Tennessee ESEA Flexibility

Request

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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

Legal Name of Requester:	Requester's Mailing Address:
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State Contact for the ESEA Flexibility Request

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Position and Office: Tennessee Commissioner of Education

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Chief State School Officer (Printed Name):	Telephone:
Candice McQueen	615-741-5158
Signature of the Chief State School Officer: X Candice McQueen	Date: July 7, 2015

The State, through its authorized representative, agrees to meet all principles of ESEA flexibility.

WAIVERS

By submitting this updated ESEA flexibility request, the SEA renews its request for flexibility through waivers of the nine ESEA requirements listed below and their associated regulatory, administrative, and reporting requirements, as well as any optional waivers the SEA has chosen to request under ESEA flexibility, by checking each of the boxes below. The provisions below represent the general areas of flexibility requested.

☒ 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 school-wide 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 that meet the definitions of "priority schools" and "focus schools," respectively, set forth in the document titled *ESEA Flexibility*, 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 that meet the definitions of "priority schools" and "focus schools," respectively, set forth in the document titled *ESEA Flexibility*.

☒ 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 that meet the definition of "reward schools" set forth in the document titled *ESEA Flexibility*.

☒ 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.

Optional Flexibilities:

If an SEA chooses to request waivers of any of the following requirements, it should check the corresponding box(es) below:

☒ 10. 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.

☒ 11. The requirements in ESEA sections 1116(a)(1)(A)-(B) and 1116(c)(1)(A) that require LEAs and SEAs to make determinations of adequate yearly progress (AYP) for schools and LEAs, respectively. The SEA requests this waiver because continuing to determine whether an LEA and its schools make AYP is inconsistent with the SEA's State-developed differentiated recognition, accountability, and support system included in its ESEA flexibility request. The SEA and its LEAs must report on their report cards performance against the AMOs for all subgroups identified in ESEA section 1111(b)(2)(C)(v), and use performance against the AMOs to support continuous improvement in Title I schools.

☒ 12. The requirements in ESEA section 1113(a)(3)-(4) and (c)(1) that require an LEA to serve eligible schools under Title I in rank order of poverty and to allocate Title I, Part A funds based on that rank ordering. The SEA requests this waiver in order to permit its LEAs to serve a Title I-eligible high school with a graduation rate below 60 percent that the SEA has identified as a priority school even if that school does not otherwise rank sufficiently high to be served under ESEA section 1113.

☐ 13. 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 in addition to waiver #6 so that, when it has remaining section 1003(a) funds after ensuring that all priority and focus schools have sufficient funds to carry out interventions, it may allocate section 1003(a) funds to its LEAs to provide interventions and supports for low-achieving students in other Title I schools when one or more subgroups miss either AMOs or graduation rate targets or both over a number of years.

If the SEA is requesting waiver #13, the SEA must demonstrate in its renewal request that it has a process to ensure, on an annual basis, that all of its priority and focus schools will have sufficient funding to implement their required interventions prior to distributing ESEA section 1003(a) funds to other Title I schools.

Click here to enter page numbers where edits have been made and where new attachments have been added. Do not insert new text here – insert new text in redline into the revised request.

☒ 14. The requirements in ESEA sections 1111(b)(1)(B) and 1111(b)(3)(C)(i) that, respectively, require the SEA to apply the same academic content and academic achievement standards to all public schools and public school children in the State and to administer the same academic assessments to measure the achievement of all students. The SEA requests this waiver so that it is not required to double test a student who is not yet enrolled in high school but who takes advanced, high school level, mathematics coursework. The SEA would assess such a student with the corresponding advanced, high school level assessment in place of the mathematics assessment the SEA would otherwise administer to the student for the grade in which the student is enrolled. For Federal accountability purposes, the SEA will use the results of the advanced, high school level, mathematics assessment in the year in which the assessment is administered and will administer one or more additional advanced, high school level, mathematics assessments to such students in high school, consistent with the State's mathematics content standards, and use the results in high school accountability determinations.

If the SEA is requesting waiver #14, the SEA must demonstrate in its renewal request how it will ensure that every student in the State has the opportunity to be prepared for and take courses at an advanced level prior to high school.

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ASSURANCES

By submitting this request, the SEA assures that:

☒ 1. It requests waivers of the above-referenced requirements based on its agreement to meet Principles 1 through 4 of ESEA flexibility, as described throughout the remainder of this request.

☒ 2. It has adopted 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 State's college- and career-ready standards. (Principle 1)

☒ 3. It will 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) no later than the 2015–2016 school year. (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 annually make public its lists of reward schools, priority schools, and focus schools prior to the start of the school year as well as publicly recognize its reward schools, and will update its lists of priority and focus schools at least every three years. (Principle 2)

If the SEA is not submitting with its renewal request its updated list of priority and focus schools, based on the most recent available data, for implementation beginning in the 2015–2016 school year, it must also assure that:

☐ 8. It will provide to the Department, no later than January 31, 2016, an updated list of priority and focus schools, identified based on school year 2014–2015 data, for implementation beginning in the 2016–2017 school year.

☒ 9. 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)

☒ 10. It has consulted with its Committee of Practitioners regarding the information set forth in its ESEA flexibility request.

☒ 11. 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)

☒ 12. Prior to submitting this request, it provided notice and information regarding the request to the public in the manner in which the SEA 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)

☒ 13. 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 its ESEA flexibility request, and will ensure that all such reports, data, and evidence are accurate, reliable, and complete or, if it is aware of issues related to the accuracy, reliability, or completeness of its reports, data, or evidence, it will disclose those issues.

☒ 14. It will report annually on its State report card and will ensure that its LEAs annually report on their local report cards, for the "all students" group, each subgroup described in ESEA section 1111(b)(2)(C)(v)(II), and for any combined subgroup (as applicable): information on student achievement at each proficiency level; data comparing actual achievement levels to the State's annual measurable objectives; the percentage of students not tested; performance on the other academic indicator for elementary and middle schools; and graduation rates for high schools. In addition, it will annually report, and will ensure that its LEAs annually report, all other information and data required by ESEA section 1111(h)(1)(C) and 1111(h)(2)(B), respectively. It will ensure that all reporting is consistent with *State and Local Report Cards Title I, Part A of the Elementary and Secondary Education Act of 1965, as Amended Non-Regulatory Guidance* (February 8, 2013).

Principle 3 Assurances

Each SEA must select the appropriate option and, in doing so, assures that:

Option A	Option B	Option C
☒ 15.a. The SEA is on track to fully implementing Principle 3, including incorporation of student growth based on State assessments into educator ratings for teachers of tested grades and subjects and principals.	If an SEA that is administering new State assessments during the 2014–2015 school year is requesting one additional year to incorporate student growth based on these assessments, it will: ☐ 15.b.i. Continue to ensure that its LEAs implement teacher and principal evaluation systems using multiple measures, and that the SEA or its LEAs will calculate student growth data based on State assessments administered during the 2014–2015 school year for all teachers of tested grades and subjects and principals; and ☐ 15.b.ii. Ensure that each teacher of a tested grade and subject and all principals will receive their student growth data based on State assessments administered during the 2014–2015 school year.	If the SEA is requesting modifications to its teacher and principal evaluation and support system guidelines or implementation timeline other than those described in Option B, which require additional flexibility from the guidance in the document titled *ESEA Flexibility* as well as the documents related to the additional flexibility offered by the Assistant Secretary in a letter dated August 2, 2013, it will: ☐ 15.c. Provide a narrative response in its redlined ESEA flexibility request as described in Section II of the ESEA flexibility renewal guidance.

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/.

Consultation on Renewal Application

Over the last several weeks, the department engaged in an extensive process of research and outreach that included the following:

- Developing an internal waiver renewal design team including data and research personnel and regional data analysts
- Engaging with expert consultants from higher education institutions on state accountability systems
- Requesting feedback from all Tennessee superintendents
- Developing an accountability design working group including members of the Tennessee Organization of School Superintendents (TOSS)
- Presenting to and soliciting feedback from the following groups:
    - District-level accountability and research personnel
    - District-level and TDOE personnel with expertise in special education and English language learners
    - CORE Regional Directors
    - Executive Board of State Superintendent's Study Council
    - The Tennessee State Collaborative on Reforming Education (SCORE)
    - Consolidated Planning and Monitoring statewide Advisory committee, including representatives from the Tennessee Education Association and the University of Memphis
    - Urban League of Tennessee
    - IDEA Advisory Council
    - ELL and Students with Disabilities Advocates
    - Teacher Advisory Council (TNReady transition)

We engaged this diverse group of stakeholders across the state who provided feedback at numerous stages of system development. The final proposal in this waiver request reflects their feedback.

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 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.

[1] 2011 NCES NAEP Data for 4th grade.

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.

Option A	**Option B**
☒ 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. i. Attach evidence that the State has adopted the standards, consistent with the State's standards adoption process. (Attachment 4)	☐ 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. i. Attach evidence that the State has adopted the standards, consistent with the State's standards adoption process. (Attachment 4) 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)

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

The majority of the text for Principle 1 was drafted at the time of Tennessee's original application for an ESEA Flexibility waiver in November 2011. Throughout this section, there are many references to CCSS, which are Tennessee's current academic standards. As described later in this section, Tennessee is also currently undergoing a standards review and development process, which will shape the math and English language arts standards for the 2017-18 school year. Tennessee is committed to rigorous academic standards for all students and will continue to update the ESEA Flexibility waiver as needed regarding potential future changes.

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). 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 aligned 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 former 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

	2011-12	2012-13	2013-14
Grades K-2	Math and ELA		
Grades 3-8		Math (partial)	Math (full) and ELA
Grades 9-12			Math and ELA

We began this year with K-2 to help lay foundational work for the coming years. We will then follow with partial implementation of 3-8 math standards in 2012-13, and full implementation of the remaining 3-8 math standards, 9-12 math standards, and 3-12 ELA standards in 2013-14. This staggered approach will allow us to field test assessment changes and fully train teachers on expected assessment changes and instructional best practices to support student achievement.

Although our timeline for implementation of CCSS is ambitious, particularly at the high school level, we believe this timeline is both right and feasible for several reasons. First, we have previously taken a strong step towards college- and career-ready standards when we raised standards substantially through the Tennessee Diploma Project in 2010. Second, we are strengthening and refining our methods for providing professional development state-wide for these rigorous new standards as we reflect on the work with K-2 educators over the past year and prepare for professional development this summer for 3rd-8th grade math. We believe providing professional development in stages and reflecting on these experiences will allow us to turn to high schools with professional development that is ready to be implemented throughout entire schools.

In order to lead the new, more effective model of professional development design and execution, we are establishing a "Leadership Cabinet" that will work in partnership with the division of Curriculum and Instruction, and that will be in place by the end of the January 2012. The Leadership Cabinet will be comprised of 10 district leaders (principals, assistant superintendents, and superintendents) and will oversee the design of teacher trainings and communication across

the state over the next 3 years. They will work with a body of Master Teachers, comprised of three teachers per grade level for each Field Service Center region. Together, the Leadership Cabinet and Master Teachers will develop and facilitate trainings for school-level coaches on CCSS, with significant support from the Department's Division of Curriculum and Instruction and content area experts. In addition to the school-level captain trainings we will provide video and online modules specific to each grade level and content area (i.e., separate math and reading modules for third grade) that can be used in district professional development and reviewed by teachers and parents state-wide. We will be releasing as many assessment items as possible for revised TCAP and EOC assessments aligned with CCSS one year in advance of administration. And we will invest in pre-service training of new teachers to ensure upfront knowledge of CCSS.

Finally, we remain in close touch with other states in order to share their high quality resources and tools with our districts and schools.

In October 2014, Governor Bill Haslam and the Tennessee State Board of Education announced the Tennessee Education Standards Review and Development process for ELA and math standards. The review provides Tennesseans the opportunity to engage in the state's effort to improve student outcomes and create rigorous college and career ready standards in Tennessee. The review will be thorough and deliberate to ensure Tennessee has the highest quality standards. It will include input from professional Tennessee educators in both K-12 and higher education. The current Tennessee State Standards will remain in place for the 2015-16 and 2016-17 school years; updated standards as a result of the standards review and development process will be implemented in the 2017-18 school year. Commissioner McQueen remains committed to maintaining college and career ready standards through this process of review and subsequent adoption of updated standards.

Analyzing standards alignment for CCSS implementation

To analyze the extent of alignment between the state's current content standards and the CCSS, TDOE has collaborated with Achieve to develop a "Crosswalk" process. The Crosswalks were conducted by teams of Tennessee teachers working closely with Dr. Marie O'Hara from Achieve, who made point-by-point comparisons between the CCSS and the existing Tennessee curriculum standards using Achieve's Crosswalk tool. The resulting Crosswalk documents identify matches between individual Common Core standards and the Tennessee curriculum standards. For example, 97 percent of the CCSS ELA standards have a match in Tennessee's ELA standards, with 90 percent being rated as an excellent or good match. The math standards are more closely aligned in the early grades, with no grade-level difference in Kindergarten and only a 1 percent difference in 1st grade; however, 59 percent of 8th grade CCSS math standards are taught earlier in Tennessee standards.

To complete the Crosswalk process, TDOE will partner with Achieve to create a Crosswalk for high school math and return to the Crosswalk for K-8 math once more to ensure its rigor and accuracy, and then seek validation from external experts. TDOE will convene a committee of LEA content experts and math specialists/coaches to complete this work, and this team will also help develop the content of math professional development (PD) and the second round of K-2 summer training.

We are committed to thoroughly training all educators on the adjustments they can expect in standards and assessments prior to the roll-out of changes. We will use findings from the Crosswalk, especially points of departure from Tennessee standards, to ensure that grade-level PD is rigorous and targets the biggest discrepancies. The state will also use Depth of Knowledge and the Revised Bloom's Taxonomy to revisit the Crosswalk and highlight areas where CCSS requires a higher order of thinking. TDOE will determine the handful of "biggest shifts" in math and ELA: 3-6 specific, concrete, and far-reaching changes in both the standards and corresponding classroom instruction that will have the greatest power to drive student achievement *immediately*, even in the early years of implementation before fully-aligned assessments.

The Crosswalk is available for teachers and administrators to cross-reference their grade level curricula, instructional materials, and activities to the CCSS. A version pared down to essential features is publicly available at http://www.tncurriculumcenter.org/common_core.

However, we also realize the fundamental differences between CCSS and previous state standards: with a renewed emphasize on close, critical reading of nonfiction and informational texts in ELA and the intricately spiraled standards in math; a focus on deep, intensive engagement with fewer standards as opposed to superficial coverage of many; and the need for teachers to master their content areas in order to teach such higher order concepts, the CCSS represents a radical shift in classroom instruction. The Crosswalk process runs the risk of masking these crucial differences: Common Core standards with words and language familiar from state standards do not necessarily reflect similar cognitive demands. In order to help educators teach the standards with fidelity, TDOE is creating a multi-year, multi-stage PD plan which is outlined in Appendix 2 and explained in further detail in the PD section below.

The training has already begun for K-2 teachers, who are the first cohort to transition to CCSS through the staged process. Though implementation was voluntary, all but four LEAs agreed to begin fully teaching the CCSS in K-2 classrooms this year, and the rest will follow next year. During summer 2011, TDOE conducted six CCSS awareness training sessions across the state for over 4,000 supervisors and principals. Partnering with Achieve, we communicated the reasons behind adopting CCSS, explained the basic structure of the standards, and explained the essential differences between CCSS and traditional math and ELA instruction. In addition, we provided training on using the online TNCurriculumCenter, and a trainer from Battelle for Kids presented on Formative Instructional Practices.

The state then held eight sessions on classroom implementation for 1,800 K-2 educators. Teams of six teachers from each LEA, or multiple teams from one LEA, met in groups to unpack each of the standards, identify learning targets, translate the standards into student friendly language, identify the difficulty level of each standard, and create a rubric on required learning to ensure foundational knowledge, mastery, and knowledge going beyond mastery. K-2 teachers were also introduced to the Crosswalks so that they can use them to analyze similarities and differences between state standards and the CCSS and aid their classroom transitions. The teams were then charged with returning to their LEA to share these tools with other educators through in-school trainings. Six experts on early childhood have been assigned to state regions as consultants to provide on-site technical assistance and additional training throughout the CCSS transition period.

Expanding access to college-level and dual enrollment courses

The state also understands that to prepare each student at a CCR level, we cannot rely solely on improved standards. We also need to ensure more students have access to college-level coursework in high school to prepare them for the rigorous demands of postsecondary learning. To that end, one of Tennessee's five RTTT goals is higher rates of college enrollment and success. In order to drive this goal, we will track an indicator of the number of students enrolling in advanced, college credit-bearing coursework. The state has already seen the expansion of AP and IB programs in recent years,[2] and TDOE is also conducting a deep diagnostic review of AP and International Baccalaureate (IB) course offerings in each LEA to identify potential needs.

TDOE intends to incentivize LEAs to work with their local Institutions of Higher Education (IHEs) to expand postsecondary credit offerings and is working to expand dual enrollment and dual credit. There is already some exciting work occurring in this area in CTE. LEAs are actively pursuing CTE articulation of credit, dual enrollment, and/or dual credit opportunities between secondary and postsecondary institutions, using career clusters to identify programs of study.[3] Secondary and post-secondary institutions have also received grants at the local level in varying amounts to implement workable articulation, dual credit, and dual enrollment opportunities. In addition, LEAs are using Perkins funding to implement innovative programs such as career academies, "Fast Track", Virtual Enterprise, Project Lead the Way, and Integrated Systems Technology. To track all this, many LEAs are actively using CTE performance data results to plan CTE programs.

Our goal of expanding access to advanced courses will be greatly aided by The Northeast Tennessee College and Career Ready Consortium (NETCO), comprised of 15 mostly rural LEAs and led by the Niswonger Foundation, which was awarded an Investing in Innovation grant. The foundation plans to make over 45,000 new "seats" available to students in AP, dual enrollment, distance learning, and online learning courses, and to ensure that over 30 percent of students in the region graduate from high school with at least half a year of college credit (for more information, see http://www.niswongerlearningcenter.org/course/view.php?id=12).

[2] The state has already seen the number of students taking AP tests rise from 13,155 in 2006-07 to 17,907 in 2010-11. The state is also committed to expanding access to low-income students: for the current 2011-12 school year, 3,943 applications have already been approved for fee reimbursements for AP exams using federal grant money, up from 442 in 2006. IB programs are expanding rapidly as well. Since the first Tennessee IB Programme (DP) school in 2000, the number of DP schools has grown to 12. The total number of IB schools—including 8 Middle Years Programme schools and 3 Primary Years Programme schools—has tripled since 2007 alone. IB Diploma candidate numbers show dramatic growth, and the trend is expected to continue. Feasibility studies will be conducted at schools where stakeholders indicate interest in determining whether the programme(s) fit their student learning needs. TDOE holds open houses, parent information sessions, and discussion round tables to answer questions about IB and spread the word.

[3] In the 2009-10 school year, 2,231 students took CTE dual enrollment courses—a 56.8 percent increase over the previous year. By earning postsecondary credits in high school, these students saved an estimated total of $1,146,450 in tuition. 14.9 percent of the 2009-10 graduating seniors attempted a dual enrollment course at some point in their high school careers and enrolled in a Tennessee public institution of higher learning (excluding Tennessee Technical Colleges).

Stakeholder engagement

As we continue to move forward with CCSS implementation, the state will craft a comprehensive stakeholder engagement plan which will include a committee of representatives from key groups. The purpose of this plan will be to ensure constant and consistent communication about CCSS in order to garner public support and combat negative misperceptions. The plan will be modeled after the prominent and successful "Expect More, Achieve More" awareness campaign that the state used after the Tennessee Diploma Project raised standards and expectations and led to a predicted drop in test scores. CCSS poses a similar opportunity when families and other stakeholders need to be aware why it is necessary to raise standards again, and how these new standards may reveal deficiencies in student preparedness but will ultimately lead to more students being prepared for college and career.

The engagement plan will include summer training on CCSS for external stakeholders, who include families, communities, the SBE, local boards of education, politicians, community-based and civil rights organizations, and advocacy groups like SCORE. The CCSS engagement plan will target differentiated strategies for each key group of stakeholders; for instance, while educators need the more detailed, technical information provided in professional development (PD) and discussed throughout this plan, parents and the general public need a broader message about the link between CCSS and the CCR agenda and how students benefit from the change. The purpose of the engagement plan will be to ensure that all stakeholders are aware of the necessity to adopt CCSS, the essential ways in which CCSS will change and improve classroom instruction, and the alignment between CCSS and our goals of helping more students graduate high school prepared to enroll in and graduate from postsecondary education, and successfully enter the workforce.

The state has already developed several tools that will ensure the public is not only aware of the new standards and their importance but even participates in their implementation. For instance, in collaboration with the office of First Lady Crissy Haslam, TDOE recently launched a free, publicly available early grades reading toolkit at http://www.readtennessee.org/. The website has entire sections devoted to families and communities, with interactive tools to help parents read to their young children and thus harness the power of families to improve students' academic skills. TDOE has partnered with Achieve, whose experts will vet the site to ensure it is aligned with CCSS. A similar math toolkit is now under construction in collaboration with authors of the math CCSS at Arizona State University. We will also continue to deploy resources such as the national PTA's CCSS guide for parents in order to reach more families.

For our crucial engagement with higher education, please see the "Expanding access to college-level and dual enrollment courses" section above and the "Student transition to higher education section" below.

Transition to new assessment/accountability systems and serving the needs of all students

Tennessee began the process of raising the rigor of its assessments by resetting the cut scores on its End of Course (EOC exams) and TCAP achievement exams for math, reading and language Arts (RLA), and science for grades 3-8 for assessment results from 2009-10 and all forthcoming school years. While the old proficient cut was closely matched to correspond to a GPA of D-, the new cut

was matched to a B. The new cuts were based on Achievement Level Descriptors closely matched to those used by NAEP. The changes resulted in a sizable difference in the number of students scoring at a proficient or advanced level, with an expected drop.

Until recently, Tennessee planned to administer the Partnership for the Assessment of Readiness for College and Career (PARCC) assessments for reading, writing and math in grades 3-11 beginning in the 2014-15 school year. However, pursuant to the recent action of the Tennessee's General Assembly through the Conference Committee Report on House Bill No. 1549/Senate bill No. 1835, available at http://www.capitol.tn.gov/Bills/108/CCRReports/CC0009.pdf, Tennessee's current assessments under the Tennessee Comprehensive Assessment Program (TCAP) will be used as the state's assessments for math, reading/language arts and writing in grades 3-11 during the 2014-15 school year. In addition, the Tennessee Department of Education will issue a request for proposals for assessments in math and reading/language arts for the 2015-16 school year, through a competitive bidding process.

Given the clarity and timing of this legislative directive, Tennessee will not be developing a new assessment for 2014-15. However, we believe our assessment program for the coming 2014-15 school year meets the minimum requirements of ESEA Flexibility Principle 1 for reasons outlined below. Furthermore, the upcoming RFP process will ensure we will have a system that is more rigorous by the 2015-16 school year.

During the summer and fall of 2014, Tennessee conducted an RFP process to develop high-quality ELA and math assessments (as required by legislation passed by the Tennessee General Assembly in April 2014 referenced above). In November 2014, the State of Tennessee completed the bid process and selected Measurement Inc. to develop standards based assessments for Tennessee. The new measurements of learning for ELA and math in grades 3-11 will be called Tennessee Ready (TNReady). These ELA and math assessments, administered by Measurement Inc., were selected through a fair, thorough and transparent process established by the General Assembly and administered by the state's Central Procurement Office. Tennessee educators – both at the K-12 and higher education levels - were significantly involved in the selection process. The new assessments will be fully aligned to the Tennessee State Standards and will replace the state's current TCAP assessments in ELA and math. TNReady will be fully operational in the 2015-16 school year.

In accordance with the requirements in the ESEA Flexibility policy guidance issued by the U.S. Department of Education, Tennessee has taken steps to ensure that its assessment program for TCAP through the 2014-15 school year and TNReady thereafter covers the full range of college and career ready standards.

- We narrowed the scope of the TCAP assessment and removed items that were not aligned to the Common Core State Standards after an alignment study. We removed 15 to 25 percent of the state performance indicators (SPIs) from the 2012-13 school year 3-8 achievement tests for math, specifically those SPIs that covered content from the Tennessee Diploma Project (TDP) standards but were not reflected in the Common Core State Standards. For 2013-14, we further narrowed the assessments for grades 3-11 math and reading/language arts to remove any SPIs not related to the Common Core State

Standards. In both cases, the alignment study consisted of state and district content experts examining Tennessee's previous TDP standards and identifying those not reflected in the Common Core State Standards; their decisions were further reviewed by external experts at Student Achievement Partners, and ultimately resulted in a list of SPIs to be dropped. We then worked with our assessment vendors to develop new blueprints that did not include any content written to the dropped SPIs, ensuring that there were no related items included on the 2012-13, 2013-14, or 2014-15 TCAP Achievement or End of Course tests. In 2015-16, the new TNReady assessment, developed directly from Tennessee's college and career-ready state standards, will be fully operational and administered to students in grades 3-11.

- In addition, we have substantially revised our writing assessment to reflect the writing elements of the Common Core State Standards, making it more rigorous, and expanded it to all grades. In the past, the writing assessment was only required in grades 5, 8, 11 and used stand-alone prompts that were not based on text and did not require any reading comprehension in order to respond. In 2012-13, we revised the writing assessment to be text-based and more rigorous for the required grades (5, 8 and 11). In 2013-14, we further revised the writing assessment to ensure complexity of texts and include two passages while also providing optional assessments in the same format for districts to administer at their discretion in all grades, 3-11. In 2014-15, Tennessee will have required writing assessments that are rigorous, text-based, and use multiple complex texts for all grades, 3-11. In 2015-16, TNReady will continue to require rigorous text-based written responses aligned to the Tennessee State Standards in grades 3-11.
- We added additional End of Course assessments for advanced coursework. As noted in our original waiver application, Tennessee began taking steps toward raising the rigor of its assessments through the Tennessee Diploma Project that took effect beginning in the 2009-10 school year. We have continued to implement more rigorous assessments over time, including adding additional End of Course assessments for Algebra II and English III in the 2012-13 school year and for chemistry in the 2013-14 school year. Proficiency cuts for these advanced assessments are benchmarked to national college readiness measures such as the ACT.
- The new TNReady assessment, which replaces legacy TCAP tests in ELA and math in grades 3-11 in 2015-16, is fully aligned to Tennessee's college and career ready state standards. These new assessments will expand to include additional high school subject areas for math: Geometry (in addition to Algebra I and Algebra II); and Integrated Math I, II, and III for districts and schools that offer these courses versus the traditional high school math sequence. TNReady is designed to measure higher expectations and critical thinking skills for Tennessee students. It will expand beyond just multiple choice questions to include: writing that requires students to cite text evidence at all grade levels; questions that measure math fluency without a calculator; and questions that ask students to show their work in math with partial credit available. It will also include more rigorous selected responses, such as multiple select and drag-and-drop items. Once the standards review process is completed, the TNReady assessment will be refined for the 2017-18 school year to ensure continued alignment with any updates to Tennessee's college and career ready state standards.

