



**TN ESEA Flexibility Waiver Renewal
Summary of Approved Application
July 23, 2015**

Tennessee's ESEA Flexibility Request was approved for a four-year renewal by the U.S. Department of Education on July 23, 2015. This approval is the culmination of an extensive research and outreach process that has been ongoing over the last several months and included the following:

- Developing an internal waiver renewal design team including data and research personnel and regional data analysts
- Engaging with expert consultants on state accountability systems
- Requesting feedback from all Tennessee superintendents
- Developing an accountability design working group including members of the Tennessee Organization of School Superintendents (TOSS)
- Presenting to and soliciting feedback from the following groups:
 - District-level accountability and research personnel
 - District-level and TDOE personnel with expertise in special education and English language learners
 - The Tennessee State Collaborative on Reforming Education (SCORE)
 - Consolidated Planning and Monitoring statewide Advisory committee

This memo details the approved changes to our prior flexibility waiver. Part I of this memo focuses on the redesign of the Tennessee district accountability system, as this represents the greatest change to the state's flexibility waiver. This initial section includes a summary of feedback, guiding principles, overall framework, and additional modifications. Part II of this memo outlines additional approved updates included in our waiver renewal, as required by the USED. These include required updates on the status of college and career ready standards, support for priority schools, support for focus schools, support for other Title I schools with large or stagnant achievement gaps, and further capacity-building efforts. The remaining parts (III, IV, and V) of the memo include the appendices referenced in Part I and Part II.

I. DISTRICT ACCOUNTABILITY SYSTEM

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

At the same time, the state identifies a select number of schools for specific designations within the system:

- Reward schools represent the 5 percent of schools that lead the state in performance and the 5 percent of schools that lead the state in growth each year.
 - As required in the renewal application, Tennessee demonstrates that a school may not receive the highest rating in our accountability system if there are significant achievement gaps that are not closing. A school is not eligible for reward school status if the achievement gap(s) in that school exceed that of the state for the same subgroup(s) and the achievement gap is not narrowing.
- Priority schools represent the 5 percent of schools at the lowest level of performance over a three-year period.
- Focus schools represent the 10 percent of schools with the largest achievement gaps over a three-year period. In addition, schools are designated Focus if graduation rates for all students are below 60% and if any subgroup has less than 10 percent of students that are proficient or advanced.

The approved waiver renewal leaves the school accountability system intact, although we propose a modification to the criteria that allow schools to exit from priority and focus status (see part II of this memo). The major changes to the system take place at the district level, where we will implement a new framework for categorizing districts into performance levels. These changes have been driven both by extensive feedback about the limitations of the prior district accountability system as well as the practical reality that the transition to a new state assessment (TNReady) beginning in 2016 made it impossible to continue using the previous system which relied entirely on achievement targets based on a district's prior year performance.

A. Feedback on Prior Accountability System

Following our initial request for feedback from districts, the department received extensive comments about the existing district accountability system. While individual comments ranged across a variety of topics, we observed the following broad trends:

- General support for the state's theory of action and the need to consider overall student growth and achievement as well as the growth and achievement of the neediest students.
- Widespread demand for adding additional emphasis on students' year-to-year growth within the system rather than focusing primarily on annual measurable objectives (AMOs) for different cohorts of students.
- Broad agreement that AMOs based on individual grades (e.g., 3rd and 7th grade) do not make sense due to year-to-year cohort differences.

- Common concern that the subgroup improvement test, as implemented, unfairly penalizes more diverse districts by burdening them with more chances to fail.
 - The subgroup improvement test evaluates the performance of nine classifications of students including race/ethnicity, disability, language and income. Failing this test results in a final district determination of *In Need of Subgroup Improvement*.
- Common concern that the prior system created a disincentive for enrolling qualified students into advanced coursework (such as Algebra I in 8th grade or Advanced Placement English) since districts do not receive credit for these students in high school proficiency results.
- Varied opinions about adding ACT performance as an explicit component of district accountability.
- Common desire to present accountability status data such that it explicitly highlights districts' strengths and weaknesses.

B. Design Principles

The department's theory of action, integrated with the feedback we received around the strengths and weaknesses of our previous system of accountability, suggests the following *principles* that we used to develop our revised district accountability framework:

- The accountability system should identify districts struggling to meet their students' needs, such that those districts may receive customized support and additional resources towards improvement.
- Absolute achievement alone is not sufficient. We are focused on *growth* for all students and faster growth for the lowest achieving students.
- When a student progresses from *below basic* to *basic*, this is a meaningful move in achievement and should be acknowledged.
- All growth should be recognized. Binary achievement targets that districts are able to only meet or miss can hide meaningful improvement.
- Growth is a minimum expectation. Ideally, the rate of growth will be sufficient to place all students on a life trajectory that will result in postsecondary and/or career readiness.
- All means all. Meeting the needs of all students is a priority. If a district is failing to make any progress with its lowest achieving students, it is in need of improvement.
- The accountability framework should have a stable design, such that districts are not expected to understand and adapt to a new system every year.

