



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF THE DEPUTY SECRETARY

January 10, 2012

The Honorable Bill Haslam  
Office of the Governor  
State Capitol  
Nashville, Tennessee 37243-0001

Dear Governor Haslam:

I am writing in response to Tennessee's request to amend its approved Race to the Top grant project. Between September 16, 2011, and January 10, 2012, the State submitted several amendment requests and supporting documentation to the U.S. Department of Education (Department). As you are aware, the Department has the authority to approve amendments to your plan and budget, provided that such a change does not alter the scope or objectives of the approved proposal. On October 4, 2011, the Department sent a letter and revised "Grant Amendment Submission Process" document to Governors of grantee States indicating the process by which amendments would be reviewed and approved or denied. To determine whether approval could be granted, the Department has applied the conditions noted in the document, and compared it with the Race to the Top program Principles, which are also included in that document.

I approve the following amendments:

- In the "Achievement School District (ASD)" project, the State believes additional capacity is needed to ensure the State has the school leaders and management structures in place to fully implement the ASD. The State will create six new positions, a director of communications, two recruiters (one half time), a chief operating officer, a chief officer of portfolio management, and a Memphis-area Superintendent, to prepare for full ASD implementation in school year (SY) 2012-2013.
  - To support a portion of costs associated with these positions, the State will utilize funds already in the personnel and fringe budget cost categories that were not needed in Year 1 or Year 2 to support previously established positions.
  - The State will also shift some contractual funds within this project budget to personnel and fringe to cover the remaining cost to support these six new positions in Years 2 through 4 and to support the two positions established in the State's September 27, 2011, amendment approval for Years 3 and 4. Based on actual executed contracts, the State's four-year contractual total for the [www.ed.gov](http://www.ed.gov)

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“Achievement School District” project is \$12,110,777 less than initially budgeted. The State will shift \$2,221,824 of this total to support personnel and related benefits.<sup>1</sup> The State still believes that when the ASD directly manages schools it will have alternative funding streams to support these positions. However, due to the number of schools that will be taken in each year, it believes that SY 2014-2015 is a more appropriate timeline for the ASD to assume those costs.

- In “(A)(1) Goals, Measures, Baselines and Final Race to the Top Targets,” refine the college enrollment and college course completion baseline and target performance measures to provide data aligned with the program definition. See appendix 1 for the revised college enrollment measures and appendix 2 for the revised college course completion measures in *bold italic*. Given that the revised measures are based on a different scale and cohort of students, it is not possible to directly compare them to the initial baselines and targets provided in Tennessee’s application appendix A-14 -18.

As defined in the Race to the Top application, college enrollment refers to the enrollment of students who graduate from high school consistent with 34 CFR 200.19(b)(1) and who enroll in an institution of higher education (IHE) (as defined in section 1010 of the Higher Education Act, P.L. 105-244, 20 U.S.C. 1001) within 16 months of graduation. As defined in the Race to the Top application, college course completion (also known as college credit attainment) refers to the number of students who complete at least a year’s worth of college credit that is applicable to a degree within two years of enrollment in an IHE. During the Year 1 Annual Performance Report (APR) data collection, it came to the attention of the State and the Department that Tennessee’s college enrollment and college course completion baseline data and targets were not calculated in alignment with the definitions provided above. At the time of application, the State used a cohort of students defined as first-time freshman aged 19 and younger who enrolled in a public institution in the summer, fall, or spring semester of the reporting year. Tennessee indicated that the initial data provided for this measure was based on an approximate count of high school graduates and may have included private high school graduates enrolling as first-time freshman and out-of-state high school graduates who enrolled in Tennessee’s public institutions of higher education. Furthermore, this data did not consider enrollment within the 16 months of high school graduation.