We believe the 2015-16 TNReady assessments also meet the other minimum requirements for assessments as outlined in Principle 1, including eliciting student demonstration and application of knowledge and skills through the revised writing assessment; providing an accurate measure of student achievement across the full performance continuum, including for high- and low-achieving students; and providing an accurate measure of student growth over a full academic year or course.

Additionally,

- The 2015-16 TNReady assessment will continue to produce student achievement data and student growth data that can be used to determine whether individual students are college and career ready or on track to being college and career ready, the state has taken the following steps. Over the last few years, the state expanded TCAP end-of-course assessments to include Algebra II and English III with the goal establishing a high school assessment measure that aligned more closely to college and career ready expectations. When setting cut scores for these assessments, the department compared student test scores in English III and Algebra II against ACT English and Reading and ACT Mathematics results. This process helped to ensure that achievement levels set by the state for TCAP were appropriately rigorous and aligned with the ACT definition of college and career ready. Tennessee's new assessment, TNReady, is an improvement upon legacy TCAP achievement tests. TNReady is a more rigorous assessment of college and career readiness and exceeds the minimum standards of ESEA Flexibility Principle 1. The TNReady assessments are also used to provide an additional indicator of college and career readiness for students through the Tennessee Value-Added Assessment System, the state's value added model. TVAAS contains a prediction of individual student performance as of 4th grade on ACT based on student's previous assessment performance on TNReady. Finally, all students in Tennessee take the PLAN, EXPLORE, and ACT assessments, and the Tennessee Department of Education also reports both ACT scores and the percentage of students qualifying for a HOPE scholarship (the state's merit based scholarship) on the state report card at the school and district level.
- Tennessee will assess all students, including English Learners and students with disabilities. Tennessee will continue to require a 95 percent participation rate for all students and for subgroups of students.
- For the 2014-15 school year, students classified as English Learners will continue to have the TCAP English Linguistically Simplified Assessment (ELSA) version of the TCAP Achievement, Algebra I and English II assessments as an option. Beginning in 2015-16, Tennessee will transition from the current English Language Development Assessment (ELDA) to the ACCESS for ELLs (Assessing Comprehension and Communication in English State-to-State for English Language Learners). ACCESS for ELLs is a standards-based assessment developed in partnership with the WIDA (World-Class Instructional Design and Assessment) Consortium and the Center for Applied Linguistics (CAL) for measuring English language proficiency in English Language Learners in grades K-12. ACCESS for ELLs exceeds the requirements stipulated by the No Child Left Behind (NCLB) Act of 2001 and serves as a measure for student growth, ELL program effectiveness, and student language proficiency attainment.

- Tennessee's assessment program will provide for alternate assessments based on grade-level academic achievement standards and 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). For the 2014-15 school year, Tennessee is continuing with its previously stated plans to eliminate the TCAP MAAS (Modified Academic Achievement Standards) assessment and to assess the vast majority of students with disabilities on grade-level academic achievement standards through the general TCAP assessment with appropriate accommodations as needed. For students with the most significant cognitive disabilities, Tennessee will continue to use TCAP-Alternate Portfolio in 2014-15, the state's current alternate assessment based on alternate academic achievement standards, but will be providing significant resources and professional development from the National Center and State Collaborative (NCSC) to teachers of this student population. For the 2015-16 school year, the NCSC assessment will fully replace the TCAP-Alt PA. . NCSC is an alternative assessment aligned with Tennessee's state standards that will be administered to students with the most sever cognitive disabilities in ELA and math.

Tennessee's new assessment program for 2015-16 will continue to produce data, including student achievement and student growth data, that can be used to inform: determinations of school effectiveness for purposes of accountability under Title I; determinations of individual principal and teacher effectiveness for purposes of evaluation; determinations of principal and teacher professional development and support needs; and teaching, learning, and program improvement. Tennessee uses achievement and growth data for the purpose of accountability under Title I by setting annual measurable objectives (AMOs) at the district and school level based on previous year performance. A district's accountability determination is based on whether the district meets the required number of AMOs in a given year as defined in the state's accountability model outlined in Principle 2 of its approved ESEA Flexibility request. Priority, Focus and Reward schools are based on a success rate calculation that includes achievement results in mathematics, reading/language arts, and science. Reward schools also have a growth component that is based on one-year growth indices as measured by TVAAS. At least 40 percent of both principal and teacher annual evaluations are derived from achievement or growth data; districts and schools should use teacher evaluation results in hiring and promotion as well as professional development opportunities

As previously emphasized, we intend to hold all students to the same high expectations for achieving the standards and learning targets to ensure college and career readiness; our plan also allows for appropriate supports and accommodations for English learner (EL) students and students with disabilities (SWD).

English Learners have access to the full range and depth of coursework provided in Tennessee schools, and are responsible for meeting the same graduation requirements expected of all students, including completing coursework requirements (with the allowance that up to 2 years of ESL classes may be substituted for 2 years of English of the four years required at the high school level) and passing all Gateway exams. Given their participation in assessments and coursework, we will be closely monitoring their progress through our new accountability system, specifically through Gap Closure AMOs. We will also be tracking the progress of English Learners under Title III

for those LEAs receiving Title III funds as the new AMOs will become the third annual measurable achievement objective (AMAO) under that program. In addition, we will begin using the new ACCESS for ELL assessment developed by World-class Instructional Design and Assessment (WIDA) for English Learner students in 2014-15, in place of the previous English Language Development Assessment. We will continue to use the TCAP English Linguistically Simplified Assessment (ELSA) in 2014-15.

For students with disabilities, as noted above, we will discontinue use of the MAAS assessment. For students with the most significant cognitive disabilities, Tennessee will continue to use TCAP-Alternate Portfolio in 2014-15, the state's current alternate assessment based on alternate academic achievement standards. Tennessee's guidelines for the TCAP-Alternate Portfolio clearly state that the state's alternate achievement standards are connected and related to our college and career-ready grade level standards. The guidelines specifically state that the alternate achievement standards "are linked to the State's content standards and are accessed through a continuum of grade level clusters (K-2, 3-5, 6-8, and 9-12). Since the TCAP-Alt PA is an assessment of the student's progress in academic areas, it is critical that students participating in alternate assessment have access to the general curriculum. The content assessed in alternate assessments should be clearly related to grade-level content, though it may be restricted in scope or complexity or take the form of pre-requisite skills."[4] In addition, the TCAP Alternate Standards Committee and department staff have reviewed the general content standards for each grade assessed, and "The Alternate Performance Indicators (API's) were developed as extensions of the general content standards for the grade level clusters in which they are indicated." In order to support educators in making these connections to general content standards and setting appropriate goals for students, the department's Division of Special Populations has provided extensive training to teachers and special education supervisors on instructionally appropriate individualized education plans. Specifically, they trained nearly 2,500 educators in summer 2014. In addition, beginning in fall 2014, members of the department's Special Populations team will provide a series of professional development opportunities based on resources that support the NCSC assessment. The NCSC assessment will fully replace the TCAP-Alt PA in the 2015-16 school year. NCSC is an alternative assessment aligned to Tennessee's college and career ready standards. It will be administered to Tennessee students with the most severe cognitive disabilities in ELA and math.

Aligning curriculum/instructional materials

The state plays an important role in driving the implementation of CCSS across its 136 LEAs; however, it is not the state's intention to dictate specific curricular or instructional decisions. TDOE sees its role as one of assistance, guidance, and targeted support when necessary. To that end, we have developed the following resources:

- A website (www.tncurriculumcenter.org) to host materials, including alignment tools and pacing guides to assist educators in the transition from current state standards to the CCSS.
- Professional Learning Communities (PLCs): each LEA has selected a representative who will be directing implementation efforts for that LEA. These implementation directors are the first step in organizing PLCs at the LEA and school level specifically focused on the implementation of the CCSS. The PLCs will drive the most important changes at the

[4] http://tn.gov/education/assessment/doc/Alternate_Perf_Indicators_2014.pdf

classroom level by convening teams of educators teaching common courses to discuss best practices for teaching the new standards and share new material.

- Battelle for Kids has already provided TVAAS (value-added) training for teachers and will continue to provide resources for the CCSS.
- Teacher committees, under the direction of TDOE, will create and provide materials aligned with the CCSS.
- The Read Tennessee website has extensive CCSS content, including a rich array of sample teaching strategies, activities, and resources for each K-3 CCSS ELA standard.
- The Tennessee Electronic Center (www.tnelc.org) will provide a variety of vetted podcasts of Tennessee teachers teaching lessons aligned to CCSS as well as explanatory PowerPoint presentations.

In order to manage the magnitude of the task, TDOE will rely on the nine Field Service Centers (FSCs) spread throughout the state to provide ongoing support on a much more intimate level. TDOE will also look into creating a comprehensive website to gather all of the above materials in one, easy portal.

Professional development: training educators on new standards and assessments

Appendix 2 outlines the sequence of professional development (PD), which will be phased over the next three years in multiple stages in order to serve specific educator needs and specific clienteles. The state fully recognizes that, in the past, PD in Tennessee, whether offered by the state, LEAs, or outside organizations, has often been of poor quality. Running PD the same old way will not result in achieving our CCSS implementation goals. Therefore, all PD related to CCSS implementation will be designed to focus on educator engagement with rigorous content, meaning that attendees will be directly involved in their own learning and deep critical thinking (e.g., by delving into the content standards or creating deliverable products to take back to their schools and share with others). We will also focus PD on the areas that will lead to the greatest shifts in instruction, particularly the 3-6 "biggest shifts" identified through the Crosswalk process. We will make use of multiple methods to suit educator needs, including summer institutes (similar to those held in previous summers on the Tennessee Diploma Project); regional trainings at field service centers; annual trainings for new administrators, teachers, and school counselors; additional training through the Electronic Learning Center; and further training for high priority schools and LEAs. The state will also explore options for providing PD through webinars or online courses in order to enable more educators to participate and receive enhanced training beyond the main summer sessions. In addition, time-bound PD sessions must be followed up with opportunities for teachers to continue and reinforce their learning. This can be accomplished through networking and sharing of practice through email lists, blogs, and wikis; follow-up or refresher trainings at a smaller and more local scale; and opportunities for teachers to enhance their learning through coursework or attending and presenting at professional conferences. Finally, each PD session must not only give attendees a chance to provide feedback via immediate surveys and other methods, but it must also be followed up by longer-term monitoring of the trainings' effects in the classroom through data and analysis. For more information, see the final section on "Monitoring and sustaining progress."

In terms of specific topics, professional development will be particularly targeted towards math as a content area, given the current state of achievement, somewhat less overlap in the alignment of

current standards and CCSS in that area, and the depth and rigor of the CCSS for math. Also, as Appendix 2 indicates, PD for the CCSS literacy standards in history, social studies, science, and technical subjects for grades 6-12 will also be provided. We believe that literacy training for all content areas will greatly enhance not only student literacy skills (particularly given the CCSS emphasis on informational text), but also content learning. In addition, as noted above, a special committee of TDOE staff and external organizations and stakeholders convened to support the transition of students with disabilities to CCSS will also be reviewing current research and compiling a kit of best practices for teachers to use for teaching the CCSS to SWD, to be incorporated into PD for all teachers. Finally, the ESL task force will help locate and/or develop resources, particularly for those schools and LEAs with significant populations of ELs.

As part of the transition to CCSS, Tennessee delivered training to teachers throughout the state in the summer of 2012. Approximately 12,000 Tennessee educators participated in training for K-8 math and K-2 ELA. All training was provided at no cost to educators.

In the summer of 2013, Tennessee moved to full-implementation of CCSS. To support teachers and their students, Tennessee delivered training in K-12 ELA and math. The state also provided literacy training for CTE, science, and social studies teachers in order to prepare educators of all subjects for rigorous college and career ready standards. Over 30,000 teachers, nearly half of the state's educators, attended training in the summer of 2013.

In the summer of 2014, Tennessee delivered training to nearly 16,000 teachers. This included training on best practices for K-11 math and literacy (ELA, science, social studies, CTE) and intervention training. Intervention training was offered in math and reading in preparation for the roll out of Response to Instruction and Intervention (RTI2) in the 2014-15 school year. RTI2's three-tier framework promotes recommended practices for an integrated system connecting General and Special Education by the use of high-quality, scientifically research-based instruction and intervention. It is intended to prepare all students for success after high school.

The Tennessee Department of Education remains committed to supporting all students and educators as Tennessee transitions to new assessments in 2015-16. Throughout the 2014-15 school year, Tennessee has held assessment information meetings for TNReady, regional workshops for ACCESS for ELLs, and training for the new alternate assessment (NCSC) for teachers, school leaders, and district leadership.

Tennessee also continues to provide training opportunities for RTI2 and teacher training in the summer of 2015. Summer training content will integrate information about standards, new assessments, resources and instructional practices. Training will be offered for 3-11 Math, ELA, and Early Grades literacy.

While the above description of professional development applies in general to teachers and principals, additional smaller shifts in focus will be made for principals in particular. The Tennessee Instructional Leadership Standards (TILS—described further under Principle 3) require principals to be knowledgeable instructional leaders who can support high expectations for all students. TDOE will therefore be providing additional PD to principals to ensure they are intimately familiar with

the Tennessee State Standards and able to assess the fidelity of teachers' implementation in the classrooms. We will be offering our Leadership Course for the third year to ensure principals understand the training their teachers will be receiving, as well as the kinds of instructional shifts they should be seeing in classrooms as a result.

To support teachers and principals beyond in-person PD, TDOE officials trained in the Tennessee State Standards and assessments will be available to answer questions by phone and email so that teachers can receive immediate and knowledgeable feedback from experts. Tennessee educators can also visit the TNCore website for ongoing training and support. All blueprints for new TNReady assessments will be posted to the TNCore website at the beginning of April 2015. Moreover, starting in May 2015, all teachers will have access to TNReady Practice Tools that include an item sampler for grades 3-11 math and ELA assessments. This web-based platform will allow teachers to understand how the instructional shifts expected by the Tennessee State Standards will be reflected in the new TNReady assessments. In conjunction with the publication of test blueprints, we believe that teachers will be able to productively engage in summer training with the full context of TNReady assessments launch in 2015-16.

Transitioning technology to support new assessment/accountability systems

Until recently, Tennessee anticipated administering the PARCC assessment online in 2014-15. LEAs have made great strides over the past several years in investing in their technology capacity for instructional purposes and also in their readiness for online assessment. We continue to anticipate moving to online assessment in 2015-16. Furthermore, the TCAP writing assessment is fully online already. The TDOE will continue to take the lead in spreading awareness of technical specifications and supporting districts in assessing their capacity and creating plans once an assessment system is selected for 2015-16.

As part of its RTTT program, the state is currently developing robust data systems which will allow teachers, schools, LEAs, and the state to track and learn from student progress and other indicators at each level. Overall, TDOE is focusing on a P-12 system - including the EWDS, teacher evaluation, a more robust student information system, and an expanded TVAAS data reporting system - and a P-20 statewide longitudinal data system. The data systems will allow the state to monitor the ways in which CCSS instruction drives student progress, learn from the CCSS-aligned field test items how well students are achieving the standards, and study the extent to which teachers are delivering CCSS-quality instruction (from teacher evaluation data). We will use this data in a timely and purposeful manner to modify our implementation plan when necessary (for more detail, see the final section on monitoring and sustaining progress).

Teacher preparation, licensing, and evaluation

Another essential component of the transition to CCSS and common assessments relates to training of new teachers and principals before entering the classroom. It is imperative that pre-service teachers and principals are provided with the necessary tools to enter a school on day one ready to implement the CCSS and assess student progress in meeting those standards. To this end, the State has launched two projects for teacher and principal training programs: (1) Integrating Common Core into Pre-Service Training, and (2) Integrating TVAAS into Pre-Service Training. TDOE,

in collaboration with the Tennessee Higher Education Commission (THEC), has undertaken a number of key activities to ensure a solid foundation for these projects:

- A small team of Deans of Colleges of Education in public and private universities has been assembled to develop the plan for CCSS integration.
- Research has been gathered from institutions with success in standards integration into pre-service curriculum as well as national organizations focused on implementation.
- Interviews have been conducted with several institutions regarding current practice on standards integration.
- After sending out an RFP (Request for Proposals), the state will choose a vendor and convene a committee to work with the vendor to develop a statewide curriculum for integrating CCSS into pre-service training. The curriculum will provide a common tool for all programs to use, but will allow for enough flexibility so that it can meet the specific needs of individual programs and LEAs.

Additionally, THEC is in negotiations with the SAS Institute to develop modules, curriculum, and assessments for TVAAS data training in pre-service curricula. Once the negotiations are complete and the contract is approved, the modules and associated curriculum will be ready for implementation in fall 2012 with faculty training in summer 2012. THEC and SAS Institute have already held six training sessions state-wide to develop higher education faculty member's understanding of TVAAS.

By the 2014-15 school year, all new public school teachers and principals who received training at Tennessee institutions of higher education will be prepared to teach the CCSS.

Student transition to higher education

TDOE is working closely with IHEs and IHE oversight, including THEC, the University of Tennessee (UT) system, and the Tennessee Board of Regents (TBR) to leverage the enormous role higher education can play in aiding our efforts to implement the standards with strength and quality and in helping our students succeed at the postsecondary level.

In addition to its abovementioned work with teacher and principal pre-service training, THEC has focused the resources of the Improving Teacher Quality grant program on providing Common Core PD to in-service teachers, and will provide high quality workshops in the math and English CCSS throughout the state in 2012.

Resources

Currently, the Race to the Top funds allotted to CCSS implementation include $2.9million, split between $1.5 million for K-12 and $1.4 million budgeted for higher education. Anticipating that additional resources will be needed, the new CCSS implementation office will first assess how TDOE might be able to leverage state training funds (including a current professional development grant with approximately $200,000 remaining), current state contracts and resources that have or will be developed for or in conjunction with other states to support training for educators. In addition, the office will devote substantial time to determining what additional specific resources are needed for professional development and developing new assessment items, in conjunction with Achieve, PARCC, and Pearson/ETS. The department anticipates that the resource demands will be greater

than the current available dollars. As we identify specific needs, the CCSS implementation office will work closely with the FTTT Oversight office to create a budget amendment for the U.S. Department of Education Race to the Top office.

Monitoring/sustaining progress

TDOE understands that it is not enough to merely create a plan and set it in motion. We must ensure, at every small step along the way, that implementation is working and that we are making progress. The new division of curriculum and instruction will drive the process by setting annual numerical performance indicators: targets that quantify the thoroughness and reach of its implementation efforts. For instance, we will track the number of teachers trained, the success rate on new field test items, the number of instructional website hits, and the evaluation scores of teachers on the standards and objectives indicator from the instruction rubric. There will be indicators to match each implementation stage represented by the above headings, and TDOE will develop a rubric to judge the progress and success of each stage. When applicable, we will ask LEAs to report on their own progress, which will provide another set of data to inform our own progress evaluations. The results will be published publically and used to inspire excellence, provide pressure where needed, and inform policy changes when targets are not met.

Next, the office will establish feedback loops in order to learn from practitioners on the ground about the success of PD through surveys and interviews. To assure the quality and effectiveness of PD, the office will send trained observers to each PD initiative to gather data and make suggestions for improvement. Tennessee's extensive value-added data system (TVAAS) will allow the CCSS office to analyze whether teachers who received training can effect improvements in student performance on standardized tests. We will also collect feedback through field visits to classrooms and interviews at school sites in order to determine the fidelity of teacher implementation and learn of any obstacles or struggles teachers encounter. Similar to the method used by the TEAM office, the CCSS oversight office will establish an online question and answer system made available to all educators and stakeholders and will commit to responding to all questions with 24 hours.

The office will also set long-term indicators for measuring achievement of our overall goal of having all students graduate with CCR skills. The state will leverage its extant RTTT goals which focus on CCR—the percentage of students taking advanced coursework, meeting ACT benchmarks, enrolling in postsecondary education, and persisting and succeeding in college—to measure the overall success of the CCSS implementation plan. The new P-20 data system will eventually prove a valuable resource, allowing us to trace students' progress through the educational system and through postsecondary education and the workforce—once this system is in place, TDOE will be able to set new, robust accountability measures to measure the long-term progress of our CCR goals.

Conclusion

With the deep belief that students rise to the level of expectation, we view the evolution of college and career ready standards as an important step forward for the students of Tennessee. This transition builds on our recent work to raise standards and increase transparency about student performance and it creates an opportunity for educators and all those who support the work of instruction to align around a common vision of excellence and expectation for the preparation of

all children to be able to compete in an increasingly global economy. Furthermore, it allows us to revisit and examine with new eyes the full suite of instructional materials and practices to ensure they are supporting the highest possible student achievement and attainment of our common vision. This work is of the utmost importance to the future of Tennessee and we intend to support it as a chief priority of the department across the next three years.

1.C Develop and Administer Annual, Statewide, Aligned, High-Quality Assessments that Measure Student Growth

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

Option A	**Option B**	**Option C**
☐ The SEA is participating in one of the two State consortia that received a grant under the Race to the Top Assessment competition. i. Attach the State's Memorandum of Understanding (MOU) under that competition. (Attachment 6)	☐ The SEA is not participating in either one of the two State consortia that received a grant under the Race to the Top Assessment competition, and has not yet developed or administered statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs. i. Provide the SEA's plan to develop and administer annually, beginning no later than the 2014–2015 school year, statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high	☒ The SEA has developed and begun annually administering statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs. i. Attach evidence that the SEA has submitted these assessments and academic achievement standards to the Department for peer review or attach a timeline of when the SEA will submit the assessments and academic achievement standards to the Department for peer review. (Attachment 7)

	school in all LEAs, as well as set academic achievement standards for those assessments.	

For Option B, insert plan here

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A.i Provide a description of the SEA's differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA's plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA's differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Tennessee recognizes and supports the principle that the USED has an interest in ensuring that states implement effective accountability systems so that all children have the opportunity to succeed in school and in life. Through Race to the Top, we have created a framework and process for ensuring that all LEAs, schools and classrooms are focused on advancing student achievement for all children. Our current and proposed action steps further the principles outlined by the Council of Chief State School Officers in its recent recommendations for state accountability to the USED, and represent a system that is tight on top-line goals, supported by effective state policy and management, but driven by local innovation and execution.

Tennessee's accountability and reporting system is rooted in the following beliefs about federal, state and local responsibilities.

Federal: We believe that the USED has the responsibility to require states to maintain rigorous state-established top-line goals for both student achievement and for closing the gap between different sub-groups of students. The USED has the responsibility to monitor annual progress against these goals, and to report and highlight the progress of states against these goals. In the case of Tennessee, the USED also signs off on implementation of TDOE's Race to the Top plan, which includes most key reforms designed to improve state results. Additionally, through this waiver, the USED retains a significant accountability lever: the ability to withdraw the waiver from the state and return the state to the current federal mandates if the state fails to make progress against its goals.

State: We believe that the state has the responsibility to set all interim benchmark goals, to define our measurement system, and to report to the USED. While the federal government can and should require states to maintain rigorous state-established top-line goals, it is the state's responsibility to figure out the interim measures that will lead to achieving the top-line goals. The state also has the responsibility of defining the measurement tool, including how to measure growth in outcomes and reduce gaps in student achievement. Additionally, the state has the responsibility of signing off on LEA goals, measuring LEA and school-level progress every year (disaggregated by student sub-groups),

and reporting LEA and school results publicly. Because the state is responsible for ensuring the attainment of state-level goals, the state also has the duty to support LEAs that are failing to make progress against goals, and to intervene in the lowest-performing schools.

LEAs: We believe that LEAs should receive greater freedom and flexibility when they are successful, support when they demonstrate progress but are failing to reach ambitious goals, and intervention when their results regress or demonstrate growing gaps between groups of students. LEAs are responsible for setting achievement targets, subject to state approval, and for implementing the reforms needed to hit these targets. LEAs are responsible for managing their schools to ensure that they make progress against goals. When schools fail to make progress, LEAs have the obligation to work with the state to develop plans for improvement. When schools perform at the very bottom of the state performance curve, the state has the obligation to remove LEA oversight. In all other cases, though, the LEA has management responsibility, and maintains accountability for student growth and outcomes.

Outline of Tennessee's proposed accountability system

The core elements of the accountability plan TDOE proposes in place of the current NCLB provisions provides for the following:

- In place of the annual designation of AYP for LEAs and schools, a state accountability system requiring, in aggregate, significant growth in student achievement in core subjects and overall improvement in subgroup performance that ultimately leads to closing achievement gap between different sub-groups of students.
- In place of an AYP structure that eventually designates most schools in the state eligible for state takeover, an accountability structure that identifies the top performing schools for recognition and creates meaningful, tailored interventions for the bottom 5 percent of schools in absolute performance and the 10 percent of schools with the largest achievement gaps state-wide.
- Flexibility in spending allowing LEAs to expand services for low-income students, and freedom that strongly encourages and rewards success by offering greater flexibility for schools and LEAs reaching ambitious targets.

Already, through Race to the Top, Tennessee has committed as a state to significantly raise student achievement levels and has created a process in which LEAs set student achievement growth goals in collaboration with TDOE. We propose to use that framework for an accountability system focused on increasing student achievement proficiency levels by a steady rate each year, while reducing achievement gaps by a significant but realistic level each year.

We also are guided by several key principles. First, through aligning our goals across all layers of the education system, we are better able to measure what works, provide information and resources from the state to LEAs, and position LEAs to operate with flexibility to innovate in the effort to achieve ambitious goals. We do not believe that direct state intervention in schools generally is an effective strategy for driving improvement (unless substantial changes in operations are made, as in the Achievement School District). We do believe that holding LEAs accountable for results, and

providing information and resources, will help feed a continuous improvement cycle when goals are aligned.

Second, we premise our goals on growth against the current baseline. While the current AYP targets are predicated on every LEA reaching 100 percent proficiency at the same time, we believe these goals are both unrealistic and de-motivating. However, we do believe that all students, classes, schools and LEAs have equal capacity to improve against their current baseline. As a result, our goals call for each LEA to have targets of advancing proficiency levels at a steady and ambitious rate over the next four years, and for our LEAs to ask all schools to do the same. Additionally, as described in Principle 3, our teacher and principal evaluation framework uses student growth through value-added scores, ensuring that across the state, we maintain a focus on advancing each child against the current baseline results. This focus on growth against our current performance level meets each child, teacher, principal and LEA superintendent in the right place and creates accountability that is fair but ambitious.

Third, we believe that the same standards should apply for all schools. When we identify the lowest performing schools in the state or the schools with the largest achievement gaps, we should apply those standards to all schools rather than just to Title I schools, and all schools should have access to targeted state support for improvement. While the majority of Tennessee's 1700 schools are Title I schools, we believe that the state should have meaningful accountability for all schools.

State accountability, LEA accountability, and school accountability

Through Race to the Top, Tennessee has committed to grow student achievement, high school graduation and post-secondary attendance rates across the state. This application for flexibility identifies overall goals for student achievement in grades 3-8 reading language arts and math and high school core subjects, as well as specific goals for 3rd grade and 7th grade, high school graduation and postsecondary going as approved by the State Board of Education. These goals reflect changes in the overall levels of proficiency identified in the original Race to the Top application due to increased rigor in the state's standards and assessments.