Given these principles, we have designed an accountability system that:

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

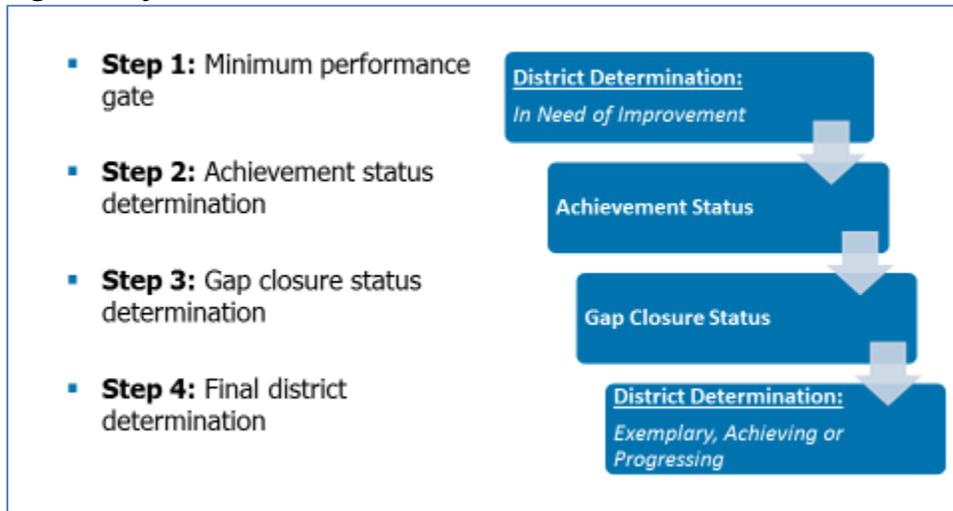
C. System Outline

1. Overview

The approved accountability system includes four steps that lead to a final district determination (Figure 1), with determinations awarded annually. In the first step, districts are evaluated according to a "minimum performance gate" that identifies districts that are not showing even minimal evidence of meaningful

student progress. These districts are categorized as *In Need of Improvement*. After the initial gate, districts receive an “achievement status” determined by their progress with all students and a “gap closure status” determined by their progress with four historically underperforming student subgroups. The overall district status, *Progressing*, *Achieving*, or *Exemplary*, is determined by the combination of district performance on the achievement and gap closure elements of the system.

Figure 1: System overview



2. Measures of Progress and Subgroups

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

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

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

** High School English includes English I, English II, and English III

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

ACT is a new performance category for the waiver renewal. Though feedback was varied in terms of the inclusion of the ACT as a content area, there was broad agreement that this benchmark is an accepted measure of postsecondary and/or career readiness. This notion is further codified in Tennessee state statute, which requires all students take the ACT in their junior year. Moreover, the department’s strategic plan has an established goal of a statewide average composite score of 21 on the ACT by the year 2020. (The current statewide average composite score is 19.3.) Given these factors and the overall statewide focus on

improving ACT results as an indicator of success after graduation, an ACT content area is included in the approved framework.

The “proficiency” cut-score for student performance on the ACT is set at a composite score of 21. This cut-score aligns with the overall state goal. A composite score of 21 also meets the criteria established by Tennessee higher education institutions for students to avoid remediation and immediately begin taking credit-bearing courses toward graduation. The TDOE will establish required participation rates and define AMO targets, as well as finalize other business rules regarding use of highest or last score and defining the applicable cohort for accountability measures (e.g., prior year graduating cohort) in advance of implementing the system in the 2015-16 school year.

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

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

3. *Step 1: Minimum Performance Gate*

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

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

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

Figure 2: Minimum performance gate illustration

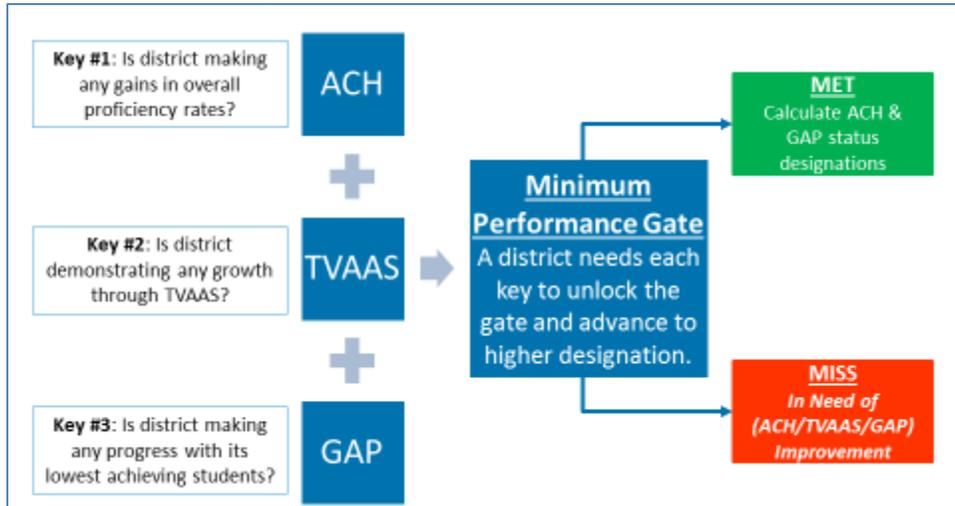


Figure 3 actualizes this design by providing a heat map showing progress across measures for a district that would receive an *In Need of Improvement* determination. Note that all such examples in this memo show actual district data from 2014.

