

Tennessee Department of Education
ESEA Flexibility Waiver Extension Request

Assessment amendment

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

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

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

- We narrowed the scope of the TCAP assessment and removed items that were not aligned to the Common Core State Standards. We removed 15 to 25 percent of the state performance indicators (SPIs) from the 2012-13 school year 3-8 achievement tests for math, specifically those SPIs that covered content from the Tennessee Diploma Project (TDP) standards but were not reflected in the Common Core State Standards. For 2013-14, we further narrowed the assessments for grades 3-11 math and reading/language arts to remove any SPIs not related to the Common Core State Standards. In both cases, state and district content experts examined Tennessee's previous TDP standards and identified those not reflected in the Common Core State Standards; their decisions were further reviewed by external experts at Student Achievement Partners, and ultimately resulted in a list of SPIs to be dropped. We then worked with our assessment vendors to develop new blueprints that did not include any content written to the dropped SPIs and therefore ensure that there were no related items included on the 2012-13 or 2013-14 TCAP Achievement or End of Course tests.
- In addition, we have substantially revised our writing assessment to reflect the writing elements of the Common Core State Standards, making it more rigorous and expanded it to all grades. In the past, the writing assessment was only required in grades 5, 8, 11 and used stand-alone prompts that were not based on text and did not require any reading comprehension in order

to respond. In 2012-13, we revised the writing assessment to be text-based and more rigorous for the required grades (5, 8 and 11). In 2013-14, we further revised the writing assessment to ensure complexity of texts and include two passages while also providing optional assessments in the same format for districts to administer at their discretion in all grades, 3-11. In 2014-15, Tennessee will have required writing assessments that are rigorous, text-based, and use multiple complex texts for all grades, 3-11.

- We added additional End of Course assessments for advanced coursework. As noted in our original waiver application, Tennessee began taking steps toward raising the rigor of its assessments through the Tennessee Diploma Project that took effect beginning in the 2009-10 school year. We have continued to implement more rigorous assessments over time, including adding additional End of Course assessments for Algebra II and English III in the 2012-13 school year and for chemistry in the 2013-14 school year. Proficiency cuts for these advanced assessments are benchmarked to national college readiness benchmarks such as the ACT.

We believe the 2014-15 TCAP assessments also meet the other minimum requirements for assessments as outlined in Principle 1:

- The 2014-15 TCAP assessment program will elicit student demonstration and application of knowledge and skills. As noted above, the revised writing assessments will be given to all students in grades 3-11 in 2014-15 and require students to use and demonstrate the following skills: strong reading comprehension, textual analysis, effective written communication, and citation of evidence.
- The 2014-15 TCAP assessment program will provide an accurate measure of student achievement across the full performance continuum, including for high- and low-achieving students. Tennessee has consistently followed rigorous development and review processes for item and test development. These development and review processes are based on commonly-accepted practices and consider the needs of all Tennessee students regardless of their achievement levels, ethnicity, social-economic status, and gender. Numerous psychometric analyses are conducted before and after each test administration to monitor and ensure that the assessments provide student scores with high reliability and the test results can be interpreted and used as intended. Evidence accumulated over the past few years shows that the assessments have provided an accurate measure of student achievement across the full performance continuum, including for high and low achieving students.
- The 2014-15 TCAP assessment program will produce student achievement data and student growth data that can be used to determine whether individual students are college and career ready or on track to being college and career ready. As described above, we have specifically added End of Course assessments in advanced high school courses (Algebra II, English III and Chemistry) to provide stronger indicators of college and career readiness beyond the earlier high school courses that were assessed previously (Algebra I, English I, English II, and Biology I). We have also tied the proficiency cuts on those assessments to national college readiness benchmarks such as ACT.

- The 2014-15 TCAP assessment program will continue to assess all students, including English Learners and students with disabilities. As with our currently approved waiver, we will require 95 percent participation for all students as well as for subgroups of students.
- The 2014-15 TCAP assessment program will provide for alternate assessments based on grade-level academic achievement standards and alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities, consistent with 34 C.F.R. § 200.6(a)(2). For the 2014-15 school year, Tennessee is continuing with its previously stated plans to eliminate the TCAP MAAS (Modified Academic Achievement Standards) assessment and to assess students with disabilities on grade-level academic achievement standards through the general TCAP assessment with appropriate accommodations as needed. In addition, for students with the most significant cognitive disabilities, Tennessee is transitioning from the TCAP-Alternate Portfolio, the previous alternate assessment based on alternate academic achievement standards, to the National Center and State Collaborative (NCSC) assessment for the areas of English language arts and math.
- Finally, the 2014-15 TCAP assessment program will continue to produce data, including student achievement and student growth data, that can be used to inform: determinations of school effectiveness for purposes of accountability under Title I; determinations of individual principal and teacher effectiveness for purposes of evaluation; determinations of principal and teacher professional development and support needs; and teaching, learning, and program improvement.