In particular, Tennessee has set the following top-line goals as critical barometers of our progress:

- Increase third grade reading language arts proficiency from 42 percent in 2009-10 to 60 percent by 2014-15.
- Increase seventh grade math proficiency from 29 percent in 2009-10 to 51 percent by 2014-15
- Increase graduation rates (while simultaneously increasing standards and requirements for graduation) from 82 percent in 2009-10 to 90 percent in 2014-15
- Increase post-secondary enrollment from 46 percent in 2009-10 to 51 percent in 2014-15[5]

[5] Post-secondary enrollment is defined here as graduates of Tennessee public high schools enrolling in Tennessee public or private institutions only.

LEAs are setting goals in these areas as well, reflecting growth that rolls up to the state's overall goals. These goals reflect a 6.25 percent annual reduction in the percent of students scoring Below Basic/Basic or a 50 percent reduction over 8 years.[6]

Tennessee, like all states, has a large achievement gap across different groups of students. We believe in the potential of all children and believe that these gaps can and must be closed. We also think that it is critically important to set goals that reflect the difficulty of simultaneously closing achievement gaps and growing achievement for all students. Through this application, we are proposing a measure that would ensure that all students grow achievement levels significantly, but that groups performing at the lowest levels currently (students in racial/ethnic sub-groups that perform below the state average, economically disadvantaged students, students with disabilities and English Learners) grow proficiency levels faster than other students.

The current AYP measurement process has three main shortcomings in terms of LEA accountability. First, it sets standards for schools that are now generally unattainable. Second, it is a pass-fail system, with little room for nuanced intervention depending on local needs. Third, the measurements used in the system are in many cases opaque, decreasing public understanding of LEA and school goals.

Through this proposal, we aim to measure LEA and school progress in a way that alleviates each of these issues.

LEA accountability

Tennessee's approach to accountability is based on a theory of action that the state's primary role is to manage district outcomes (rather than school outcomes), both by evaluating current performance and by providing supports that promote equity, excellence, and continuous improvement. This system is designed to accelerate growth for all students and especially for those who are farthest behind. The state sets district level targets for state assessments and graduation, measuring overall improvement and achievement gaps for the neediest students. Districts are then expected to manage school performance within the framework provided by the state.

The department's theory of action, integrated with the feedback we received around the strengths and weaknesses of our system of LEA accountability originally proposed our in 2011 flexibility waiver application, suggests the following *principles* that we used to develop our revised district accountability framework:

- The accountability system should identify districts struggling to meet their students' needs, such that those districts may receive customized support and additional resources towards improvement.
- Absolute achievement alone is not sufficient. We are focused on *growth* for all students and faster growth for the lowest achieving students.
- When a student progresses from *below basic* to *basic*, this is a meaningful move in achievement and should be acknowledged.
- All growth should be recognized. Binary achievement targets that districts are able to only meet or miss can hide meaningful improvement.

[6] Tennessee began setting Annual Measurable Objectives (AMOs) using this methodology in SY 2012-13.

- Growth is a minimum expectation. Ideally, the rate of growth will be sufficient to place all students on a life trajectory that will result in postsecondary and/or career readiness.
- All means all. Meeting the needs of all students is a priority. If a district is failing to make any progress with its lowest achieving students, it is in need of improvement.
- The accountability framework should have a stable design, such that districts are not expected to understand and adapt to a new system every year.

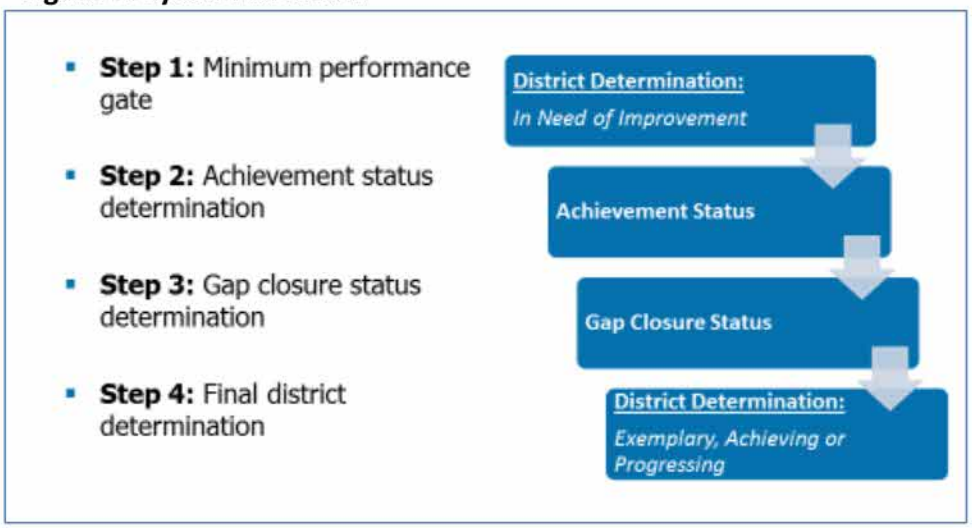
Given these principles, we propose to update the LEA accountability system such that it:

- Recognizes the hard work districts do to make incremental gains by awarding partial credit for improving but not meeting targets.
- Recognizes districts that greatly exceed their targets or expected growth/performance.
- Will work every year moving forward, with certain elements phased in as data become available.
- Includes many pathways to *Exemplary*, the highest district performance determination.

Overview

The proposed accountability system includes four steps that lead to a final district determination (Figure 1), with determinations awarded annually. In the first step, districts are evaluated according to a "minimum performance gate" that identifies districts that are not showing even minimal evidence of meaningful student progress. These districts are categorized as *In Need of Improvement*. After the initial gate, districts receive an "achievement status" determined by their progress with all students and a "gap closure status" determined by their progress with four historically underperforming student subgroups. The overall district status, *Progressing*, *Achieving*, or *Exemplary*, is determined by the combination of district performance on the achievement and gap closure elements of the system.

Figure 1: System overview



Measures of Progress and Subgroups

Districts will be assessed on student performance in the following grade-content areas:

Grades 3-5 Math	Grades 6-8 Math	High School Math*	ACT
Grades 3-5 Reading/ Language Arts	Grades 6-8 Reading/ Language Arts	High School English**	High School Graduation

* High School Math includes Algebra I, Geometry, *and* Algebra II, OR Integrated Math I, II, *and* III
** High School English includes English I, English II, *and* English III

Based on feedback gathered from stakeholders, measures that focus on individual grades i.e., 3rd and 7th grade) are eliminated in the proposed system for the waiver renewal application. By separating grades 3-5 and grades 6-8 into separate bands, districts will have more refined information about performance at the elementary and middle school levels. Moreover, the grade bands for all content areas now include three cohorts, as all EOCs in English and Math at the high school level have been included. *(For more detailed information about how advanced coursework will factor into the grade bands and content areas, please see section 2.B.)*

ACT is a new performance category for the waiver renewal application. Though feedback was varied in terms of the inclusion of the ACT as a content area, there was broad agreement that this benchmark is an accepted measure of postsecondary and/or career readiness. This notion is further codified in Tennessee state statute, which requires all students take a college-readiness assessment in their junior year. Moreover, the department's strategic plan has an established goal of a statewide average composite score of 21 on the ACT by the year 2020. (The current statewide average composite score is 19.3.) Given these factors and the overall statewide focus on improving ACT results as an indicator of success after graduation, an ACT content area is included in the proposed framework in the waiver renewal application. *(Please note that ACT is the current postsecondary readiness benchmark most widely used in Tennessee. The TDOE may elect to secure and administer a different postsecondary readiness benchmark through a formal procurement process in the future.)*

The "proficiency" cut-score for student performance on the ACT is set at a composite score of 21. This cut-score aligns with the overall state goal. A composite score of 21 also meets the criteria established by Tennessee higher education institutions for students to avoid remediation and immediately begin taking credit-bearing courses toward graduation. The TDOE will establish required participation rates and define AMO targets for the ACT, as well as finalize other business rules regarding use of highest or last score and defining the applicable cohort for accountability measures (e.g., prior year graduating cohort) in advance of implementing the proposed system in the 2015-16 school year. The ACT participation rates will be defined by December 31, 2015 and will consider the statutory requirement in Tennessee that *all* eleventh grade students participate in the ACT, in addition to considering the allowable accommodations defined by ACT in order to generate a valid test score. The AMO targets for ACT will be established based on 2015-16 results for students in eleventh grade who complete the exam and achieve a composite score of 21. The targets will be based on the goal of reducing the percent of students who earn a composite score of less than 21 by 50% in eight years or by 6.25% per year, similar to the state's method for setting AMO targets for all TCAP subjects.

In addition, to maintain a focus on historically underperforming student subgroups, district performance will be assessed for the following student groups:

- All students
- Black/Hispanic/Native American students (BHN)
- English Language Learners (ELL)
- Students with Disabilities (SWD)
- Economically Disadvantaged students (ED)

Step 1: Minimum Performance Gate

At the minimum performance gate, a district must show some improvement in the following three areas:

- Overall student achievement as measured by change in proficiency percentages across content measures (e.g., 6-8 Reading/Language Arts)
- Overall value-added scores as measured by the Tennessee Value-Added Assessment System (TVAAS) across content measures
- "Super" subgroup performance as measured by reduction in below basic percentages across content measures for all students that fall within one of the four subgroups listed above (*Super subgroup* refers to BHN, ELL, SWD, and ED as a combined group, counting any student only once.)

Figure 2 illustrates this concept by showing the three "keys" that a district must obtain in order to pass the gate and avoid an *In Need of Improvement* determination. To fail the minimum performance gate, a district must fail to show progress in greater than 75 percent of its measures within at least one of the key areas.

Figure 2: Minimum performance gate illustration

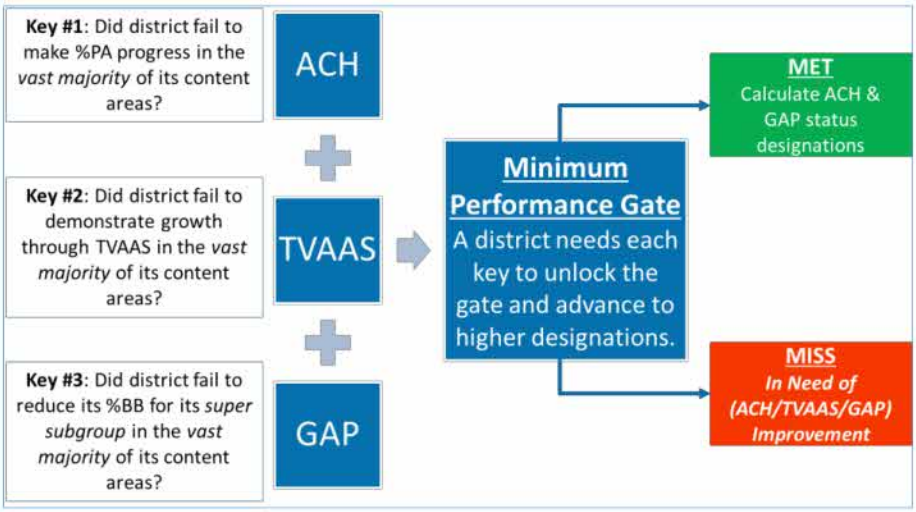


Figure 3 actualizes this design by providing a heat map showing progress across measures for a district that would receive an *In Need of Improvement* determination. Note that all such examples show actual district data from 2014.

Figure 3: Minimum performance gate heat map

Did the district fail to: make achievement gains for its all students group, make growth for its all students group, or reduce below basic for its super subgroup in the vast majority of its content areas? "X" indicates failing and "✓" indicates passing.

Content Area	Achievement Key	TVAAS Key	Gap Closure (Below Basic) Key
3-5 Math	✓	✓	X
3-5 RLA	X	X	X
6-8 Math	X	✓	X
6-8 RLA	✓	✓	X
HS Math	✓	✓	X
HS RLA	X	✓	✓
Graduation Rate	✓	N/A	N/A
ACT	X	✓	N/A
Key Status:	MET (✓)	MET (✓)	MISS (X)
Final Status: In Need of Improvement – Gap			

We modeled these proposed parameters for the minimum performance gate using 2014 assessment data for all districts. Figure 4 below details the distribution of districts who are designated as In Need of Improvement versus the 2014 designations using the current system.

Figure 4: In Need of Improvement District Distributions

Not Passing the Gate: In Need of Improvement Determination	Total Districts	2014 Determinations under Current System
INI – Achievement	3	1 district INI 2 districts INSI
INI – Achievement & Gap	2	1 district INSI 1 district Intermediate
INI – Achievement, TVAAS, & Gap	1	1 district INI
INI – Gap	13	5 districts INI 7 districts INSI 1 district Intermediate
INI – TVAAS	3	2 districts INI 1 district INSI
TOTAL	**22**	**23 INI** **78 INSI**

INI – In Need of Improvement **INSI** – In of Subgroup Improvement

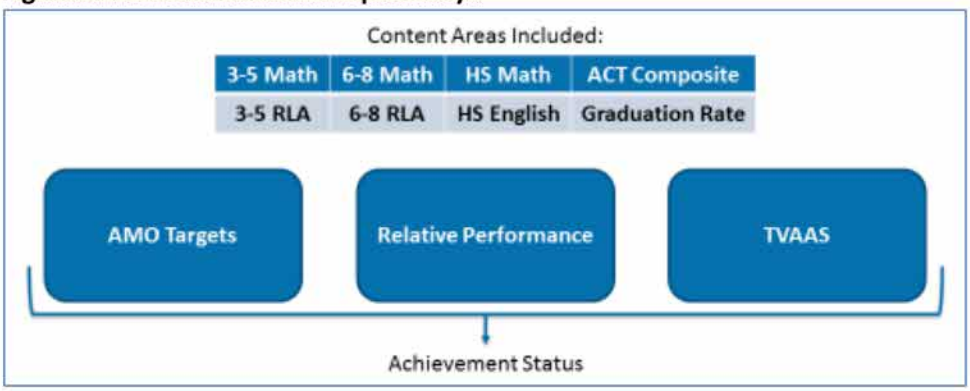
Step 2: Achievement Status Determination

A district's achievement status is determined by the growth that a district shows in each of its grade-content areas (e.g., 3-5 Math). Districts can demonstrate improvement through any of the following pathways (Figure 5):

- Overall student achievement as measured by change in proficiency percentages
- Overall value-added scores, as measured by the Tennessee Value-Added Assessment System (TVAAS), which is a true cohort growth measure at the student level

- A relative performance metric that compares a district's percentile rank with respect to all other districts in the state in the current year to its percentile rank in the previous year

Figure 5: Achievement status pathways



For each measure, a district is awarded a status and a corresponding series of points according to the following scale:

0: Moving backward or staying the same
1: Moving forward, but not meeting growth expectation
2: Meeting growth expectation
3: Exceeding growth expectation
4: Greatly exceeding growth expectation

Since districts eligible for achievement status will have passed through the minimum performance gate, each pathway is considered to be an equally valid means to demonstrate improvement. Thus, districts are awarded the best score across pathways within each grade-content area as shown for the example district in Figure 6. Scores are then averaged across grade-content areas to create a final achievement status according to the following scale:

- Progressing (>0 to <2.00): District is improving on average but falling short of growth expectation
- Achieving (2.00 to <3.00): District is meeting growth expectation on average
- Exemplary (3.00 and above): District is exceeding growth expectation on average

Figure 6: Achievement status heat map

Content Area	AMO Targets	Relative Performance	TVAAS	Best Score
3-5 Math	1	3	0	3
3-5 RLA	0	1	0	1
6-8 Math	1	1	2	2
6-8 RLA	1	1	2	2
HS Math	2	0	4	4
HS RLA	3	4	3	4
Graduation Rate	0	0	N/A	0
ACT	1	1	4	4
			District Achievement Status	2.50

*Overall, we see that District C is either meeting or exceeding expected performance, with an average of 2.50. This would make District C **"achieving"** for Achievement Status.*

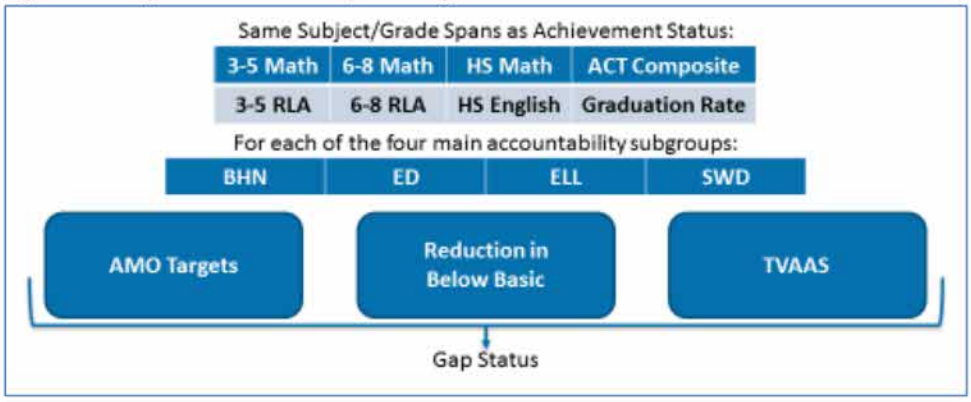
Step 3: Gap Closure Status Determination

A district's gap closure status is determined by the growth that a district shows in each of its grade-content areas for the four historically underperforming student subgroups (BHN, ED, ELL, SWD). Districts can demonstrate improvement through each of the following pathways (Figure 7):

- Subgroup student achievement as measured by change in proficiency percentages across content measures
- Subgroup value-added scores, as measured by the Tennessee Value-Added Assessment System (TVAAS), which is a true cohort growth measure at the student level
- Reduction in the percentage of students within the subgroup performing at a below basic level of achievement

Unlike the achievement status pathways, there is no relative performance pathway for gap closure. This reflects the design principle that "all means all" and equity demands cannot be relative.

Figure 7: Gap Closure status pathways



As with achievement status, districts are awarded a status and corresponding series of points using the same scale as previously defined. Again, districts are awarded the best score across pathways within each grade-content area for each subgroup. Figure 8 provides an example for the Black-Hispanic-Native American subgroup in one district.

Figure 8: Gap Closure status heat map for the BHN subgroup

BHN Content Area	AMO Target	Reduce BB	TVAAS	Best Score
3-5 Math	2	1	0	2
3-5 RLA	0	0	0	0
6-8 Math	1	1	2	2
6-8 RLA	1	2	2	2
HS Math	1	0	4	4
HS RLA	2	3	2	3
Grad Rate	0	TBD	N/A	0
ACT	TBD	TBD	TBD	TBD

For graduation rate and ACT, we will use comparable measures for the reduction in below basic pathway. For graduation rate, we will use the reduction in cohort drop-out rate. For ACT, we will use the reduction in the percent of students who earn a composite score of less than 19 on the ACT. A score of 19 for the ACT composite is the threshold to bypass remediation courses at Tennessee's community colleges. For the purposes of our modeling, we were not able to obtain historical ACT data or the drop-out rate data by subgroup. However, this information will be available for operational use.

Because the system considers each subgroup individually, the process described above results in four sets of scores for each of the major student subgroups. These scores are averaged to create a final gap closure status as shown for the example district in Figure 9.

Figure 9: Gap Closure status heat map for all subgroups

Best Score Content Area	BHN	ED	ELL	SWD
3-5 Math	2	2	2	2
3-5 RLA	0	0	1	1
6-8 Math	2	2	.	2
6-8 RLA	2	2	.	2
HS Math	4	4	.	2
HS RLA	3	3	.	1
Grad Rate	0	0	.	0
ACT	TBD	TBD	.	TBD
SG Average	1.857	1.857	1.500	1.429
			District Gap Closure Status	1.66

*Overall, we see that District C is making progress but not hitting all of its targets. This would make District C **"progressing"** for Gap Status.*

Step 4: Final Determination

Final district determinations are calculated by averaging a district's scores for achievement and gap closure and then using the scale detailed in step 2 to assign a final determination. Figure 10 illustrates the final determination for the district shown in previous examples.

Figure 10: Final determination heat map

Status	Average	Determination	Average Score	Final Determination
Achievement	2.50	ACHIEVING	2.08	ACHIEVING
Gap Closure	1.66	PROGRESSING		

District C is generally meeting or exceeding its performance targets across content areas, but struggling in 3-5 reading and graduation rate. Regarding gap closure, District C is making progress with its subgroups in many content areas, but also struggling in 3-5 reading and graduation rate.

*This performance profile would result in a final district determination of **"Achieving"** for District C.*

*District C was **In Need of Subgroup Improvement** in 2014.*

In using achievement data from 2013-14, we modeled how the updated system would have impacted district designations. Figure 11 below details the distribution of results for the proposed system, versus the current system in operation through 2014-15.

Figure 11: Overall District Determination Frequencies

District Determination (Based on 2014 Data)	Number of Districts	2014 Determinations under Previous System
Exemplary	42	3 districts Exemplary; 1 district INI; 20 districts INSI; 18 districts Intermediate
Achieving	69	11 districts INI; 46 districts INSI; 12 districts Intermediate
Progressing	3	2 districts INI; 1 district INSI
In Need of Improvement	22	9 districts INI; 11 districts INSI; 2 districts Intermediate

INI – In Need of Improvement **INSI** – In of Subgroup Improvement

Impact of the Assessment Transition on the Proposed System

This update to district accountability will accommodate the transition to the new TNReady assessment. In year 1, the 2015-16 school year, there will be no baseline data available for TNReady assessments. Therefore, no AMOs can be set in advance of the academic year by which to measure

progress. As such, the system will rely on other metrics until baseline results have been established. The TDOE will use these metrics to determine and report district accountability results in fall 2016.

At the minimum performance gate, the achievement key will be determined by the change in relative performance of the district in terms of percentile rank. District performance will be judged based on the percentile rank of the district in terms of the percent of proficient or advanced students using 2015 assessment results compared to the percentile rank of the district on the same metric using 2016 assessment results. Districts that have maintained or improved their relative performance in at least 25% of applicable grade-content areas will meet the criteria to earn that key. The TVAAS key will be unaffected by the transition to TNReady and will be available as in any other year. The gap closure key metric is the reduction in the percent of students (in the super subgroup) who are performing at below basic. Again, this will be an area for which there is no baseline data in the first year of the new TNReady assessment. As such, this area will be determined by the relative performance of the district's super subgroup when compared to other districts across the state in terms of the percent of students who are performing at the below basic level.

For the determination of the district's achievement status, the AMO target pathway will not be applicable in year 1. Instead, only the relative performance and TVAAS pathways will drive the calculation of the achievement status during this transition year. The gap closure status determination will also only have two pathways available in year 1 of TNReady. The AMO pathway will not have baseline data available against which to measure progress. So, the AMO pathway will be based on the relative performance of each of the district's four underperforming subgroups when compared to other districts across the state in terms of the percent of students who are proficient or advanced. TVAAS will be calculated for the subgroups at the second pathway as in any other year. The transition to TNReady will not have an impact on the availability of TVAAS scores. The reduction in the percent below basic pathway will not be available during this first year of baseline setting. In 2016-17, all pathways for achievement and gap closure status will be available as described above, as baseline data will be available to set AMOs and reduction in below basic targets.

By January 2017, the department will also generate and report "look-back" AMO targets for 2015-16 results using the statewide results from year 1 of TNReady. These AMO targets will reflect district performance on TNReady in 2015-16 as compared to the percentile rank of the district in the prior year on achievement tests. We will also set and report AMO targets for the 2016-17 school year and going forward based on the goal of reducing the percent of non-proficient students by 50% in eight years, or 6.25% per year.

We believe that the most important state function vis-à-vis district performance is to ensure that LEAs set appropriate goals, provide public, state-level reporting of progress against goals, and provide support to LEAs as they manage their progress locally. We believe that state intervention must be narrowly defined and targeted. Our experience through the past decade suggests that the state is ill-equipped to engage in detailed planning and management with hundreds of schools across the state, and is better positioned to support LEA management of school systems.

At the same time, TDOE can and should engage to support students in habitually failing schools. Additionally, the state can and should support school-level planning processes when LEAs are failing to improve student performance through their own management.

In the following section, we detail the assessments that we will use for state, LEA and school-level AMOs. These AMOs are predicated on the twin pillars of our accountability proposal: we will improve overall student achievement levels at an ambitious but achievable rate; and we will ensure that the students who are farthest behind grow the fastest.

We will ask each LEA meet expectations under a category of Achievement measures and a category of Gap Closure measures that aggregate to our state-level goals in both categories. LEAs will then be measured through the following basic system:

- The state will publish the goals for each LEA, and for schools within the LEA.
- The state will report on progress against those goals.
- When LEAs earn the designation of Achieving or Exemplary, the state will continue to support them and provide flexibility where possible to innovate.
- When LEAs earn the designation of In Need of Improvement or Progressing, the state will provide differentiated levels of intervention, depending on the LEA progress. LEAs that are making progress, designated as Progressing, but at a slower rate of growth than desired, will have a lower tier of intervention. LEAs that are not making sufficient progress in achievement, value-added growth, or gap closure will have a higher level of intervention, including public identification on the list of LEAs in need of improvement, with increased state engagement and decreased LEA flexibility.
- Regarding gap closure expectations specifically:
    - When LEAs meet expectations for gap closure (i.e., successfully show that the lowest achieving students with the greatest needs are advancing at a faster rate), the state will continue to support them and provide flexibility where possible.
    - When LEAs fail to meet expectations for gap closure, the state will provide differentiated levels of intervention. LEAs that are demonstrating increased student achievement, but are failing to meet expectations for gap closure, will have a lower tier of intervention. LEAs that fail to meet minimum performance standards for subgroup improvement as defined in the accountability framework will have a higher level of intervention, including public identification on the list of LEAs in need of improvement, with increased state engagement and decreased LEA flexibility.
- LEAs that exceed expectations for both achievement and gap closure in given year would be commended to an exemplary LEA list, freed from state strategic planning processes and some state reporting requirements for that year, and, where possible, granted increased latitude in funding flexibility.
- LEAs meet expectations in achievement and gap closure would be recognized on the achieving LEA list and adhere to regular strategic planning and reporting requirements for that year.
- LEAs that improve but not meet expectations in achievement and gap closure would be named on the progressing LEA list and be required to submit a detailed analysis of the results

along with plans for the coming year to achieve goals, subject to TDOE discussion and approval. This process will be developed by TDOE.

School accountability

In compliance with the rules of this application for regulatory relief, Tennessee proposes to have two types of school-level accountability: 1) absolute accountability for growth against current baselines; and 2) relative accountability in which schools are measured against their peers.

In absolute accountability for progress, Tennessee believes that the state role generally should be helping LEAs in goal-setting, publishing results for all schools, and providing transparent information for parents. State-to-school interventions should be limited to the system of relative accountability, where the state may engage (often in conjunction with LEAs) with priority, focus, and reward schools. Therefore, Tennessee's accountability for school growth is centered on the following activities.