The revised figures for college enrollment provide student-level data for Tennessee public high school graduates enrolling in a Tennessee public institution or in a participating institution of the Tennessee Independent Colleges and Universities Association (TICUA) within 16 months. The revised figures for college course completion are consistent with the program’s enrollment definition, and further track whether or not students who enrolled within 16 months earned a year’s worth of college credit applicable to a degree (defined by Tennessee as 24 credit hours). The State’s baseline and targets for both measures are now provided only in aggregated form (i.e., for all IHEs) rather than disaggregated by university type. The Race to the Top application did not ask States to provide these performance measures disaggregated by university type. The State believes that increasing college going rates overall is a more meaningful way to determine Tennessee students’ postsecondary progress.

- In “(D)(2) Improving Teacher and Principal Effectiveness Based on Performance” and “(D)(3) Ensuring Equitable Distribution of Effective Teachers and Principals” clarify and adjust the performance measures as described below. See appendix 3 for the revised (D)(2) measures and appendix 4 for the revised (D)(3) measures in *bold italic*.

Tennessee’s application stated that a qualifying evaluation system would be implemented in SY 2011-2012. Consistent with this timeline, in its (D)(2)(ii) performance measures, Tennessee indicated ‘0’ for the percentage of participating local educational agencies (LEAs) with qualifying evaluations for teachers and principals, respectively, in SY 2009-2010 and SY 2010-2011. A qualifying evaluation system must be in place before a State would be able to report meaningful data on the use of that system to inform human capital decisions or the distribution of educators within rating categories. As a result, Tennessee has clarified that its performance measures for (D)(2)(iv)(a)-(d) and all of (D)(3) for SY 2009-2010 and SY 2010-2011 are not applicable (N/A) rather than zero.

In (D)(2), the State will also revise its targets for the percentage of participating LEAs with qualifying evaluation systems that are used to inform compensating teachers and principals in SYs 2011-2012, 2012-2013, and 2013-2014.

- At the time of the application, the States projected a baseline of 20 percent of LEAs using a qualifying evaluation system to inform decisions about compensating teachers and principals. Based on participation in the State’s Teacher Incentive Fund grant as well as in Race to the Top-funded projects, including the Innovation Acceleration Fund and the Competitive Supplemental Fund, the State has since determined that 10 percent (14 LEAs) is a more accurate baseline for SY 2011-2012.
- The State also underappreciated the time and capacity at the State education agency and LEA levels needed to increase the number of participating LEAs using the evaluation to inform compensation decisions. The State believes that growing the number of LEAs using the evaluation for such decisions by 5 percent each year for the next two years to reach 28 LEAs by the end of the grant period is a more feasible goal. In the future, when assessing the State’s implementation, the Department will maintain transparency around the initial four-year targets and will manage to this new goal.

In (D)(3), the State will also revise its targets for SYs 2011-2012, 2012-2013, and 2013-2014 for the metrics related to evaluation ratings of teachers and principals in LEAs (with qualifying evaluation systems) designated in poverty or minority categories.

- At the time of the application, Tennessee reported data in this section inconsistent with the required performance measure. The State provided baseline information based on data from the State’s existing evaluation system which provided scores for teachers in tested grades and subjects based on the Tennessee Value-Added Assessment System (TVAAS). So, for “percentage of teachers in schools that are high-poverty, high-minority, or both who are highly effective,” the denominator was limited to just teachers in tested grades and subjects rather than all teachers. Additionally, the State also provided targets based on designation in one of the poverty or minority categories listed in the measure,

but did not consider “both.” The State’s revised targets reflect the appropriate denominator of all teachers in LEAs with qualifying evaluation systems and to address the potential duplicate counts of educators in LEAs with both a poverty and minority designation.

- The State’s revised targets also reflect an updated theory of action around the State’s anticipated range of distribution of evaluation results. In supporting documentation and conversations between the Department and the State regarding this request, the State indicated that it carefully studied past TVAAS data, reviewed results of schools nationwide implementing the Teacher Advancement Program (TAP) observation rubric in the first and succeeding years, examined data on student performance in Tennessee, and looked at research on normal distributions of performance in teacher and other professions to determine expected ranges across multiple rating categories. The State believes that these distributions will serve as a research-based tool to help schools and LEAs reflect on their data and protect equity of implementation across LEAs.
- In “(E)(2) Turning Around the Lowest-Achieving Schools,” to ensure alignment with the program’s definition, the State will update its baseline and targets to represent the number of schools expected to initiate a model in each year of the grant period rather than the number of schools designated in particular categories by the State. See appendix 5 for the revised measures in *bold italic*.