Figure 3: Minimum performance gate heat map

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

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

A full set of business rules for determining progress at the minimum performance gate are included in Appendix A at the end of this memo.

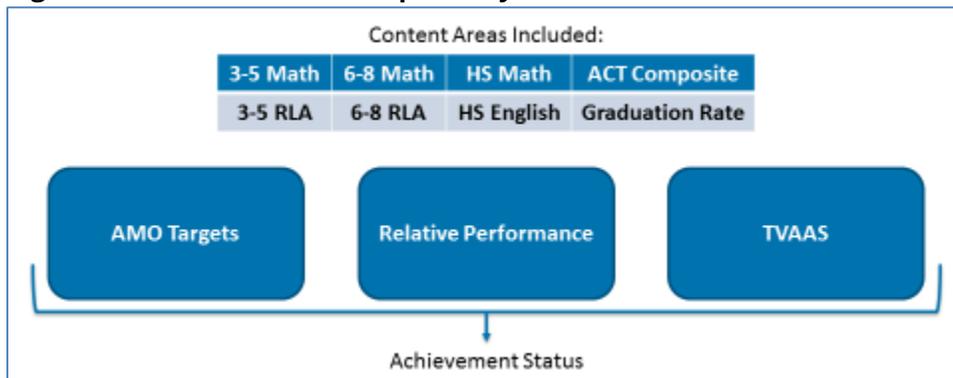
4. *Step 2: Achievement Status Determination*

A district's achievement status is determined by the growth that a district shows in each of its grade-content areas (e.g., 3-5 Math). Districts can demonstrate improvement through any of the following pathways (Figure 4):

- Overall student achievement as measured by change in proficiency percentages

- Overall value-added scores, as measured by the Tennessee Value-Added Assessment System (TVAAS), which is a true cohort growth measure at the student level
- A relative performance metric that compares a district's percentile rank with respect to all other districts in the state in the current year to its percentile rank in the previous year

Figure 4: Achievement status pathways



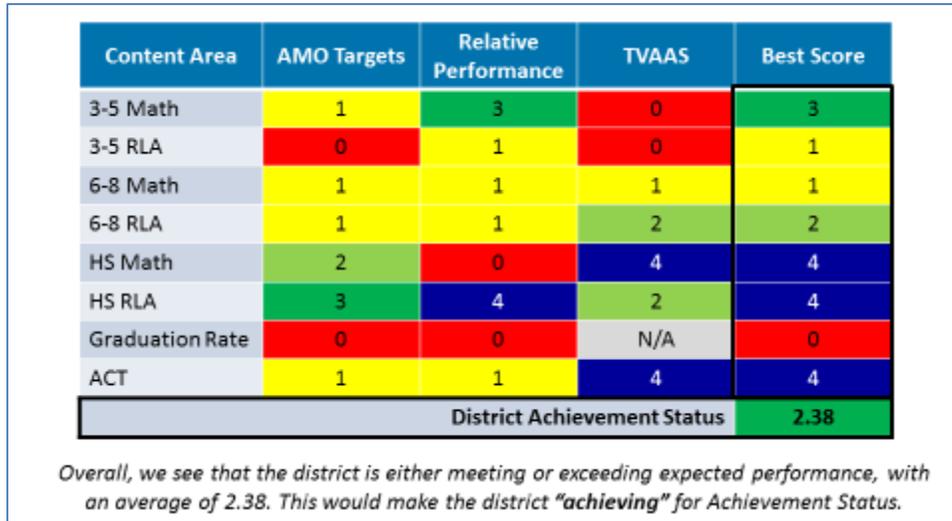
For each measure, a district is awarded a status and a corresponding series of points according to the following scale:

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

Since districts eligible for achievement status will have passed through the minimum performance gate, each pathway is considered to be an equally valid means to demonstrate improvement. Thus, districts are awarded the best score across pathways within each grade-content area as shown for the example district in Figure 5. Scores are then averaged across grade-content areas to create a final achievement status according to the following scale:

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

Figure 5: Achievement status heat map



A full set of business rules for determining achievement status are included in Appendix A at the end of this memo. Please note the explanation of how confidence intervals are used in evaluating a district's performance.

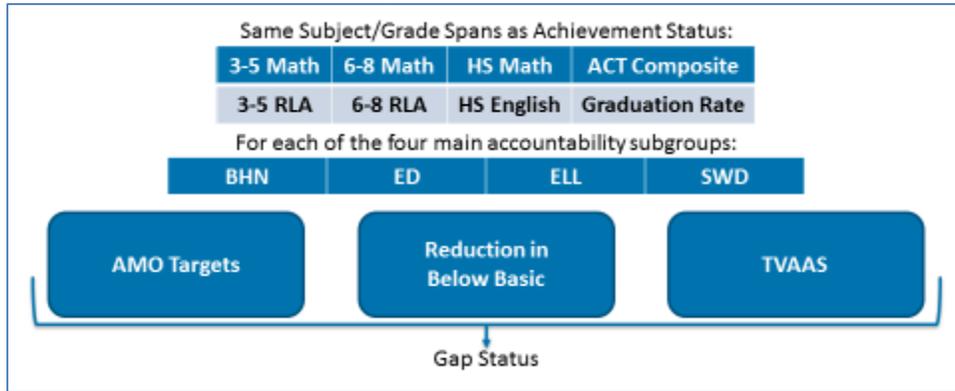
5. *Step 3: Gap Closure Status Determination*

A district's gap closure status is determined by the growth that a district shows in each of its grade-content areas for the four historically underperforming student subgroups listed in section I.C.2. Districts can demonstrate improvement through each of the following pathways (Figure 6):

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

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

Figure 6: Gap Closure status pathways



As with achievement status, districts are awarded a status and corresponding series of points using the same scale as previously. Again, districts are awarded the best score across pathways within each grade-content area for each subgroup. Figure 7 provides an example for the Black-Hispanic-Native American subgroup in one district.