- **Transparency:** To ensure transparency regarding Tennessee's accountability plan and student achievement, annually, TDOE plans to update its school report card to reflect changes to LEA accountability, such as including individual performance heat maps for schools, in 2016. The report card will share information about student achievement scores in aggregate and by subgroup, trajectory of growth based on longitudinal data (value-added scores using Tennessee's TVAAS data), rates of participation in testing, and the size of all achievement gaps. TDOE already issues a report card for every school and LEA in the state. See Appendix 3 for current report card.
- **Absolute Performance Accountability (AMOs):** By holding LEAs accountable for LEA AMOs that are aggregated from school performance, we are creating a system where LEAs are responsible for and incented to identify and intervene with schools that are missing their AMOs. LEAs that are not achieving their goals overall are required to submit an LEA plan for improvement that specifies interventions the LEA will take with specific schools. Through LEA-led planning, and through transparent reporting of progress, the state will ensure progress in all schools for all children.
- **Relative Performance Accountability (Priority, Focus, and Reward schools):** Tennessee has demonstrated a strong commitment to turning around the state's lowest performing schools through the creation of the Achievement School District. In compliance with this application, Tennessee is also proposing additional processes to drive increased performance in chronically low performing schools and the schools with the largest achievement gaps in the state. Our focus at the state level will be measurement, public accounting, and targeting financial and planning resources to support improvement. Finally, Tennessee proposes to recognize and reward our top performing and fastest growth schools in the state. Details about each category are summarized below and detailed in subsequent sections.
    - *Priority:* Schools in the bottom 5 percent of overall performance across tested grades and subjects will face one of four interventions: (1) placement in the Achievement School District, (2) turnaround under the governance of an LEA innovation zone, (3) turnaround through one of the federal School Improvement Grant plans, subject to approval by the state; or (4) LEA-led school improvement planning processes, subject to direct ASD intervention in the absence of improved results.
    - *Focus:* Ten percent of schools with the largest achievement gaps, subgroup performance below a 5 percent proficiency threshold, or high schools with graduation

rates less than 60 percent that are not already identified as priority schools, will be identified publicly and LEAs will need to submit a plan to TDOE for how to address achievement gaps in all their identified focus schools. LEAs will also have the opportunity to submit a more comprehensive proposal for a competitive grant that in most cases will address interventions specifically focused on improving the performance of English Learners and students with disabilities

- *Reward:* Schools in the top 5 percent of overall performance and schools in the top 5 percent of fastest growth – a total of 10 percent of schools in all – will be recognized publicly, receive financial rewards, and have more opportunities to serve as leaders across the state. Specifically, reward schools will have the opportunity to apply for a substantial competitive grant that will enable them to share best practices broadly.

Monitoring performance of individual sub-groups of students

Through annual publication of a report card, we will highlight the performance of individual sub-groups at the school level in addition to the LEA and state-wide level. We believe the public accountability created through transparent reporting will continue to bring pressure to bear on schools to improve the performance of individual sub-groups.

We also consider the non-performance of individual sub-groups over time at the school level through the reward school methodology, in addition to the focus school lists. Schools that would otherwise be included on the reward list for high performance or high progress are excluded if any of the four achievement gaps identified in the focus methodology were larger than the state median achievement gap for that group, and where any achievement gap widened from prior year to current year.

Through public accountability and the specific aspects of our relative accountability system with reward and focus lists described above, we believe that we will sufficiently draw attention to the performance of individual sub-groups.

Conclusion

The attached Appendix 4 depicts the overall accountability system and demonstrates the flow of LEA accountability and school accountability for student achievement results. Overall, we have created a system predicated on the general belief that LEAs are best positioned to manage schools against goals, and state intervention should happen in a limited way and only when LEAs are failing to make progress for groups of students or overall. Descriptions of the relative accountability system—Reward, Focus, and Priority Schools—are in the following sections.

This proposed accountability structure reinforces the goals, priorities, and plan outlined in the state's Race to the Top proposal and provides the flexibility and tailored interventions necessary to ensure that TDOE can significantly increase student achievement and reduce achievement gaps across the state.

Please note: TDOE staff members, led by the assistant commissioner of legislation and external affairs, worked closely with legislators to make the necessary changes to ensure that this system will

be implemented in LEAs and schools no later than the 2012-13 school year. Refer to Tennessee Code Annotated 49-1-602 for state law that reflects our plans outlined in this waiver. Furthermore, once ESEA flexibility for Tennessee is approved, TDOE's FTTT office will work with the U.S. Department of Education Race to the Top office to propose a budget amendment to align some of the dollars allocated on turnaround work to the state's new accountability system.

NOTE for waiver renewal: Tennessee's differentiated recognition, accountability and support system for schools is limited to identifying Priority, Focus, and Reward schools, with Reward being the highest recognition for schools. Reward schools are ten percent of all schools in the state, made up of the top five percent of highest performing schools and the top five percent of highest progress schools. A school cannot be a Reward school if the three-year success rate gap for the following gap groups is larger than the three-year state success rate gap, and the one-year success rate gap has not narrowed for the same eligible subgroup from previous year to current year. The four gap groups are racial/ethnic subgroups that have historically performed below the state average as compared with all students (African American, Hispanic, and Native American students); economically disadvantaged students as compared with their non-economically disadvantaged peers; English language learners as compared with non-ELL students; and students with disabilities compared with students without disabilities. The success rate calculation includes achievement tests and, for high school, also includes graduation rate.

2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

Option A	**Option B**
☐ The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.	☒ 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 to identify reward, priority, and focus schools, it must: a. provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each assessment for all grades assessed; and b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

A) See Attachment 8

B) TDOE will focus our accountability assessments predominantly on reading/language arts and mathematics, with some exceptions for science.

Science assessments will be used when determining:

- **Priority school lists:** Biology I in High School (representing 14 percent weight calculation); TCAP Science in grades 3-8 (representing 33 percent weight in calculation)
- **Focus school lists:** Biology I in High School (representing 14 percent weight in calculation), TCAP Science in grades 3-8 (representing 33 percent weight in calculation)
- **Reward school lists:** Biology I in High School (representing 14 percent weight in calculation), TCAP Science in grades 3-8 (representing 33 percent weight in calculation)

We have decided to include TCAP Science and Biology across all aspects of the school accountability system to ensure a continued focus on science across all schools. We have chosen not to include the social studies assessments, except in composite TVAAS scores, because the standards and cut scores have not been changed commensurate with the other assessments and there is therefore insufficient differentiation in outcomes.

2.B Set Ambitious but Achievable Annual Measurable Objectives

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

Option A	**Option B**	**Option C**
☐ Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the "all students" group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs.	☐ Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs.	☒ Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups. i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the

i. Provide the new AMOs and an explanation of the method used to set these AMOs.	i. Provide the new AMOs and an explanation of the method used to set these AMOs.	new AMOs in the text box below. iii. Provide a link to the State's report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups. (Attachment 8)

Tennessee is focused on two primary measures in our accountability system: Raising absolute proficiency for all students and closing the achievement gap between groups of students. As such, we have developed an accountability system that holds LEAs and schools accountable to: (A) Achievement, and (B) Gap Closure.

We determine achievement at the rate necessary to reduce the percentage of students who are below basic/basic by half over eight years or 6.25 percent annually. For achievement targets, the baseline is reset each year; therefore, districts that fall behind their targets and districts that improve beyond their targets must still reduce the number of students that are below basic/basic by 6.25 percent annually. Additionally, to target gap closure, we have set improvement goals for students in key under-performing comparison groups (students in racial/ethnic sub-groups that perform below the state average, economically disadvantaged students, students with disabilities, and English Learners) 6.25 percent annually, or 50 percent over eight years. Moreover, we will set targets to reduce the percent of students who are below basic in each individual subgroup at rate of 12.5 percent annually, or 50 percent over four years. For these targets, the baseline is reset each year; therefore, districts that fall behind their targets and districts that improve beyond their targets are still required to improve subgroup performance by 6.25 percent annually and reduce the percent of students who are below basic in each subgroup by 12.5 percent annually. In effect, these targets satisfy a modified "Option A": in eight years, the percentage of students in the "all students" group and in each subgroup who are not proficient will be reduced by half. Additionally, in four years, the percent of students who are performing below basic in each subgroup will be reduced by half. We believe that an eight-year timeline is ambitious but feasible, and we believe that LEAs and schools will manage aggressively against the benchmarks because they believe they are feasible. Moreover, we believe that the four-year timeline to improve performance for students in the lowest achievement category is ambitious yet achievable through the implementation and support of our RTI2 guidelines. We are committed to ensuring that students who are furthest behind grow at a faster rate.

An explanation of our AMOs is detailed below. Please refer to Appendix 5 to see the numeric targets for the State AMOs.

(A) Achievement

Beginning in 2016-17, at the 3-8 grade levels[7] we will set Achievement AMOs for percent of students who are proficient or advanced[8] in:

- 3-5 grades aggregated for Math
- 6-8 grades aggregated for Math
- 3-5 grades aggregated for RLA
- 6-8 grades aggregated for RLA

Beginning in 2016-17, at the high school level we will set Achievement AMOs for percent of students who are proficient or advanced in:

- End-of-course exam for Algebra I, Geometry and Algebra II OR Integrated Math I, I, and III
- End-of-course exam for English I, II and III
- ACT Composite
- Graduation rates

TDOE, in collaboration with LEAs and other stakeholders, determined this set of Achievement measures based on alignment with our strategic plan goals.
Following the principles of our current state-wide, state board-approved student achievement goals, we have determined that approximately 6.25 percent annual growth, or approximately 3 to 5 percentage point annual growth, in proficiency levels across all subjects and grade levels struck the right balance between what is ambitious and feasible.

These goals are consistent with our strategic plan and with our LEA-level goals in core subject areas. Additionally, we have asked for input from stakeholders in the state and from research experts. This process is briefly described below:

- TDOE convened approximately 20 internal and external stakeholders (including representatives from the Tennessee Higher Education Commission, Tennessee State Board of Education, and Governor Haslam's office) as an AMO setting committee. Participants were given baseline data for each of the new AMOs, as well as information regarding the previously established First to the Top AMOs. Participants were given the guidelines to determine goals at the intersection of ambition and attainability.
- The AMO setting committee's proposed growth targets were vetted by research conducted on the achievement gains made by other states. The Center for Education Policy (CEP) has conducted several national studies examining the types of gains experienced on state assessments. One such study (*State Test Score Trends Through 2008-09, Part 1: Rising Scores on State Tests and NAEP* - September 2010) found that between 2005 and 2009 median average yearly gains on state reading tests were 0.8 and 1.8 percentage points for 4th and 8th grade, respectively. Median average yearly gains on state math tests were 1.3 and 1.8 percentage points for 4th and 8th grade. Additionally, another CEP report (*State Test Score Trends Through 2008-09, Part 5: Progress Lags in High School, Especially for Advanced*

[7] Assessments are not currently administered in kindergarten, first grade, or second grade.
[8] Tennessee state assessments measure proficiency on four levels: (1) Advanced, (2) Proficient, (3) Basic, and (4) Below Basic.

Achievers - October 2011) analyzing high school achievement tests found that between 2002 and 2009, 55 percent of the 38 states analyzed saw gains between 0.1 and 1.9 percentage points in reading, while 53 percent saw the same percentage point gains in math. Report Card data for a number of other Race to the Top state recipients was analyzed for the 3 most recent years' data and average yearly gains were between 1 and 2 percentage points. Together, this research provides strong support for the ambitiousness of Tennessee's AMOs and annual progress of 3 to 5 percent growth. .

We will also include an additional pathway based on growth, as demonstrated by Tennessee's value-added growth measure (TVAAS). This pathway aligns with the emphasis we have placed on TVAAS in teacher and principal evaluations (and the focus on growing every student, every year), while enabling the primary achievement goals that we have set to align with strategic plan goals (and the focus on growing school and LEA performance). Additionally, Tennessee has many small, rural LEAs and schools, and the use of proficiency targets alone can lead to data that skews based on shifts in individual student cohorts. Using value-added growth as an additional pathway protects LEAs and schools that advance student performance for individual students.

Finally, we will include relative performance versus other districts as a third pathway that will allow for measuring district performance in the transition from legacy TCAP tests to the new TNReady assessments in 2015-16. The relative performance pathway considers district performance across each content area in terms of a comparison to the prior year percentile rank versus the current year percentile rank.

(B) Gap Closure

We have also determined a state goal to achieve at least a 6.25 percent annual reduction (and 50 percent reduction over eight years) in the percent of students who are performing below basic or basic in historically under-performing subgroups:

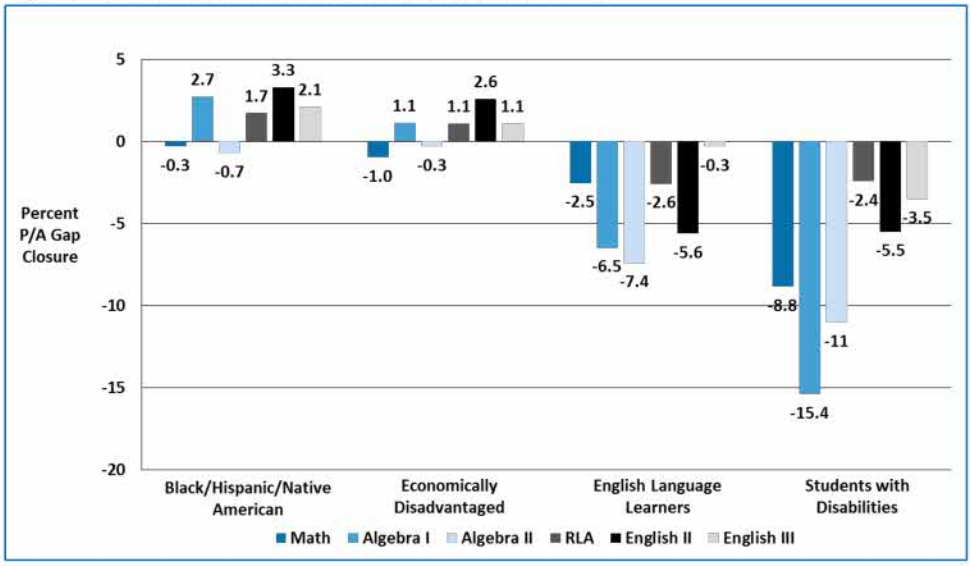
- racial/ethnic sub-groups currently performing below the state average
- Economically disadvantaged (ED) students;
- English learners (ELs); and
- Students with disabilities (SWD).

Moreover, we will be setting targets to achieve at a 12.5 percent annual reduction (and 50 percent over four years) in the percent of students in historically underperforming subgroups who are performing below basic. We have shifted our emphasis from the traditional measure of gap closure (comparison group/all students minus subgroup equals gap) to focus squarely on subgroup performance. The traditional gap closure calculation actually gave districts credit for closing gaps the "wrong way," i.e. because the comparison or all students group declined, even when the subgroup did not improve. In addition, the prior calculation penalized districts who grew all students, which is in direct opposition to our stated principles.

In reviewing our state-wide data over the last four years, we have not met our goals with regard to closing achievement gaps. While Tennessee student achievement has risen considerably over the past several years, the state has seen far less progress in narrowing persistent achievement gaps between our historically underperforming student groups and their comparison groups. Figure 12

shows the change in gap size by subject (measured by the percentage of students scoring proficient) for different subgroups between 2010 and 2014. There has been a slight reduction but small reduction in the gap between economically disadvantaged and non-economically disadvantaged students and between Black-Hispanic-Native American students and all students. At the same time, gaps between English Language Learners and non-English Language Learners and gaps between students with disabilities and those without have increased considerably. Looking at this data, we see little evidence that the Tennessee accountability strategy with regard to gap closure has been successful.

Figure 12: Change in Achievement Gaps over time



As such, the new gap closure measures will allow a targeted approach that drives districts to provide additional resources to address skill deficits for the lowest achieving students in these subgroups. We have found that common practice led LEAs to focus on "bubble" students, who were those closest to the proficiency cut-score. This practice only exacerbated or maintained gaps between higher achieving and lower achieving students. This shift in measurement does not indicate a shift in commitment. Our goal is still to close gaps in achievement between comparison groups and historically underperforming subgroups. However, after three years of experience with the traditional gap closure calculation, we believe these two new pathways are a better way to attain that goal. We believe that these focused measures for gap closure will drive districts to implement with fidelity research-based instruction and interventions that will address skill deficits for the lowest achieving students.

Finally, we will also incorporate a third pathway to measure LEA performance in gap closure. We will use value-added data for students in each individual subgroup at the district level. This will allow for a true student-level cohort growth measure to determine if districts are making progress with subgroups across all achievement levels. Again, this growth measure enable small subgroup cohorts to show growth even when traditional growth in achievement fails to capture this progress.

We have also set graduation rate AMO targets for individual sub-groups. In doing so, we considered two key factors: first, our Race to the Top goal of a 90 percent graduation rate state-wide by 2014-15, and our general principle of aiming to halve achievement gaps over an eight-year period. Our overall goal is for all sub-groups of students to reach a graduation rate of 90 percent over time. However we recognize the current reality of different sub-groups of students currently graduating at different rates, and have therefore set differentiated targets through 2018-19 on the path to that goal.
In order to reach our Race to the Top goal of an overall 90 percent graduation rate by 2014-15, all sub-groups need to grow at a relatively rapid pace, with those sub-groups that are further behind growing even faster than those who are currently further ahead. After 2014-15, we set targets to aim for continued growth for those sub-groups that are not yet at 90 percent by that point, at a rate that would average to approximately halving the gap in certain comparison groups over an eight year arc. For example, the gap in graduation rates between students with disabilities and students without disabilities was 21.1 percent in the 2010-11 school year, and would be narrowed to 10.3 percent by the 2017-18 school year.

Performance of individual subgroups
We have taken a number of steps to ensure that LEAs and schools are incented to work towards the progress of all subgroups.

- LEAs and schools have Achievement AMOs and Gap Closure AMOs that measure subgroup performance. LEAs and schools cannot achieve their overall Achievement AMOs if higher-performing comparison groups of students do not continue to make progress and grow over time. At the same time, they cannot achieve their Gap Closure goals if lower-performing comparison groups are not making equal or faster progress.
- LEAs will be accountable for a "super subgroup" at minimum performance gate, which will include any student who is a member of any one of the four focus subgroups – Black, Hispanic, Native American; Economically Disadvantaged, English Language Learners, and Students with Disabilities. As such, even in those districts that did not meet the threshold N-count for any one of these subgroups, LEAs will be accountable for student performance in all underperforming subgroups in order to not be deemed In Need of Improvement. In addition, this super subgroup configuration insures parity between more and less diverse districts.
- We will report publicly on the progress of all sub-groups, including each racial/ethnic sub-group. The results disaggregated by sub-group including progress against subgroup AMO targets will also be included on our report card.

Rates of progress
For both sets of AMO targets, we are asking LEAs and schools to grow at the same rate in terms of an increase in percentage of proficient and advanced students each year (for Achievement targets) and a decrease in achievement gaps between comparison groups of students (for Gap Closure targets), but for LEAs and schools that are further behind in overall performance or in the size of their achievement gaps, this will represent a faster rate of growth against their baselines. For example, an LEA that currently has 20 percent of its students scoring proficient or advanced on the aggregate 3-8 math measure currently, and sets an AMO of 24 percent in that category, would be aiming for an increase

of 4 percent that actually represents 20 percent growth over its baseline. In contrast, an LEA that currently has 64 percent of its students proficient/advanced in the same category with an AMO of 68 percent would be aiming for the same increase in percentage proficient/advanced, but that increase represents only 6.25 percent growth over its baseline. The LEA that is further behind must grow at a faster rate (20 percent vs. 6.25 percent) to achieve the same percentage increase in proficient/advanced. The same principle holds true for LEAs and schools that have larger achievement gaps in trying to achieve their Gap Closure AMOs.

By using multiple pathways to demonstrate Gap Closure in our updated accountability system, LEAs and schools are required to make greater rates of annual progress for students in subgroups that are furthest behind. LEAs are expected to reduce the percent of students who are below basic by 50 percent over four years, or 12.5 percent annually. Any given LEA will need to make faster progress with the lowest achieving students versus the 6.25 percent achievement goals across categories.

Differentiated interventions

As noted above in section 2.A, we believe that interventions should be differentiated based on the actual extent of LEA progress. Given that, TDOE's interventions with LEAs are outlined as follows:

If An LEA is…	Then, it will:
Exceeding growth expectations or targets in Achievement and Gap Closure	• Be commended to an Exemplary LEA list • Be allowed to maintain plans at the LEA level without approval from the state • Be granted increased latitude in funding flexibility (where possible)
Meeting growth expectations or targets in Achievement and Gap Closure	• Be recognized on an Achieving LEA list • Participate in normal state planning and reporting requirements
Improving but not meeting growth expectations or targets in Achievement and Gap Closure	• Be named to a Progressing LEA list • Submit a detailed analysis of the results along with plans for the coming year to achieve goals, subject to TDOE approval • Any LEA that obtains an average scale score of less than one for achievement or gap closure status will be subject to additional interventions through CORE office support Any LEA that is Progressing for two consecutive years will be elevated to the same intervention level as In Need of Improvement LEAs in the following year
Failing to improve in the vast majority of content areas in achievement, TVAAS, or gap closure	• Be placed on public list of LEAS In Need of Improvement • Meet with TDOE officials in person to support the creation of an aggressive plan for corrective action

	• Submit a detailed analysis of the results along with plans for the coming year to achieve goals, subject to TDOE approval • Complete planning and monitoring process with follow-up action support via CORE offices

Rigorous nature of the accountability system

The updated accountability system strikes the right balance between ambitious and achievable. It is difficult to achieve both the overall achievement and the gap closure goals. At the same time, there is recognition that not all districts that miss goals are identical. Districts that not only miss their goals but fail to make progress in the vast majority of content areas in achievement, TVAAS, and gap closure require more significant intervention and public identification. Moreover, this system correctly targets districts for additional supports and interventions. Under the current accountability framework, the In Need of Subgroup Improvement designation tended to reflect more about a district's diversity than its performance. The category included a wide-range of overall performance that did not appropriately discriminate results for public transparency. The updated accountability system as proposed will allow for greater focus on districts that truly need interventions, while also providing more discrete information to the public via transparent reporting using the heat maps.

Process for setting LEA and school AMOs

Beginning in 2016-17, under our updated accountability system, the Centers for Regional Excellence (CORE) will lead and monitor the goal-setting process. Tennessee developed a tool where districts could modify school level goals by the number of students scoring proficient or advanced and check to see if school-level goals, in aggregate, met or exceed LEA-level AMOs.

Throughout this process, the district support team and CORE will be monitoring results and providing technical assistance, and the district support team will grant final approval of goals.

Once LEAs and schools have engaged in the AMO-setting process, we will report the specific LEA- and school-level AMOs to the U.S. Department of Education.

Assessment standards

Note: assessments will have to fulfill the following standards (for all systems of accountability):

N-Count

For purposes of accountability, TDOE will use an N count of 30 because the prior N count of 45 masks many subgroups at a school level. A sample size or N count of 30 or greater is commonly used to ensure a greater probability that the sampling distribution of the mean will be approximately

normally distributed and the results of the analysis can be inferred to the general population.[9] For example, New Jersey uses an N count of 30 for accountability, and Colorado uses an N count of 20 or less, depending on the measure. Research on NCLB N counts (conducted in 2005) demonstrates that a total of 26 states established N counts of 30 or less for subgroup accountability[10].

For purposes of transparency and reporting, TDOE will continue to report data for students in a LEA or school group, with a minimum number of 10.

Participation Rate

- Schools or LEAs must have at least a 95 percent participation rate in the required TCAP accountability tests for all students and for each student subgroup;
- If a school does not meet this participation rate, the school will automatically fail both its achievement and gap closure measures.

If a school or LEA meets or exceeds the minimum number of students in a required subgroup and meets the 95 percent participation rate requirement, then that school or LEA must meet annual measureable objectives (AMOs) approved by the SEA with the application of a 95 percent confidence interval or any of the safe harbor mechanisms.

Tennessee determined participation rates for the first time in Spring 2003. Only schools and LEAs that meet the 95 percent participation rate for all students and each subgroup meet AYP requirements unless the size of the subgroup does not meet the minimum number set for participation rate purposes (30). To meet this requirement, the State will use the most current year, the most current two years, or the most current three years of participation rate data.

Schools are responsible for completing answer sheets for any student enrolled in grades and subjects included in the assessment program. The participation rate for all students and required subgroups are determined by the number of students participating in the assessment divided by the number of students enrolled (as indicated by the number of answer sheets). Only students who have a significant medical emergency may be exempted from testing and not counted in the participation rate calculation. Students with invalid assessment scores are counted only in the denominator of the participation rate calculation and are not counted in the numerator. These data are randomly audited for accuracy.

Test Taker Scores

In order accommodate the fact that TNReady will include two parts: Part I, which is administered two-thirds of the way through the course or the school year; and Part II, which is administered 90 percent of the way through the course or the school year, we will update our test taker business rules. Given this new construct for assessments, we believe that an adjustment is warranted to ensure that district

[9] Marion et. al. "Making Valid and Reliable Decisions in Determining Adequate Yearly Progress." Series: *Implementing the State Accountability System Requirements Under The No Child Left Behind Act of 2001*. ASR-CAS Joint Study Group on Adequate Yearly Progress. Council of Chief State School Officers. December 2002.

[10] Porter et. al. "The Effects of State Decisions About NCLB Yearly Progress Targets." Educational Measurement: Issues and Practice. 2005.

results reflect those students who have been enrolled for a reasonable period by which to hold the district accountable for results. As such, we will exclude from district accountability any test-takers who are enrolled for less than 60% of the instructional calendar for the course or the school year. The precise number of days will be calculated in accordance with the district's instructional calendar that is submitted and approved by the TDOE.

Safe Harbor

Graduation Rate is used for both achievement and gap closure in the accountability model. We use the following safe harbor provision: districts and schools with graduation rates above 95 percent will be considered to have achieved the graduation rate goal regardless of the previous year graduation rate.[11]

Similarly to the graduate rate safe harbor, we will determine safe harbor provisions for the AMO and relative performance pathways for achievement status (in terms of highest performing LEAs). In addition, we will determine safe harbor provisions for the reduction in below basic pathway for gap closure status (for those districts that very low percentages of students who perform below basic).

Middle School Acceleration

We have requested Waiver 14 in recognition of our state board policy that restricts students from participating in both the Algebra I EOC and the 8th grade math achievement test. We do believe our current practice and proposed update do meet the standards for granting of this waiver.

