



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

February 25, 2019

The Honorable Penny Schwinn
Commissioner of Education
Tennessee Department of Education
710 James Robertson Parkway
Nashville, TN 37243

Dear Commissioner Schwinn:

I am writing in response to the Tennessee Department of Education's (TDOE's) request to the U.S. Department of Education (Department) on January 23, 2019, to amend its approved consolidated State plan under the Elementary and Secondary Education Act of 1965 (ESEA).

I have determined that the amended request meets the requirements in the ESEA and, for this reason, I am approving Tennessee's amended State plan. A summary of Tennessee's amendment is enclosed. This letter, as well as Tennessee's revised ESEA consolidated State plan, will be posted on the Department's website. Any further requests to amend Tennessee's ESEA consolidated State plan must be submitted to the Department for review and approval.

In addition to these changes, and as noted in a letter to TDOE on August 14, 2018, TDOE must update its methodology for identifying schools for additional targeted support and improvement (ATSI) so that it is consistent with the statute. Specifically, that methodology must be based on the methodology the State uses for identifying its lowest-performing five percent of Title I schools for comprehensive support and improvement. The ESEA requires a State to identify for ATSI any school with one or more subgroups whose performance, on its own, would lead to identification of the school for comprehensive support and improvement based on being among the lowest-performing five percent of Title I schools, using the State's methodology to identify the lowest-performing five percent of Title I schools. TDOE must identify schools for ATSI, no later than the beginning of the 2019-2020 school year. At that time, TDOE will need to apply its methodology to identify any schools that were not identified at the start of the 2018-2019 school year, but would have been, had TDOE been using methodologies that met all applicable ESEA requirements. My staff is available to work with TDOE in developing a revised methodology in time to meet these requirements.

Please be aware that approval of this amendment to Tennessee's consolidated State plan is not a determination that all the information and data included in the amended State plan comply with Federal civil rights requirements, including Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, and requirements under the Individuals with Disabilities Education Act. It is Tennessee's responsibility to comply with these civil rights requirements.

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Thank you for all of the work that TDOE has put into its consolidated State plan under the ESEA. If you need any assistance regarding the implementation of your ESEA consolidated State plan, please contact my staff at: OSS.Tennessee@ed.gov.

Sincerely,

/s/

Frank T. Brogan
Assistant Secretary for
Elementary and Secondary Education

Enclosure

cc: Eve Carney, Executive Director, Office of Consolidated Planning and Monitoring
Mary Batiwalla, Assistant Commissioner, Division of Assessment, Accountability & Data
Governance

Amendment to the Tennessee Consolidated State Plan

The following is a summary of Tennessee's amendment request. Please refer to the U.S. Department of Education's (the Department) website at <https://www2.ed.gov/admins/lead/account/stateplan17/map/tn.html> for Tennessee's complete consolidated State plan.

- **Identification of schools for comprehensive support and improvement**

The Tennessee Department of Education (TDOE) clarified the methodology for identifying comprehensive support and improvement schools that are among the lowest-performing five percent of Title I schools using all indicators in its accountability system.

TDOE identifies comprehensive support and improvement schools that are among the lowest performing five percent of Title I schools using a multi-step process:

1. Identify those schools that are the lowest performing based on student academic achievement in reading/language arts, mathematics, and science and that have a school-level Tennessee Value-Added Assessment System (TVAAS) score below level 4 in the most recent two consecutive years.
2. Review each other indicator for which the school meets the n-size and identify those schools that do not exceed a 3 on all other eligible indicators.
3. As needed, in order to identify five percent of Title I schools that meet all of the criteria, to the extent that step 2 removes schools from identification, TDOE will include additional schools for consideration based on being just higher than the lowest five percent based on step 1. That is, based on student achievement and TVAAS, TDOE may need to consider the lowest performing six percent of Title I schools, if some schools from among the lowest-performing five percent are removed during step 2.

- **Other Academic Indicators for Elementary and Middle Schools who are not High Schools/School Quality or Student Success indicator**

TDOE updated the years in which it will use science achievement in making accountability determinations consistent with the waiver the Department granted to TDOE on February 4, 2019. The State will exclude the science results from accountability determinations based on the 2018-2019 school year because the State is field-testing a new science test statewide. TDOE will again include the science results in the accountability system beginning in the 2019-2020 school year.