In summary, we believe that the steps we have taken to better align our assessment with the expectations of college and career ready standards, through the removing of unrelated SPIs, the transition to more rigorous writing assessments in all grades 3-11, and the addition two End of Course assessments for advanced math and English courses, along with the other features of the assessment program described above, mean that Tennessee will have an assessment program that meets the minimum requirements outlined in Principle 1. We will also be developing and issuing a request for proposals for more rigorous assessments in math and reading/language arts for grades 3-11 for the 2015-16 school year.

Accountability amendment

For the 2014-15 school year, Tennessee is continuing with its previously stated plans to eliminate the TCAP MAAS (Modified Academic Achievement Standards) assessment and to assess students with disabilities on grade-level academic achievement standards through the general TCAP assessment with appropriate accommodations as needed. Tennessee is one of only fourteen states that currently offer a MAAS-type assessment for students with disabilities, and all states are planning to phase these assessments out over the next year. In addition, because we have been planning for this transition, we do not have a MAAS assessment prepared for the 2014-15.

For students with the most significant cognitive disabilities, Tennessee is transitioning from the TCAP-Alternate Portfolio, the previous alternate assessment based on alternate academic achievement

standards, to the National Center and State Collaborative (NCSC) assessment for the areas of English language arts and math.

We recognize that these assessment transitions for students with disabilities raise questions about the impact on our district accountability system, which is based on setting annual measurable objectives (AMOs) in Achievement and Gap Closure that are measured by the percentage of students who score proficient and advanced as compared with the previous year. Based on the prior achievement of students transitioning from MAAS to TCAP, the state anticipates a drop of roughly one to two percentage points in the percentage of students scoring proficient and advanced. In order to account for this change in proficiency levels resulting from the assessment transitions, we propose creating a new safe harbor across the district accountability system. The safe harbor would apply to achievement, gap closure and subgroup improvement targets.

For this transition in assessments for students with disabilities, the state will create a safe harbor that is essentially a modified annual measurable objective for each achievement, gap and subgroup target accounting for the anticipated percentage point drop. This safe harbor would only be applied if the district did not hit one of the other available safe harbors, including TVAAS.

To see how this safe harbor would be applied, consider the following example of a district that had 1000 students testing in 3-8 math in 2013-14.

- Of these students, 500 score proficient or advanced on TCAP. Another 20 students score proficient or advanced on MAAS. Overall, the district had 52 percent of their students proficient or advanced in 3-8 math in 2013-14. Therefore, using the current accountability methodology for setting AMO targets, this district's 3-8 math target in 2014-15 would be 55 percent.
- The district's safe harbor for the students with disabilities transition would be calculated by assuming that 10 percent of the total MAAS students for 2013-14 would have scored proficient or advanced had they taken the TCAP instead. Making this assumption, the district's adjusted proficiency level for 2013-14 would have been 50.2 percent. Using the AMO target-setting methodology, the district's 2014-15 math target based on this adjusted baseline would have been 53.3 percent. The district's students with disabilities transition safe harbor would therefore be set at 53.3 percent.
- If the district had 55 percent or more of its students proficient or advanced on 3-8 math in 2014-15, the district would pass its 3-8 math target with no safe harbors applied. If, however, the district's percent proficient or advanced was 53.5 percent, the district would not pass the 3-8 math target without safe harbors. At this point, safe harbors would be applied, beginning with TVAAS and the other existing safe harbors. If none of the other safe harbors applied, in this scenario, with a transition safe harbor target of 53.3 percent and 2014-15 proficiency of 53.5 percent, the district would still pass the 3-8 math target through the students with disabilities transition safe harbor.

Part B Monitoring Responses

As required, Tennessee has prepared the following responses to the U.S. Department of Education's identified next steps in Tennessee's ESEA Flexibility Part B Monitoring Report, available at <http://www2.ed.gov/admins/lead/account/monitoring/reports13/tnpartbrpt2014.pdf>.

Element: Monitoring

As noted in the final monitoring report, completing the next step identified in the "Focus Schools" element below will address this issue.

Element: Technical Assistance

As noted in the final monitoring report, completing the next step identified in the "Focus Schools" element below will address this issue.

Element: Priority Schools

Monitoring Report Next Step: Through the ESEA flexibility extension process Tennessee will (1) revise the timeline on which all priority schools will implement either one of the four SIG models or interventions aligned with the turnaround principles (reflecting that all non-SIG priority schools will fully implement the turnaround principles by the 2014–2015 school year), and (2) describe the process by which it will ensure that its LEAs with priority schools implement all turnaround principles.