- Tennessee State Board of Education High School Policy 2.103, Section 8e requires students enrolled in a course with an associated end-of-course examination to take the end-of-course examination. Middle school students taking Algebra I are therefore assessed using EOCs instead of the 8th grade math TNReady assessment.
- For accountability purposes, the student's proficiency level on the EOC assessment counts in the grade that the student is enrolled. For example, if a student in 8th Grade takes Algebra I and scores Proficient, the student's Algebra I score will be included in 8th Grade Math for the school and district. It does not matter that the student took the course at a high school or with a high school teacher. Likewise, EOC assessments taken in grades 9-12 will be included in Federal accountability determinations for the students' high school.
- According to Tennessee State Board of Education High School Policy 2.103, Section 1e, "Students are required to complete four units of mathematics including Algebra I and II, Geometry or the equivalent, and another mathematics course beyond Algebra I. Students must be enrolled in a mathematics course each school year." Because Tennessee students entering high school with Algebra I credit are still required to take four years of math, most Tennessee students who take Algebra I in 8th Grade take advanced level math courses, such as Calculus, or other AP or IB courses.
- Tennessee students enrolled in high school will be assessed on more than one advanced, high-school level mathematics assessment. Tennessee State Board of Education High School Policy 2.103, Section 1e requires high school students complete four years of math including Algebra I, Algebra II, Geometry or the equivalent, and one additional mathematics course. As

[11] This safe harbor provision was submitted to USED in April 2013; it will be used in the accountability model for the first time in 2013 Accountability (SY 2012-13).

stated in section 8e of the Tennessee State Board of Education High School Policy, three out of the four required mathematics courses require end-of-course examinations: Algebra I, Geometry, and Algebra II (or Integrated Math I, II, and III). As such, all high school students in Tennessee will be assessed on three advanced, high school level mathematics assessments.

- The TDOE will ensure that every student in the state has an equal opportunity to be prepared for and take courses at an advanced level prior to high school through our rigorous implementation of college and career ready standards for all students, publication of middle school course book, and our practices regarding teacher licensure and credentials for Algebra I. We will ensure that all students have an equal opportunity to be prepared for Algebra I by exposing them to rigorous standards and curriculum that build numeracy skills beginning in pre-K. These foundational skills that focus on the progress towards mastery of algebraic expression will result in the potential of all students to maintain a trajectory towards taking Algebra I in eighth grade. We also ensure that parents are aware of course offerings in middle school, as all schools are required to publish and distribute a course manual to parents. Moreover, we have increased the ability for teachers with middle grades licensure to earn a specific endorsement to teach Algebra I. As such, these teachers are not required to complete the full certification pathway for all high school math content. Therefore, even in areas that are experiencing shortages in teachers highly qualified to teach advanced math content, they can pursue this alternative certification pathway to meet the demands of additional students taking Algebra I in eighth grade.

<u>High School Acceleration</u>

We propose using a proficient score (based on ACT benchmarks) on the English subject-level ACT score as a substitute for a proficient score on the English III EOC for students who have enrolled in advanced coursework instead of English III. Thus, a student taking advanced coursework for English during her junior year would still be counted as a proficient member of her English III cohort if her English ACT score meets the designated benchmark. Similarly, for students who have accelerated beyond Algebra II or Integrated Math III in their junior year, we propose using a proficient score on the Math subject-level ACT score as a substitute for a proficient score on the Algebra II/Integrated Math III EOCs. As such, these students would be included in the junior year cohort, ensuring that they are equally represented in accountability results.

To meet the minimum requirements of ESEA, as we have done in our previous waiver application and will continue in this renewal, we will include the following high school assessments:

- Algebra I/Integrated Math I. All students must take this course to graduate. We have set and maintain a 95% participation rate. We offer a portfolio assessment subject to the 1% limit as defined in ESEA.

- English II. All students must take this course to graduate. We have a set and maintain a 95% participation rate. We offer a portfolio assessment subject to the 1% limit as defined in ESEA.

In addition, we will go beyond ESEA minimum requirements and include Geometry/Algebra II or Integrated Math II/III for additional high school math subjects. We will also maintain a 95% participation rate. Similarly, we will also include English I and III in our accountability framework. We will maintain a 95% participation rate for all of these subjects.

English Learners

The State will continue to provide English Learners who are in their first year in a U.S. school an option that may exempt them from one administration of the reading/language arts subtest. Their participation in the TCAP assessments is included in the participation rate but not in the accountability determination.

Students who are identified as English learners and monitored for two years after they test proficient (Transition 1 and Transition 2 or Monitored Former Limited English Proficient (MFLEP)) are not counted in the EL subgroup to meet the minimum N, but their scores are counted in that subgroup when the minimum N count is achieved by a school or LEA.

Students With Disabilities

Tennessee will continue to permit LEAs to exceed the 1 percent cap on the number of proficient and advanced scores based on the alternate achievement standards that can be included in AYP calculations if the LEA establishes that the incidence of students with the most significant disabilities, as defined by the State, exceeds the limit and if the LEA documents circumstances that explain the higher percentage. Without approval requesting the extension of the 1 percent cap, proficient scores exceeding this cap must be changed to below proficient for accountability purposes. For 2013-14, the scores for students with disabilities who take the modified achievement standards assessment will be included in the assessment data in the accountability system so long as the number of those proficient and advanced scores does not exceed 2 percent of all students in the grades assessed at the LEA and State levels. For 2014-15 and beyond, there will no longer be a modified achievement standards assessment.

2.C Reward Schools

2.C.i Describe the SEA's methodology for identifying highest-performing and high-progress schools as reward schools.

TDOE will identify Reward Schools annually based on highest overall proficiency and/or highest overall progress.

To ensure that the State looks at all schools, regardless of their Title I status, we have included all schools in the pool from which we identify Reward Schools. We have also set a target to identify 10 percent of Tennessee schools that exhibit high proficiency and/or high progress based on TVAAS. We believe that highlighting a large number of schools (169 schools, equivalent to 10 percent of all schools) will increase motivation – both for schools to attain and maintain high levels of proficiency as well as for schools that may be starting from much lower levels of proficiency but have the most opportunity to make substantial gains. Whereas the priority and focus lists allow us to identify schools that face additional challenges and to provide resources to have schools better overcome those challenges, we view the reward list as an opportunity to recognize a large number of schools that achieved different types of success.

We have identified two categories of Reward schools, each category representing 5 percent of All Schools for a total of 10 percent:

Achievement-based Reward Schools (5 percent):

- Represent the 5 percent with the highest overall achievement based on percent proficient or advanced proficiency levels across assessments in school
    - High schools will be assessed based on an equally weighted composite[12] of:
        - Graduation rates
        - End-of-course Algebra I (Percent proficient and advanced)
        - End-of-course English I (Percent proficient and advanced)
        - End-of-course English II (Percent proficient and advanced)
        - End-of-course Biology I (Percent proficient and advanced)
    - Elementary/Middle schools will be assessed based on a TCAP aggregate, which includes and equally weights:
        - Math (Percent proficient and advanced)
        - Reading/Language Arts (Percent proficient and advanced)
        - Science (Percent proficient and advanced)
- Within-school gaps must be smaller than the state median, or if they are larger than the state median they must be narrowing[13]

Progress-based Reward Schools (5 percent):

- Represent the 5 percent of schools with the highest growth based on TVAAS value-added scores
    - Elementary/Middle schools will be assessed based on TVAAS growth composite index scores, which include TCAP Math, Science, RLA, Social Studies (and Algebra I if taken at the Middle school level)

[12] We have developed higher level Algebra II and English III which we will include when we have sufficient data.

[13] This analysis is based on the "gap index" we describe in focus schools; The USED states: "A school may not be classified as a 'highest-performing' school if there are significant achievement gaps across subgroups that are not closing in the school" and "A school may not be classified as a 'high-progress school' if there are significant achievement gaps across subgroups that are not closing in the school." (US Department of Education, *ESEA Flexibility*, September 23, 2011)

- High schools will be assessed based on TVAAS growth composite index scores, which include Algebra I, Biology I, U.S. History, English I, and English II
- Within-school gaps must be smaller than the state median, or if they are larger than the state median they must be narrowing [14]

Schools that serve some portion of both high school grades and elementary/middle grades, will be assessed as both school types.

Please refer to Appendix 6 for a step by step outline of TDOE's reward identification methodology.

2.C.ii Provide the SEA's list of reward schools in Table 2.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

TDOE compiled feedback from LEA personnel about how the State and LEAs can acknowledge high performing schools at the Federal Programs Directors' Conference we hosted in October 2011. We have also gathered feedback on this subject through a meeting with the Superintendents' Study Council, and a webinar hosted with superintendents from all 136 LEAs across the state. Three resounding themes emerged, from which we have designed our reward system.

1. Meaningful public recognition and honoring:
The annual list of Reward schools will be posted on TDOE's website, the state report card, and publicized through media outlets across the state. Letters of acknowledgement will also be sent to LEAs listing their reward schools and highlighting ways the LEAs can publicize and reward their high performing schools.

2. Financial rewards:
Beyond public recognition, TDOE will also provide financial rewards. TDOE will create a competitive grant process for reward schools to share their best practices with other schools which we expect will strengthen their existing programs. Each school, with the approval of its LEA, will be eligible to apply for funds. Financial rewards will allow the school to create a thorough description of their instructional improvement program and provide funds for publication, travel and visitation. Grant decisions will be based on innovation and opportunities for scalability.

3. Leadership opportunities among schools:
Reward schools will also be honored as leaders across the state. We believe that the designation of being a Reward school is an opportunity to serve as a key strategic partner in the work to raise achievement levels across the state; the best way to drive improvement across all schools is by leveraging the thinking, best practices, and credibility of those schools that are already doing a great job.

[14] Ibid

To this end, Reward schools will be asked to consider serving as Ambassadors to other schools, meaning a Reward school would: analyze its best practices; share best practices with neighboring schools by hosting visiting staff or conducting school visits to other schools; create mentorship opportunities between its staff and neighboring schools' staff. TDOE will provide the necessary financial and other resources to support Reward schools to carry out these additional functions.

We anticipate that we will be able to allocate approximately $2 million toward reward schools annually beginning in 2012-13.[15]

2.D PRIORITY SCHOOLS

2.D.i Describe the SEA's methodology for identifying a number of lowest-performing schools equal to at least five percent of the State's Title I schools as priority schools.

Priority schools will be identified every 3 years based on an evaluation of all Schools' (expanding beyond just Title I schools) 3-year achievement data. Schools must have a minimum of two years of data (i.e. they must have been in operation for 2 years) to be considered.

In order to identify the bottom 5 percent of schools in overall achievement, we will consider the performance of all students on the following state assessments.

High schools will be assessed based on an equally weighted composite[16] of:

- Graduation rates[17]
- End-of-course Algebra I (Percent proficient and advanced)
- End-of-course English I (Percent proficient and advanced)
- End-of-course English II (Percent proficient and advanced)
- End-of-course Biology I (Percent proficient and advanced)

Elementary/Middle schools will be assessed based on a TCAP aggregate, which includes and equally weights:

- Math (Percent proficient and advanced)

[15] Once ESEA flexibility for Tennessee is approved, the state will propose an amendment to its Race to the Top plan to align some of the dollars allocated on turnaround work to the state's new accountability system. Any dollar figures cited are contingent upon: the continuation of SIG funding, Race to the Top approval, and/or the reallocation of other state funds.

[16] We have developed higher level Algebra II and English III which we will include when we have sufficient data.

[17] To mitigate unintended consequences from using graduation rate as an indicator by itself, we have included graduation rates as part of the composite measure for high schools. Any high school with a graduation rate of less than 60 percent that is not identified through this priority methodology is automatically included on the focus list, as is mandated by the ESEA flexibility application guidance.

- Reading/Language Arts (Percent proficient and advanced)
- Science (Percent proficient and advanced)

Schools that serve some portion of both high school grades and elementary/middle grades, will be assessed as both school types.

Because Title I schools predominate in the bottom five percent of all schools, expanding the "Priority" mandate to identify five percent of all Schools results in a greater number of Title I schools identified as Priority. In the draft Priority list submitted with this application based on current data, we have identified a total of 85 priority schools all of which are Title I schools, representing nearly 8 percent of all Title I schools. While the decision to include all schools requires greater state intervention and support covering a greater number of schools, we believe this is the right thing to do because it ensures: (1) all schools are held to the same standards, and (2) more of the lowest performing schools get the additional support they need to be successful.

Please refer to Appendix 7 for a step by step outline of TDOE's priority identification methodology.

2.D.ii Provide the SEA's list of priority schools in Table 2.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.

In the short-term, identified priority schools will face one of four types of interventions:

1) Enter the TDOE-run Achievement School District (ASD)
2) Enter an LEA-run "innovation zone" (that affords schools flexibilities similar to those provided by the ASD) that an LEA has applied to create and that TDOE has approved
3) Apply and be approved by TDOE to adopt one of four SIG turnaround models
4) Undergo LEA-led school improvement planning processes, subject to direct ASD intervention in the absence of improved results.

By 2014-15, the bottom five percent of schools will all be served through one of the first three categories. Each of the first three categories, as described below, meets the U.S. Department of Education's turnaround principles for interventions, including:

- Strong leadership by reviewing principals and providing operational flexibility
- Strong instruction by reviewing teachers and providing professional development
- Flexibility to redesign learning time and instructional program
- Focus on data and on school environment
- Ongoing community engagement

Over time, as the ASD expands capacity and as LEAs establish effective innovation zones, we envision all priority schools to be served by one of these channels.

The Achievement School District

Overview of the Organization

In January 2010 the Tennessee legislature enacted the First to the Top Act – the most sweeping education law passed in Tennessee in over two decades. Among the most notable components of this new, bipartisan legislation was the creation of The Achievement School District ("ASD" or "the district"), a wholly new division of the State's Department of Education. The ASD is a key component of Tennessee's strategy to address the persistently poor performance of some of its schools. Modeled after the Recovery School District in Louisiana, the ASD has the ability to take over and operate persistently poor performing schools, or to authorize charter schools.

Further affirmation of Tennessee's bold vision for reforming public education for its schoolchildren followed in the form of two substantial federal grants. First, in March 2010, Tennessee was named as one of only two states to receive a grant award in the first round of the federal Race to the Top competition. Next, in August, and in partnership with Louisiana's Recovery School District and New Schools For New Orleans, Tennessee's Department of Education was awarded $30 million in the highly competitive Investing in Innovation (i3) federal grant program designed to support and expand high-quality charter schools.

ASD Design

The primary functions of the ASD fall into five categories: oversight, facilitation, human capital, operations and support. Below is a table that shows the kinds of activities that fall under each category. This list is not exhaustive, but is meant to illustrate the ASD's main oversight and facilitation functions (occurring at the state-level) and human capital, operations, and support functions (at the school level).

State Level Work

Oversight	*Facilitation*
• Identify schools to enter the ASD • Select intervention strategies (charter or direct-run) • Hold all schools accountable for results and, when necessary, for compliance	• Develop policy • Oversee public affairs

School Level Work

Human Capital	*Operations*	*Support*
• Employ teachers and leaders to work in ASD schools • Administer HR programs • Oversee performance management systems	• Transportation • Food Service • Technology • Maintenance • Purchasing	• Instructional Services • Professional Development • Grants Administration

Per the table above, the ASD will employ two primary intervention strategies to dramatically increase student achievement – (1) convert the school into a charter school, or (2) replace the LEA and manage the daily operations of the school.

Charter Conversions. The ASD will use best-in class charter operators to transform schools wherever possible. In this scenario, the ASD's role will be to:

- Identify, recruit and cultivate highly effective charter management organizations, both home-grown and nationally recognized, to turnaround schools as a first option.
- Grant flexibility in exchange for a high degree of accountability for outcomes
- Provide transition support via i3 funding to ensure the charter operator has ample planning time and support for a successful school launch
- Evaluate performance every 2 years leading to a robust renewal process

Direct-run Conversions. In addition to authorizing high-quality charter operators, the ASD will scale up priority interventions by also directly running great schools. In this scenario, the ASD's role will be to:

- Invest heavily in recruiting and in human capital management in order to secure a highly effective school staff
- Hire the turnaround team (principal and lead teachers) at least six months in advance to allow for a robust induction program.
- Employ charter-like flexibility and autonomy over hiring, budget, schedule, and program.
- Maintain tight control over scope and sequence, assessments, professional development, and performance management.

Among the identified priority schools, the ASD will determine which schools to absorb based on two factors: (1) student achievement growth, and (2) feeder pattern analysis. Priority schools that are geographically clustered with the worst growth will be the first contenders for an ASD conversion outlined above.

School Support Team. The ASD will support its charters and direct-runs schools through a lean and flexible school support team. The approach to building the school support team will be:

- Outsource all functions that non-ASD entities can perform well
- Maximum flexibility and authority in staffing
- Utilize exceptional generalists who can shift to different roles at different times
- Invest in key capacity ahead of growth

Stakeholder Engagement. The ASD is committed to open, honest engagement with stakeholders. The ASD role in engaging communities through the turnaround process will be:

- Listen and learn even as we share our convictions and expectations
- Empower communities to provide input at all stages of the turnaround process (e.g. school identification, charter operator selection, principal/teacher hiring)

To this end, the ASD has already hosted community forums at four ASD-eligible schools this year, gathering input from hundreds of parents and community members.

Schools will enter the ASD for a period of at least five years with return of the management of the school subject to both the school and the home-LEA meeting performance goals.

Consistent with state law, the use of the full per-pupil funding, facilities and transportation services for all students within the school would be accessible to the ASD.

ASD Autonomy

In order for the ASD to optimize its ability to successfully improve student achievement in the Priority Schools, it must operate as a nimble, service-oriented organization that moves resources quickly in order to support the turnaround efforts in its charter and direct-run schools. The additional autonomy the ASD requires are as follows:

Funding. The ASD must control the local, state, and federal funding attributable to each school placed in its jurisdiction, and must have the same authority to seek, expend, manage, and retain funding as that of an LEA .

Facilities. The ASD must have the right to use any school building and all facilities and property otherwise part of the school and recognized as part of the facilities or assets of the school prior to its placement in the ASD.

People. In the ASD direct-run schools, the employees of the school may be deemed employees of the ASD. The ASD must have the authority to select, hire, and assign staff to positions in the school as needed to support the highest-possible quality faculty in the school. All existing staff within and ASD school will be required to re-apply for a position with the ASD. The ASD must have the same salary autonomy and flexibility afforded to any LEA.

Procurement. The ASD must have the same authority and autonomy afforded to any LEA under state law regarding the procurement of goods and services. This includes but is not limited to personal, professional, consulting, and social services; and the procurement and/or leasing of property.

Current Status of ASD

Since winning the Race to the Top award in March 2010, the Tennessee Department of Education has been moving ahead with its ambitious reform agenda. Year 1 of the grant was designated as a planning year for the ASD and one in which low performing schools and LEAs are being assessed for entry into the new District.

The election of a new Governor on November 2, 2010, and the subsequent state-level leadership transition resulted in a large portion of the planning year occurring with the Superintendent position open. On April 5, 2011 Governor Haslam swore in Kevin Huffman as the Commissioner of Education. A month later, Commissioner Huffman hired Chris Barbic to serve as the first superintendent of the Achievement School District. Barbic started in this new role on August 1, 2011.

Prior to serving as Superintendent, Barbic founded YES Prep Public Schools, a Houston-based charter management organization (CMO) that exists to increase the number of low-income Houstonians who graduate from a four-year college prepared to compete in the global marketplace and committed to improving disadvantaged communities. Barbic led YES Prep for thirteen years and grew it from a single campus serving 300 students to a charter management organization of ten schools on track to serve 10,000 low-income students in Houston. YES Prep is often recognized as one of the highest-performing CMOs in the country and has served as a model for preparing low-income students for success in the collegiate environment.

Over the course of the last three months, the ASD team has been working on the following:

Co-Managing 5 Campuses. The ASD is currently working jointly with four Memphis City Schools and one Hamilton County School (Chattanooga) to influence decisions about staff, academics, non-academics, culture, and budget/finance. In this role, the ASD is providing "coordinated" supports and services to schools and helping the co-managed schools make smart choices with their SIG resources. The ASD is closely monitoring the schools' progress in order to determine whether or not each school is a candidate for charter or direct-run conversion.

Building the Launch Plan. The ASD spent the first two months building out a launch plan. The launch plan includes:

- Guiding principles
- Goals
- Growth scenarios
- Strategic Priorities
- Potential risks
- Monthly planning calendar (18 months out)
- Workforce and organizational development plan
- Budget template
- Stakeholder engagement framework

Building Capacity. The workforce plan mentioned above is driving the staffing plan for the ASD. While the ASD will be a lean and nimble support office, it must have the capacity to effectively authorize and manage the charter and direct-run conversions. During the course of the first three months, the ASD has hired a Chief Strategy Officer, a Charter Portfolio Director, and a Data Director.

Engaging the Community. A key strategic priority is open and honest communication with the community. The ASD team has met with dozens of stakeholders and has held four community forums in Memphis to gather input on the four co-managed schools.

Launching the Charter and i3 Application Process. The charter application for 2012-13 charter conversions began on August 1st and the ASD team in conjunction with leading teacher education organizations has been working to evaluate both the charter and i3 applications. The first round of charters and i3 award recipients will be announced in mid-November.

ASD Exit Criteria

The default is return school to local control in 5 years contingent upon the following:

(1) A majority of parents do not vote to keep school in ASD (i.e. "parent trigger" not activated); and

(2) Commissioner's discretion/evaluation of LEA's ability to ensure ASD-like context for school. This will be evaluated based on the LEA's ability to:

- Attract and support partners: match schools to models and improvement strategies/partners
- Coordinate school support: reduce or eliminate unnecessary interference from LEA and state; clear path to promised autonomies for schools.
- Foster human capital: attract talent from both inside and outside the LEA by crafting incentives and favorable conditions
- Provide monitoring and oversight over school performance: collect, analyze, and disseminate data (e.g. issuing school report cards, designing progress metrics).
- Secure resources: Coordinate with other state and LEA offices (e.g., grants management) to be sure turnaround schools receive priority.

While certain ASD schools may improve student achievement and no longer be in the bottom 5 percent (priority school), these schools will remain in the ASD for the minimum of five years. In addition, new schools that fall into the bottom 5 percent will be eligible for the ASD charter conversion or direct-run options.

LEA Innovation Zones

Given the difficult nature of turnaround work and our focused commitment on quality in all we pursue, we do not plan to rapidly scale the ASD. In current plans, the ASD will charter and direct-run approximately 35 schools in its third year (2014-15). This represents less than half of the Priority Schools. And while the ASD was established as an exception because we also believe the very lowest-performing schools will not improve with business as usual, we also believe that, whenever possible, LEAs should be the point of intervention with failing schools.

In addition to the ASD, we believe that LEAs can establish innovation zones that have similar flexibilities to the state-run ASD, and that will allow for greater local innovation when conducting turnarounds in the worst schools. LEAs must capitalize on the urgency of persistently failing schools to develop an innovative, service-oriented model of school support.

An LEA Innovation Zone achieves this by

- Streamlining supports from multiple offices rather than creating additional bureaucracy
- Creating a framework for low-performing schools based on opting-in to high-potential reforms rather than a punitive framework
- Ensuring that low-performing schools are prioritized in not only talk but also action
- Protecting school and Lead Partner level authority to deliver results

An LEA Innovation Zones represents a powerful mechanism to turnaround Priority schools because the Innovation Zones (1) create local and sustainable capacity to engage in meaningful turnaround of Priority Schools, and (2) ensure close coordination and collaboration between the LEA and the ASD.

The legislation creating the ASD calls for the Priority School to be given back to local control after five years. Creating an LEA innovation zone creates capacity within the LEA to successfully build upon the turnaround strategies implemented by the ASD and ensure the long-term sustainability of student achievement gains at the campus level once the school is returned to the LEA. Ramping up both the ASD and LEA innovation zone will require close coordination and collaboration between TDOE and the LEA. This coordination will ensure TDOE and LEA capacity are being deployed in the most effective and efficient manner possible.

TDOE will approve and support the creation of LEA-directed innovation zones. TDOE will flow federal and state funding ear-marked for priority schools to the LEA if the LEA has: (1) developed a clear, realistic plan for developing an innovation zone, and (2) demonstrated evidence that the LEA will be able to afford the innovation zone the necessary flexibility to be effective (e.g. new policies adopted by school boards). TDOE will provide organizational support by clearly defining the expectations of roles and responsibilities of an LEA innovation zone, and by allocating state resources to help LEAs create an operating structure in line with these expectations for all stakeholders (outlined below).

We believe that creating incentives for other LEAs across the State to create a similar type of innovation zone is a great example of an additional role TDOE can play to effectively turn around Priority Schools. Below is an explanation of the roles and responsibilities of the various stakeholders in creating the LEA innovation zone.

<u>Requirements of the LEA</u>

- *Structure:* Establish an Innovation zone office
- *Build Management Capacity:* The LEA innovation zone requires sufficient management flexibility to undertake the work successfully. Hire (internally or externally) a leader for the innovation zone office with the authority to hire his/her staff, with at a minimum, one full-time employee per priority school and one full-time data analyst for the office
- *Provide Governing Autonomy:* Allow schools, under governance of the innovation zone office, to have autonomy over financial, programmatic, staffing, and time allocation decisions. The Innovation Zone must be directly linked to and empowered by the superintendent to implement time-critical initiatives quickly.

<u>Requirements of the School Board:</u>

- *Provide Governing Autonomy:* Pass policy, as necessary, to allow schools, under governance of the innovation zone office, to have autonomy over financial, programmatic, staffing, and time allocation decisions

<u>Requirements of the Innovation Zone office:</u>

- *Foster Human Capital:*

- Attract talent from both inside and outside of the LEA by crafting incentives and favorable conditions (e.g., allow principals to build their own teams; provide specialized training for principals; develop clear recruitment incentives and selection criteria/processes for turnaround teachers; performance contracts for teachers with hiring and dismissal flexibility)
- Liaise with other partners working on developing human capital

- *Monitoring and Oversight:* Directly oversee the priority schools absorbed by the Innovation zone in LEA
  - Hold schools accountable for student achievement based on data analysis; establishing and monitoring against goals, benchmarks, and timelines for student achievement
  - Hold LEA support services (e.g. transportation, budget, facilities) that serve priority schools accountable for effective and efficient delivery based on metrics the innovation zone will establish
  - Provide transparency and access to key stakeholders
- *Service-oriented support:* Organize as a comprehensive, service-oriented unit that can serve clusters of priority schools (addressing feeder patterns within LEAs).
  - Communicate with LEA to establish priority in delivery of support services (e.g. contracts, management, technology)
  - Secure direct access to the superintendent
  - Administer SIG and other grants
  - Pursue outside funding opportunities
- *LEA leverage:* The innovation zone should be developed as a LEA platform to afford flexibility, autonomy, and accountability to specific schools that are unlikely to succeed under business-as-usual.
  - Over time, the innovation zone should plan to scale in a similar fashion as the ASD. In order to build a strong foundation, growth will be limited in the first few years to a count of schools that can be managed effectively and comprehensively.
  - We expect that scale-up of an LEA innovation zone would be similar to the scale-up of the ASD: approximately six schools in the first year. An LEA innovation zone must propose and TDOE must approve the number of schools an innovation zone can absorb each year. This decision will be based on past success.
- *Build management capacity:* Hire (internally or externally) a leader for each school with the authority to hire his/her staff
- *Provide Technical Assistance:* Directly or through external partners (as decided and monitored by the Innovation Zone) to assist school strategic planning, stakeholder engagement, and execution of interventions

<u>Requirements of Priority schools absorbed by the Innovation Zone:</u>

- *Operate with Managerial Autonomy:* school leadership will make decisions around financial, programmatic, staff and time allocation
- *Accountability:* school leadership will be held accountable on the managerial decisions that have been made based on the net impact on student achievement

<u>Requirements of TDOE:</u>

- *Provide financial support:* Federal and state funding for a priority school will be channeled directly to the LEA innovation zone for the priority schools that the innovation zone absorbs
- *Provide management support:* Dedicate state resources to LEA innovation zones
- *Accountability:* Monitor progress annually through AMOs and on-site visits by state officials

Consequences of Failure

- If in 2 years, the school's student achievement does not improve, then the school will be absorbed the ASD
- LEA innovation zones that have slower rates of improvement across schools compared to the ASD will lose the right to expand into new schools, until achievement growth in their existing schools improves to ASD levels

LEA/School-led SIG Turnaround

Corresponding to SIG turnaround funding and interventions today, LEAs can apply to TDOE for their priority schools that are not absorbed by the ASD or LEA Innovation zones to adopt one of four federal interventions: (1) turnaround model, (2) transformation model, (3) closure, or (4) restart. These school plans must address each of the areas identified in the ESEA Flexibility Guidance for Priority schools.