At the time of the application, Tennessee reported data in this section inconsistent with the required performance measure. The State provided baseline information based on schools eligible for the Achievement School District and targets based on schools to be designated in low-achieving categories (e.g., Tier 1, Tier 2). While schools designated in these categories may implement intervention efforts, the State does not require or support them to fully implement one of the four models.

The revised figures provide targets for the number of schools fully implementing one of the four federally-defined intervention models each year.

Tennessee also clarified its National Assessment of Educational Progress (NAEP) goals for grade eight reading and math to align with the years in which NAEP is administered. In its application, the State provided a baseline for SY 2007-2008 and targets for SYs 2009-2010, 2011-2012, and 2013-2014. The State maintains its overall targets and sub-group targets, but clarifies that the baseline is for SY 2008-09 data and the subsequent targets are for SYs 2010-2011, 2012-2013, and 2014-2015, respectively.

If you need any assistance or have any questions regarding Race to the Top, please do not hesitate to contact Tennessee’s Race to the Top Program Officer, Jessie Levin, at 202-453-6651 or [Jessie.Levin@ed.gov](mailto:Jessie.Levin@ed.gov).

Sincerely,

//s//

Ann Whalen

Director, Policy and Program Implementation  
Implementation and Support Unit

cc: Commissioner Kevin Huffman  
Meghan Curran

<sup>1</sup> The State indicated it will propose its use of the remaining \$9,888,953 in a separate amendment request.

### Appendix 1: College Enrollment (A)(1)

	Actual Data: Baseline (Current school year or most recent)	End of SY 2010-2011	End of SY 2011-2012	End of SY 2012-2013	End of SY 2013-2014
All Students	54%	54%	55%	57%	59%

As defined in the Race to the Top application, college enrollment refers to the enrollment of students who graduate from high school consistent with 34 CFR 200. 19(b)(1) and who enroll in an institution of higher education (as defined in section 1010 of the Higher Education Act, P.L. 105-244, 20 U.S.C. 1001) within 16 months of graduation.

## Appendix 2: College Course Completion (A)(1)

	Actual Data: Baseline (Current school year or most recent)	End of SY 2010-2011	End of SY 2011-2012	End of SY 2012-2013	End of SY 2013-2014
All Students	70%	71%	72%	73%	75%

Also known as college credit attainment, college course completion refers to the number of students who complete at least a year's worth of college credit that is applicable to a degree within two years of enrollment in an institution of higher education.

### Appendix 3: Performance Measures (D)(2)

<p align="center"><b>Performance Measures</b></p> <p>Note: Data should be reported in a manner consistent with the definitions contained in this application package in Section II. Qualifying evaluation systems are those that meet the criteria described in (D)(2)(ii).</p>	<p align="center">Actual Data: Baseline (Current school year or most recent)</p>	<p align="center">End of SY 2010-2011</p>	<p align="center">End of SY 2011-2012</p>	<p align="center">End of SY 2012-2013</p>	<p align="center">End of SY 2013-2014</p>
<p>(D)(2)(i) Percentage of participating LEAs that measure student growth (as defined in the Race to the Top notice).</p>	100	100	100	100	100
<p>(D)(2)(ii) Percentage of participating LEAs with qualifying evaluation systems for teachers.</p>	0	0	100	100	100
<p>(D)(2)(ii) Percentage of participating LEAs with qualifying evaluation systems for principals.</p>	0	0	100	100	100
<p>(D)(2)(iv) Percentage of participating LEAs with qualifying evaluation systems that are used to inform:</p>					



