, based on that evaluation, revise its own administrative requirements to reduce duplication and unnecessary burden on LEAs and schools. (Principle 4)
- 11. It has consulted with its Committee of Practitioners regarding the information set forth in its request.
- 12. Prior to submitting this request, it provided all LEAs with notice and a reasonable opportunity to comment on the request and has attached a copy of that notice (Attachment 1) as well as copies of any comments it received from LEAs (Attachment 2).
- 13. Prior to submitting this request, it provided notice and information regarding the request to the public in the manner in which the State customarily provides such notice and information to the public (*e.g.*, by publishing a notice in the newspaper; by posting information on its website) and has attached a copy of, or link to, that notice (Attachment 3).
- 14. It will provide to the Department, in a timely manner, all required reports, data, and evidence regarding its progress in implementing the plans contained throughout this request.

If the SEA selects Option A or B in section 3.A of its request, indicating that it has not yet developed and adopted all guidelines for teacher and principal evaluation and support systems, it must also assure that:

N/A 15. It will submit to the Department for peer review and approval a copy of the guidelines that it will adopt by the end of the 2011–2012 school year. (Principle 3)

CONSULTATION

An SEA must meaningfully engage and solicit input from diverse stakeholders and communities in the development of its request. To demonstrate that an SEA has done so, the SEA must provide an assurance that it has consulted with the State's Committee of Practitioners regarding the information set forth in the request and provide the following:

1. A description of how the SEA meaningfully engaged and solicited input on its request from teachers and their representatives.

The Tennessee Department of Education (TDOE) has solicited input from a broad range of stakeholders, including teachers, other educators, and community leaders in the process of creating this application. Furthermore, the vast majority of components described in this application stem directly from our Race to the Top plan, including all of Principles 1 and 3, and a significant number of the goals, processes, and interventions in Principle 2. The state's work in building stakeholder support for Race to the Top is also described below, since our Race to the Top plan is foundational to this waiver request.

We have engaged with teachers and their representatives throughout the ESEA flexibility request application process. After we submitted our original letter requesting a waiver from current ESEA requirements in July 2011, the Commissioner gave speeches in front of educators across the state to explain the goals of the waiver. In preparation for this application, TDOE officials held meetings seeking input from the Superintendents' Study Council, the leadership of the Tennessee Education Association (TEA), Tennessee's Committee of Practitioners (which includes teachers, parents, school administrators, and TEA members), the state's English as a Second Language (ESL) task force (a committee of stakeholders from across the state, including teachers, administrators, and superintendents), and the Tennessee School Boards Association. We held a targeted community forum co-hosted by Stand for Children, Tennessee State Collaborative on Reforming Education (SCORE), United Ways of Tennessee, and Urban Leagues of Tennessee, in which more than 450 people participated, including many educators. We also presented an overview of the application to all 136 superintendents from across the state and the TEA leadership, and held individual consultations with leading urban and rural superintendents to ensure that we captured their unique needs. Finally, we are partnering with Teach Plus, a network of teachers that seeks to ensure teacher voices are part of the policy discussion.

The feedback from these consultations has been valuable in shaping important aspects of our application, particularly in helping us to check against unintended consequences and design a system that is as aligned as possible to the ongoing work of LEAs and schools. For example, we decided to include a safe harbor provision from a "Miss" designation on Achievement AMOs for LEAs that perform strongly on growth data in the Tennessee Value Added Assessment System (TVAAS); this was a direct result of educators highlighting the many small, rural LEAs in our state where AMOs around growth in proficiency may be skewed because of genuine differences in individual cohorts, but while LEAs may still demonstrate their strong performance on value-added data with the same cohort of students. In addition, we made the decision to include not only Title I schools but all schools on our Focus schools list, based on feedback from some superintendents, given the charge to raise student achievement across all schools, and because there were many non-Title I schools in their LEAs with substantial achievement gaps between subgroups of students. Finally, comments and questions from community

leaders reinforced the importance of focusing on closing achievement gaps, which is reflected throughout our proposed new accountability system. A summary of comments received from educators can be found in Attachment 2.