LEAs must complete the SIG application, specifying the federal model proposed for each school and describing in detail how the robust and dramatic interventions will be implemented. TDOE will evaluate each application based on its comprehensiveness and feasibility; the State intends to only grant funds to realistic, effective plans. LEAs with TDOE approved school plans will receive SIG funding to implement the turnaround.

Consequences of Failure

- If in 2 years, the school's student achievement does not improve, then the school will be absorbed by the ASD or by an LEA innovation zone

LEA-led school improvement

To ensure success, the ASD and LEA innovation zones must scale thoughtfully and with measured growth. To ensure SIG turnaround applications are meaningful and truly competitive, school plans that do not meet a high bar for efficacy and feasibility should not be approved. As the ASD and LEA-led innovation zones scale, some schools in the bottom five percent of performance that do not receive SIG funding will require another type of intervention. TDOE will rely on LEAs to manage and closely monitor school improvement in these schools until either the ASD or an effective LEA innovation zone is able to absorb them.

In the event that a school on this list is able to achieve its AMOs for 2 years in a row on its own, thereby showing substantial growth in results, it will be released from "priority" with no more aggressive intervention.

2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each

priority school no later than the 2014–2015 school year and provide a justification for the SEA's choice of timeline.

In our original approved ESEA flexibility request, we included an approximate, anticipated timeline for Priority school interventions. An updated timeline by which all Priority schools will implement either one of the four SIG models or interventions aligned with the turnaround principles is included below, along with an explanation of why the timeline has shifted since our originally approved waiver.

Priority Schools Identified for 2012-13

	2012-13	Change	2013-14	Change	2014-15 Projected
ASD	6*	+6	12*	+5	17[18]
LEA Innovation zones	12*	+11	23*	+4	27[26]
SIG models (Transformation, Closure, Restart, Turnaround)	0	+6	6	+8	14
LEA-led turnaround	66	- 23	43	-43	
To be treated in 2014-15	0		0	+26	26[19]

There are two major factors that have shifted our timeline since our originally approved waiver. First, 69 of the 83 Priority schools identified in 2012 were located in what was then Memphis City Schools. Memphis City Schools and Shelby County Schools were working towards a merger which took place prior to the 2013-14 school year. The 14 Priority schools in other districts outside of Memphis had all entered an intervention implementing one of the four SIG turnaround models or aligned with all of the SIG turnaround principles by the 2013-14 school year. However, given the large-scale transitions taking place in the Memphis/Shelby district and uncertainty around district leadership until just before the 2013-14 school year, we did not feel it would be effective to require SIG-aligned interventions or to administer SIG grant competitions in the Priority schools located in Memphis in the absence of more certainty around structure and leadership in the district as a whole. Second, the ASD has grown at a slower pace than originally anticipated, as it solidified its strategy and planned for

[18] One Priority school, Brick Church Middle School is currently part of both the ASD and an LEA innovation zone as it goes through a grade-by-grade transition, and is therefore included in both counts.

[19] As noted in our original approved ESEA flexibility request, we will be rerunning the Priority list in summer 2014 to identify the bottom 5 percent of schools based on three years of data at that point in time, and to give those schools one year for planning purposes prior to officially entering Priority status and beginning an intervention in summer 2015. We expect that some of the originally identified Priority schools will have improved to the point that they will not be included on the second iteration of the list, and that other schools will be added. Per our original waiver application, 2012 Priority schools that improved so as to not be identified on the next Priority list will exit Priority status. We anticipate that some of the schools that have not yet begun interventions and are therefore in the category to be treated in 2014-15 will be among those that have improved to the extent that they will exit Priority status. In those cases, we do not believe it makes sense to require an intervention consistent with the SIG turnaround principles in the 2014-15 school year when these schools have already shown substantial improvement and are therefore exiting Priority status, so they will not be required to begin interventions in that year. Schools that have already begun interventions will fulfill the length of those interventions as described in section 2.D.v below, consistent with our original approved flexibility request.

scale that would ensure quality. By 2014-15, the ASD will also have six newly opened schools (as opposed to transformation of existing schools) serving students from Priority schools. These new schools are not reflected in the count above as they are not direct interventions in a single, existing, identified Priority school, but they are exclusively serving the students from those schools. These factors resulted in the updated timeline above.

In 2014-15, we project that there will be 19 schools that will continue to be in Priority status (see footnote 27 on the previous page for additional context), and will be managed directly by Shelby County in line with all of the SIG turnaround principles. We have been engaged in a series of conversations with Shelby County district leaders to ensure that the LEA is implementing interventions consistent with the SIG turnaround principles in each school. In addition, we know that the ASD and the Shelby County iZone will continue to expand in 2015-16, and part of our conversations with Shelby County will be in identifying which schools may be best suited for those interventions. Finally, the projected 19 schools include charter schools authorized by Shelby County. Pursuant to action by Tennessee's General Assembly in Public Chapter 721, http://state.tn.us/sos/acts/108/pub/pc0721.pdf, these schools would be closed if they were identified again as Priority schools in the list run in summer 2014.

Timeline

As required in the renewal application, Tennessee is submitting its updated list of Priority schools for implementation beginning in the 2015-16 school year. This list is included as Attachment 4.

Our updated timeline for implementation of interventions aligned with all of USED's turnaround principles in all Priority schools was developed in partnership with the Achievement School District and those LEAs that have priority schools. The State plans to continue a phased implementation approach, to allow the Achievement School District, LEA-led innovation zones and other LEA-led efforts the time and capacity to effectively implement interventions. The table below is an overview of the anticipated timeline for additional interventions which ensures that all 84 currently identified priority schools have interventions implemented by the 2016-17 school-year:

	Already included	2015-16	2016-17	2017-18
ASD Total	23	30	36	40
Individual SIG grants	12	0	0	0
LEA innovation zones Total	24	39	41	42
Individual SIG grants	22	18	18	18
LEA-led turnaround Total	3	2	7	2
Individual SIG grants	3	2	2	2
Schools with Interventions Total	50	71	84	84
Individual SIG grants Total	37	20	20	20

Monitoring Results

Beginning in summer 2015, the Tennessee Department of Education will review data on priority schools and will specifically look at the data for those schools which have implemented interventions for three school years. Because the first Priority schools were identified in summer 2012 and some schools began their interventions in 2012-13, this will be the earliest time by which schools will have implemented interventions for three years. If schools have not made sufficient progress to exit priority status (meaning their success rate has not yet improved beyond the threshold used for identification on the 2015 list, and they have not made enough progress to exit in the summer 2015 based on updated criteria detailed below), the department plans to take the following actions to ensure increased rigor of interventions and supports by the following school year: (1) requiring LEAs to designate funds to support struggling Priority schools in their local Title I annual budget; (2) requiring a specific improvement plan for Priority schools through the state's funding application, ePlan; (3) appointing the state's director of large district support to specifically work with the LEA for any schools that fall into this category.

2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

Schools will exit "priority" status when:

- Three years later, a school is not identified in the next "priority" list that is identified by TDOE; or
- A school meets all of its achievement AMOs or achieves level 4 or 5 TVAAS performance in all subject/grade content areas two years in a row

or

- A school dramatically improves achievement based on the success rate calculation which includes the combined achievement results (the percent of students who are proficient or advanced) in mathematics, reading/language arts, and science.
    - Beginning summer 2015, using 2014-15 achievement data, for schools designated as a Priority school in August 2014:
        - Any identified Priority school (for the 2015-16 school year) that exceeds the 15th percentile in the state using a one-year success rate will exit priority status.
            - In 2013 (for schools named priority in 2012) – one school would have exited priority status.
        - Any identified Priority school (for the 2015-16 school year) that exceeds the 10th percentile in the state using a one-year success rate or meets all of its Achievement AMO targets without safe harbor will be designated as: "Priority – *Improving*."
            - In 2013 (for schools named priority in 2012) – five schools would have been designated as "Priority – *Improving*."
    - Beginning with 2015-16 achievement data for any school designated as a Priority School in August 2014:

- Any identified "Priority – *Improving*" school that exceeds the 10th percentile in the state using a one-year success rate will exit priority status.
    - In 2014 (for schools named priority in 2012 and "Priority – *Improving*" in 2013) – no schools would have exited priority status via this criteria.

In 2014, three schools would have exited via the one-year criteria, as they exceeded the 15th percentile for performance in the state in 2014.

However, priority schools that enter specific interventions will be required to fulfill the entire length of the intervention:

- ASD: five-year minimum requirement (see ASD section above for full exit criteria description)
- LEA Innovation zone: to be determined by each LEA, with a minimum length of three years.
- SIG turnaround: 36-month intervention

2.E Focus Schools

2.E.i Describe the SEA's methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as "focus schools."

We have identified focus schools based on any of the following three pathways, as mandated in this waiver application:

1. High schools with a three-year average graduation rate less than 60 percent that have not otherwise been identified as "Priority" (automatic)
2. Schools with any sub-group(s) with less than 10 percent composite "proficient or advanced" performance on the Math, RLA, and Science portions of the TCAP exam for grades three through eight; or composite "proficient, advanced, or graduated" performance on Algebra and English assessments and graduation rates in high school, and have not been identified as Priority (automatic)[20]
3. For each of the four gap groups – students with disabilities, economically disadvantaged students, students in racial/ethnic groups currently performing below the state average (Black/Hispanic/Native American student), and English Learners – rank the size of each school's achievement gap between the historically under-performing and their comparison for each group. An equal proportion of schools will be drawn from each subgroup ranking, starting with the school with the largest achievement gap for that subgroup and working downward, until 10 percent of all schools in the state have been selected. Due to the federal requirement that Focus Schools include at least 10 percent of all Title I schools in the state, this method will first be applied to Title I schools, with non-Title I schools added in once the Title I requirement has been met.[21]

1. Graduation rate:

After identifying our priority list, we automatically included any high school with a graduation rate less than 60 percent. In the draft list we submitted with this waiver application in 2012, we identified one school through this pathway. When focus schools were identified in the summer of 2012, again one school was identified through this pathway.

[20] When the state submitted its waiver application in 2012, the state committed to raising the percent composite proficient or advanced from 5% to 10% for the 2014 run for focus schools. This change is indicated here.

[21] Tennessee ran its first focus school is in the summer of 2012. Focus schools identified at that time were selected based on their weighted gap. By taking a weighted gap, gaps in each of the four comparison groups were combined. Schools that were selected until 10 percent of all schools were chosen as Focus Schools based on their weighted gap. The department, districts, and schools felt that the methodology was too complex and too difficult to identify specific groups for improvement; therefore, the department amended its waiver for the summer 2014 focus school list to the approach outlined here.

2. Sub-group performance below threshold:
We determined a composite threshold of 5 percent, because state intervention is necessary in a school with severely low academic achievement. In the draft list we submitted with this waiver application, we identified 26 schools through this pathway. When focus schools were identified in the summer of 2012, three schools were identified in this pathway. When focus schools were identified in the summer of 2012, the composite threshold was five percent; as stated at the time of the waiver's original approval, as levels of student achievement increase across the state, we expect fewer and fewer schools to fall below this threshold. Therefore, with the summer of 2014 focus school identification, the composite threshold will increase to 10 percent. Each time we run the focus school list, the threshold will increase by 5 percent.

3. Gap analysis:
Tennessee's focus school list should reflect schools that have the largest and most pervasive achievement gaps.

We assess gaps between the following four sets of comparison sub-groups:

- Comparison group of racial/ethnic subgroups of students currently performing below the state average vs. All students[22]
- Economically Disadvantaged (ED) vs. Non-ED
- English learners (EL) vs. Non-EL
- Students with disabilities (SWD) and Non-SWD

For the high school pool of focus schools, we assessed achievement gaps based on an equally weighted composite of:

- Graduation rates
- End-of-course Algebra I, Algebra II (Percent proficient and advanced)
- End-of-course English I, English II, English III (Percent proficient and advanced)
- Biology I

For grades three through eight, we assessed achievement gaps based on an equally weighted composite of the TCAP, including:

- Math (Percent proficient and advanced)
- Reading/Language Arts (Percent proficient and advanced)
- Science (Percent proficient and advanced)

To determine the most pervasive gaps, rank the size of each school's achievement gap for each particular group. Equal proportion of schools will be drawn from each subgroup ranking, starting with the school with the largest achievement gap for that subgroup and working downward, until 10 percent of all schools in the state have been selected. Due to the federal requirement that Focus Schools include at least 10 percent of all Title I schools in the state, this method will first be applied to Title I schools, with non-Title I schools added in once the Title I requirement has been met.

Schools will be exempt from this pathway for a particular subgroup if the school's success rate gain is positive **and** is greater than the state's success rate gain for the same group.[23]

In order to determine if a school is eligible for a subgroup, the school must have an N Count of 30 students in both the historically underperforming subgroup and its comparison group.
When the state submitted its waiver in 2012, we identified 142 schools based on the achievement gap pathway, reaching a total of 169 focus schools, which represent 10 percent of all schools in the state. When the state identified focus schools in the summer of 2012, 163 were identified through this pathway.

Please refer to Appendix 8 for a detailed step-by-step explanation of the methodology used at the time of submission to this waiver and the summer 2012 identification of focus schools as well as a step-by-step explanation of the methodology used for the identification in summer 2014.

2.E.ii Provide the SEA's list of focus schools in Table 2.

2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA's focus schools and their students and provide examples of and justifications for the interventions focus schools will be required to implement to improve the performance of students who are the furthest behind.

All focus schools will have their names published in a list distributed to the public on the state's website and will have a "focus" designation on the school report card.

We will be providing direct support and technical assistance to ensure that each LEA identifies the needs of its focus schools and their students and responds to those needs, particularly for the highest-need subgroups. These efforts will be led by TDOE's office of district support and the Centers of Regional Excellence or CORE offices. See section 2.F for more detail on our approach to the CORE offices.

In the summer of 2012, a final version of the focus lists will be run based on three years of achievement data including the results from the 2011-12 school year. At that time, TDOE will communicate directly with each school regarding the specific achievement gaps or other reasons that led to their inclusion on the Focus list and notifying the respective LEAs as well. Once the schools are announced, LEAs – with the support of TDOE's CORE staff - will be required to conduct a root cause analysis of the achievement gaps within focus schools and across the LEA as a whole (e.g., a large achievement gap at a high school might be rooted in the feeder middle school). In order to ensure these plans will be effective, CORE staff will work with LEAs to identify schools with that have

[22] Currently this comparison group includes African American, Hispanic, and Native American students based on state-wide achievement data from the 2009-10 and 2010-11 school years.
[23] For the focus school methodology outlined in the state's original waiver application and used for the summer 2012 focus school identification, the state used two forms of "safe harbor": (1) if a school has reduced its achievement gap by 6 percent annually (equivalent to the annual gap closure AMO), or (2) if all comparison groups are performing at or above the state subgroup median. This change occurred due to the change in methodology from using a weighted gap approach to identifying focus schools by specific subgroup. The state will continue to use these safe harbors for 2014 focus school identification.

common characteristics to the LEAs' focus schools but are achieving much better results, in order to learn from the higher-performing schools. CORE staff will seek to identify schools at the same level (e.g., elementary schools with other elementary schools) and similar needs, so that the plans that the LEAs design and implement will have the greatest possible chance of success. Moreover, the CORE offices will look for initiatives that have proven effective among Reward schools that have successfully made strides in closing achievement gaps in similarly situated sub-groups. Based on this analysis, LEAs must submit one LEA improvement plan that includes school level improvement plans for their designated focus schools. These plans will be submitted to TDOE in late summer of 2012 with the expectation that they will be acted upon immediately at the beginning of the 2012-13 school year. (Since our initial submission of the ESEA flexibility request on November 14, 2011, we have already seen some schools taking on new initiatives to address their achievement gaps. For example, Pope Elementary in Madison County has already instituted a program where struggling students receive an additional 30 minutes of daily intervention.[24])

LEAs will also have the opportunity to submit more detailed version of their plan as part of a competitive grant process. Grants of approximately $100,000 per school will be offered to LEAs with focus schools on a competitive basis. TDOE will fund these competitive grants from a combination of Title I, Part A, 1003 (a) school improvement funds, Race to the Top funds, and/or state funds to approximately 100 focus schools.[25] Plans submitted for the grant process will be competitive if they have realistic and ambitious plans to take on some of the following initiatives: time on task; extended school day; cultural competency education; co-teaching opportunities; family support/community services; continued root cause analyses; feeder pattern analyses; inter-school strategic staffing of school leaders and teachers; intra-school strategic staffing of teachers. These plans will be submitted in the fall of 2012 and we anticipate grant decisions will be made by the end of the 2012 calendar year. Funds will be distributed at the beginning of 2013. Additionally, we may provide another opportunity to apply for a competitive grant in the 2013-14 school year for schools that chose not to apply or who did not receive funding in 2012-13. We anticipate the timeline would be similar: application submission in the fall of 2013, grant decisions by the end of 2013, and money disbursed in the beginning of 2014.

Each year, we will publish the results of all identified Focus schools so that the public can clearly see the progress they are making. For focus schools where the gaps widen or little progress is being made, TDOE officials will meet in-person with the LEA to review their improvement plans and to assist with plan revisions, if needed. Improvement plans must be approved by TDOE.

Tennessee's ESEA Flexibility Part B monitoring report included the next step that we would submit a plan for ensuring that our LEAs with the subset of 11 of 169 focus schools described in the monitoring

[24] Cheshier, Tajuana. JACKSON-MADISON COUNTY SCHOOLS: 1st look at proposed evaluation system - Alternative to No Child Left Behind. *Jackson Sun*, November 26, 2011. http://www.jacksonsun.com/article/20111127/NEWS10/111270323/1002/rss

[25] Once ESEA flexibility for Tennessee is approved, the state will propose an amendment to its Race to the Top plan to align some of the dollars allocated on turnaround work to the state's new accountability system. Any dollar figures cited are contingent upon: the continuation of SIG funding, Race to the Top approval, and/or the reallocation of other state funds.

report would monitor implementation of interventions in these schools and provide technical assistance to support effective implementation of these interventions.

Of the 11 Focus schools which were not awarded a competitive grant and had previously rejected support from the Public Consulting Group (PCG), we found that most had actually already received specific support in the 2013-14 school year from either PCG or one of the department's eight Centers of Regional Excellence or CORE offices. Specifically, we found that three of the 11 schools ultimately decided to use PCG support during the 2013-14 school year. Another four of the schools received substantial support from multiple CORE staff members in the 2013-14 school year, including data and analysis support from the regional data analyst and through participation in a regional data consortium, instructional support from math, reading, and intervention consultants, overall consultation from the CORE director and through engagement in the region's principal study councils.

Based on what we have seen in terms of past supports for Focus schools, in the 2014-15 school year, we will ensure that any LEA with a Title I Focus school is providing monitoring of and effective technical assistance for interventions by assigning a point of contact from the CORE office in their region to work with district leadership at least twice a year to touch base on progress and coordinate additional CORE support as needed.

Timeline

Focus schools will be identified once every 3 years, in line with priority identification. The first identification occurred in the summer 2012. LEAs worked on improvement plans throughout the summer, and applied for competitive grants in fall 2012. These plans were submitted in the fall of 2012 and grant decisions were made by the end of the 2012 calendar year. Funds were distributed at the beginning of 2013. Competitive grants were allocated for the maximum grant award period of the funding source. Additionally, we may provide another opportunity to apply for a competitive grant in the 2013-14 school year for schools that chose not to apply or who did not receive funding in 2012-13. We anticipate the timeline would be similar: application submission in the fall of 2013, grant decisions by the end of 2013, and money disbursed in the beginning of 2014. For Focus school identification taking place during the summer of 2014, these schools will be publicly named as 2015 Focus schools but will be given a year to plan for interventions. The three year period for being named as a Focus school will begin in SY 15-16.
We will continue publish the results of all Focus schools and the progress they are making toward closing achievement gaps.

As required in the renewal application, Tennessee is submitting its updated list of Focus schools for implementation beginning in the 2015-16 school year. This list is included as Attachment 5.

Monitoring Results

Beginning in summer 2015, the Tennessee Department of Education will review data on previously identified Focus schools, since the first Focus schools were identified in summer 2012 and began their interventions in 2012-13. If they have not made sufficient progress to exit Focus status (meaning they were included on the 2015 list published in August 2014 and have not made enough progress to exit in the summer 2015 based updated criteria detailed below), the department plans to take the

following actions to ensure increased rigor of interventions and supports by the following school year: either a) requiring participation in the state's Focus School Convening support structure by the school and an LEA point of contact who will follow-up with the school after each regional meeting, OR b) requiring the LEA to designate Title I or other funds to support their struggling Focus schools and requiring a specific improvement plan for Focus schools in their annual ePlan application.

Support

Beginning in the 2015-16 school year, the Tennessee Department of Education will offer a *Focus School Convening* support structure to help principals from Focus schools improve. After discussions with Focus School principals and staff members from across the TDOE, we believe that the state is best positioned to support 2015 Focus Schools by organizing and hosting regional convenings that bring together the principals and instructional leaders of Focus schools from that region and successful principals who have closed gaps in the past. During these convenings, leaders will be able to collaborate, share effective practices, and learn from one another.

Goals

- The purpose of these convenings is to establish an action-focused community of practitioners who can learn from each other's experiences, share tools and resources, and engage in learning and problem solving around areas of need.
- The goal of this support is to provide meaningful learning experiences for principals in Focus Schools that will enable them to implement effective practices that close achievement gaps in their schools.
- We will measure success based on positive survey responses from principals on their experiences in the cohort and by using student data to determine if participating schools meet their state-level AMOs for gap closure each year.

Structure

- Convenings will occur at least four times per year.
- Facilitators will be hired through a competitive application process to lead the sessions in a given region.
- Content will consist of general sessions based on the interview findings and could include topics like: effective PLCs, RTI^2 implementation, and data use and analysis. This will also serve as an opportunity to provide additional support directly to schools around some of the state's priority initiatives.
- Content will include case studies of schools in the state that have experienced success with closing achievement gaps. Convenings will focus on the specific strategies and behaviors that led to positive results in the case studies.
- Content will also include time for school planning and collaboration and will incorporate bridge to practice activities.

- Participants will identify promising strategies from these convenings and incorporate those strategies into school improvement plans. These plans will be submitted to the Office of Consolidated Planning and Monitoring via the *ePlan* platform for review and approval. The department will monitor and evaluate these plans based on student outcome data regarding the narrowing of achievement gaps and improved subgroup performance. Districts who do not show progress will be required to revise plan annually and adjust strategies and interventions.

The support structure will be optional, but for any LEA that chooses not to have its schools participate, the LEA will be required to describe its plan for ensuring the Focus schools will improve in addressing the achievement gap or area of struggling performance that led to its identification. These plans will be submitted to the Office of Consolidated Planning and Monitoring via the *ePlan* platform. The department will monitor and evaluate these plans based on student outcome data regarding the narrowing of achievement gaps and improved subgroup performance. Districts who do not show progress will be required to revise plan annually and adjust strategies and interventions.

2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

Schools will exit "focus" status when:

- Three years later, a school is not identified in the next "focus" list that is identified by TDOE; or
- Beginning summer 2015, using 2014-15 achievement data, for schools designated as a Focus school in August 2014:
    - Graduation rate exit (for those schools identified based on a graduation rate of less than 60% for all students):
        - Any identified focus school that has a graduation rate of exceeding 75% for the "All Students" group for the 2014 graduating class will exit focus status.
        - Focus schools that have a graduation rate of exceeding 70% will be deemed "Focus – *Improving, Graduation Rate*."
    - A school dramatically improves subgroup achievement based on the success rate calculation which includes the combined achievement results (the percent of students who are proficient or advanced) in mathematics, reading/language arts, and science.
        - Success rate exit (for those schools identified for having one or more subgroups with a 3-year success rate of 10% or less):
            - Any identified focus school that demonstrates a 1-year success rate exceeding 20% for the subgroup(s) that resulted in said school's focus determination will exit focus status.

        - Focus schools that demonstrate a 1-year success rate exceeding 15% for the subgroup(s) that resulted in focus determination will be designated "*Focus – Improving, Subgroup(s)*."
    - Subgroup gap exit (for schools identified based on achievement gaps between subgroups and comparison group):
        - Any identified focus school that demonstrates a 25% reduction in the percent below basic for the subgroup(s) that resulted in said school's focus determination will exit focus status.
        - Focus schools that demonstrate a 12.5% reduction in the percent below basic for the subgroup(s) that resulted in focus determination will be deemed "Focus – *Improving, Gap Closure*."
        - This proposed exit criteria reflects the updated gap closure metrics for use in district accountability. Prior to the determination of the next cohort of Focus schools in 2017 or later, the TDOE will reconsider the metric used to identify focus schools based on achievement gap methodology to align with district accountability.
- Beginning with 2015-16 achievement data for any school named a Focus School in August 2014:
    - Graduation rate exit (for those schools identified based on a graduation rate of less than 60% for all students):
        - Any school designated as "Focus – *Improving, Graduation Rate*" that has a graduation rate exceeding 70% for the "All Students" group for the most recent year will exit focus status.
    - Success rate exit (for those schools identified for having one or more subgroups with a 3-year success rate of 10% or less):
        - Any school designated as "Focus – *Improving, Subgroup(s)*" that demonstrates a 1-year success rate exceeding 15% for the subgroup(s) that resulted in said school's focus determination will exit focus status.
    - Subgroup gap exit (for schools identified based on achievement gaps between subgroups and comparison group):
        - After year 1 of TNReady and baseline is established, any school designated as "Focus – *Improving, Gap Closure*" that demonstrates a 12.5% reduction in the percent below basic for the subgroup(s) that resulted in said school's focus determination will exit focus status.

