ESEA Flexibility

Request

November 14, 2011
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Revision 2: January 11, 2012
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U.S. Department of Education
Washington, DC 20202

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Paperwork Burden Statement

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	achievement standards to the Department for peer review, or a timeline of when the SEA will submit the assessments and academic achievement standards to the Department for peer review (if applicable)	
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COVER SHEET FOR ESEA FLEXIBILITY REQUEST

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

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

☒ 1. The requirements in ESEA section 1111(b)(2)(E)-(H) that prescribe how an SEA must establish annual measurable objectives (AMOs) for determining adequate yearly progress (AYP) to ensure that all students meet or exceed the State's proficient level of academic achievement on the State's assessments in reading/language arts and mathematics no later than the end of the 2013–2014 school year. The SEA requests this waiver to develop new ambitious but achievable AMOs in reading/language arts and mathematics in order to provide meaningful goals that are used to guide support and improvement efforts for the State, LEAs, schools, and student subgroups.

☒ 2. The requirements in ESEA section 1116(b) for an LEA to identify for improvement, corrective action, or restructuring, as appropriate, a Title I school that fails, for two consecutive years or more, to make AYP, and for a school so identified and its LEA to take certain improvement actions. The SEA requests this waiver so that an LEA and its Title I schools need not comply with these requirements.

☒ 3. The requirements in ESEA section 1116(c) for an SEA to identify for improvement or corrective action, as appropriate, an LEA that, for two consecutive years or more, fails to make AYP, and for an LEA so identified and its SEA to take certain improvement actions. The SEA requests this waiver so that it need not comply with these requirements with respect to its LEAs.

☒ 4. The requirements in ESEA sections 6213(b) and 6224(e) that limit participation in, and use of funds under the Small, Rural School Achievement (SRSA) and Rural and Low-Income School (RLIS) programs based on whether an LEA has made AYP and is complying with the requirements in ESEA section 1116. The SEA requests this waiver so that an LEA that receives SRSA or RLIS funds may use those funds for any authorized purpose regardless of whether the LEA makes AYP.

☒ 5. The requirement in ESEA section 1114(a)(1) that a school have a poverty percentage of 40 percent or more in order to operate a schoolwide program. The SEA requests this waiver so that an LEA may implement interventions consistent with the turnaround principles or interventions that are based on the needs of the students in the school and designed to enhance the entire educational program in a school in any of its priority and focus schools, as appropriate, even if those schools do not have a poverty percentage of 40 percent or more.

☒ 6. The requirement in ESEA section 1003(a) for an SEA to distribute funds reserved under that section only to LEAs with schools identified for improvement, corrective action, or restructuring. The SEA requests this waiver so that it may allocate section 1003(a) funds to its

LEAs in order to serve any of the State's priority and focus schools.

☒ 7. The provision in ESEA section 1117(c)(2)(A) that authorizes an SEA to reserve Title I, Part A funds to reward a Title I school that (1) significantly closed the achievement gap between subgroups in the school; or (2) has exceeded AYP for two or more consecutive years. The SEA requests this waiver so that it may use funds reserved under ESEA section 1117(c)(2)(A) for any of the State's reward schools.

☒ 8. The requirements in ESEA section 2141(a), (b), and (c) for an LEA and SEA to comply with certain requirements for improvement plans regarding highly qualified teachers. The SEA requests this waiver to allow the SEA and its LEAs to focus on developing and implementing more meaningful evaluation and support systems.

☒ 9. The limitations in ESEA section 6123 that limit the amount of funds an SEA or LEA may transfer from certain ESEA programs to other ESEA programs. The SEA requests this waiver so that it and its LEAs may transfer up to 100 percent of the funds it receives under the authorized programs among those programs and into Title I, Part A.

☒ 10. The requirements in ESEA section 1003(g)(4) and the definition of a Tier I school in Section I.A.3 of the School Improvement Grants (SIG) final requirements. The SEA requests this waiver so that it may award SIG funds to an LEA to implement one of the four SIG models in any of the State's priority schools.

Optional Flexibility:

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

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

ASSURANCES

By submitting this application, the SEA assures that:

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

☒ 2. It will adopt English language proficiency (ELP) standards that correspond to the State's college- and career-ready standards, consistent with the requirement in ESEA section 3113(b)(2), and that reflect the academic language skills necessary to access and meet the new college- and career-ready standards, no later than the 2013–2014 school year. (Principle 1)

☒ 3. It will develop and administer no later than the 2014–2015 school year alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities that are consistent with 34 C.F.R. § 200.6(a)(2) and are aligned with the State's college- and career-ready standards. (Principle 1)

☒ 4. It will develop and administer ELP assessments aligned with the State's ELP standards, consistent with the requirements in ESEA sections 1111(b)(7), 3113(b)(2), and 3122(a)(3)(A)(ii). (Principle 1)

☒ 5. It will report annually to the public on college-going and college credit-accumulation rates for all students and subgroups of students in each LEA and each public high school in the State. (Principle 1)

☒ 6. If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and uses achievement on those assessments to identify priority and focus schools, it has technical documentation, which can be made available to the Department upon request, demonstrating that the assessments are administered statewide; include all students, including by providing appropriate accommodations for English Learners and students with disabilities, as well as alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities, consistent with 34 C.F.R. § 200.6(a)(2); and are valid and reliable for use in the SEA's differentiated recognition, accountability, and support system. (Principle 2)

☒ 7. It will report to the public its lists of reward schools, priority schools, and focus schools at the time the SEA is approved to implement the flexibility, and annually thereafter, it will publicly recognize its reward schools. (Principle 2)

☒ 8. It will report annually to the public and each LEA will annually report to its SEA and to the public, beginning no later than the 2014–2015 school year, on the aggregate distribution of teachers and principals by performance level, including the percentage of teachers and principals by performance level at the State, LEA, and school level, and by school poverty quartile within the State and LEA. (Principle 3)

☒ 9. Prior to submitting this request, it provided student growth data on their current students and the students they taught in the previous year to, at a minimum, teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects in a manner that is timely and informs instructional programs, or it will do so no later the deadline required under the State Fiscal Stabilization Fund. (Principle 3)

☒ 10. It will evaluate and, based on that evaluation, revise its own administrative requirements to reduce duplication and unnecessary burden on LEAs and schools. (Principle 4)

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

☒ 12. Prior to submitting this request, it provided all LEAs with notice and a reasonable opportunity to comment on the request and has attached a copy of that notice (Attachment 1) as well as copies of any comments it received from LEAs (Attachment 2).

☒ 13. Prior to submitting this request, it provided notice and information regarding the request to the public in the manner in which the State customarily provides such notice and information to the public (*e.g.*, by publishing a notice in the newspaper; by posting information on its website) and has attached a copy of, or link to, that notice (Attachment 3).