Figure 7: Gap Closure status heat map for the BHN subgroup

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

Because the system considers each subgroup individually, the process described above results in four sets of scores for each of the major student subgroups. These scores are averaged to create a final gap closure status as shown for the example district in Figure 8.

Figure 8: Gap Closure status heat map for all subgroups

Best Score Content Area	BHN	ED	ELL	SWD
3-5 Math	2	2	1	2
3-5 RLA	0	0	0	1
6-8 Math	1	1	.	1
6-8 RLA	2	2	.	2
HS Math	1	2	.	2
HS RLA	3	3	.	1
Grad Rate	0	0	.	0
ACT	2	2	.	1
SG Average	1.375	1.500	.500	1.250
District Gap Closure Status				1.16

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

A full set of business rules for determining gap closure status is included in Appendix A at the end of this memo.

6. *Step 4: Final Determination*

Final district determinations are calculated by averaging a district’s scores on the achievement and gap closure sides and then using the scale shown in section I.C.4 to assign a final determination. Figure 9 illustrates the final determination for the district shown in previous examples.

Figure 9: Final determination heat map

Status	Average	Determination	Average Score	Final Determination
Achievement	2.38	ACHIEVING	1.77	PROGRESSING
Gap Closure	1.16	PROGRESSING		

District C is generally meeting or exceeding its performance targets across content areas; however, in 3-5 reading and graduation rate, the district is not making progress.

Regarding gap closure, District C is making progress with its subgroups, but failing to meet the majority of its targets.

*This performance profile would result in a final district determination of **“Progressing”** for District C.*

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

7. *Additional System Modifications*

In addition to the major structural changes to the district accountability system, USED approved two other important changes to elements within the system. These include:

a) *Earned credit for high school students who accelerate into advanced coursework in their junior year*

Under the previous system, students who take advanced coursework (e.g. Advanced Placement or Dual Credit) English rather than English III during their junior year do not appear in state test results and, therefore, do not appear in the accountability system. As in the case of advanced middle school students, this policy creates a disincentive for districts to move qualified students into advanced coursework. We propose using a proficient score on the English subject-level ACT score as a substitute for a proficient score on the English III EOC for students who have enrolled in advanced coursework instead of English III. Thus, a student taking advanced coursework for English during her junior year would still be counted as a proficient member of her English III cohort if her English ACT score meets the designated threshold. Similarly, for students who have accelerated beyond Algebra II or Integrated Math III in their junior year, we propose using a proficient score on the Math subject-level ACT score as a substitute for a proficient score on the Algebra II/Integrated Math III EOCs. As such, these students would be included in the junior year cohort, ensuring that they are equally represented in accountability results.

b) *Every Test Taker Methodology*

This element of the framework refers to the prior rule that all students enrolled and present on the day of the assessment are included in the district accountability results. In the waiver renewal reflects the fact that TNReady will include two parts: Part I, which is administered two-thirds of the way through the course or the school year; and Part II, which is administered 90 percent of the way through the course or the school year. Given this new construct for assessments, we believe that an adjustment is warranted to ensure that district results reflect those students who have been enrolled for a reasonable period by which to hold the district accountable for results. As such, the updated proposal will exclude from district accountability any test-takers who are *enrolled* for less than 60% of the instructional calendar for the course or the school year. The precise number of days will be calculated in accordance with the district's instructional calendar that is submitted and approved by the TDOE.

D. Impact of the Assessment Transition on the Updated System

The update to district accountability will accommodate the transition to the new TNReady assessment. In year 1, the 2015-16 school year, there will be no baseline data available for TNReady assessments. Therefore, no AMOs can be set by which to measure progress. As such, the system will rely on other metrics until baseline results have been established.

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

determined by the relative performance of the district's super subgroup when compared to other districts across the state.

For the determination of the district's achievement status, the AMO target pathway will not be applicable in year 1. Instead, only the relative performance and TVAAS pathways will drive the calculation of the achievement status during this transition year. The gap closure status determination will also only have two pathways available in year 1 of TNReady. The AMO pathway will not be available as there are no targets in this baseline-setting year. TVAAS will be calculated for the subgroups at the second pathway as in any other year. The transition to TNReady will not have an impact on the availability of TVAAS scores. The reduction in the percent below basic pathway will be based on the relative performance of each of the district's four underperforming subgroups when compared to other districts across the state. In 2016-17, all pathways for achievement and gap closure status will be available as described in section I.C, as baseline data will be available to set AMOs and reduction in below basic targets.