(1) Timeline

In our original waiver, we included the following approximate, anticipated timeline for Priority school interventions:

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

Below is an updated timeline on which all priority schools will implement either one of the four SIG models or interventions aligned with the turnaround principles (also included in the attached redline version of the ESEA Flexibility request):

83 Priority Schools identified in 2012

	2012-13	Change	2013-14	Change	2014-15 Projected
ASD	6*	+6	12*	+5	17*
LEA Innovation zones	12*	+11	23*	+4	27*
SIG models (Transformation,	0	+6	6	+7	13

Closure, Restart, Turnaround)					
LEA-led turnaround	66	- 23	43	-43	
LEA-led turnaround consistent with SIG principles	0		0	+20	20
Projected to not be on 2014 Priority list	0		0	+7	7**

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

** As noted in our original waiver application, we will be rerunning the Priority list in 2014 to identify the bottom 5 percent of schools based on three years of data at that point in time, and to give those schools one year for planning purposes prior to beginning an intervention in summer 2015. We expect that some of the originally identified Priority schools will have improved to the point that they will not be included on the second iteration of the list, and that other schools will be added. Per our original waiver application, 2012 schools that improved so as to not be identified on the next Priority list will exit Priority status. We do not believe it makes sense to require an intervention consistent with the SIG turnaround principles in the 2014-15 school year when these schools have already shown substantial improvement and are therefore exiting Priority status.

There are two major factors that have shifted our timeline. First, 69 of the 83 Priority schools identified in 2012 were located in what was then Memphis City Schools. Memphis City Schools and Shelby County Schools were working towards a merger which took place prior to the 2013-14 school year. The 14 Priority schools in other districts outside of Memphis had all entered an intervention implementing one of the four SIG turnaround models or aligned with all of the SIG turnaround principles by the 2013-14 school year. However, given the large-scale transitions taking place in the Memphis/Shelby district and uncertainty around district leadership until just before the 2013-14 school year, we did not feel it would be effective to require SIG-aligned interventions or to administer SIG grant competitions in the Priority schools located in Memphis in the absence of more certainty around structure and leadership in the district as a whole. Second, the ASD has grown at a slower pace than originally anticipated, as it solidified its strategy and planned for scale that would ensure quality. However, by 2014-15, the ASD will also have six newly opened schools serving students from Priority schools. These new schools are not reflected in the count above as they are not direct interventions in a single, existing, identified Priority school, but they are exclusively serving the students from those schools. These factors resulted in the updated timeline above.

(2) Ensure LEAs with priority schools implement all turnaround principles

In 2014-15, we project that there will be 20 schools that will continue to be in Priority status, and will be managed directly by Shelby County in line with all of the SIG turnaround principles. We have been engaged in a series of conversations with Shelby County district leaders to ensure that the LEA is implementing interventions consistent with the SIG turnaround principles in each school. In addition, we know that the ASD and the Shelby County iZone will continue to expand in 2015-16, and part of our

conversations with Shelby County will be in identifying which schools may be best suited for those interventions. Finally, two of the projected 20 schools are charters authorized by Shelby County. Pursuant to action by Tennessee's General Assembly in Public Chapter 721, <http://state.tn.us/sos/acts/108/pub/pc0721.pdf>, these schools would be closed if they were identified again as Priority schools in the list run in summer 2014.

Element: Focus Schools

Monitoring Report Next Step: Through the ESEA flexibility extension process, Tennessee will submit a plan for ensuring that its LEAs with the subset of 11 of 169 focus schools described above monitor implementation of interventions in these schools and provide technical assistance to support effective implementation of these interventions.

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

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

Element: Other Title I Schools

Monitoring Report Next Step: Through the ESEA flexibility extension process, Tennessee will either provide evidence that that its nine COREs support LEAs in providing incentives and supports to other Title I schools in which students consistently miss performance targets (including AMOs, graduation rates, and other indicators) or a plan describing how they will do this in the 2014-2015 school year and beyond.

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

To date, 21 Title I schools fall into this category. In the 2013-14 school year, 15 received substantial support either directly from the CORE offices or through the coordination of the CORE office with district leaders specifically to support the school in question. Six of the LEAs participated only in general CORE

activities such as superintendent or supervisor study council meetings that were not specifically aimed at supporting the Title I schools in this category.

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

Element: State and Local Report Cards

Monitoring Report Next Step: As part of the extension process, Tennessee will submit a timeline for revising its State and local report card templates to include all the required elements such that the report cards based on 2013–2014 data will contain all required elements.

We will use the following timeline to revise our state and local report card template to include all of the required elements contained in the non-regulatory guidance on report cards in time for our release of 2013-14 data in November 2014.

Step	Date
Take inventory of the state's report card against the non-regulatory guidance on report card.	Completed
Determine source and business rules for missing data elements	June 2, 2014 to June 13, 2014
Incorporate missing data elements into the report card's design	June 19, 2014 to June 30, 2014
Obtain source data from data steward within the TDOE	September 22, 2014 to October 3, 2014
Migrate source data into the report card	October 6, 2014 to October 17, 2014
Report card release to districts for verification and edits	October 20, 2014 to October 24, 2014
Report card public release	November 1, 2014