☒ 14. It will provide to the Department, in a timely manner, all required reports, data, and evidence regarding its progress in implementing the plans contained throughout this request.

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

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

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

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

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

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

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

throughout our proposed new accountability system. A summary of comments received from educators can be found in Attachment 2.

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

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

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

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

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

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

constituents to raise questions and hear directly from the Commissioner on his thinking. Please see Appendix 1 for a summary of our recent engagement.

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

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

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

EVALUATION

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

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

OVERVIEW OF SEA'S REQUEST FOR THE ESEA FLEXIBILITY

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

1. explains the SEA's comprehensive approach to implement the waivers and principles and describes the SEA's strategy to ensure this approach is coherent within and across the principles; and

2. describes how the implementation of the waivers and principles will enhance the SEA's and its LEAs' ability to increase the quality of instruction for students and improve student achievement.

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

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

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

charter schools; and using distance learning to provide geographically isolated students access to rigorous high-level coursework. These initiatives are foundational to the state's winning Race to the Top plan.

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

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

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

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

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

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

1.A   ADOPT COLLEGE- AND CAREER-READY STANDARDS

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

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**
> Tennessee has demonstrated the political will and capacity to significantly change state-level standards through our work over the last two years. Furthermore, we previously committed to implement the Common Core Standards in our Race to the Top application, passed the necessary

rules, and have begun implementation. Our work raising standards is emblematic of the need for regulatory relief. By doing the hard work of raising our state standards and proficiency levels, we made it harder for schools to achieve AYP. We did the right thing for kids, but are now impeded in our efforts to improve instruction and increase student achievement by the outdated rules and standards of No Child Left Behind.

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

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

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

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

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

- **Inclusiveness**: As the CCSS standards for English Language Arts (ELA) make clear, "all students must have the opportunity to learn and meet the same high standards if they are to access the knowledge and skills necessary in their post-high school lives." Tennessee's plan has the same high expectations for *all* students, while recognizing the need for support and accommodations for students with disabilities and English Learners (ELs) to be able to achieve at such a rigorous level. We explain in further detail below how we will support struggling student populations in reaching these ambitious but achievable CCR goals.
- **Targeting the areas of greatest need**: There is one general subgroup for which we intend this plan to have the greatest impact: low-achieving students. Closing gaps is an overarching state

goal expressed in each waiver principle, and the CCSS plays a prominent role in raising expectations and achievement for underperforming students. Within this targeted area, math will be a particular focus: math tends to be the greatest weakness for our students, and math instruction the greatest weakness for our teachers. Because of this, the implementation timeline provided in Appendix 2, which explains how we will introduce the CCSS statewide and applies to all students and teachers, moves most aggressively on math standards.

- **Partnership**: The section below on stakeholder engagements emphasizes the crucial role of communication and partnership with all stakeholder groups. We also rely heavily on outside expertise: throughout the process, TDOE has collaborated extensively with Achieve, Partnership for the Assessment of Readiness for College and Careers (PARCC), and Council of Chief State School Officers (CCSSO). Our Commissioner sits on PARCC's governing board, and TDOE has been heavily involved in the CCSS project from the beginning. We will continue to draw from the expertise and technical support of these partner organizations.

- **Driving with data:** Only by collecting, reviewing, and analyzing actionable data will we know the success of implementation; only by acting on that data will our implementation efforts succeed. Several sections below explain the key role that data, especially educator feedback loops, plays in this plan.

- **Lead with strength; support with generosity:** CCSS implementation is too big an endeavor to leave up to chance. TDOE must set a strong CCR vision and devise a careful, thorough plan. But we also recognize that there are areas of implementation that TDOE cannot fully control: each LEA, school, administrator, teacher, student, and external stakeholder exerts his or her own level of independence and influence on the process. There are certain non-negotiable elements: most of these are the key implementation events in Appendix 2's timeline. But TDOE's plan also leaves considerable room for LEAs (and, by extension, schools, principals, and teachers) to exercise their expertise in deciding the best way to accomplish goals, with TDOE providing support and guidance.

- **Ensuring progress:** TDOE recognizes the incredible difficulty of this work. Simply stating our intentions and providing the proper information and training ensures nothing. It is at the very end of the implementation chain—in the classroom — where our success will be determined. Involving every classroom, teacher, and student throughout the state in not just understanding but leading this transition is a colossal undertaking. Thus, to drive our goals and to ensure the successful implementation of the following plan, under its forthcoming realignment, TDOE will establish a new office to oversee the implementation of CCSS and PARCC assessments over the next several years. This office will also be responsible for monitoring effectiveness at each stage of implementation. For more details, please see the final section on monitoring/sustaining progress.

- **Flexibility:** In requesting ESEA flexibility, we intend to be flexible ourselves. No plan, however detailed, can anticipate every single challenge or unexpected snags and development. TDOE is open to a process of constant improvement and will continue to tweak the plan as needed.

Foundation for CCSS Implementation

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

Governor's Office staff, and Achieve.

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

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

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

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

Table A: Timeline for CCSS implementation

	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. Additionally, for this year's kindergartners, the 3rd grade PARCC assessment in 2014-15 will be their first standardized test, so it makes sense to begin their education with CCSS. 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. We will then be fully prepared in 2014-15 for transition to PARCC assessments.

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 are partnering closely with all the PARCC states for all of our implementation of college- and career-ready standards and look forward to engaging with them around high school strategy in particular. We will serve as a conduit for districts and schools to the resources and cutting-edge technology developed in other states.

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

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[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).

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).

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.

Serving the needs of all students
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.

Tennessee's current English Language Proficiency (ELP) standards are aligned to the English Language Development Assessment (ELDA), a test which is administered to all ELs annually. However, it is not clear to what extent the ELDA corresponds with state standards in the content areas. In order to better align ELP instruction and assessments with the CCSS, and in order to ensure that ELs are capable of mastering the CCSS, Tennessee is committed to adopting new ELP standards and considering a new ELP assessment. As a member of the Common English Language Acquisition Standards (CELAS) state consortium, Tennessee is collaborating with 16 other states and CCSSO to develop the new set of standards aligned with the CCSS. The consortium's work also includes convening experts to analyze the "gaps" in language proficiency ELs might experience in confronting the linguistic complexity of the CCSS, and developing new assessments aligned to the new standards. The new standards developed by CELAS will thus be able to address the needs of ELs by requiring teachers to provide direct support when it comes to accessing the CCSS. After the completion of this work by summer 2012, the state's ESL task force—a committee of stakeholders from across the state, including teachers, administrators, and superintendents—will decide whether to adopt the new standards. Tennessee is also a member of the Worldwide International Design Assessment (WIDA) consortium, which is designing its own new assessments. With the help of the ESL task force, Tennessee will either adopt assessments from the CELAS or WIDA consortiums or design its own ELP assessment for the 2014-15 school year depending on which option is most closely aligned with the intent of the new ELP standards and with the content of the CCSS. Finally, TDOE's recent decision to extend accommodations to English Learners for up to two years after exiting the English as a Second Language (ESL) program will help those who have achieved proficiency but still occasionally struggle with the demands of mastering a new language to continue to learn the linguistically demanding content of the CCSS standards. TDOE will continue to engage closely and communicate with families of ELs and advocacy groups on these developments.