E. Modeling Results

To test the viability of the new system, we modeled the results using district data from school year 2013-14. Figure 10 shows the distribution of district determinations if we had implemented our new system in 2014. *(Note: This modeling does not include the subgroup TVAAS pathway for the gap closure status calculation, as the information was not available prior to the public comment period. In addition, the results below should not be deemed as predictive of system results using actual student data in 2016 and beyond.)*

Figure 10: Model of district determinations under new system using 2014 data

District Determination	Number of Districts	Determinations under Previous System
In Need of Improvement – Ach	3	1 district INI; 2 districts INSI
In Need of Improvement – Ach & Gap	2	1 district INSI; 1 district Intermediate
In Need of Improvement – Ach, TVAAS, & Gap	1	1 district INI
In Need of Improvement – TVAAS	1	1 district INSI
In Need of Improvement – Gap	13	5 districts INI; 7 districts INSI; 1 district Intermediate
Progressing	8	4 districts INI; 4 districts INSI
Achieving	82	12 districts INI; 53 districts INSI; 17 districts Intermediate
Exemplary	26	3 districts Exemplary; 10 districts INSI; 13 districts Intermediate

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

F. Differentiated interventions

We believe that interventions should be differentiated based on the actual extent of LEA progress. Given that, TDOE's interventions with LEAs are outlined as follows:

If An LEA is...	Then, it will:
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<p>Exceeding growth expectations or targets in Achievement and Gap Closure</p>	<ul style="list-style-type: none"> • Be commended to an <i>Exemplary</i> 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)
<p>Meeting growth expectations or targets in Achievement and Gap Closure</p>	<ul style="list-style-type: none"> • Be recognized on an <i>Achieving</i> LEA list • Participate in normal state planning and reporting requirements
<p>Improving but not meeting growth expectations or targets in Achievement and Gap Closure</p>	<ul style="list-style-type: none"> • Be named to a <i>Progressing</i> LEA list • Submit a detailed analysis of the results along with plans for the coming year to achieve goals, subject to TDOE approval • Any LEA that obtains an average scale score of less than one for achievement or gap closure status will be subject to additional interventions through CORE office support <p><i>Any LEA that is Progressing for two consecutive years will be elevated to the same intervention level as In Need of Improvement LEAs in the following year.</i></p>
<p>Failing to improve in the vast majority of content areas in achievement, TVAAS, or gap closure</p> <p><i>See Section II.E for information on additional supports for districts In Need of Improvement.</i></p>	<ul style="list-style-type: none"> • Be placed on public list of LEAs <i>In Need of Improvement</i> • Meet with TDOE officials in person to support the creation of an aggressive plan for corrective action • Submit a detailed analysis of the results along with plans for the coming year to achieve goals, subject to TDOE approval • Complete planning and monitoring process with follow-up action support via CORE offices

II. OTHER REQUIRED UPDATES TO FLEXIBILITY WAIVER

A. College and Career-Ready Expectations for All Students

In the approved waiver, Principle 1 (College and Career-Ready Expectations for All Students) was updated to reflect the outcome of the Request for Proposals process for a new state assessment in 2015-16. The RFP was won by Measurement, Inc. to create the new TNReady assessment for English and Math in grades 3 – 8 and high school. In addition, the waiver renewal reflects the standards review and development process announced by Governor Haslam in fall 2014. This process would potentially lead to revised standards for the 2017-18 school year, but any revisions to the standards will continue to reflect Tennessee’s commitment to college- and career-readiness for all students. Finally, the waiver renewal will include updated descriptions of the extensive supports the Tennessee Department of Education has provided to local education agencies (LEAs), schools, and educators to help them prepare for and implement the standards, as well as the work done through the statewide launch of Response to Instruction and Intervention (RTI²) guidelines designed to help students access the rigorous expectations.

B. Priority Schools

1. *Updated List*

As required in the renewal application, Tennessee submitted its updated list of Priority schools for implementation beginning in the 2015-16 school year.

2. *Timeline*

Our anticipated timeline for implementation of interventions aligned with all of USED’s turnaround principles in all Priority schools is being developed in partnership with the Achievement School District and those LEAs that have priority schools. We plan to continue a phased implementation approach, to allow the Achievement School District, LEA-led innovation zones and other LEA-led efforts the time and capacity to effectively implement interventions. The table below is the timeline detailed in the approved waiver application.

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

3. *Monitoring Results*

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

4. *Priority Schools Exit Criteria*

Under our prior waiver, schools may have exited Priority status when after three years, a school was not identified in the next Priority list or a school met its achievement AMOs without safe harbor two years in a row. In addition to maintaining this criteria, the approved waiver renewal includes the following updates to the exit criteria and annual school status designations:

a) *Updated Exit Criteria*

Schools will exit “priority” status when:

- Three years later, a school is not identified in the next “priority” list that is identified by TDOE; or
- A school meets all of its achievement AMOs or achieves level 4 or 5 TVAAS performance in all subject/grade content areas two years in a row; or
- A school dramatically improves achievement based on the success rate calculation which includes the combined achievement results (the percent of students who are proficient or advanced) in mathematics, reading/language arts, and science.
 - Beginning summer 2015, using 2014-15 achievement data, for schools designated as a Priority school in August 2014:
 - Any identified Priority school (for the 2015-16 school year) that exceeds the 15th percentile in the state using a one-year success rate will exit priority status.
 - In 2013 (for schools named priority in 2012) – one school would have exited priority status.
 - Any identified Priority school (for the 2015-16 school year) that exceeds the 10th percentile in the state using a one-year success rate or meets all of its Achievement AMO targets without safe harbor will be designated as: “Priority – Improving.”
 - In 2013 (for schools named priority in 2012) – five schools would have been designated as “Priority – Improving.”
 - Beginning with 2015-16 achievement data for any school designated as a Priority School in August 2014:
 - Any identified “Priority – Improving” school that exceeds the 10th percentile in the state using a one-year success rate will exit priority status.
 - In 2014 (for schools named priority in 2012 and “Priority – Improving” in 2013) – no schools would have exited priority status via this criteria.
 - In 2014, three schools would have exited via the one-year criteria, as they exceeded the 15th percentile for performance in the state in 2014.

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

- ASD: five-year minimum requirement
- LEA Innovation zone: to be determined by each LEA, with a minimum length of three years.
- SIG turnaround: 36-month intervention

C. Focus Schools

1. Updated List

As required in the renewal application, Tennessee submitted its updated list of Focus schools for implementation beginning in the 2015-16 school year.

2. Support

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

Goals

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

Structure

- Convenings will occur at least four times per year.
- Facilitators will be hired through a competitive application process to lead the sessions in a given region.
- Content will consist of general sessions based on the interview findings and could include things like: effective PLCs, RTI² implementation, and data use and analysis. This will also serve as an opportunity to provide additional support directly to schools around some of the state's priority initiatives.
- Content will include case studies of schools in the state that have experienced success with gap closure. Convenings will focus on the specific strategies and behaviors that led to positive results in the case studies.
- Content will also include time for school planning and collaboration and will incorporate bridge to practice activities.
- Participants will identify promising strategies from these convenings and incorporate those strategies into school improvement plans. These plans will be submitted to the Office of Consolidated Planning and Monitoring via the *ePlan* platform for review and approval. The department will monitor and evaluate these plans based on student outcome data regarding the

narrowing of achievement gaps and improved subgroup performance. Districts who do not show progress will be required to revise plan annually and adjust strategies and interventions.

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

3. *Monitoring Results*

Beginning in summer 2015, the Tennessee Department of Education will review data on previously identified Focus schools, since the first Focus schools were identified in summer 2012 and began their interventions in 2012-13. If they have not made sufficient progress to exit Focus status (meaning they were included on the 2015 list published in August 2014 and have not made enough progress to exit in the summer 2015 based updated criteria detailed below), the department plans to take the following actions to ensure increased rigor of interventions and supports by the following school year: either a) requiring participation in the state's Focus School Convening support structure by the school and an LEA point of contact who will follow-up with the school after each regional meeting, OR b) requiring the LEA to designate Title I or other funds to support their struggling Focus schools and requiring a specific improvement plan for Focus schools in their annual *ePlan* application.

4. *Focus Schools Exit Criteria*

Under our prior waiver, a school may have exited Focus status when after three years, a school was not identified in the next Focus list or a school met its gap closure AMOs (without safe harbor) two years in a row.

a) *Updated Exit Criteria*

Schools will exit "focus" status when:

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

- Success rate exit (for those schools identified for having one or more subgroups with a 3-year success rate of 10% or less):
 - Any identified focus school that demonstrates a 1-year success rate exceeding 20% for the subgroup(s) that resulted in said school's focus determination will exit focus status.
 - Focus schools that demonstrate a 1-year success rate exceeding 15% for the subgroup(s) that resulted in focus determination will be designated "*Focus – Improving, Subgroup(s).*"
 - Subgroup gap exit (for schools identified based on achievement gaps between subgroups and comparison group):
 - Any identified focus school that demonstrates a 25% reduction in the percent below basic for the subgroup(s) that resulted in said school's focus determination will exit focus status.
 - Focus schools that demonstrate a 12.5% reduction in the percent below basic for the subgroup(s) that resulted in focus determination will be deemed "*Focus – Improving, Gap Closure.*"
 - This exit criteria reflects the updated gap closure metrics for use in district accountability. Prior to the determination of the next cohort of Focus schools in 2017 or later, the TDOE will reconsider the metric used to identify focus schools based on achievement gap methodology to align with district accountability; or
- Beginning with 2015-16 achievement data for any school named a Focus School in August 2014:
 - Graduation rate exit (for those schools identified based on a graduation rate of less than 60% for all students):
 - Any school designated as "*Focus – Improving, Graduation Rate*" that has a graduation rate exceeding 70% for the "All Students" group for the most recent year will exit focus status.
 - Success rate exit (for those schools identified for having one or more subgroups with a 3-year success rate of 10% or less):
 - Any school designated as "*Focus – Improving, Subgroup(s)*" that demonstrates a 1-year success rate exceeding 15% for the subgroup(s) that resulted in said school's focus determination will exit focus status.
 - Subgroup gap exit (for schools identified based on achievement gaps between subgroups and comparison group):
 - After year 1 of TNReady and baseline is established, any school designated as "*Focus – Improving, Gap Closure*" that demonstrates a 12.5% reduction in the percent below basic for the subgroup(s) that resulted in said school's focus determination will exit focus status.