Furthermore, this application is, at heart, about our efforts to implement and fully realize the goals of our Race to the Top application. Tennessee's Race to the Top application was created with broad community and teacher input. The application itself was supported and signed on to by all 136 LEAs and major stakeholder groups across the state, including the Tennessee Education Association (the largest teachers' union in the state), the Principals' Study Council, school leaders, the Tennessee Supervisors' Study Council, Tennessee Organization of School Superintendents, Tennessee School Boards Association, and the Coalition of Large School Systems.

Teachers and their representatives have continued to play a key role as we have worked to implement the initiatives outlined in our Race to the Top application. As we prepared for implementation of Common Core State Standards (CCSS), teams of teachers have worked with outside experts to complete "crosswalks" which analyze the alignment between current state standards and CCSS by topic and depth of rigor. These efforts are described in greater detail under Principle 1 below.

Educators also played a key role in the Tennessee Diploma Project and accompanying efforts to raise standards and set more rigorous and realistic assessment cut-off scores for proficiency levels on state assessments (described in greater detail below under Principle 1). These efforts were supported by the First to the Top Coalition, which included the Tennessee Education Association among many other stakeholder groups.

In addition, teachers and principals have been intimately engaged throughout the process of designing and implementing our teacher and principal evaluation models. The Tennessee Evaluation Advisory Committee (TEAC), a 15-member body that included five teachers, two principals, and one superintendent, met more than 20 times over the course of a year and developed the guidelines and criteria for teacher and principal evaluation that the State Board of Education (SBE) adopted. In addition, teachers make up the development teams which continue to contribute recommendations around alternative growth measures for non-tested grades and subjects. When multiple observation models were tested in the 2010-11 school year, more than 8,000 teachers across 84 LEAs participated in the field testing. All of these interactions around evaluation are described in much greater detail under Principle 3 below.

2. A description of how the SEA meaningfully engaged and solicited input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes.

We have engaged with a wide variety of education stakeholders as we developed and finalized our application for ESEA flexibility. TDOE officials met with the state's ESL Task Force (a statewide group of teachers, consultants, and district officials working with English Learners), representatives from the special education advocacy community including Support and Training for Exceptional Parents (STEP) and the Disability Law and Advocacy Center of Tennessee, Tennessee Business Roundtable, and legislators. In addition, the community forum described above was co-hosted by four large, diverse, and

important advocacy groups, Stand for Children, Tennessee SCORE, United Ways of Tennessee, and Urban Leagues of Tennessee, and represented an important opportunity for their members and constituents to raise questions and hear directly from the Commissioner on his thinking. Please see Appendix 1 for a summary of our recent engagement.

Furthermore, this application represents the next step in our efforts to implement and fully realize the goals of our Race to the Top application, which were supported and signed on to by an incredibly broad group of stakeholders from across the state. These stakeholders included:

- the state’s political leadership, including the Tennessee General Assembly, the state’s delegation to the U.S. Congress, and Mayor Karl Dean of Metropolitan Nashville;
- education non-profit organizations, including the Charter School Growth Fund, the Knowledge is Power Program, New Leaders for New Schools, Teach For America, and The New Teacher Project;
- business groups, including the Tennessee Chamber of Commerce and Industry, the Greater Memphis Chamber, Memphis Tomorrow, the Tennessee Business Roundtable, Junior Achievement;
- civil rights organizations, including the Tennessee State Conference of the National Association for the Advancement of Colored People, Tennessee Urban League Affiliates, and the Memphis Urban League,
- Tennessee Parent Teacher Association, Stand for Children, Volunteer Tennessee, TN SCORE, Alignment Nashville
- Philanthropic groups, including the Public Education Foundation, Public School Forum of East Tennessee, the Ayers Foundation, Benwood Foundation, Cal Turner Family Foundation, Hyde Family Foundations, James Stephen Turner Family Foundation, Lyndhurst Foundation, Niswonger Foundation, and Memphis Philanthropic Partners;
- Higher education institutions and affiliated organizations, including the Tennessee Higher Education Commission, the University of Tennessee system, Tennessee State University, Tennessee Tech University, University of Memphis, Cleveland State Community College, Dyersburg State Community College, Motlow State Community College, Nashville State Community College, Roane State Community College, Volunteer State Community College, Walters State Community College, the Tennessee State Board of Regents, Tennessee Technology Center at Dickson, Tennessee Technology Center at Dickson, and Tennessee Technology Center at Oneida/Huntsville);
- Science, technology, engineering, and math (STEM)-focused centers, businesses, and organizations, including BioTN Foundation, Vanderbilt Center for Science Outreach, Millard Oakley STEM Center at Tennessee Tech University, Center for Excellence in Math and Science Education at Eastern Tennessee State University, Tennessee Math, Science and Technology Education Center at Middle Tennessee State University, BioMimetic Therapeutics, Inc., Eastman Chemical Co., Memphis Bioworks Foundation, Bridgestone Americas, St. Jude Children’s Research Hospital, Smith & Nephew, Nashville Health Care Council, and Tennessee Biotechnology Association.

Numerous stakeholder groups also played a key role in supporting the Tennessee Diploma Project and accompanying efforts to raise standards and set more rigorous and realistic cut-off scores for state assessments (described in greater detail below under Principle 1) as part of the First to the Top Coalition. The First to the Top Coalition included corporations and business groups, philanthropic groups, education organizations, advocacy groups, and civil rights groups. For a full list, see

<http://www.expectmoretn.org/about/>.

EVALUATION

The Department encourages an SEA that receives approval to implement the flexibility to collaborate with the Department to evaluate at least one program, practice, or strategy the SEA or its LEAs implement under principle 1, 2, or 3. Upon receipt of approval of the flexibility, an interested SEA will need to nominate for evaluation a program, practice, or strategy the SEA or its LEAs will implement under principles 1, 2, or 3. The Department will work with the SEA to determine the feasibility and design of the evaluation and, if it is determined to be feasible and appropriate, will fund and conduct the evaluation in partnership with the SEA, ensuring that the implementation of the chosen program, practice, or strategy is consistent with the evaluation design.

Check here if you are interested in collaborating with the Department in this evaluation, if your request for the flexibility is approved.

OVERVIEW OF SEA'S REQUEST FOR THE ESEA FLEXIBILITY

Provide an overview (about 500 words) of the SEA's request for the flexibility that:

1. explains the SEA's comprehensive approach to implement the waivers and principles and describes the SEA's strategy to ensure this approach is coherent within and across the principles; and
2. describes how the implementation of the waivers and principles will enhance the SEA's and its LEAs' ability to increase the quality of instruction for students and improve student achievement.

Tennessee sits at a critical juncture in education. As the first winner (along with Delaware) of the Race to the Top competition, we have a compelling vision, plan and goals designed to make our state the fastest improving state in the country in educational outcomes. At the same time, we simply must attain this lofty vision for the good of the state; our students currently rank 46th among states in math proficiency levels, and 41st in reading.¹ We are requesting this waiver so that we are able to meaningfully improve instruction and raise achievement for all students in Tennessee.

We have, over the last two years, made a number of critical changes and commitments that are foundational for our efforts to improve outcomes for children. We significantly raised academic standards, thereby ensuring that our state proficiency rates paint a realistic picture of college- and career- readiness. We committed to use data and qualitative assessments to evaluate teachers and

¹ 2011 NCES NAEP Data for 4th grade.

principals and have begun implementation state-wide, in an effort to provide meaningful feedback to improve instruction. We agreed to implement the Common Core standards to ensure even more rigorous coursework over time. We created an Achievement School District to work in our chronically lowest performing schools. We took multiple steps to create additional high performing schools, including the creation of exemplar STEM academies and associated regional hubs; lifting the cap on charter schools; and using distance learning to provide geographically isolated students access to rigorous high-level coursework. These initiatives are foundational to the state's winning Race to the Top plan.