In addition to the ELDA, English Learners are currently assessed annually through the English Linguistically Simplified Assessments which are an accommodated form of the TCAP and end of course assessments for high school which remove some language barriers but assess the same content. Per federal guidelines, English Learners who have been in a U.S. school for less than 1 year may be exempted from the language arts and writing assessment in a one-time exemption. As we

transition to PARCC assessments in 2014-15, we will be collaborating with PARCC's Accessibility, Accommodations, and Fairness Technical Working Group, whose work is meant to "ensure the PARCC design includes accessible assessments that remain true to the intended vision of the assessment system" for both English Learners and students with disabilities.

Students with disabilities fall into two assessment categories: the 2 percent of all students who are unable to take the Tennessee Comprehensive Assessment Program (TCAP) standardized test because of disability take a modified test called the MAAS (Modified Academic Achievement Standards); the 1 percent of the student population classified as having significant cognitive disabilities submit an IEP portfolio. We recognize the need to help these students achieve at a CCR level and improve the rigor of these assessments. To that end, Tennessee has joined, along with 18 other states, the National Center and State Collaborative (NCSC; see http://www.cehd.umn.edu/nceo/projects/NCSC/NCSC.html), a consortium which intends to develop a new system of supports—including assessment, curriculum, instruction, and PD to help them graduate high school ready for postsecondary options. NCSC will create a framework aligned with CCSS that uses scaffolded learning progressions to bring these students towards an understanding of the core CCSS concepts. The bases of these scaffolded learning progressions, known as Common Core Connectors will be made available to states for the 2012-13 school year, and will be followed by lesson plans on key CCSS concepts. As a partner state, Tennessee has convened a 30-member community of practitioners—including LEA special education supervisors, special education teachers, TDOE staff, and other stakeholders (e.g. advocacy groups)—which participates in the NCSC work group focusing on PD; however, the state will have access to the work done by other states in assessment, curriculum, and instruction. After NCSC completes its work by the 2014-15 school year, the community of practitioners will advise TDOE on whether to adopt the new assessment system and related materials.

Students who do not fall into the 1 percent with significant cognitive disabilities will be required to take regular PARCC assessments in 2014-15. Because PARCC tests will be administered online, SWD populations will be able to take advantage of the principles of universal design, as accommodations, such as large text and read-aloud, can be built into the test items themselves. In order to help these students with the rigor of CCSS, we will convene a special committee of TDOE staff and external organizations and stakeholders to create a comprehensive student support plan, which explicitly enumerates the accommodations offered to support the needs of SWD students with the new standards to be fully implemented by the 2013-14 school year. The committee will begin by reviewing the CCSS from the perspective of students with a wide range of learning disabilities, and will make a recommendation to the state in time for the 2012-13 school year on whether to continue administering the MAAS through 2013-14 or adopt a transitional assessment to gradually bring the 2 percent of MAAS-tested students toward a PARCC-like model. The committee will then conduct a review of current research and compile a kit of best practices for teachers to use for teaching the CCSS to SWD. The set of strategies will be incorporated into PD for all teachers, not only those teaching in EL or special education classrooms. The state will also provide PD for special education teachers on writing standards-based IEPs correlated to CCSS.

Due to the rigorous nature of the standards, it is inevitable that some students, including those without learning disabilities or language deficiencies, will still struggle with new, higher expectations. The state will thus convene a committee to devise an intervention and support plan which will focus on providing remedial and "bridge" coursework in twelfth grade for students who are not on track to

graduate at the CCR level. In December 2011, we began working with four other states through the Gates-Southern Regional Education Board (SREB) College Transition Course Project on the development of bridge coursework modules to be available for use for the 2013-14 school year. The committee will also study the correlation between CCR and certain early signs (like attendance and course completion) to determine the "flags" that indicate when a student is unlikely to meet the CCR goal. We will then be able to use our robust data systems to provide student-level information to teachers, counselors, and administrators, who can provide early interventions. Training in this kind of intervention will be a crucial part of the summer PD sessions outlined in Appendix 2.

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 classroom level by convening teams of educators teaching common courses to discuss best practices for teaching the new standards and share new material.
- TDOE will disseminate all instructional materials made available from PARCC, such as the Model Content Frameworks, model instructional units, item and task prototypes, online PD modules, and K-2 formative tools.
- TDOE will develop a team of educators and other in-state experts to review textbooks and other curricular and instructional materials offered by vendors and, working in conjunction with Achieve and using publishing criteria from PARCC and CCSSO, will report on the degree of alignment. TDOE will then provide guidelines to LEAs on purchasing products from vendors to ensure these products are legitimately aligned with the CCSS.
- 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.

One curricular decision that PARCC leaves up to states is whether to transition to an integrated Math I-IV progression in high school. Currently, Tennessee does not plan to make changes to its

"traditional" math course pathways (with discrete courses in Algebra and Geometry, etc). As we receive more information from PARCC on the structure and content of its high school math assessments, we will consider ways to ensure that math curricula are closely aligned to the CCSS in each high school course.

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, creating deliverable products to take back to their schools and share with others, or judging materials provided by vendors and making recommendations for LEA adoption using PARCC resources). 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.

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 CCSS and able to assess the fidelity of teachers' implementation in the classrooms. We will be providing PD for all elementary and middle school principals next summer on the 3-8 math standards, in preparation for their partial implementation next school year, to ensure they 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 CCSS will be available to answer questions by phone and email so that teachers can receive immediate and knowledgeable feedback from experts. A list of these experts will be made available on the websites mentioned above.

Transition to new assessment/accountability systems
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.

PARCC assessments represent the next and final step in truly aligning our assessments with CCR standards. To prepare both students and teachers for PARCC assessments in 2014-15, TDOE will develop a comprehensive assessment plan to drive a gradual transition of its current state assessments toward a more rigorous, CCSS-aligned format. The assessment plan will take into consideration feedback from educators and assessment experts in determining how changes to assessments will correspond to student achievement scores and TVAAS data. In short, while Tennessee transitions to the CCSS, we will ensure that assessment appropriately captures what Tennessee teachers are delivering in their classrooms with predictability and transparency.