<p align="center"><b>Performance Measures</b></p> <p>Note: Data should be reported in a manner consistent with the definitions contained in this application package in Section II. Qualifying evaluation systems are those that meet the criteria described in (D)(2)(ii).</p>	<p align="center">Actual Data: Baseline (Current school year or most recent)</p>	<p align="center">End of SY 2010-2011</p>	<p align="center">End of SY 2011-2012</p>	<p align="center">End of SY 2012-2013</p>	<p align="center">End of SY 2013-2014</p>
<p>(D)(2)(iv)(a)</p> <ul style="list-style-type: none"> <li>Developing teachers and principals.</li> </ul>	<p align="center">0</p> <p align="center"><i>N/A</i></p>	<p align="center">0</p> <p align="center"><i>N/A</i></p>	<p align="center">100</p>	<p align="center">100</p>	<p align="center">100</p>
<p>(D)(2)(iv)(b)</p> <ul style="list-style-type: none"> <li>Compensating teachers and principals.</li> </ul>	<p align="center">0</p> <p align="center"><i>N/A</i></p>	<p align="center">0</p> <p align="center"><i>N/A</i></p>	<p align="center">20.0</p> <p align="center"><i>10.0</i></p>	<p align="center">30.0</p> <p align="center"><i>15.0</i></p>	<p align="center">&lt;50.0</p> <p align="center"><i>20.0</i></p>
<p>(D)(2)(iv)(b)</p> <ul style="list-style-type: none"> <li>Promoting teachers and principals.</li> </ul>	<p align="center">0</p> <p align="center"><i>N/A</i></p>	<p align="center">0</p> <p align="center"><i>N/A</i></p>	<p align="center">100</p>	<p align="center">100</p>	<p align="center">100</p>
<p>(D)(2)(iv)(b)</p> <ul style="list-style-type: none"> <li>Retaining effective teachers and principals.</li> </ul>	<p align="center">0</p> <p align="center"><i>N/A</i></p>	<p align="center">0</p> <p align="center"><i>N/A</i></p>	<p align="center">100</p>	<p align="center">100</p>	<p align="center">100</p>
<p>(D)(2)(iv)(c)</p> <ul style="list-style-type: none"> <li>Granting tenure and/or full certification (where applicable) to teachers and principals.</li> </ul>	<p align="center">0</p> <p align="center"><i>N/A</i></p>	<p align="center">0</p> <p align="center"><i>N/A</i></p>	<p align="center">100</p>	<p align="center">100</p>	<p align="center">100</p>

<p><b>Performance Measures</b></p> <p>Note: Data should be reported in a manner consistent with the definitions contained in this application package in Section II. Qualifying evaluation systems are those that meet the criteria described in (D)(2)(ii).</p>	<p>Actual Data: Baseline (Current school year or most recent)</p>	<p>End of SY 2010-2011</p>	<p>End of SY 2011-2012</p>	<p>End of SY 2012-2013</p>	<p>End of SY 2013-2014</p>
<p>(D)(2)(iv)(d)</p> <ul style="list-style-type: none"> <li>Removing ineffective tenured and untenured teachers and principals.</li> </ul>	<p>0</p> <p>N/A</p>	<p>0</p> <p>N/A</p>	<p>100</p>	<p>100</p>	<p>100</p>

### Appendix 4: Performance Measures (D)(3)

<b>Performance Measures for (D)(3)(i)</b> <i>Note: All information below is requested for Participating LEAs.</i>	Actual Data: Baseline (Current school year or most recent)	End of SY 2010-2011	End of SY 2011-2012	End of SY 2012-2013	End of SY 2013-2014
Percentage of teachers in schools that are high-poverty, high-minority, or both (as defined in the Race to the Top notice) who are highly effective (as defined in this notice).	23 <i>N/A</i>	25 <i>N/A</i>	35 <i>27</i>	45 <i>30</i>	60 <i>33</i>
Percentage of teachers in schools that are low-poverty, low-minority, or both (as defined in the Race to the Top notice) who are highly effective (as defined in the Race to the Top notice).	34 <i>N/A</i>	34.5 <i>N/A</i>	40 <i>44</i>	50 <i>45</i>	60 <i>46</i>
Percentage of teachers in schools that are high-poverty, high-minority, or both (as defined in the Race to the Top notice) who are ineffective.	32 <i>N/A</i>	25 <i>N/A</i>	19 <i>32</i>	13 <i>30</i>	<10 <i>27</i>
Percentage of teachers in schools that are low-poverty, low-minority, or both (as defined in the Race to the Top notice) who are ineffective.	24 <i>N/A</i>	21 <i>N/A</i>	17 <i>27</i>	12 <i>26</i>	<10 <i>25</i>