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

D. Other Title I schools

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

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

With regard to incentives, the waiver renewal affirms the continued use of school lists including Reward, Priority, and Focus schools, as well as transparency in reporting. Upon approval of this waiver renewal, we intend to begin redesigning our school grading system (used only for public transparency reporting) to align with this updated differentiated accountability system. It is our expectation that in fall 2016, the state will launch a school report card application that reflects the "heat map" information similar to what we have shown in sections I.C.4 and I.C.5 of this memo. Moreover, we will use that information to provide a summary ratings system for individual schools for public stakeholders via the report card application.

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

E. Build SEA, LEA, and School Capacity to Improve Student Outcomes

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

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



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

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

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

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

The TDOE is also launching its next strategic plan which includes attention to a priority to promote district flexibility. The plan will include guidelines by which districts who are designated as *Exemplary* will be able exercise increased autonomy and also serve as a peer resources for districts who need support in specific areas. The department will finalize its strategic plan in summer 2015 and include these provisions regarding increased flexibility and autonomy in communications after the plan is completed.

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



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

III. APPENDIX A – BUSINESS RULES FOR APPROVED ACCOUNTABILITY FRAMEWORK

The following grade-content areas are evaluated in the district accountability:

- Grades 3-5 Math
- Grades 6-8 Math
- High School Math (includes Algebra I, Algebra II, and Geometry, OR Integrated Math I, II, and III)
- Grades 3-5 Reading/Language Arts
- Grades 6-8 Reading/Language Arts
- High School English (includes English I, English II, and English III)
- ACT
- High School Graduation

In order to be evaluated for a grade-content area, a district must have at least 30 test-takers.

A. Minimum Performance Gate

At the minimum performance gate, a district is evaluated in the following three areas:

- Overall student achievement as measured by change in proficiency percentages across grade-content areas.
- District value-added scores as measured by the Tennessee Value-Added Assessment System (TVAAS) across grade-content areas.
- Super subgroup performance as measured by reduction in below basic percentages across grade-content areas for students that fall within one of the four subgroups listed above (super subgroup combines students in BHN, ELL, SWD, and ED into a single group).

In order to determine whether a district is showing some improvement in each of the above three areas the following process is used.

1. Determine the total number of grade-content areas for which a district is eligible to be held accountable.
2. Total the number of grade-content areas in which a district is *not* making progress. The following standards are used to determine whether progress is being made:
 - a. Proficiency key: The percentage of students proficient in a grade-content area in the current year is greater than in prior year.
 - b. TVAAS key: The district achieved a TVAAS level of 3 or higher in the content area.
 - c. Gap closure key: The percentage of students in the super subgroup scoring at the below basic achievement level is less than in the prior year.
3. Determine the overall percentage of areas failing to improve by district for each key:

$$\left(\frac{\# \text{ grade content areas not improving}}{\text{total \# grade content areas improving} + \text{total \# grade content areas not improving}} \right)$$

- a. If greater than 75% of the content areas are failing to improve then a district fails the key.
- b. If district fails one of these three keys, then they fail the minimum performance gate.

- c. Districts that fail the minimum performance gate receive the *In Need of Improvement* determination. The determination will specify what key(s) led the district to fail the minimum performance gate.

B. Achievement Status Determination

A district's achievement status is determined by the growth that a district shows in each of its grade-content areas with all students. Districts can demonstrate improvement through any of the following pathways:

- Overall student achievement as measured by change in proficiency percentages across content measures
- District value-added scores as measured by the Tennessee Value-Added Assessment System (TVAAS) across content measures
- A relative performance metric that compares a district's percentile rank with respect to all other districts in the state in the current year to its percentile rank in the previous year

The performance of each district is evaluated in each of the above pathways using the following process:

1. *AMO (Proficiency) Pathway*

1. Set a proficiency target for each district in every grade-content area using the following formulas:
 - a. Proficiency Rate Growth Goal = $((100 - \% \text{ProficientAdvanced}_{\text{Previous}}) / 16)$
 - b. Proficiency Target = $\text{Proficiency Rate}_{\text{Previous}} + \text{Proficiency Rate Growth Goal}$
2. Compare the district's percentage of students scoring proficient or advanced in each of the content areas in the current year to the percentage of students scoring proficient or advanced in the prior year. Award points as follows:
 - a. 0 points: District's proficiency rate (including upper bound confidence interval) is less than prior year.
 - b. 1 point: District's proficiency rate (including upper bound confidence interval) is greater than prior year but does not meet the proficiency rate target.
 - c. 2 points: District's proficiency rate (including upper bound confidence interval) meets the proficiency target.
 - d. 3 points: The proficiency rate exceeds the target but does not exceed by more than double the growth expectation (12.5% instead of 6.25%)
 - e. 4 points: The proficiency rate grew by double the growth target. (Substitute "8" for "16" in the denominator in the equation in 1a above to calculate this benchmark.)