The assessment alignment process has already begun, with TDOE holding discussions with Pearson and its subsidiary, ETS. ETS, using an assessment crosswalk, is identifying "gap items" between the CCSS and Tennessee state standards, and using these findings to develop new CCSS-aligned items for the transition to PARCC. TDOE will also collaborate with Achieve, which has begun identifying the most important changes in CCSS and will provide guidance to vendors on developing new test items, in deciding which standards these new items will refer to, especially in math. When possible, the new items will be aligned with the standards to which the 3-6 "biggest shifts" pertain. They will also allow state tests to shift emphasis from low-level multiple choice questions to constructed response items requiring higher order thinking skills. The TCAP RLA exams will feature more informational text passages while maintaining the same length and structure. In cases where there is a misalignment in grade level between the old and the new standards, TCAP achievement tests will be modified to reflect the learning expected by the CCSS.

Over the next two years, the state will add to its TCAP exams these new CCSS-aligned items as field test items, which are randomly assigned to students, and which will grow in number as we approach

2014-15. While field test items do not count toward a student's test score, they can be evaluated so that the state can monitor student performance. The state plans to begin field testing items this spring for 3-8 math and in the 2012-13 school for the remaining grades and subjects, including CCSS prompts on the TCAP writing test, with the goal of having these new items analyzed and vetted for use as operational items administered to all students in the 2013-14 school year.

Overall, students and teachers will become familiar with the more rigorous, performance-based items that will appear in PARCC assessments and the presence of these new items will correspond with CCSS instruction. In all cases, teachers will be fully trained on all new standards before they will be assessed in classroom evaluations or their students will be assessed with summative exams. Finally, teachers, administrators, and supervisors have already received periodic updates on the development of the PARCC assessment model, and these updates will continue.

Transitioning technology to support new assessment/accountability systems
Administering online PARCC assessments to all students within three years represents an enormous challenge for LEAs. TDOE must take the lead in spreading awareness of the technological demands of PARCC and engaging stakeholders with information, support, and a sense of urgency. In cooperation with PARCC, TDOE will distribute purchasing guidelines with minimum technological specifications to LEAs to enable them to ramp up their technological capacity in preparation for administering computer-based PARCC assessments in 2014-15. TDOE will work with LEAs to conduct an in-depth study of capacity, with particular focus on broadband access and number of computer terminals, in order to determine which LEAs will need assistance in meeting these guidelines. Our Chief Information Officers (CIOs) will then craft a plan summarizing LEA capacity and including annual metrics to measure the scaling-up efforts, which TDOE can then use to monitor the pace of transition. In those cases where lack of funding is an issue, we will assist LEAs in creating partnerships with local businesses and non-profits to improve their technological capacity.

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. The state will also revise its licensure requirements by:
- Requiring new teacher and principal candidates to demonstrate mastery of CCSS content through a skills assessment or portfolio project.
- Updating reciprocation procedures to ensure that out-of-state teachers wishing to gain Tennessee licensure have received appropriate training in CCSS content or, alternatively, pledge to attend PD or take the relevant coursework.
- Requiring teachers entering the school system through alternative certification pathways to be trained in CCSS content.

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.

Tennessee is also a PARCC governing state, and THEC has been actively engaged during the previous year with campus faculty to prepare for implementation of the PARCC initiative. In addition, THEC will engage faculty who teach first year standards in using Algebra II and English III PARCC assessment results to determine if students are eligible for entry into credit-bearing courses during the freshman year of college or if remedial studies will be required, and to more closely align credit-bearing freshmen courses with the CCSS.

To prepare for implementation, a Tennessee PARCC steering committee was formed consisting of math and English faculty from across the state. These faculty members have participated in the development of the PARCC assessment and serve as representatives at their institutions regarding PARCC. Following formation of the steering committee, THEC convened a statewide PARCC Summit to engage with a larger group of faculty and educate them regarding the CCSS. This Summit was attended by over 30 math and English faculty from almost every public university, and all participants were fully briefed on the CCSS and the PARCC initiative. Of note, Dr. Carl Hite, President of Cleveland State Community College, serves as a member of the PARCC Advisory Committee on College Readiness, and formally represents Tennessee higher education in all PARCC discussions that center on college readiness.

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 CCSS/PARCC oversight office 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. For the first time, PARCC assessments will give us a legitimate, comprehensive, detailed, and annual measurement of our students' performance in relation to students in other states. Additionally, 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.	☐ 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	☐ 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 the State's Memorandum of Understanding (MOU) under that competition. (Attachment 6)		i. Attach evidence that the

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

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 cutting the 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[4]

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.[5]

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

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[4] Post-secondary enrollment is defined here as graduates of Tennessee public high schools enrolling in Tennessee public or private institutions only.
[5] Tennessee began setting Annual Measurable Objectives (AMOs) using this methodology in SY 2012-13.

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
We believe that the most important state function vis-à-vis performance targets 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 to set goals 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 hit the majority of their goals, the state will continue to support them and provide flexibility where possible to innovate.
- When LEAs miss half or more of their goals, the state will provide differentiated levels of intervention, depending on the LEA progress. LEAs that are making progress, but at a slower rate of growth than desired, will have a lower tier of intervention. LEAs that are not making progress in achievement 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 AMOs specifically:
  - When LEAs reach their achievement gap closure goals (i.e., successfully show that the students with the greatest needs advance the fastest), the state will continue to support them and provide flexibility where possible.
  - When LEAs miss achievement gap goals, the state will provide differentiated levels of intervention. LEAs that are demonstrating increased student achievement, but are failing to reach gap-closure goals, will have a lower tier of intervention. LEAs in which gaps are widening, either because they are not making progress in student achievement overall across gap closure areas, or because any individual sub-group is not making progress in a majority of target areas 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 meet both the aggregate student achievement goal and the gap reduction goal for a 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 that improve in overall achievement and gap reduction but do not "achieve" across either or both Achievement and Gap Closure categories will have 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 develop a report card grading all schools on an A, B, C, D, F scale. 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 <u>all</u> schools for <u>all</u> 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.

- o *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
- o *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.

In addition, we have built in a safeguard at the LEA level in our accountability system, in that if any individual sub-group is not making progress in a majority of areas at the LEA level, the LEA will be subject to intervention (inclusion on a public list for LEAs in need of subgroup improvement and meeting with the TDOE to support the creation of an aggressive plan for corrective action). This safeguard corresponds with our philosophy that the state cannot intervene effectively in hundreds of schools based on the performance of individual sub-groups. At the same time however, we also believe the state can incent effective LEA management of schools and of the performance of individual sub-groups within schools, and that we can monitor and support LEA efforts to do so.

Finally, we 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 2009-10 to 2010-11.

Through public accountability, the LEA-level safeguard regarding failure to make progress in individual sub-groups, 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.