Perhaps most importantly of all, we set rigorous proficiency goals to measure our progress as a state, and we used those proficiency goals to set LEA targets. These goals are our line in the sand. They represent significant, steady growth in student achievement that would change Tennessee's educational trajectory as a state. We have proposed increasing our reading and math proficiency rates by around 20 percent over a five year arc, and growing graduation rates to 90 percent while simultaneously increasing course rigor.

These are goals that our 136 superintendents believe in and can manage against. They meet our LEAs where they are, rather than forcing an arbitrary framework on them. They call upon each LEA, each school, to grow from its current starting point, continuously improving each year until we, across 1,700 schools serving 950,000 students, achieve the fastest rate of improvement in the country.

Our Race to the Top plan and, in particular, our ability to manage against that plan is significantly undermined by the current No Child Left Behind rules and regulations. Last year, around half of Tennessee schools failed to make AYP. This year, that number would be around 80 percent. In setting unrealistic goals, and requiring rigidity of plans to reach those goals, No Child Left Behind now has created two unintended consequences in Tennessee. First, it has set goals that virtually all educators across the state believe are unrealistic and unattainable. We are asking educators to do the impossible, and then labeling them as failures when they don't achieve those unrealistic outcomes.

Second, there is an enormous opportunity cost associated with the current federal rules. Tennessee's LEAs and schools believe that they can improve significantly over the coming years. They believe that it is realistic and appropriate to hold them accountable for student growth. They believe that they can simultaneously grow achievement levels for students while closing gaps between groups of students. Moreover, they have committed to plans through Race to the Top that are ambitious and challenging and designed to drive continuous improvement across the system. These plans include implementing the Common Core standards, providing ongoing feedback and evaluation to adults at all layers of the system, and improving achievement measurably for all children.

As this application for regulatory relief makes clear, Tennessee has the goals, the plan and the political will to make rapid improvements in educational outcomes. We cannot allow outdated federal rules and regulations to stand in the way.

PRINCIPLE 1: COLLEGE- AND CAREER-READY EXPECTATIONS FOR ALL STUDENTS

1.A ADOPT COLLEGE- AND CAREER-READY STANDARDS

Select the option that pertains to the SEA and provide evidence corresponding to the option selected.

<p>Option A</p> <p><input checked="" type="checkbox"/> The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that are common to a significant number of States, consistent with part (1) of the definition of college- and career-ready standards.</p> <p>i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)</p>	<p>Option B</p> <p><input type="checkbox"/> The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that have been approved and certified by a State network of institutions of higher education (IHEs), consistent with part (2) of the definition of college- and career-ready standards.</p> <p>i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)</p> <p>ii. Attach a copy of the memorandum of understanding or letter from a State network of IHEs certifying that students who meet these standards will not need remedial coursework at the postsecondary level. (Attachment 5)</p>
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1.B TRANSITION TO COLLEGE- AND CAREER-READY STANDARDS

Provide the SEA’s plan to transition to and implement no later than the 2013–2014 school year college- and career-ready standards statewide in at least reading/language arts and mathematics for all students and schools and include an explanation of how this transition plan is likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards. The Department encourages an SEA to include in its plan activities related to each of the italicized questions in the corresponding section of the document titled *ESEA Flexibility Review Guidance*, or to explain why one or more of those activities is not necessary to its

plan.

Introduction

Tennessee has demonstrated the political will and capacity to significantly change state-level standards through our work over the last two years. Furthermore, we previously committed to implement the Common Core Standards in our Race to the Top application, passed the necessary rules, and have begun implementation. Our work raising standards is emblematic of the need for regulatory relief. By doing the hard work of raising our state standards and proficiency levels, we made it harder for schools to achieve AYP. We did the right thing for kids, but are now impeded in our efforts to improve instruction and increase student achievement by the outdated rules and standards of No Child Left Behind.