However, if a school has failed to make progress in the achievement of the sub-group or sub-groups of students which led to its identification on the focus list in the first place, it will remain in focus status and automatically be included in the next focus list identified by the TDOE. For example, if a school was originally included on the focus list because of the gap in achievement between economically disadvantaged students and non-economically disadvantaged students, but failed to make progress in the achievement of economically disadvantaged students over the next three years, it would remain a focus school.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

Provide the SEA's list of reward, priority, and focus schools using the Table 2 template. Use the key to indicate the criteria used to identify a school as a reward, priority, or focus school.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

LEA Name	School Name	School NCES ID #	REWARD SCHOOL	PRIORITY SCHOOL	FOCUS SCHOOL
TOTAL # of Schools:					

Total # of Title I schools in the State: __1208_____
Total # of Title I-participating high schools in the State with graduation rates less than 60%: ___10_____

Key	
Reward School Criteria: **A.** Highest-performing school **B.** High-progress school **Priority School Criteria:** **C.** Among the lowest five percent of Title I schools in the State based on the proficiency and lack of progress of the "all students" group **D.** Title I-participating or Title I-eligible high school with graduation rate less than 60% over a number of years **E.** Tier I or Tier II SIG school implementing a school intervention model	**Focus School Criteria:** **F.** Has the largest within-school gaps between the highest-achieving subgroup(s) and the lowest-achieving subgroup(s) or, at the high school level, has the largest within-school gaps in the graduation rate **G.** Has a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate **H.** A Title I-participating high school with graduation rate less than 60% over a number of years that is not identified as a priority school

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE I SCHOOLS

2.F Describe how the SEA's differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Incentives

We believe that transparency through state reporting and local management through district control will continue to be the primary drivers of action for local schools. However, unlike the accountability system under NCLB where 80 percent of Tennessee schools would be "failing" this year, the differentiated system we are proposing will return meaning to transparent reporting.

All schools and LEAs will continue to receive an annual report card with full transparency on:

- Progress against AMOs, including individual sub-group AMO targets
- School status as Reward, Priority, or Focus
- Achievement data by assessment, by sub-group performance
- Growth data by sub-group performance
- Participation and Graduation rates
- School environment
- School profile

To help the public synthesize transparency across multiple types of data, all schools will also receive a letter A-F grade (in addition to the public lists of reward, priority, and focus schools and the public lists for exemplary LEAs and LEAs in need of improvement). Letter grades will have the most impact differentiating schools that are not priority, focus, or reward, and differentiating schools within LEAs that have been designated exemplary or in-need-of-improvement. We believe that making data fully available and providing a clear synthesis of the implications of the data will enable school communities to better understand the state of their schools and the levers for improvement.

Tennessee provides letter grades in our report card today (see Appendix 3). Upon approval of this waiver application, we intend to re-align our grading system with this new differentiated accountability system. The school report card will continue to be managed by TDOE's Office of Accountability.

Support

The key element of our strategy to ensure continuous improvement in other Title I schools is through the monitoring and technical assistance provided by our eight Centers of Regional Excellence or CORE offices. The most effective way TDOE can drive school improvement broadly, through all principles under this waiver, is to enhance support to LEAs through CORE. Previously known as Field Service Centers, these offices traditionally supported compliance efforts across the state. However, we are shifting their focus to ensure a dual purpose: improving student outcomes in addition to continuing to

support compliance. Since 2012, we have restructured the CORE offices and the roles within them to fully pursue the mission of supporting districts in increasing student achievement. We intend to maximize support to LEAs by reducing our reliance on external vendors and building capacity in-house, particularly in field service centers. Increasing the number of regional staff will ensure that LEAs have more individual support; doing so in house will ensure that the support provided is always high quality. TDOE will place a particular focus in building FSC capacity in: technical assistance, data support, and content area specialists (e.g., English Learners, students with disabilities, K-8 Math, etc.); these content specialists will play a key role in leading implementation of Common Core state standards.

CORE will continue to work with LEAs to build capacity and ensure they can in turn effectively manage their schools. The study council structure provides a key opportunity to build capacity in this and other areas. Each CORE region has a superintendents study council, a supervisors study council, and a principals study council, in which all of the leaders in those positions for that region participate. CORE has now been tasked with ensuring a state role in those gatherings. Potential topics that the CORE might lead engagement around include effective implementation of key initiatives (including CCSS implementation and teacher and principal evaluation) and problem solving and best practice sharing around common challenges such as effectively supporting particular sub-groups of students.

Because a significant piece of our new accountability proposal relies on district management, we intend to drive most of our support for Title I schools through differentiated support for districts. As described earlier in this section, we intend to provide significant latitude for districts that are both increasing achievement and reducing achievement gaps at ambitious levels. We will provide school improvement planning support for districts that are making progress but not reaching goals. And we will provide significant school planning supports for districts that are failing to make progress. Essentially, in districts that do not demonstrate the capacity to increase achievement and reduce gaps, TDOE will use internal staff to engage directly with school planning. In districts that are making progress, we intend to use our CORE offices to support the districts in managing their school improvement planning locally.

The School Improvement Planning process aligns with TDOE's philosophy that LEAs are best positioned to support schools, that the state is best positioned to support LEAs in need, and that the state plays a critical coordination role. School level plans are submitted to the LEA for review and support. LEA plans are submitted to the CORE offices for review and support. Those LEAs that are making progress, but not meeting goals, as well as LEAs that are failing to make progress receive direct assistance in the planning process from TDOE. School and system improvement plans (SIPs) contain the required Title I components and these components are monitored by TDOE staff during district visits.

Collaborative school and system improvement planning begins with a needs assessment merged with data collection. Data collected and analyzed include: 1) achievement data (formative and summative), 2) value added data, 3) school climate perceptual data (student, family/community and staff), 4) graduation, promotion and retention rates, 5) discipline data, and 6) teacher evaluation information. Root cause analysis provides a basis for prioritizing challenges. School and system strengths are also ascertained.

Schools and systems use the prioritized needs as the foundation for SMART (specific, measurable, attainable, realistic and timely) goals. The school improvement process includes a review of researched-based interventions in curriculum, instruction, assessment, organization and leadership; this review assists the schools and systems in making data-driven decisions regarding the action steps that will be initiated to meet the goals for the school/system. Improvement plans are communicated to all constituents and representatives from all stakeholder groups participate in the improvement planning process. Finally, the process for monitoring the action steps, a timeline for implementation of the actions, and the resources that will be used for the actions are delineated in the SIP. Increasing CORE capacity benefits all LEAs and their school improvement planning, but LEAs that have been identified "in need of improvement" (due to missing Achievement AMOs, Gap Closure AMOs, or both) will receive varying degrees of additional attention. CORE staff will be more deeply engaged in supporting LEAs to develop differentiated plans for schools based on their characteristics and challenges. TDOE will ultimately sign off on the school improvement plans for all LEAs "in need of improvement". If a plan does not meet required thresholds for quality and feasibility, and deficiencies cannot be remediated through TDOE support and collaboration, then an LEA plan may be subject to state-directed rewrites.

Finally, we are also building LEA capacity to support other Title I schools (and all schools) through several key Race to the Top projects around increasing the data available to schools and LEAs and ensuring educators and district leaders are fully equipped to use this information to the fullest extent. These projects include an Early Warning Data System to provide teachers, school leaders, and district leaders with detailed data on students at risk of falling behind academically, an updated and revised TVAAS dashboard website to make student growth data more accessible and usable for educators, and training modules developed in collaboration by TDOE and Battelle for Kids on how to best use and integrate data to inform instructional decisions at every level.[26]

Tennessee's ESEA Flexibility Part B monitoring report included the next step that we would either provide evidence that that our CORE offices support LEAs in providing incentives and supports to other Title I schools in which students consistently miss performance targets (including AMOs, graduation rates, and other indicators) or a plan describing how we will do this in the 2014-2015 school year and beyond.

The schools that fell within this monitoring category were Title I schools that were not identified on the Reward, Priority, or Focus lists, and in which students consistently missed performance targets. We defined schools in which students consistently miss performance targets as those that did not pass the majority of their Achievement and Gap AMOs for the past two years (graduation rate is one of the AMOs for high schools; for a full list of AMO areas, please see appendix 4 of Tennessee's approved ESEA flexibility request).

[26] The modules include a variety of topics: 1). Maximizing the Usage of Value-Added Data; 2). Making the Case for Change; 3). Implementing Formative Assessment Practices; 4). Introducing and Implementing a Successful Strategic Compensation Model; 5). Ensuring Accuracy when Using Data Systems; 6). Providing Research and Innovation Expertise; 7.) Supporting Rural and Urban Educators Statewide. They can be accessed at http://portal.battelleforkids.org/tennessee/home.

To date, 21 Title I schools fall into this category. In the 2013-14 school year, 15 received substantial support either directly from the CORE offices or through the coordination of the CORE office with district leaders specifically to support the school in question. Six of the schools were in LEAs that participated only in general CORE activities such as superintendent or supervisor study council meetings that were not specifically aimed at supporting the Title I schools in this category.

In 2014-15, we will ensure that all of the Title I schools that fall in this category either receive substantial support from the CORE office or through coordination of the CORE office with district leaders, by assigning a point of contact from the CORE office in their region to work with district leadership at least twice a year to touch base on progress and coordinate additional CORE support as needed.

Other Title I Schools with Subgroup Performance Challenges

The TDOE will establish a clear and rigorous process for ensuring LEAs provide incentives and supports to other Title I schools that have one or more subgroups miss either AMOs, graduation rate targets or both metrics for two consecutive years. Similar to the TDOE's prior plan to support other Title I schools that missed AMO targets for all students for two consecutive years, the department will update its process to identify schools under this new criteria that focuses on subgroups.

As of August 2014, there were 21 other Title I schools that missed their AMO targets for all students for two consecutive years. Over the course of this academic year, all 21 schools have had a dedicated resource and support from Centers of Regional Excellence or CORE offices. We plan to update this list to identify other Title I schools for targeted based on the most recent two-year results (2013-14 and 2014-15) for subgroup AMO targets in August 2015.

With regard to incentives, the waiver application affirms the continued use of school lists including Reward, Priority, and Focus schools, as well as transparency in reporting. Upon approval of this waiver renewal, we intend to begin redesigning our school grading system (used only for public transparency reporting) to align with this newly proposed differentiated accountability system. It is our expectation that in fall 2016, the state will launch a school report card application that reflects the "heat map" information similar to what we have shown in sections 2.A of this waiver request. Moreover, we will use that information to provide a summary ratings system for individual schools for public stakeholders via the report card application.

In terms of support, the TDOE will continue to leverage the CORE offices to provide direct support to schools. We will invite these other Title I schools to participate in the Focus school convenings as detailed in 2.E of this waiver request as an optional support. For those LEAs that do not choose to participate in the convenings, they will be required to describe the system improvement plan for ensuring that these other Title I schools will make progress in addressing the achievement gap or area of struggling subgroup performance. These plans will monitored and evaluated for success based on student outcomes.

2.G Build SEA, LEA, and School Capacity to Improve Student Learning

2.G Describe the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:

i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;

ii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools; and

iii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

We are excited by the opportunity to build significant, sustainable capacity in LEAs, and in doing this, to substantially enhance LEA support for schools. Throughout this application we have reiterated our philosophy of holding LEAs accountable on behalf of their schools and of working through LEAs to support schools. We believe that the main path to success in the state is by supporting LEAs and building their capacity, rather than through punishment and intervention. In this section, we seek to add credence to this philosophy by outlining the additional resources we will commit to schools through LEAs.

TDOE will allocate a substantial pool of funding toward Priority and Focus schools, beginning with approximately $40 million in School Improvement Grant (SIG) funding in 2012, the majority of which we anticipate flowing through LEAs (see Appendix 9 for an outline of timeline and resources).[27] This funding will enable LEAs to build up LEA staff capacity, to invest in robust data systems, and to develop rigorous and innovative school improvement plans that are not constrained by current budgets. The impact of this funding will have spillover effects for all schools in an LEA. A portion of this funding will also enable TDOE to build up state staff capacity to monitor LEA and school progress, and to support LEAs (particularly in TDOE's regional field service centers) with technical and operational assistance.

Specifically, TDOE will support LEAs responsible for priority and focus schools by creating financial incentives for implementation and providing monitoring and technical assistance resources:

Support for Implementation

Priority schools

[27] Once ESEA flexibility for Tennessee is approved, the state will propose an amendment to its Race to the Top plan to align some of the dollars allocated on turnaround work to the state's new accountability system. Any dollar figures cited are contingent upon: the continuation of SIG funding, Race to the Top approval, and/or the reallocation of other state funds.

We will distribute approximately $40 million[28] for priority schools in the next year, and anticipate allocating further resources in the next few years. This funding will be used to: strengthen the ASD, incent LEAs to build LEA innovation zones, and support realistic, innovative SIG plans that are not constrained by current budgets.

In order to ensure that priority interventions are successfully implemented, it is imperative that the foundations for the ASD and the LEA innovation are firmly established and that SIG turnarounds continue to be funded sufficiently. We believe that targeted investment in the ASD and LEA innovation zones will enable them to scale more quickly and ultimately absorb all schools that are not succeeding in other LEA-led turnarounds.

All priority schools in the ASD and in LEA innovation zones are required to implement interventions that align directly with each of USED's turnaround principles and/or with one of the four School Improvement Grant turnaround models. Interventions will look different depending on whether a school is being managed by the ASD, an LEA innovation zone, or an LEA either through a SIG turnaround process of an LEA-led turnaround. The authority of the ASD and LEA Innovation Zones to make changes in line with USED's "turnaround principles" is consistent with the important concept that the ASD and LEA Innovation Zones are best positioned to make operating decisions at the school level and, by design, have received state approval to operate autonomously.

That said, in order to receive state approval, the ASD and LEA Innovation Zones are required to create conditions for schools that are perfectly aligned with USED's "turnaround principles," as described below. And all priority schools, including those in the ASD and in LEA innovation zones are required to implement interventions that align directly with turnaround principles and/or the School Improvement Grant turnaround models.

Turnaround Principles	ASD (pg. 53-57)	LEA Innovation Zone (pg. 58-61)
(i) providing strong leadership by: (1) reviewing the performance of the current principal; (2) either replacing the principal if such a change is necessary to ensure strong and effective leadership, or demonstrating to the SEA that the current principal has a track record in improving achievement	• An ASD school will be either direct-run by the ASD or run by a charter operator approved by the ASD. In both scenarios, new school leadership – principals and lead teachers – will be hired (existing staff may re-apply for a position) • A key tenet of the ASD is the notion of providing	• The Innovation Zone is required to hire (internally or externally) a leader for each school with the authority to hire his/her staff. The hiring decision will be based on the prospective school leader's ability to lead the turnaround effort • Furthermore, a requirement of the LEA,

[28] Once ESEA flexibility for Tennessee is approved, the state will propose an amendment to its Race to the Top plan to align some of the dollars allocated on turnaround work to the state's new accountability system. Any dollar figures cited are contingent upon: the continuation of SIG funding, Race to the Top approval, and/or the reallocation of other state funds.

and has the ability to lead the turnaround effort; and (3) providing the principal with operational flexibility in the areas of scheduling, staff, curriculum, and budget;	greater flexibility in exchange for a high degree of accountability. To this end, principals in ASD schools will have operational flexibility in scheduling, staff, curriculum, and budget.	the LEA School Board, and the LEA Innovation Zone is to allow schools, under governance of the LEA innovation zone office, to have autonomy over financial, programmatic, staffing and time allocation decisions
(ii) ensuring that teachers are effective and able to improve instruction by: (1) reviewing the quality of all staff and retaining only those who are determined to be effective and have the ability to be successful in the turnaround effort; (2) preventing ineffective teachers from transferring to these schools; and (3) providing job-embedded, ongoing professional development informed by the teacher evaluation and support systems and tied to teacher and student needs;	• **ASD-run schools:** All existing staff within an ASD school will be required to re-apply for a position with the ASD. Through this process, staff quality will be reviewed and only staff who are determined to be effective will be re-hired. ASD is investing heavily in recruiting and human capital management to secure a highly effective school staff. The ASD also has contracts with outside human capital providers to broaden its high quality candidate pool. • **Charter-run schools:** ASD has a rigorous application process for any charter management organization that seeks to operate an ASD school. As part of this application, the ASD vets a CMO's ability to attract, retain, and develop high quality teachers. After a CMO has been approved, it will be evaluated every 2 years leading to a robust new renewal process.	• Fostering human capital is a requirement of the Innovation Zone office. This requires that the Innovation Zone create favorable conditions (e.g., allow principals to build their own teams; provide specialized training for principals; develop clear recruitment incentives and selection criteria/ processes for turnaround teachers; performance contracts for teachers with hiring and dismissal flexibility) to attract and maintain high quality talent at all levels.
(iii) redesigning the school day, week, or year to include additional time for student	• All ASD schools will have autonomy over hiring, budget, schedule, and	• A requirement of the LEA, the LEA School Board, and the LEA Innovation Zone is

learning and teacher collaboration;	program. This includes the authority to redesign the school day.	to allow schools, under governance of the innovation zone office, to have autonomy over financial, programmatic, staffing and time allocation decisions
(iv) strengthening the school's instructional program based on student needs and ensuring that the instructional program is research-based, rigorous, and aligned with State academic content standards;	• The ASD is an autonomous school district that is held to the same standards as any other district in the State. It has the flexibility to make instructional changes in its schools as it deems necessary and has invested in a robust data team to ensure a data-driven approach to decision-making.	• LEA Innovation zones are held to the same standards as their LEAs. Moreover, they have the flexibility to make instructional changes in their schools more nimbly. • TDOE staff will review LEA Innovation Zone plans for the Zone as a whole as well as individual schools to ensure that their instructional programs are research based and rigorous
(v) using data to inform instruction and for continuous improvement, including by providing time for collaboration on the use of data	• The capacity to analyze data to inform decisions and make school improvements is integral to the ASD's design and operating structure. The ASD will have allocated data analysts who will be responsible for analyzing data to develop instructional strategies	• A requirement of the LEA to create an LEA Innovation zone is the commitment to hire, at a minimum, one full-time data analyst to serve priority schools • Like the ASD, this allocated data analyst will be responsible for analyzing data to develop instructional strategies
(vi) establishing a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement, such as	• All priority schools will be monitored through FSC field visits on school environment factors • Additionally, through the state's Safe and Supportive Schools grant, the schools will participate in a survey	• All priority schools will be monitored through FSC field visits on school environment factors • Additionally, through the state's Safe and Supportive Schools grant, the schools will participate in a survey

students' social, emotional, and health needs; and	yearly to assess school environment	yearly to assess school environment
(vii) providing ongoing mechanisms for family and community engagement?	• Open and honest communication with the community is another central tenet of the ASD's operations. The ASD has met with dozens of stakeholders and has held four community forums in Memphis to gather input on the four schools co-managed by the ASD today. • All priority schools will be monitored through FSC field visits on family and community engagement initiatives	• All priority schools will be monitored through FSC field visits on family and community engagement initiatives

TDOE will hold the ASD and LEA Innovation Zones accountable to these turnaround principles in the short term, based on state monitoring, and in the long term, based on school results.

Focus schools

We believe that the attention and public accountability for particularly large achievement gaps alone can kick start a school into effective action. To inspire ingenuity and innovation, TDOE will also support a competitive grant process where approximately 100 schools will receive $100,000 to invest specifically in initiatives targeted at closing the achievement gap (anticipating approximately $10 million to be spent on focus schools), pending U.S. Department of Education's approval of a Race to the Top budget amendment. This will allow schools to hire additional support to extend learning time, fund community services that will positively impact students, propose and test innovative solutions for solving the achievement gap challenges specific to the school, or undertake other targeted initiatives.

Monitoring and Technical Assistance

Our general philosophy is that the state is not able to effectively intervene in hundreds of schools, and as a result, we need to carefully prioritize our direct intervention at the school level and limit it to the places where we can add the most value. First, we will be closely monitoring the implementation of interventions in Priority schools, in keeping with this philosophy. Because of the clustering of priority schools (there are 85 priority schools across 3 LEAs in our draft list), TDOE can provide

concentrated LEA monitoring and technical assistance. Specifically, TDOE will allocate one full-time employee to any LEA with 5 or more priority schools to lead the monitoring of interventions in coordination with the federal programs team and the relevant Field Service Center. This will ensure that TDOE will have dedicated staff to not only monitor LEAs and schools based on clear goals and interim benchmarks (as we do today), but to engage in more thorough and time intensive monitoring activities that require staff members to spend more time on site, working collaboratively with LEA staff and schools. Greater TDOE staff time allocated on site will also increase accountability of LEAs and schools as TDOE staff will be able to better understand the challenges and possibilities in a given school and LEA. This is above and beyond the work of the ASD in Priority schools, as well as the technical assistance the Department's federal programs team is providing to LEA innovation zones for their work in Priority schools.

For Focus schools, we believe the most effective lever for change will be public accountability through the report card, the publication of lists, and overall transparency of data and information, including an annual publication of the progress of all identified Focus schools. There are 169 focus schools across over 60 LEAs in our initial, draft list. Because of the dispersion of focus schools, it makes sense for TDOE to work with LEAs to determine a system for monitoring focus schools' progress, where clear goals and interim benchmarks would be mutually agreed upon between TDOE and the LEA, and the LEA would be held responsible for monitoring and reporting progress. If progress is insufficient, TDOE will provide additional technical assistance to LEAs through FSC staff with expertise in strategies for improving achievement for specific subgroups of students. In addition, for the Focus schools that will be receiving competitive grant funds, their interventions through these funds will be monitored through either the First to the Top office or through the federal programs office (depending on whether the ultimate source of funding will be Race to the Top or SIG funding). LEAs that received funding for focus schools through the competitive grant process will have set a timeline for results in their application. If there is insufficient progress in these focus schools, TDOE has the right to revoke the grant. Our process and timeline for monitoring and providing technical support to Focus schools is described in further detail in section 2.E.iii.

<u>Interventions focused on the performance of English Learners, students with disabilities, and low-achieving students</u>

We believe deeply in the importance of improving the performance of English Learners, students with disabilities, and low-achieving students. The monitoring and technical assistance described above, as well as in sections 2.D on priority schools and 2.E on focus schools will be particularly focused on the lowest-performing groups within schools, including these populations of students. For example, the root cause analysis led by LEAs with the support of FSCs described in section 2.E.iii will focus specifically on the student groups most affected by within-school achievement gaps. TDOE's federal programs team has provided specialized types of technical assistance in the past. For example, we have provided the following kinds of assistance for students with special needs in high priority schools under NCLB.

- Data Professional Development was provided to teams from all High Priority Schools to assist the schools in determining which students are in need of more assistance to become proficient or advanced. In particular, this training provided the schools with collaborative methods to display and discuss data so that all teachers (special education and regular education) can work together to increase the achievement of

special education students. These data trainings also reiterated the need for a paradigm shift of special education teachers to be sure that they were teaching the current grade level standards (common core). They allowed high priority schools to better determine what students needed tutoring, movement to higher levels in response to intervention, and other issues that involved assistance to special education students. Finally, they provided a data-driven foundation for determining additional resources needed. Many high priority schools purchased additional intervention software to assist special education students and other students that were not proficient in mathematics and RLA.

- Job Embedded Professional Development regarding inclusion was provided by coaches and content specialist to assist regular education and special education teachers. This professional development has helped both sets of teachers to determine how they can best use their skills and knowledge to increase the achievement of the special education students including pedagogy sharing from special education teachers and content sharing from regular education teachers. The collaborative process of teaching in an inclusion classroom was also presented.
- Content professional development in Mathematics and RLA to increase teacher knowledge and pedagogy skills required with the move to Common Core Standards was presented. This professional development allows all teachers (special and regular education) to be sure that they have the knowledge and skills necessary to teach the Common Core standards. Appropriate instruction of the common core standards, using a variety of pedagogical skills, is necessary for special education students to be able to perform at the proficient/advanced level on the TCAP.

We would look forward to providing similar forms of specialized technical assistance in the future.

In addition, one of our key RTTT projects is building an Early Warning Data System that will use several research-based indicators to provide teachers and school leaders with detailed data on students at risk of falling behind academically. We will be piloting this system in spring of 2012, with statewide implementation in the summer of 2012. We believe this system will be useful for all schools and LEAs, and will particularly promote its use with priority and focus schools as a key tool in identifying low-achieving students.

<u>External providers</u>

When we use external providers of technical assistance and other services, we will be monitoring performance closely through the federal programs team. The ASD is already vetting all charter applicants through a rigorous new process from the National Association of Charter School Authorizers (NACSA). To get a sense of the rigor applied through this process, in the first round of this process only 3 charter organizations were advanced out of 8 applicants. Similarly, TDOE intends to create other rigorous review mechanisms to assess any external providers selected by LEAs and funded by SIG or Race to the Top funds. All external providers must be signed off on by TDOE. Generally, we plan to reduce reliance on external providers, and build greater capacity internally to provide technical assistance. To this end, we have already cancelled one of our provider contracts.

More broadly, all LEAs in Tennessee will have the authority to decide if and how they wish to provide public school choice and choice-related transportation to students attending Title I schools. LEAs may

also provide extended learning time or targeted remediation services that specifically address the student's individual academic needs. We will track the performance of students receiving supplemental education services and provide transparent information to LEAs so they can make the best possible decisions.

Statewide Strategy Update

The TDOE will continue to implement a statewide strategy to support and monitor LEA implementation of our proposed framework for differentiated recognition, accountability, and support based on our theory of action grounded in holding districts accountable for improving school and student performance. Our renewal application will update the district accountability framework as we have outlined in section 2.A of this waiver request. As a result of this update to district accountability, we will also propose adjustments to our support plan for districts.

For all districts, we will produce very detailed information on performance through the minimum performance gate "key" heat map, the achievement status heat map, and the gap closure status heat map. These visual scorecards will help to quickly identify areas of strength and opportunities for growth. Those content areas in either achievement or gap closure that show a lack of progress or progress that falls short of goals will lead to additional support via CORE resources and other networks for peer support between districts. Moreover, districts will be able to use this information to complete their needs assessment for system improvement plans submitted via the ePlan platform. As such, districts will be able to align resources and initiatives to target improvement in those identified areas.

For those districts designated In Need of Improvement, the TDOE will seek to provide customized support and additional resources to help those districts meet the needs of all its students. That customized support will include consultation and planning with the director of large district support or other designated individuals. In addition, districts that are In Need of Improvement will be included in the Office of Consolidated Planning and Monitoring's annual review process such that more refined diagnostic information will be identified. This review will be geared towards developing a comprehensive needs assessment that will govern the system improvement plan.

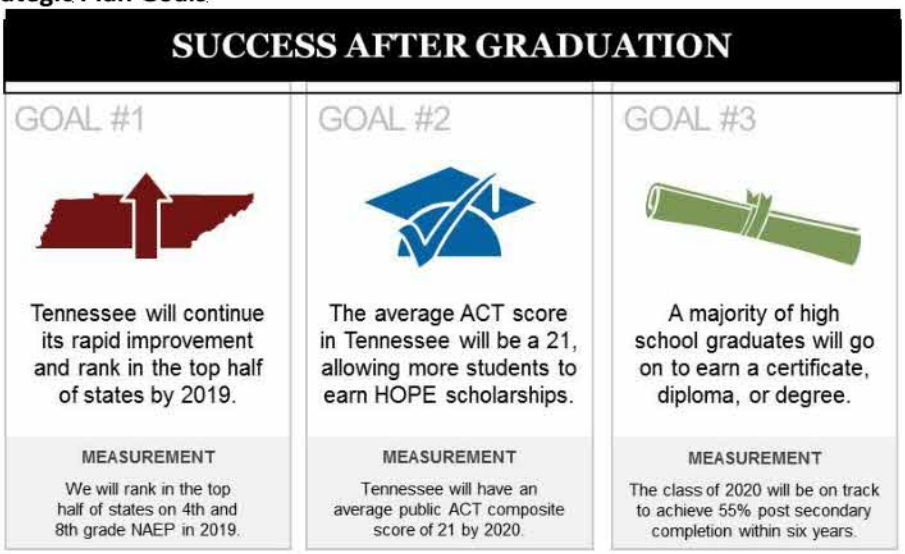
We are currently developing strategies to "embed" support personnel to help districts with specific areas of concern – such as RTI2, teacher evaluation, curriculum and instruction, data analysis, etc. These customized supports will be available as a "menu of options" from which districts will select the resources they prefer based on identified opportunities for growth aligned to the comprehensive needs assessment. Many of these personnel resources will be managed through the CORE offices.