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:** 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 a more comprehensive set of assessments that includes science for "Priority" identification (and the corresponding "Reward" identification based on the same methodology) because of the high stakes interventions associated with "Priority" and because we believe that including science both enhances the rigor of our assessment and encourages high achievement in all subject areas, particularly given the importance of science in guiding future job prospects for students. We have also included TCAP science in identifying focus lists because we believe it is important to include at least three areas of assessment for each grade level. High schools have graduation rates to consider in addition to Algebra and English; TCAP science provides a third category of assessment for grades 3-8. 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. i. Provide the new AMOs and an explanation of	☐ 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. i. Provide the new AMOs and an explanation of the method used to set these	☒ 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 new AMOs in the text box below.

the method used to set these AMOs.	AMOs.	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 targets, and (B) achievement Gap Closure targets.

We determine achievement targets 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, we have set a target of closing achievement gaps 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. For gap closure 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 close their gaps by 6.25 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 eight years, the achievement gap will also be halved. 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.

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

(A) Achievement Targets
At the 3-8 grade levels[6] we have set Achievement AMOs for percent of students who are proficient or advanced[7] in:
- 3rd grade Math
- 3rd grade RLA

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

- 7th grade Math
- 7th grade RLA
- 3-8 grades aggregated for Math
- 3-8 grades aggregated for RLA

At the high school level we have set Achievement AMOs for percent of students who are proficient or advanced in:
- End-of-course exam for Algebra I
- End-of-course exam for Algebra II[8]
- End-of-course exam for English II
- End-of-course exam for English III[9]
- Graduation rates

TDOE, in collaboration with LEAs and other stakeholders, determined this set of Achievement measures based on alignment with our Race to the Top goals. We will continue to measure and report out on all Race to the Top goals, which also include college going and credit accumulation goals (see full list at: http://www.tn.gov/firsttothetop/goals.html), but determined a more narrow set of achievement AMOs so that LEAs and schools would be able to focus on state assessments administered at the school level. Understanding that AMOs drive behavior, we have also decided to add aggregate grades 3-8 Math and RLA measures to mitigate an over-emphasis on 3rd and 7th grades.

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 current Race to the Top 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*

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[8] Assessment first administered in 2011-12 school year and first used in the accountability model in 2012-13.
[9] Assessment first administered in 2011-12 school year and first used in the accountability model in 2012-13.

Trends Through 2008-09, Part 5: Progress Lags in High School, Especially for Advanced 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 allow provisions for safe harbor based on growth, as demonstrated by Tennessee's value-added growth measure (TVAAS). Safe harbor 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 Race to the Top 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 a safe harbor protects LEAs and schools that advance student performance for individual students.

(B) Achievement Gap Closure targets
 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 achievement gap between particular comparison groups who have historically under-performed:
- racial/ethnic sub-groups currently performing below the state average, weighted by the size of the individual sub-groups that fall in this comparison group,compared to all students;
- Economically disadvantaged (ED) students compared to non-ED students;
- English learners (ELs) compared to non-ELs; and
- students with disabilities (SWD) compared to non-SWD.

The first comparison group considers the gap between achievement of all students at the state-level, and the achievement of any racial/ethnic sub-groups of students currently performing below the state average, weighted by the size of the sub-groups. We begin by identifying the racial/ethnic sub-groups of students state-wide who are currently performing below the state average. At the state-wide level, this includes African American, Native American and Hispanic student sub-groups. We would then determine the current achievement of the students in the comparison group at the relevant level (state, LEA, or school), as weighted by the population size of the individual sub-groups within it at the relevant level. We would compare the performance of this comparison group against that of all students at the relevant level (state, LEA, or school), to determine the achievement gap for this comparison. Finally, we would seek to halve that gap over the next 8 years.

For example, consider Hamblen County where 6.7 percent of students are African American, 1.2 percent are Asian/Pacific Islander, 15.1 percent are Hispanic, 0.6 percent are Native American/Alaskan, and 76.3 percent of students are white. State-wide, African American, Native American/Alaskan, and Hispanic students underperform the state average, and students of all three of these racial/ethnic groups attend schools in Hamblen County. As a result, Hamblen's comparison group would include each of these three groups, weighted by their percentage of the overall student population. We would then compare the performance of this comparison group against that of all students LEA-wide to determine the achievement gap in this comparison. Hamblen County would

then seek to halve that gap over the next 8 years.

At the 3-8 grade levels, we have based achievement gap closure targets for 3-8 aggregate math and 3-8 aggregate reading. At the high school level, we have based achievement gap closure targets on Algebra I, Algebra II, English II, and English III end- of- course exams.[10] We have combined Algebra I and Algebra II into a combined gap closure measure, and English II and English III into a combined gap closure measure. This allows for a balance of measures in 3-8 and high school at two each. We believe that this is a manageable set of assessments that provide a solid demonstration of the degree of achievement gaps in a school and LEA.

It is important to note that our achievement gap closure goals also satisfy the requirement set forth in this waiver application to establish subgroup-level AMOs. The combination of school- and LEA- wide achievement targets in the range of 6.25 percent annual reduction in the number of students below basic/basic nd 6.25 percent annual gap closure targets imply subgroup level achievement targets (as exhibited in Appendix 5), that in effect require subgroups that are farther behind to make greater rates of annual progress. We will continue to measure progress of each individual sub-group against sub-group AMO targets at the state, LEA, and school levels in public reporting. However, we think it is important to focus on gap closure AMOs for comparison groups in our accountability system rather than sub-group achievement AMOs because:

- While we acknowledge that sub-groups are performing at different rates of proficiency today, we believe communicating different expectations of proficiency for different subgroups at the state level sends the wrong message.
- At the same time, while we aspire towards one day being able to set the same proficiency targets for all subgroups, doing so today would ignore the pervasive achievement gaps that currently exist. Setting the same target for all sub-groups is unrealistic in a framework focused on consistent growth against baselines, and therein, also sends the wrong message.
- We believe that communicating a gap closure measure, in conjunction with achievement measures, focuses the communication on the right messages: we believe all schools and LEAs should realize an ambitious and achievable annual growth rate of approximately 6.25 percent across different measures and that this should be done while closing achievement gaps.

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

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[10] Tennessee began end-of-course testing in Algebra II and English III in 2011-12. We began using Algebra II and English III in the accountability model for 2012-13.

the 2017-18 school year.