While the following section details our implementation plan and provides ample documentation demonstrating our commitment, we can answer the underlying question about Tennessee’s commitment to higher standards in one word: Yes. Yes, we believe in and are implementing higher standards. Yes, we think it will make a difference in the lives of all children. And yes, we believe that eliminating implausible federal goals and layers of federal compliance paperwork will better equip us to manage our state system against tougher standards.

In 2010, the state of Tennessee committed to raise standards and expectations for all students by adopting the Common Core State Standards (CCSS), which were approved by the State Board of Education (SBE) in July of that year. The purpose is clear: in Tennessee’s Race to the Top (RTTT) application, we explained that adopting new standards with correspondingly aligned assessments and training would improve student achievement. In addition, we pledged to transform public education for *every* student, regardless of location or demographic. Tennessee’s CCSS implementation plan intends to do just that: reach every student, from K-12, regardless of race, ethnicity, socioeconomic status, disability status, or English language proficiency. Adopting the CCSS will also lead to improved instruction and teacher quality; ultimately, the increased emphasis on rigorous content and critical thinking in the classroom will inspire more of the most talented and ambitious college students to choose a career in teaching.

Our plan draws in teachers, principals, LEA-level administrators, the Tennessee Department of Education (TDOE), higher education, families, communities, stakeholder organizations, and others—all of whom play an important role in reaching our goal of having every student graduate from high school at a college- and career-ready (CCR) level.

The college- and career- ready focus must permeate every academic area. We reject the false choice between college- and career-readiness, as if one can only emphasize one to the detriment of the other. Career and Technical Education (CTE) and Advanced Placement (AP) classes should operate under the same principle (and thus both play crucial roles in the CCR agenda): providing students the skills to succeed at the postsecondary level.

The following CCSS implementation plan operates according to several core philosophies that will inform our work at every stage of this process over the next several years:

- **Inclusiveness:** As the CCSS standards for English Language Arts (ELA) make clear, “all students must have the opportunity to learn and meet the same high standards if they are to access the knowledge and skills necessary in their post-high school lives.” Tennessee’s plan has the

same high expectations for *all* students, while recognizing the need for support and accommodations for students with disabilities and English Learners (ELs) to be able to achieve at such a rigorous level. We explain in further detail below how we will support struggling student populations in reaching these ambitious but achievable CCR goals.

- **Targeting the areas of greatest need:** There is one general subgroup for which we intend this plan to have the greatest impact: low-achieving students. Closing gaps is an overarching state goal expressed in each waiver principle, and the CCSS plays a prominent role in raising expectations and achievement for underperforming students. Within this targeted area, math will be a particular focus: math tends to be the greatest weakness for our students, and math instruction the greatest weakness for our teachers. Because of this, the implementation timeline provided in Appendix 2, which explains how we will introduce the CCSS statewide and applies to all students and teachers, moves most aggressively on math standards.
- **Partnership:** The section below on stakeholder engagements emphasizes the crucial role of communication and partnership with all stakeholder groups. We also rely heavily on outside expertise: throughout the process, TDOE has collaborated extensively with Achieve, Partnership for the Assessment of Readiness for College and Careers (PARCC), and Council of Chief State School Officers (CCSSO). Our Commissioner sits on PARCC's governing board, and TDOE has been heavily involved in the CCSS project from the beginning. We will continue to draw from the expertise and technical support of these partner organizations.
- **Driving with data:** Only by collecting, reviewing, and analyzing actionable data will we know the success of implementation; only by acting on that data will our implementation efforts succeed. Several sections below explain the key role that data, especially educator feedback loops, plays in this plan.
- **Lead with strength; support with generosity:** CCSS implementation is too big an endeavor to leave up to chance. TDOE must set a strong CCR vision and devise a careful, thorough plan. But we also recognize that there are areas of implementation that TDOE cannot fully control: each LEA, school, administrator, teacher, student, and external stakeholder exerts his or her own level of independence and influence on the process. There are certain non-negotiable elements: most of these are the key implementation events in Appendix 2's timeline. But TDOE's plan also leaves considerable room for LEAs (and, by extension, schools, principals, and teachers) to exercise their expertise in deciding the best way to accomplish goals, with TDOE providing support and guidance.
- **Ensuring progress:** TDOE recognizes the incredible difficulty of this work. Simply stating our intentions and providing the proper information and training ensures nothing. It is at the very end of the implementation chain—in the classroom — where our success will be determined. Involving every classroom, teacher, and student throughout the state in not just understanding but leading this transition is a colossal undertaking. Thus, to drive our goals and to ensure the successful implementation of the following plan, under its forthcoming realignment, TDOE will establish a new office to oversee the implementation of CCSS and PARCC assessments over the next several years. This office will also be responsible for monitoring effectiveness at each stage of implementation. For more details, please see the final section on monitoring/sustaining progress.
- **Flexibility:** In requesting ESEA flexibility, we intend to be flexible ourselves. No plan, however detailed, can anticipate every single challenge or unexpected snags and development. TDOE is open to a process of constant improvement and will continue to tweak the plan as needed.