The department has also just convened a District Planning Task Force to improve the ePlan platform such that it becomes the primary planning tool for districts and drives a thoughtful, effective strategic planning process that is updated annually. To date, we recognize that many districts see ePlan as a compliance tool that is separate from their actual planning process. We believe that improvements to the platform will help the TDOE better support districts and facilitate more robust planning for continuous improvement across the state.

The funding for these supports may be sourced via a statewide set-aside of ESEA funds that will be targeted and prioritized to support our CORE offices to provide additional capacity for In Need of Improvement districts. In addition, for all other state-awarded competitive grants, districts that are In Need of Improvement will receive competitive priority across early childhood, adult education, special education, 21st Century and other applicable programming categories for discretionary funding. These updates to the supports and resources available to In Need of Improvement districts will be finalized by summer 2016 and announced in conjunction with the first year of the updated district determinations.

The TDOE is also launching its next strategic plan which includes attention to a priority to promote district flexibility. The plan will include guidelines by which districts who are designated as Exemplary will be able to exercise increased autonomy and also serve as a peer resources for districts who need support in specific areas. The department will finalize its strategic plan in summer 2015 and include these provisions regarding increased flexibility and autonomy in communications after the plan is completed. The strategic plan will include five priorities: (1) Early Foundations; (2) Support Educators; (3) Empower Districts; (4) All means All; and (5) High School and Bridge to Postsecondary. Figure 14 provides an overview of strategic plan goals:

Figure 14: Strategic Plan Goals



Finally, in alignment with strategic plan goals and priorities, the TDOE is committed to the inclusion of appropriate input measures in future updates to the accountability framework. While we recognize that student outcomes are of utmost importance, we also recognize that there are certain behaviors by districts that have been shown through research to improve those outcomes, including closing achievement gaps. For example, our RTI2 framework is designed to address skill deficits for our lowest achieving students through providing high-quality instruction and research-based interventions. In addition, we have studied the equitable distribution of teachers in terms of the access of our lowest achieving students to our most effective teachers. We have found that student placement with highly effective teachers is a driver of achievement gains for our lowest performing students. Another example of a meaningful driver of student performance is the disparity in

discipline that results in more out of school suspensions for underperforming subgroups, leading to decreased instructional time for those students. Similarly, we have studied differences in access to and enrollment in advanced coursework for students in our subgroups when compared to all students. Both of these realities have meaningful implications for success after graduation for these students. These are a few examples of behavioral or input metrics that can be reasonably incorporated into our accountability framework in future amendments. The TDOE will continue our identification and development of such measures, such that we will be able to formally incorporate one or more of them as part our accountability framework in future amendments.

PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION AND LEADERSHIP

3.A DEVELOP AND ADOPT GUIDELINES FOR LOCAL TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS

Select the option that pertains to the SEA and provide the corresponding description and evidence, as appropriate, for the option selected.

Option A	Option B	Option C
☐ If the SEA has not already developed any guidelines consistent with Principle 3, provide: i. the SEA's plan to develop and adopt guidelines for local teacher and principal evaluation and support systems by the end of the 2011–2012 school year; ii. a description of the process the SEA will use to involve teachers and principals in the development of these guidelines; and iii. an assurance that the SEA will submit to the Department a copy of the guidelines that it will adopt by the end of the 2011–2012 school year (see Assurance 15).	☐ If the SEA has already developed and adopted one or more, but not all, guidelines consistent with Principle 3, provide: i. a copy of any guidelines the SEA has adopted (Attachment 10) and an explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students; ii. evidence of the adoption of the guidelines (Attachment 11); iii. the SEA's plan to develop and adopt the remaining guidelines for local teacher and principal evaluation and support systems by the end of the 2011–2012 school year;	☒ If the SEA has developed and adopted all of the guidelines consistent with Principle 3, provide: i. a copy of the guidelines the SEA has adopted (Attachment 10) and an explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students; ii. evidence of the adoption of the guidelines (Attachment 11); and iii. a description of the process the SEA used to involve teachers and principals in the development of these guidelines.

	iv. a description of the process used to involve teachers and principals in the development of the adopted guidelines and the process to continue their involvement in developing any remaining guidelines; and v. an assurance that the SEA will submit to the Department a copy of the remaining guidelines that it will adopt by the end of the 2011–2012 school year (see Assurance 15).	

Using Teacher and Principal Evaluation to Improve Student Achievement and Instruction
In July 2011, Tennessee became one of the first states in the country to implement a comprehensive, student outcomes-based, state-wide educator evaluation system. Implementing a statewide evaluation system for teachers and principals was a key tenet of Tennessee's First to the Top Act, passed in January 2010 with bipartisan support in the Legislature, from educator unions, community leaders, business leaders and public education advocates. The resulting Tennessee Educator Acceleration Model (TEAM) is a comprehensive evaluation tool designed to improve instructional practices. Given the current state of our student achievement results, it is the Tennessee Department of Education's goal to become the fastest-improving state in the country. Implementing the TEAM system during the 2011-12 school year not only reaffirms the state's commitment to reaching this goal, but accelerates a sense of urgency around improving student outcomes.

TEAM Teacher Evaluation
The TEAM program gives educators a roadmap to instructional excellence, a process to guide reflection, and a common language for collaborating to improve instructional practice and examine student outcomes.

Designed to include frequent observation for teachers and principals, the model facilitates constructive conversation between teachers and school leaders about improving practices and student results. Under the TEAM model, 50 percent of the educator's final effectiveness rating is based on observations conducted by trained LEA officials (principals, LEA employees, other administrators, et al.); 35 percent of the rating is based on a student growth measure; and 15 percent of the rating is based on an achievement measure that is cooperatively agreed upon between the educator and evaluator. Experienced teachers are observed four times annually, and novice teachers

are observed six times annually. The TEAM model differentiates educator performance into a one-through-five scale (from "significantly below expectations" to "significantly above expectations"), based on this observational data, student growth data and achievement data. TDOE and LEAs are able to continuously monitor educator effectiveness scores through observational and quantitative data sources, as they are uploaded into a central data system (described in greater detail in the next section).

The use of data from the Tennessee Value Added Assessment System (TVAAS) is a critical component of the TEAM system. Tennessee has the country's oldest value-added student growth model, and has been using TVAAS for nearly 20 years. In that time, Tennessee has captured tens of millions of student assessment records and calculated similar numbers of teacher effect reports that provide TDOE with a veritable vault of achievement and growth data that has informed both the FTTT legislation and the development of the TEAM system. For teachers, 35 percent of their overall evaluation is based on growth data, and 15 percent on achievement data. For teachers in tested subject areas, the 35 percent growth component is individual teacher effect TVAAS data; for teachers in non-tested subject areas, the 35 percent growth component is generally based on available school-wide growth data, with many pilots underway to allow more educators to use individual growth data in the future.

The TEAM model is in marked contrast to the pre-existing system. Previously, student achievement data was not considered, and there was insufficient differentiation of performance. In contrast, TEAM uses student growth data for 35 percent of the overall evaluation, and student achievement data for fully half, and allows for a clear distribution of results across five categories. Under the past system, tenured teachers were evaluated only twice over a 10-year period (in contrast with annual evaluations under TEAM). In contrast, TEAM provides frequent observation and feedback for all teachers. Furthermore, teachers were not treated as professionals with unique strengths and developmental needs, but instead as a monolithic group with no regard for individual differences. TEAM addresses these variations, enabling school leaders to provide tailored feedback that teachers can immediately use to improve their practices. Finally, in addition to providing differentiated, meaningful feedback, another chief objective of TEAM is to identify Tennessee's most outstanding classroom leaders, through the full model of both quantitative and qualitative measures. This will enable school and LEA leaders, for the first time, to tap into the state's greatest educational resource – our most outstanding teachers. We are learning what makes them successful, and how we can share, replicate and reward their best practices.

The First to the Top statute states that teacher and principal evaluations "shall be a factor in employment decisions, including, but not necessarily limited to, promotion, retention, termination, compensation and the attainment of tenure status."[29] All personnel decisions will continue to be made by LEAs. The state will not mandate that LEAs make any employment decisions based on educators' final TEAM effectiveness ratings, but instead hopes to give LEAs meaningful data in order to inform their personnel decisions. Tennessee also passed tenure reform legislation that extends the teacher tenure probationary period from three to five years, and requires teachers to perform "above expectations" (level 4 of 5) "or "significantly above expectations" (level 5 of 5) for two consecutive

[29] Tenn. Code Ann. § 49-1-302(d)(2).

years before receiving tenure.[30] Similarly, tenured teachers who perform "below expectations" (level 2 of 5) or "significantly below expectations" (level 1 of 5) for two consecutive years may be dismissed by their LEAs.

TEAM Educator Rubric

The TEAM Educator Rubric is based on the premise of ensuring rigorous learning for all students. The vision of excellence established by the rubric provides a clear foundation for teaching the Common Core State Standards. In addition, while the rubric itself is content-neutral and not tied to particular content standards, there are some clear connections to CCSS. For example, the "Teacher Content Knowledge" strand in the Instruction rubric correlates with the trend in math Common Core standards of emphasizing fewer concepts to a much greater depth. The descriptors for level 5 performance in that strand include, "The teacher regularly highlights key concepts and ideas and uses them as basis to connect other powerful ideas," and "Limited content is taught in sufficient depth to allow for the development of understanding."

In addition, the rubric clearly emphasizes the need to reach all students, including students with disabilities and English Learners. For example, the "Teacher Knowledge of Students" strand describes level 5 performance as including the following: "Teacher practices display understanding of each student's anticipated learning difficulties," and "Teacher regularly provides differentiated instructional methods and content to ensure children have the opportunity to master what is being taught."

The Department has been working with development teams for both English Learners and students with disabilities. Both teams have found the rubric to be helpful as a starting point for teachers of both these sub-groups of students, and are continuing to work with the TEAM team as well as higher education experts at the University of Tennessee Knoxville and Vanderbilt University on potential adjustments that may be needed in specific circumstances (for example, for teachers of students with severe and profound disabilities).

We expect to make adjustments to the TEAM evaluation model this summer, as we seek to continue to improve our implementation. We are currently implementing teacher and principal evaluation state-wide, and have structured processes for gathering feedback both internally (Department staff members have met with nearly 5,000 educators across the state), and through a third-party process facilitated by Tennessee SCORE. We will receive this report on June 1, 2012, and also aim to have TVAAS data by June 15 for the quantitative portion of the evaluations. We will then consider all of the internal and third-party feedback we have gathered, and will also be able to compare qualitative and quantitative evaluation results. By July 15, we will submit a report to the legislature on any changes we plan to make for the 2012-13 school year. By the end of July, we will work with the State Board to implement any policy changes needed for the 2012-13 school year. Throughout this process, we will consider any changes that may be necessary to strengthen connections to CCSS or to better support the performance of English Learners and students with disabilities.

TEAM Principal Evaluation

[30] Tenn. Code Ann. § 49-5-501, 503-4.

The implementation of the TEAM system for principals is another critical element of improving student outcomes across the state. The First to the Top Act requires annual evaluations for all principals and administrators. Tennessee is implementing comprehensive principal evaluation state-wide in the 2011-12 school year. Implementing a rigorous principal evaluation system during the current school year underscores Tennessee's commitment to ensuring that every school is led by strong instructional leaders, who will profoundly impact their students' achievement.

Principal and Assistant Principal evaluations are based half on qualitative and quantitative data. On the qualitative side, 35 percent of a principal's effectiveness rating is based on their performance on the Tennessee Instructional Leadership Standards (TILS) framework and 15 percent is based on an assessment of the quality of the teacher evaluations that the principal conducts. On the quantitative side, 35 percent of a principal's scores are based on school-wide growth data, and 15 percent on an achievement measure agreed upon by the administrator and their LEA evaluator. As with teachers, principals are scored on a 5 point scale, ranging from "significantly above expectations" (level 5 of 5) to "significantly below expectations" (level 1 of 5).

The TEAM principal evaluation is slightly different for Phase 1 principals (principals who are new to their LEA, school and/or level and those scoring "below expectations" or "significantly below expectations" on their most recent evaluation) and Phase 2 principals who are veteran administrators who scored "at expectations" or better on their most recent evaluation. See Appendix 10 for more details on both processes. In the TEAM model, principals are given opportunities to self-reflect, use formative assessments, and are required to have observations and conferences, conduct staff surveys (which the LEA can select) and hold summative conferences with their LEA evaluator.

We are currently in the process of working with superintendent and principal working groups to develop descriptive indicators for the TILS principal evaluation rubric. The TILS rubric has been in use in the state of Tennessee since 2008 as part of the Learning Centered Leadership initiative, and is familiar to administrators across the state. It was originally designed to be a developmental rubric, and so the existing descriptive indicators require some modification before they can be used for purposes of evaluation. For example, exemplary performance on an indicator related to engaging stakeholders in developing a school vision, mission and goals currently require that a principal be a leader at the district level in strategic planning and mentors developing school leaders in this school level process. While this makes sense in a developmental rubric as an advanced stage for veteran school leaders, this level of district leadership and mentoring is not necessarily appropriate in describing exemplary performance for all school leaders, including principals in their first year. Some districts have already created their own descriptive indicators for purposes of internal consistency, and the working groups will be examining these as we adopt a state-wide version for next year.

We have attached the existing TILS appraisal instrument indicators (see Appendix 20), used by some districts as a self-assessment tool for reference, but as noted above, we are in the process of developing the specific descriptive indicators that will be used for evaluation purposes. We decided to move forward with principal evaluation this year for two key reasons. First, as noted above, the TILS rubric is familiar to school leaders across the state because it has already been in use across the state. Second, we believe deeply in the importance of administrator evaluation in its own right, given the need for principals to be true instructional leaders as we seek to improve outcomes, and also as a

part of teacher evaluation. The 15 percent of principal evaluation based on quality of implementation of teacher evaluation is a key element to successful implementation of educator evaluation across the state.

Accountability for advancing the learning of English learners and students with disabilities
All educators, including full-time classroom teachers who provide instructional services to English Learners and students with disabilities and teachers of students taking the alternate assessment, are assessed 50 percent on quantitative measures (35 percent by student growth, and 15 percent by student achievement) and 50 percent on qualitative measures, as required by statute. For the 35 percent student growth measure, full-time teachers of English Learners currently use a school-level literacy growth data (which includes reading and writing scores, school-wide). This school year, we are piloting use of the English Language Development Assessment (ELDA) as a growth measure. Full-time teachers of students with disabilities currently use school-level student growth data, either overall data, or numeracy (math and science) or literacy (reading and writing) data, at the discretion of the district. We are piloting the use of Student Learning Objectives (SLOs) as a growth measure for this group, in which teachers set individual student learning objectives each year, monitor progress, and eventually rate their achievement of these objectives on a 1 to 5 scale. For the 15 percent based on student achievement data, all teachers, including full-time teachers of English learners and students with disabilities, choose from a menu of approved options in a decision made with their evaluator based on their specific context (see Appendix 18).

The alternative assessment for students with disabilities, the Modified Academic Achievement Standards (MAAS) is included in all school-wide student achievement scores and growth data.

On the qualitative side, all teachers, including full-time teachers of English Learners and students with disabilities, are assessed using an approved instructional rubric, whether TEAM or one of the three approved alternative models currently in use in certain LEAs.

3.B Ensure LEAs Implement Teacher and Principal Evaluation and Support Systems

3.B Provide the SEA's process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, including mechanisms to review, revise, and improve, high-quality teacher and principal evaluation and support systems consistent with the SEA's adopted guidelines.

Involving Educators in the Development of TEAM
In passing the First to the Top legislation into law in January 2010, and in developing TEAM, Tennessee brought together educators in to provide input and guidance related to the legislation, policy and implementation. Grounded in the reality that the state lags behind much of the rest of the country in student achievement, and has a profound "achievement gap" across income and race, educators from across the state mobilized around the widespread belief that a new evaluation system could provide a key lever for changing practice and improving student outcomes.

As such, state officials consulted and collaborated with educators to develop the TEAM model. The Tennessee Evaluation Advisory Committee (TEAC), a 15-member panel that included public school teachers and principals, developed and recommended to the State Board of Education guidelines and criteria for the annual evaluation of teachers and principals see (Appendix 11).

Teacher Evaluation

Over the course of several months, the Tennessee Department of Education (TDOE) also convened twelve development teams of teachers and content specialists in the non-tested grades and subject areas to make recommendations around alternative growth measures (see Appendix 12) for the new teacher evaluation system. Their recommendations were reviewed by a group of technical experts, and development teams reviewed and, where necessary, revised the recommendations based on feedback. Teachers' union representatives were involved in these meetings as well to assure that points of view from their constituents were represented.

Based on discussions of the TEAC, department officials then worked with The Tennessee Consortium on Research Evaluation and Development (TN CRED) to conduct field testing of four observational models of teacher evaluation with schools and LEAs throughout the state in the 2010-11 school year to learn more about the various appraisal instruments (see Appendix 13). The field test included 84 LEAs and more than 8,000 teachers. TN CRED conducted a rigorous review of the piloting of the each of the four models being considered for the state's observational model. TN CRED also conducted a series of focus groups with principals who took part in a field test of the principal qualitative instrument and changes were made based on participants' feedback. According to field test data, educators and evaluators reported that the TAP model provided useful feedback opportunities, encouraged reflection on strategies to improve instruction, and required less paperwork of the educators.

After months of thoughtful consideration of research and national models, analysis and dialogue with educators across the state, and in accordance with state law (which requires 50 percent of an educator's evaluation be based on qualitative observational data and 50 percent on student performance data), TDOE elected to adapt the TAP® rubric (see Appendix 14) as the qualitative instrument for teacher evaluation, and the Tennessee Instructional Leadership Standards (TILS) framework (see Appendix 15) as the qualitative instrument for principal evaluation in TEAM, the state-wide evaluation model.

The state has also invited all LEAs to submit their own models for the qualitative portion of the evaluation (see Appendix 16 that details alternate model development and alternate model implementation planning process). Following a year-long pilot and analysis phase, three alternate models were approved for the 2011-12 school year, and are currently being used in 10 of the state's 136 LEAs. The component percentages (50 percent qualitative, 35 percent student growth, 15 percent student achievement) are codified in state statute, ensuring that no matter which qualitative model an LEA elects to implement, there will be comparability across LEAs. Additionally, based on this year's results, we anticipate that additional LEAs will submit alternate models for approval by the state board. These models must follow state rules for the qualitative and quantitative proportional scoring,

and districts using alternate models must still meet the state's recommended range of distribution of results.

Principal Evaluation

We conducted administrator evaluation trainings last summer and early fall via webinar. Unlike teacher evaluation rater trainings where the TAP rubric had an existing tool for assessing inter-rater reliability, we were not able to utilize a formal tool to assess inter-rater reliability for administrator evaluation. Instead, we are working toward consistency among raters through several means. First, throughout our evaluation system (teacher and administrator), we are looking for a relationship between quantitative and qualitative measures as an indicator of consistency and reliability. In general, we expect to see higher qualitative rubric scores when we see higher quantitative student achievement results. We will continue to look for this relationship between quantitative and qualitative results and discuss in on-going conversations with school and district leaders.

We have also been working to develop more descriptors for the evidence in the 15 percent portion of administrator evaluation tied to quality of implementation of teacher evaluation, and to ensure calibration in this area. We are holding training sessions in January 2012 on evaluation that include the descriptors and greater guidance on this aspect of administrator evaluation. In addition, our data system for evaluation allows us to have a real-time sense of teacher evaluation data as it is entered, and therefore allows us to analyze for consistency. Finally, we are working with the working groups of principals and superintendents to revamp administrator evaluation training for this summer, and aspire to have an inter-rater reliability assessment as part of that process.

TDOE technical assistance and support

In implementing the TEAM model in 2011-12, TDOE is providing direct, intensive training on the new evaluation system. Over the summer of 2010, TDOE partnered with the National Institute for Excellence in Teaching (NIET) to train more than 5,000 evaluators, through an intensive process including an assessment to ensure a measure of consistency across evaluator ratings. TDOE also dispatched scores of implementation coaches, recruited full-time regional consultants to provide on-the-ground support for implementation of the system state wide, and trained nine field service centers to further assist LEAs in implementing the TEAM model.

TDOE has developed several avenues of ongoing communication to ensure that educators and evaluators have the resources necessary to implement the TEAM model. Channels for input and feedback include: training session surveys, webinars, conference calls, meetings and the clearly established communication on-line vehicles - team.questions@tn.gov and team.feedback@tn.gov - among others to inform and enhance the TEAM model. The team-tn.gov web-site, launched in August, provides a readily accessible and current channel of communication on implementing the model, and provides a host of up-to-date resources for educators and leaders. To date, TDOE has had several thousand interactions with teachers in assisting them with implementing the TEAM system. TDOE staff has held scores of trainings, Q&A sessions, calls, webinars, weekly communications, produced and disseminated scores of support and guidance documents, and have spoken to thousands of educators in assisting them in implementing this model (see Appendix 17 for an example of weekly email communication with updates and resources). This robust effort to support

the implementation of the TEAM program is one of the central components of TDOE's efforts to ensure the model's success in improving student outcomes.

TDOE monitoring and review

Because TEAM is a statewide system, most of its components are mandated by statute, State Board of Education policy, or TDOE guidelines. The only discretionary component is the 15 percent of teacher and principal evaluations comprised of an achievement measure to be selected from a TDOE-approved list by joint decision of the teacher/principal being evaluated and his or her evaluator. See Appendix 18 for TDOE-approved list of measures.

TDOE has developed a robust data system (see Appendix 19 for more information) that allows evaluators to enter observation scores and comments, allows educators to track their observation reports, calculates summative ratings, and allows LEA leaders and TDOE real-time access to data that will help determine where additional implementation support is needed. The data system already has several thousand records of observational data entered. On November 4, 2011, the State Board of Education adopted a policy change, stating that each year, TDOE will publish an anticipated range of distribution of evaluation results (from level 5, "significantly above expectations," to level 1, "significantly below expectations") for the coming school year, subject to variation based on differences in student achievement growth in individual schools and LEAs. The Department of Education will monitor observation scores throughout the year and enforce consistent application of standards across LEAs. Upon the conclusion of the school year and relevant data collection, the department will publish evaluation results by LEA. LEAs that fall outside the acceptable range of results, subject to student achievement scores, will not be approved to use alternate models for the following school year, and will be subject to additional training and monitoring by the department.

Next steps on TEAM implementation

The State of Tennessee, through its First to the Top Act has committed to rigorously evaluating educators, and TDOE will continue to work to improve the TEAM model. Among the most significant areas of continued work and progress are ongoing pilots of non-tested grades and subjects, in which TDOE and educators are collaborating to determine the best possible measures to use for the growth measures of non-tested subjects. TDOE also expects to learn a great deal from the ongoing implementation of three alternate observation models for the qualitative component of teacher evaluations, and potentially more in the future, as we continue to refine the TEAM model overall to most dramatically increase student achievement.

Tennessee Teaching Evaluation Enhancement Act

As part of several key initiatives to support Tennessee teachers, and in response to feedback from educators across the state, the governor proposed legislation to adjust and improve the state's teacher evaluation law. The legislation specifically addressed three major educator concerns:

1. the transition to new assessments and how it will impact evaluation scores;
2. too much weight being placed on student growth data for teachers in non-tested grades and subjects; and

3. school districts being forced to make decisions on hiring, placement, and compensation based strictly on student performance on state assessments.

The Tennessee Teaching Evaluation Enhancement Act (House Bill 0108 / Senate Bill 0119) was passed by the General Assembly during the 2015 legislative session and was signed into law by Governor Haslam on April 16, 2015. Any changes to the evaluation process outlined in the Tennessee Teaching Evaluation Enhancement Act will first be implemented during the 2015-16 school year.

The Tennessee Teaching Evaluation Enhancement Act provides for a phase-in approach. Under this approach, assessments administered in 2015-16 will account for 10 percent of the overall evaluation. In 2015-16, the remaining 25 percent of the teacher's multi-year TVAAS Evaluation Composite, which will continue to account for the 35 percent of the overall evaluation designated for individual growth, will come from any available prior year scores. However, if a teacher's single-year TVAAS Evaluation Composite is greater than their multi-year TVAAS Evaluation Composite, the single-year TVAAS Evaluation Composite will count for the full 35 percent designated for individual growth. This will give teachers the benefit of the doubt through the testing transition. It will help both teachers who have demonstrated strong growth on prior assessments but are still adjusting to the new assessments and teachers who immediately demonstrate strong growth on the new assessments. The rest of the weighting of the evaluation system will remain unchanged for these teachers, as observation scores will continue to count for 50 percent of the overall evaluation and achievement measure scores will continue to count for 15 percent.

Teachers in tested grades and subjects who generate TVAAS data in 2015-16, but do not have prior data from the 2013-14 or 2014-15 school years, will receive a single-year TVAAS Evaluation Composite, and will not receive a multi-year TVAAS Evaluation Composite. During the 2015-16 school year, the single-year TVAAS Evaluation Composite will count as 10 percent of these teachers' overall evaluation. The achievement measure will account for 15 percent of these teachers' overall evaluation, while their observation scores will account for 75 percent of their evaluation.

In 2016-17, 20 percent of the 35 percent TVAAS individual multi-year TVAAS growth measure will be based upon results from new assessments administered in the prior two-years. In 2017-18, after the third year of implementation, individual multi-year TVAAS growth measures based upon the new assessments administered in the prior three years will represent the full 35 percent of the individual growth measure.

Non-tested teachers who receive an individual growth score from an approved portfolio growth model (Fine Arts, Physical Education, or World Languages) will continue to use the same weighting as in prior years. The weighting for these teachers will continue to be 35 percent individual growth from the portfolio growth model, 15 percent from the achievement measure, and 50 percent from observation scores.

In response to educator feedback, the Tennessee Teaching Evaluation Enhancement Act reduces the weighting of school-level TVAAS Evaluation Composites for teachers who do not receive individual growth scores. A similar phase-in approach will be used as school-wide growth scores will count for 10 percent of the overall evaluation in 2015-16 and then permanently move to 15 percent in 2016-17 and beyond.

Attachment 7

The Tennessee Department of Education will provide its assessments and academic achievement standards under Principle 1 to the U.S. Department of Education for peer review upon request.