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

- LEAs and schools have Achievement AMOs in addition to Gap Closure ones. 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 targets if lower-performing comparison groups are not making even faster progress.
- If any individual sub-group is not making progress in a majority of its measures, the LEA will "miss" its Gap Closure goals overall. For example, if Hamblen County meets its Gap Closure AMOs by making broad growth across its comparison groups and across most sub-groups of students, but Native American students did not make progress in a majority of measures, then the LEA would "miss" in the Gap Closure framework overall.
- 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 Gap Closure AMOs in our new accountability system, LEAs and schools are required to make greater rates of annual progress for sub-groups that are further behind. For example, in considering the category of 3-8 aggregate reading, the achievement gap between students with disabilities and students without disabilities is currently 9.3 percentage points (see Appendix 5). In order to achieve the annual gap closure goal, LEAs and schools will need to close the gap by approximately 6.25 percent or by 0.6 percentage points.. In contrast, the achievement gap between English Learners and non-English Learners in 3-8 aggregate reading is currently much larger at 39.0 percentage points. To achieve the gap closure AMO in this category, LEAs and schools will need to close that gap at a much faster rate of 2.4 percentage points in the following year.. This same methodology will hold true at the LEA and school levels. Any given LEA or school will need to make faster progress with the sub-groups that have larger achievement gaps than with those that have smaller ones in order to achieve their 6.25 percent gap closure goals across categories.

Achieving or missing AMO categories

Setting targets that strike an honest balance between ambitious and achievable means that even high-functioning schools will not achieve every target. Therefore, we believe the ability to allow schools and LEAs to miss some AMOs without being identified as "failing" is important.

As described above, we consider Achievement measures and Gap Closure measures as two distinct categories of AMOs. We will assess LEAs and schools based on whether they "achieve" or "miss" the Achievement category (aggregated) and whether they "achieve" or "miss" the Gap Closure category (aggregated).

To "achieve" in the Achievement category, an LEA/school must achieve more targets than it misses. If an LEA misses half or more targets (because student achievement did not improve, or because all students improved in achievement but did not improve enough), then this would constitute a "miss".

To "achieve" in the Gap Closure category, an LEA/school must:
- Achieve more targets than it misses
- An LEA must not widen achievement gaps because an individual subgroup did not make progress in achievement in the majority of its target areas (3-8 Math, 3-8 RLA, Algebra I/Algebra II, and English II/English III) or in any of the aggregate measures (3-8 Math, 3-8 RLA, and at least half of the high school measures).[11][12]

Missing either of the above stipulations would result in a "miss" in the Gap Closure category. For example, even if an LEA achieved more than half of its Gap Closure targets, it would still "miss" in the Gap Closure category if African American students did not make progress in a majority of gap target areas or did not make progress in any of the aggregate areas (3-8 Math, 3-8 RLA, Algebra I/II, and English II/III)[13].

Every LEA and school will be evaluated based on the combination of "achieve"/"miss" for Achievement and Gap Closure. However, in line with TDOE's overarching philosophy that the state can best intervene at the LEA level, TDOE will only engage directly with LEAs. TDOE will expect LEAs to engage meaningfully with their schools (and will support LEAs in this endeavor as necessary).

Differentiated interventions

As noted above in section 2.A, we believe that interventions for "missing" within the Achievement or Gap Closure categories 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…	Then, it will:

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[11] For example: an LEA must not widen its gap between Economically Disadvantaged students and Non-ED students because ED students made no progress in achievement in half or more target areas.

[12] Algebra I and II are combined into one target area by taking the average gap weighted by the size of the subgroup. English II and English III are combined into one target area by taking the average gap weighted by the size of the subgroup.

[13] In 2012-2013, the measures will be 3-8 Math, 3-8 Reading/Language Arts, Algebra I/II, and English II/III. Algebra I/II and English II/III would not be combined into one proficiency rate that is tested for improvement. Subjects would be considered individually, but both must improve. For example, if a district improved in Algebra I but not Algebra II, Algebra I/II would be considered a decline but if they improved in both it would be considered an improvement.

Achievement: Achieve **Gap Closure: Achieve**	• 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)
Achievement: Achieve Not Exemplary **Gap Closure: Achieve**	• Be given intermediate status
Achievement: Miss **Gap Closure: Achieve**	***If an LEA made no progress in achievement in half or more measures; OR no progress in either 3-8 math, 3-8 RLA, or the majority of high school measures:*** • LEA will be placed on public list of LEAs in need of improvement. • LEA must meet with TDOE to support the creation of an aggressive plan for corrective action. ***In all other cases (**i.e. the LEA missed half or more of its achievement targets, but made progress in the aggregate categories):* • *LEA must submit a detailed analysis of the results along with plans for the coming year to achieve goals, subject to TDOE approval.*
Achievement: Achieve **Gap Closure: Miss**	***If an individual subgroup made no progress in achievement in a majority of its gap target areas, or the LEA made no progress in achievement in half or more of its target areas overall:*** • LEA will be placed on public list of LEAs in need of subgroup improvement for the particular subgroup not making progress. • LEA must meet with TDOE to support the creation of an aggressive plan for corrective action. ***In all other cases (**i.e. the LEA missed half of more targets but made progress in at leass half of its target areas and did not have any individual subgroup that failed to make progress in half or more targets):* • LEA must submit a detailed analysis of the results along with plans for the coming year to achieve goals, subject

	to TDOE approval.
Achievement: Miss **Gap Closure: Miss**	• Be placed on public list of LEAS in need of improvement (for all students and subgroup achievement failures) • Meet with TDOE officials in person to support the creation of an aggressive plan for corrective action.

Please refer to Appendix 4 for a visual representation of AMO failure and consequences. Please also note the safe harbor provisions as well as other assessment standards below.

Rigorous nature of the accountability system
Tennessee's proposed accountability system requires districts to make ambitious progress, not only in overall student achievement, but in particular for the student sub-groups that are farthest behind. In 2010-11, student test scores rose significantly in Tennessee. Had the proposed accountability system been in place, the state's LEAs would have achieved the following results:
- On overall achievement growth, 92 LEAs would have achieved the goal, while 43 would have missed the goal.
- For gap closure, 30 LEAs would have achieved the goal, while 105 would have missed the goal.

Based on the differentiated accountability system proposed, Tennessee LEAs would have fallen into the following categories.
- 22 LEAs would have achieved "exemplary" status for achieving both goals.
- 63 LEAs would submit plans and analyses to the state department, detailing plans to improve performance in particular areas.
- 50 LEAs would have been placed on a list of LEAs in need of improvement, with corresponding interventions from the state department.
  - 35 would be on the improvement list for missing both overall goals.
  - 13 would be on the list even though the district hit the overall achievement goals. because the district did not make progress for an individual sub-group in a majority of the gap closure target areas for that sub-group, or because the LEA did not make progress in achievement across a majority of gap closure target areas overall.
  - 2 would be on the list because overall achievement failed to progress in most areas, even though the district hit gap closure goals.

The proposed 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 student achievement, either overall or for a sub-group that is an area of focus, require more significant intervention and public identification.

Process for setting LEA and school AMOs
Upon state board approval of the proposed state AMOs, TDOE will set LEA targets based on the methodology previously outlined. For achievement AMOs, LEAs will be required to reduce the number of students scoring below basic/basic on state assessments by 50 percent over eight years.