Foundation for CCSS Implementation

Tennessee has already laid the foundation for the work of implementing college- and career-ready standards and aligning high quality assessments through our work as part of Achieve’s American Diploma Project (ADP) network. Our version, known as the Tennessee Diploma Project (TDP), raised the bar for all students in the state by revising standards in RLA, math, and science, and setting new graduation requirements to ensure more students graduate at a CCR level through a true collaboration consisting of K-12, higher education, the business and philanthropic community, Governor’s Office staff, and Achieve.

The State Board of Education (SBE) adopted the new standards and graduation requirements in January 2008, setting out an ambitious goal: “All students will have access to a rigorous curriculum that includes challenging subject matter, emphasizes depth rather than breadth of coverage, emphasizes critical thinking and problem solving, and promotes responsible citizenship and lifelong learning.” This current school year’s junior class will be the first students to be held to the new graduation requirements. In order to graduate, students now must take Algebra II as well as a math course in all four years of high school, take a third year of lab science, and complete 22 credits instead of the previous minimum of 20. To give meaning and credibility to the new, more rigorous TDP standards, Tennessee also revamped its TCAP assessment system to provide a more accurate indicator of student performance. The state moved to a four-level proficiency model, adding the below basic category to basic, proficient, and advanced, and reset the cut scores associated with the top two levels to more closely align with national standards for NAEP and the ACT.

Student achievement scores predictably plummeted after the above changes were implemented for the spring 2010 TCAP exams. Instead of ignoring the results or backing down, the state engaged in a public awareness campaign called “Expect More, Achieve More” (<http://www.expectmoretn.org/>), with media events held around the state to educate the public and prepare parents and students for the shock of low scores. In acknowledging that the state had been using inflated scores for years, the state was able to tout its new standards and more demanding graduation requirements as the path forward towards a more honest, robust conversation about raising expectations for all students. By way of example, the percentage of students scoring proficient or advanced on the 7th grade math TCAP dropped from 90.3 percent in 2009 to 28.5 percent in 2010, the first year of data after the standards were raised. While full implementation of CCSS may cause an additional shift in results, Tennessee’s state proficiency levels now mirror proficiency on NAEP at 4th and 8th grades, and ACT at the high school level. They are, in a word, realistic.

Since the process began over four years ago, Governor Haslam and Commissioner Huffman have joined as strong supporters of the TDP and are working to continue to drive higher expectations for all students. Thanks to the work the state engaged in for the TDP, the CCSS are closely aligned with existing state standards, and because of the process of engaging stakeholders and achieving such widespread collaboration across political divides, the public has a clear understanding of the need to make such difficult but necessary decisions in order to achieve ambitious improvements for our students. The state is now well prepared for the final stage in its transition to a complete, CCR-aligned education system based on the CCSS, and to drive that transition with a strong support plan for implementation.

Tennessee has planned a phased implementation over the next three years, briefly outlined in table A below:

Table A: Timeline for CCSS implementation