<b>Performance Measures for (D)(3)(i)</b> <i>Note: All information below is requested for Participating LEAs.</i>	Actual Data: Baseline (Current school year or most recent)	End of SY 2010-2011	End of SY 2011-2012	End of SY 2012-2013	End of SY 2013-2014
Percentage of principals leading schools that are high-poverty, high-minority, or both (as defined in the Race to the Top notice) who are highly effective (as defined in the Race to the Top notice).	26  <i>N/A</i>	28  <i>N/A</i>	36  <b>36</b>	48  <b>39</b>	60  <b>42</b>
Percentage of principals leading schools that are low-poverty, low-minority, or both (as defined in the Race to the Top notice) who are highly effective (as defined in the Race to the Top notice).	41  <i>N/A</i>	42  <i>N/A</i>	46  <b>45</b>	52  <b>46</b>	60  <b>47</b>
Percentage of principals leading schools that are high-poverty, high-minority, or both (as defined in the Race to the Top notice) who are ineffective.	42  <i>N/A</i>	40  <i>N/A</i>	33  <b>37</b>	22  <b>34</b>	<10  <b>31</b>
Percentage of principals leading schools that are low-poverty, low-minority, or both (as defined in the Race to the Top notice) who are ineffective.	28  <i>N/A</i>	27  <i>N/A</i>	21  <b>30</b>	16  <b>29</b>	<10  <b>28</b>

<b>Performance Measures for (D)(3)(ii)</b>	Actual Data: Baseline (Current school year or most recent)	End of SY 2010-2011	End of SY 2011-2012	End of SY 2012-2013	End of SY 2013-2014
<i>Note: All information below is requested for Participating LEAs.</i>					
Percentage of mathematics teachers who were evaluated as effective or better.	68 <i>N/A</i>	80 <i>N/A</i>	85 <i>73</i>	90 <i>76</i>	≥90 <i>79</i>
Percentage of science teachers who were evaluated as effective or better.	68 <i>N/A</i>	80 <i>N/A</i>	68 <i>73</i>	68 <i>74</i>	68 <i>75</i>
Percentage of special education teachers who were evaluated as effective or better.	<i>N/A</i>	<i>N/A</i>	<i>N/A</i> <i>77</i>	80	≥90 <i>83</i>
Percentage of teachers in language instruction educational programs who were evaluated as effective or better.	<i>N/A</i>	<i>N/A</i>	<i>N/A</i> <i>77</i>	80	68 <i>83</i>

Tennessee aligns the five rating categories within the Tennessee Educator Acceleration Model (TEAM) as follows: a rating of 1 or 2 is “ineffective, a rating of 3 is “effective,” and a rating of 4 or 5 is “highly effective.”

## Appendix 5: Performance Measures (E)(2)

Performance Measures	Actual Data: Baseline 2009-10	End of SY 2010-2011	End of SY 2011-2012	End of SY 2012-2013	End of SY 2013-2014
Total number of schools for which one of the four school intervention models (as described in Appendix C of the Race to the Top notice) will be initiated each year.	13 schools in the ASD.  <i>0</i>	10 new Tier 1 and Tier 2 schools in Renewal or Focus categories.  <i>10</i>	8 new Tier 1 and Tier 2 schools in Renewal or Focus categories initiating one of the four intervention models  <i>0</i>	8 new Tier 1 and Tier 2 in Renewal or Focus categories initiating one of the four school intervention models.  <i>20</i>	16 new Tier 1 and Tier 2 schools in Renewal or Focus categories initiating one of the four school intervention models.  <i>10</i>