For gap closure AMOs, LEAs must close achievement gaps so that the current gap is reduced by 50 percent over eight years. LEAs may modify their school level AMOs so that school-level AMOs will, in aggregate meet or exceed the LEA level AMOs; LEA-level AMOs will, in aggregate, meet or exceed State-level AMOs.

As described in our supplement to our ESEA flexibility request of December 1, 2011, LEAs and schools recently set Race to the Top goals using a similar process to the one we plan to use in our new accountability system. We found this process to be successful in two specific regards. First, we succeeded in setting individual LEA goals that aggregated to our state-wide goals. 121 of 136 LEAs either accepted the state-level goals or set higher targets. Only 15 LEAs (11 percent) set goals that were lower than the state ones, and the total result for all LEAs aggregated to state-wide goals. Second, LEAs and schools were more invested as a result of engaging deeply in the process of setting their own goals. In 2012, districts were required to accept LEA level AMOs based on the methodology described above. LEAs may modify school level AMOs, but for SEA approval, school level AMOs must, in aggregate, meet or exceed LEA-level AMOs.

Under our new 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 FSCs 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.

Please refer to Attachment 8 to review a copy of the average statewide proficiency based on assessments administered in the 2010-11 school year in reading language arts and math for the "all students" group and all subgroups; or to Appendix 5 which outlines TDOE's proposed statewide AMOs.

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.[14] 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[15].

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[14] 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.
[15] Porter et. al. "The Effects of State Decisions About NCLB Yearly Progress Targets." Educational Measurement: Issues and Practice. 2005.

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
The State will include scores from every student enrolled and tested (every test taker (ETT)) in the school or LEA at the time of assessment administration whether or not enrolled for a full academic year. This means, that regardless of when a student enrolled, the student must test, and the score is counted toward the school, district, and state where it tested.

Safe Harbor
For the achievement side of the accountability model, we propose to have three safe harbor provisions: 1) student growth results from Tennessee Value Added Assessment System (TVAAS), 2) reduction of the percent below proficient, and 3) a confidence interval (CI) safe harbor which allows the LEA to pass an eligible subject if the percentage of Proficient/Advanced students meets the upper bound of the 95% CI
TDOE proposes to utilize our student growth results from TVAAS to align with the emphasis we have placed on TVAAS in teacher and principal evaluations (and the focus on growing every student, every year). Additionally, Tennessee has many small, rural LEAs and schools, and the use of proficiency targets alone can lead to identification based on shifts in individual student cohorts. Using value-

added growth as a safe harbor provision protects LEAs and schools that advance individual students' performance. To pass this Safe Harbor, a measure must either 1) receive an index value of 1 or higher (represented by a dark green in TVAAS) for the current year if it is an elementary or middle school measure or 2) receive an index of 2 or higher (represented by a dark green in TVAAS) in the current year if it is a high school subject . Since the following subjects have a value-added measure, they are used in the TVAAS Safe Harbor.

We will also maintain our current provision for safe harbor allowing that a school or LEA may achieve a goal if the percentage of below proficient students (either all students or a particular subgroup depending on the measure) decreases by 10 percent from the previous year, 19 percent from two years previously, or 27 percent from three years previously.

Graduation Rate is used on the achievement side of 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.[16]

For the gap closure side of the accountability model, we propose one safe harbor provision: the school or LEA can meet the Safe Harbor if the subgroup met or exceeded their subgroup target for that subject and the gap stayed the same or decreased. For Algebra I/II and English II/III, in order to meet the safe harbor, a district must meet the subgroup target for all subjects with valid tests (both subjects or one subject if the other does not have a valid target). This safe harbor mechanism will protect districts that do not meet their gap closure AMO due to strong growth in both groups. [17]

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. 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

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[16] 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).

[17] 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).

levels.

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[18] 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[19]

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[18] We have developed higher level Algebra II and English III which we will include when we have sufficient data.
[19] 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

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)
    - 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 [20]

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.

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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)

[20] Ibid

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.

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.[21]

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[22] of:
- Graduation rates[23]
- 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)

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[21] 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.

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

[23] 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.

- 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)

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.

Requirements of the LEA
- *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.

Requirements of the School Board:
- *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

Requirements of the Innovation Zone office:
- *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)

- o Secure direct access to the superintendent
- o Administer SIG and other grants
- o 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.
  - o 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.
  - o 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

Requirements of Priority schools absorbed by the Innovation Zone:
- *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

Requirements of TDOE:
- *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.

All priority schools that fall into this fourth category will be absorbed either by the ASD or an LEA innovation zone by 2014-15. However, 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.

We have identified a draft list of 85 schools based on 5 percent of 1,687 schools, and we anticipate that our final list determined in the summer of 2012 (which will include 2011-12 data) will have a similar number. We will serve this first cohort of priority schools using a combination of the four interventions outlined above.

Beginning in 2012-13 school year, we anticipate that the ASD will have the capacity to manage approximately 6 schools – 3 schools through direct ASD run operations and 3 schools through charter organizations. We will also work with the LEAs with identified priority schools (there are 3 LEAs identified in the draft lists submitted with this application but there may be more when we re-run the final list next summer 2012) to either establish innovation zones or, in the case of LEAs that already have some version of an innovation zone, make necessary refinements to their current structures to ensure that they will offer similar flexibilities to schools as the ASD. We anticipate that, at a minimum, 3 LEAs will decide to adopt innovation zones that meet the requirements outlined above and that they will be able to each operate 3 schools, in line with what the ASD will also be able to direct run in the first year. Of the remaining approximately 70 schools, we anticipate that the majority will apply for SIG turnaround grants and that through our competitive screening process some portion will gain approval. If we estimate that roughly half will begin SIG turnarounds, then the remaining 35 schools will be managed directly through LEA-led turnarounds.

In 2013-14, we anticipate that the ASD will scale and have capacity for an additional 12 schools

(through a combination of direct-run and charter). Similarly, we anticipate that LEA innovation zones will also scale and have capacity for an additional 9 schools collectively. The capacity for 25 new schools to have access to more comprehensive interventions either through the ASD or through their LEA innovation zones will be filled by 25 schools that were being managed directly through the lower-level LEA-led turnaround intervention. The decision around which schools would be handed off from the LEA to the ASD or the LEA-innovation zone would be made based in part through collaborative conversations between the ASD and the LEA.

After the end of the 2013-14 school year and before the start of the 2014-15 school year, all priority schools will be evaluated on academic progress. If in 2 years, any LEA innovation school's student achievement does not improve, then the school will be absorbed by the ASD. If any LEA innovation zone has slower rates of improvement across schools overall compared to the ASD, then the LEA innovation zone will lose the right to expand into new schools until achievement growth in their existing schools improves to ASD levels. If in 2 years, any SIG turnaround school's achievement does not improve sufficiently, then the school will be absorbed by either the ASD or by an LEA innovation zone that is able to expand into new schools. If in 2 years, a school in LEA-led turnaround does not appear to be making enough progress to get off the priority list for the 2nd cohort (to be identified in the fall of 2014 and inducted beginning in the 2015-16 school year), then it will be absorbed by either the ASD or by an LEA innovation zone that is able to expand into new schools.