2. *TVAAS Pathway*

1. Using the district's one-year TVAAS level in each content area, award points as follows:
 - a. 0 points: Level 1
 - b. 1 point: Level 2
 - c. 2 points: Level 3
 - d. 3 points: Level 4
 - e. 4 points: Level 5

3. *Relative Pathway*

1. Using the percentage of students scoring proficient or advanced in the current year, rank each district and grade-content area and assign a percentile rank.
2. Using the percentage of students scoring proficient or advanced in the prior year, rank each district and grade-content area and assign a percentile rank.
3. Compare each district's current percentile rank to its prior percentile rank for every grade-content area.
4. Award points as follows:
 - a. 0 points: District's rank went backwards greatly.
 - b. 1 point: District's rank went backwards but less than the standard set for 0 points.
 - c. 2 points: District rank stayed the same
 - d. 3 points: District rank improved but improved less than the standard set for 4 points.
 - e. 4 points: District rank improved greatly.

4. *Generating the Achievement Status Determination*

1. In each grade-content area, assign the district the highest score it received across the above three pathways.
2. Average each of the highest scores. This average is the district's achievement status average.
3. Using the achievement status average and the following cut points, assign each district that passed the minimum performance gate an achievement status determination:
 - a. > 0.00 and < 2.00 : Progressing
 - b. ≥ 2.00 and < 3.00 : Achieving
 - c. ≥ 3.00 : Exemplary

C. Gap Closure Status Determination

The following subgroups are individually evaluated in the gap closure status determination process:

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

In order to be evaluated for a subgroup-grade-content area a district must have at least 30 tests.

A district's gap closure status is determined by the growth that a district shows in each of its grade-content areas for the four historically underperforming student subgroups listed above. Districts can demonstrate improvement through each of the following pathways:

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

The performance of each district in each of its grade-content areas is evaluated in each of the above pathways for each subgroup using the following process:

1. *AMO (Proficiency) Pathway*

1. Set a proficiency target for each district in every subgroup in each grade-content area using the following formulas:
 - a. Proficiency Rate Growth Goal = $((100 - \% \text{ProficientAdvanced}_{\text{Previous}}) / 16)$
 - b. Proficiency Target = $\text{Proficiency Rate}_{\text{Previous}} + \text{Proficiency Rate Growth Goal}$
2. Compare the district's percentage of students in each of the four subgroups scoring proficient or advanced in each of the grade-content areas in the current year to the percentage of students scoring proficient or advanced in the prior year. Award points as follows:
 - a. 0 points: District's proficiency rate (including upper bound confidence interval) is less than prior year.
 - b. 1 point: District's proficiency rate (including upper bound confidence interval) is greater than prior year but does not meet the proficiency rate target.
 - c. 2 points: District's proficiency rate (including upper bound confidence interval) meets the proficiency target.
 - d. 3 points: The proficiency rate exceeds the target but does not exceed by more than double the growth expectation (12.5% instead of 6.25%)
 - e. 4 points: The proficiency rate grew by double the growth target. (use 8 in the denominator in the equation in 1a above)

2. *TVAAS Pathway*

1. Using the district's one-year TVAAS level for each subgroup in each grade-content area, award points as follows:
 - a. 0 points: Level 1
 - b. 1 point: Level 2
 - c. 2 points: Level 3
 - d. 3 points: Level 4
 - e. 4 points: Level 5

3. *Reduction in Below Basic Pathway*

1. Set a reduction in below basic target for each district in every subgroup in each grade-content area using the following formulas:
 - a. Below Basic Reduction Rate Growth Goal = $(\% \text{BelowBasic}_{\text{Previous}}) / 8$
 - b. Below Basic Reduction Target = $\text{BelowBasic Rate}_{\text{Previous}} - \text{Below Basic Rate Growth Goal}$
2. Compare the district's percentage of students in each of the four subgroups scoring below basic in each of the grade-content areas in the current year to the percentage of students scoring below basic in the prior year. Award points as follows:
 - a. 0 points: District's below basic (including lower bound confidence interval) rate is greater than prior year.

- b. 1 point: District's below basic rate (including lower bound confidence interval) is less than prior year but does meet the below basic reduction target.
- c. 2 points: District's below basic rate (including lower bound confidence interval) meets the below basic reduction target.
- d. 3 points: The below basic rate is less than the target but below basic is not reduced by double the reduction target (25% instead of 12.5%)
- e. 4 points: The below basic rate reduced by double the reduction target. (use 4 in the denominator in the equation in 1a above)

4. *Generating the Gap Closure Status Determination*

1. In each grade-content area, assign the district the highest score it received across the above three pathways in each of its four subgroups.
2. Average each of the highest scores for each subgroup.
3. Average together the highest score average for each subgroup. This average is the district's gap closure status average.
4. Using the gap closure status average and the following cut points, assign each district that passed the minimum performance gate gap closure status determination:
 - a. > 0.00 and < 2.00 : Progressing
 - b. ≥ 2.00 and < 3.00 : Achieving
 - c. ≥ 3.00 : Exemplary

D. Final Determination

Final determinations for districts are calculated by averaging a district's achievement average and gap closure average and then using the below scale to assign a final determination.

1. > 0.00 and < 2.00 : Progressing
2. ≥ 2.00 and < 3.00 : Achieving
3. ≥ 3.00 : Exemplary