To demonstrate how progress across the four groups of schools may work, we have an approximate timeline below. Under any scenario, we will have no schools in the LEA-led turnaround category by 2014-15.

Illustrative: 85 Schools – approximate anticipated timeline

	2012-13	Change	2013-14	Change	2014-15
ASD	6 schools	**+ 12**	18 schools	**+17**	35 schools
LEA Innovation zones	9 schools	**+ 9**	18 schools	**+6** **- 2**	23 schools
SIG turnarounds	35 schools		35 schools	**- 11**	24 schools
LEA-led turnaround	35 schools	**- 25**	10 schools	**- 10**	0 schools

Note: an increase in schools in the ASD or LEA Innovation zones corresponds to increased capacity. A decrease in schools in LEA innovation zones corresponds with schools that are absorbed by the ASD; a decrease in schools in SIG turnaround or LEA-led turnaround corresponds with schools that are absorbed by the ASD or effective LEA innovation zones.

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 passes its achievement AMOs two years in a row

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.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 5 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)
3. Schools with the largest within-school gaps between comparison groups (largest gaps to threshold of up to 10 percent of schools in the state)

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, we identified 1 school through this pathway.

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.

As levels of student achievement increase across the state, we expect fewer and fewer schools to fall below this threshold. Therefore, we will increase the composite threshold to 10 percent by the next time that we identify Focus schools, which will take place after the 2013-14 school year.[24] The threshold will then continue to increase by 5 percent each subsequent time we run the list.

3. Gap analysis:
There are many ways we explored defining a "gap" but we ultimately decided that Tennessee's focus school list should reflect schools that have the largest and most pervasive achievement gaps. Furthermore, we decided that there would be two forms of "safe harbor": (1) if a school has reduced its achievement gaps 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.

To determine "largest" gaps, we accounted for both the degree of a gap between comparison groups (e.g. 40 percent gap between the comparison group of racial/ethnic subgroups of students currently performing below the state average and all students), and the percent of the school population size in the underperforming group (e.g. students in the comparison group of racial/ethnic subgroups

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[24] Although priority and focus interventions will last for three years for the schools identified in the summer of 2012, we plan to run our next identification of Priority and Focus schools after the 2013-14 school year to provide schools a planning year before the next round of interventions begins.

currently performing below the state average comprise 50 percent of the student body).

To determine "most pervasive" gaps, we looked at the pervasiveness of a gap between the same comparison groups across assessments and high school graduation rates; we considered the gaps between multiple sets of comparison groups; and we also plan to use three years of data to capture pervasiveness of gaps over time. As noted elsewhere, we currently have access to only two years of data because cut scores were changed for assessments in the 2009-10 school year, but we will include three years of data when we run the final Focus school list this summer.

We assessed gaps between the following four sets of complementary sub-groups:
- Comparison group of racial/ethnic subgroups of students currently performing below the state average vs. All students[25]
- Economically Disadvantaged (ED) vs. Non-ED
- English learners (EL) vs. Non-EL
- Students with disabilities (SWD) and Non-SWD

At the high school level for our draft list submitted with this application, we assessed achievement gaps based on an equally weighted composite of:
- Graduation rates
- End-of-course Algebra I (Percent proficient and advanced)
- End-of-course English II (Percent proficient and advanced)

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 ensure that small population sizes would not skew the analysis, we established that any comparison group with an N less than 30 would be suppressed.

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.

Please refer to Appendix 8 for a detailed step-by-step explanation of our methodology.

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.

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[25] 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.

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 Field Service Centers. See section 2.F for more detail on our approach to the Field Service Centers (FSCs).

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 Field Service Center 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, FSCs will work with LEAs to identify schools with that have common characteristics to the LEAs' focus schools but are achieving much better results, in order to learn from the higher-performing schools. FSCs 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, TDOE and the FSCs 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.[26])

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.[27] 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

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[26] 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
[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.

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.

Timeline
Focus schools will be identified once every 3 years, in line with priority identification. The first identification will occur in summer 2012. LEAs will then work on improvement plans throughout the summer, and will apply for competitive grants in fall 2012. 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. Competitive grants may be 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. Each summer we will publish the results of all Focus schools and the progress they are making toward closing achievement gaps.

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
- A school passes its gap closure AMOs two years in a row

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
See Attachment 9 for Tennessee's List of Reward, Priority, and Focus Schools					
TOTAL # of Schools:					

Total # of Title I schools in the State: __1120_____
Total # of Title I-participating high schools in the State with graduation rates less than 60%: ___9_____

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 9 regional Field Service Centers (FSCs). The most effective way TDOE can drive school improvement broadly, through all principles under this waiver, is to enhance support to LEAs through the FSCs. FSCs have 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. The FSC directors are currently reporting directly to Commissioner Huffman to provide him a direct lens into their work and help align them to their new dual mission and purpose. We have analyzed staffing models, and are fully staffing the FSCs to pursue the dual goals of student achievement and compliance support by this summer. 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.

FSCs will 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 FSC 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. FSCs have now been tasked with ensuring a state role in those gatherings. Potential topics that the FSCs 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 FSCs 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 Field Service Centers 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 FSC capacity will benefit 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. FSC 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.[28]

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

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[28] 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.

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). [29] 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
We will distribute approximately $40 million[30] 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.

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[29] 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.
[30] 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.

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 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;	• 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 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 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, 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	• **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	• 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

to teacher and student needs;	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.	maintain high quality talent at all levels.
(iii) redesigning the school day, week, or year to include additional time for student learning and teacher collaboration;	• All ASD schools will have autonomy over hiring, budget, schedule, and program. This includes the authority to redesign the school day.	• A requirement of the LEA, the LEA School Board, and the LEA Innovation Zone is 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	• The capacity to analyze data to inform decisions and make school improvements is integral	• A requirement of the LEA to create an LEA Innovation zone is the commitment to hire, at a

for collaboration on the use of data	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	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 students' social, emotional, and health needs; and	• 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 yearly to assess school environment	• 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 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.

Interventions focused on the performance of English Learners, students with disabilities, and low-achieving students
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.

- o 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.
- o 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.
- o 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.

External providers
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.

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; iv. a description of the process used to involve teachers and principals in the development of the	☒ 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.

| | 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."[31] 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 years before receiving tenure.[32] 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

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[31] Tenn. Code Ann. § 49-1-302(d)(2).
[32] Tenn. Code Ann. § 49-5-501, 503-4.

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
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 lead 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.