TEA ESSA Draft Plan Response

INTRODUCTION

The Tennessee Education Association (TEA) agrees that passage of the Every Student Succeeds Act (ESSA) presents "a real opportunity to build on current successes and support larger state goals." [1]

In reading Tennessee ESSA State Plan (TESP), it is not clearly outlined what opportunities the state is taking advantage of under ESSA. The TESP focuses on how the state complies with ESSA but doesn't differentiate new initiatives separately. In the TESP, new initiatives under ESSA are embedded with existing Tennessee programs. Having a visual of opportunities the state is taking advantage of will be helpful especially since the Tennessee Department of Education (TDOE) is moving from a "mindset of strict compliance to one of continuous improvement."

It will be helpful for stakeholders to have a better understanding of ESSA's "new autonomies and flexibilities"[2] Tennessee is exploring under the new federal legislation. This can take the form of a crosswalk or a one-page list of new initiatives for the 2017-2018 school year.

We are pleased that NAEP scores have improved. However, NAEP is only one assessment and it is not administered annually (and not administered to all students or target groups). We must be careful to not place too much weight on one assessment when showcasing student achievement.

TEA was fortunate to have representation and provide feedback on the TDOE Educator Support and Effectiveness working group. However, we also believe TDOE missed an opportunity to engage more teachers in the feedback stage. In fact, some of the working groups did not include any educators.[3]

Recommendations:

1) Develop a section within the TESP that clearly delineates new programs and the funding structure and targets under ESSA.

2) Develop a diverse statewide ESSA Implementation group consisting of teachers, instructional support personnel, and paraprofessionals that will help with the implementation of the federal law during the 2017-18 school year. This list of implementation members should be published on the state website.

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[1] TESP, pg. 5

[2] *Id.* at pg. 7

[3] *Id.* at pg. 9.

STANDARDS

TEA has always and continues to support rigorous standards that prepare students to succeed in college and/or the work place. TEA supports a process that allows review and refinement of currently adopted state standards and allows educators to have an active role in such a process.

TEA believes that to provide the highest quality education to all students, educators must be the primary voice in the planning, development, implementation, monitoring, and refinement of curriculum standards.

We commend the Tennessee State Board of Education (SBE) and the Standards Recommendation Committee (SRC) for their rigorous standards review process.

Recommendations:

1) Implementation of the standards must provide adequate time and resources to be effective.

2) We urge political representatives and policymakers to provide adequate and relevant resources to schools and communities to ensure that students have the tools and support required for meeting the demands of the standards implemented in our schools.

3) Educators that are on the various review committees should be publicly recognized. On the TDOE website, we recommend that educators serving on each of the standards review committees be listed. From a statewide perspective, these leaders will help with standards implementation.

4) Include a crosswalk document that shows the alignment between the new standards and assessments.

ASSESSMENT

TEA recognizes the usefulness of testing for diagnostic purposes. However, inappropriate interpretation of test scores and the use of mandated testing can lead to loss of reliability and validity of test results and/or serious misuse and abuses of testing. Statewide testing programs must be designed and implemented for the purpose of improving instruction.

TEA supports ongoing comprehensive assessment of student growth. The Association believes that the primary purposes of assessment are to:

a. assist students, teachers, and their parents/guardians in identifying the student's strengths and needs
b. encourage students to become lifelong learners
c. measure a program's effectiveness, communicate learning expectations, and provide a basis for determining instructional approaches and
d. develop appropriate learning experiences for students.

The TESP outlines that mathematics, ELA, science, and social studies assessments across grades three through eight "make our standards tangible and allow for the accountability that has set the conditions for our recent successes in areas such as 4th and 8th grade NAEP science tests."[4]

We applaud our student's success on 2015 NAEP Science in doubling student growth on that assessment. Furthermore, we recognize the importance in eliminating the performance gap between male and female students. However, it's not clear that one assessment (not given annually or to every grade) is correlated with 4 annual assessments in grades 3-8.

TDOE gathered stakeholder feedback that shared "our current assessment system can feel excessive or overly rigid."[5]

The following survey question was posed to 10,000 teachers through the 2015 SCORE Assessment study.[6]

Think about the number of district and state mandated assessments your students take during the school year. Do you think students in this school are not given enough assessments, are given about the right number of assessments, or are given too many assessments throughout the school year?

74% of Teachers responded that there are "too many assessments."

Furthermore, 71% of teachers agreed or strongly agreed that they "spend too much time on benchmark assessments." In addition, 63% of teachers disagreed that benchmark assessments are "worth their time and effort."

In addition to the concerns teachers have about assessments, the assessment study commissioned by the TN State Assessment Task Force (TSATF) also found that 84% of districts have some concern about time spent on assessments in their district.[7]

Science and Social Studies Exams

The TESP references the following changes for the future assessment landscape:
- Reducing testing time in science and social studies
- Modify the mathematics and ELA tests

ESSA maintains the requirement that states test students annually in reading or language arts and math in grades 3-8 and once in grades 10-12, and in science once in each of the following grade spans: 3-5, 6-9 and 10-12.[8]

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[4] TESP, pg. 31

[5] *Id.*

[6] 2015 Tennessee Assessment Task Force Report
https://www.tn.gov/assets/entities/education/attachments/tst_assessment_task_force_report.pdf

[7] *Id.* at 43.

[8] Section 1111(b)(B)(v)(I)

Recommendations:

1) Since there is a clear opportunity to reduce both science and social studies assessments, this section should have information TDOE received from stakeholders on this topic. What feedback was received from districts and teachers on this topic and how is it addressed in the ESSA draft plan?

2) If over-testing is a concern for teachers and districts, it will be helpful to provide information about the pros and cons of grade-span testing in those content areas.

End-of-Course Exams

In TDOE's October 2016 Status Report, the Department noted that "some stakeholders have shared specific concerns about over-testing of 11th grade students. There is continued discussion about ways to reduce testing, including a potential pilot option for select districts (based on current ACT scores and growth) to use ACT as the 11th grade ELA and math EOCs." [9]

In the TESP, the reason for not including an option for districts to use the ACT as a replacement was because of the "need for an initial period of stability to make sense of the data from these assessments." If the desire to have data is the primary goal, that focus likely won't change with a "two year-investigative period" and "extensive stakeholder feedback."[10]

TEA urges the state to constantly evaluate all assessments which consume school time and only continue assessments which are constructive and appropriately aligned to the standards. The time to teach is extremely valuable for our educators and should be protected and consistently monitored.

Recommendations:

1) Clearly outline why there was a shift between the October Status Report and the TESP in terms of the pilot option. If there is a possible pilot, what would the threshold be for this option?

2) Share feedback from districts and teachers you received about this option.

Innovative Assessments

ESSA allows a State to pilot new innovative assessment under demonstration authority, but requires that each State assess all students on the applicable assessments, using either the innovative assessment in participating LEAs and schools or the statewide assessment in non-participating LEAs and schools.

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[9] TDOE October 2016 ESSA Status report
[10] TESP, pg. 32

Recommendations:

1) We would like to see the pros and cons of an innovative system option within this section. Since the state has examined the Competency-Based Education Pilot, it is important to highlight this option.[11]

2) We would like to see reference to the Competency-Based Education Pilot details within this section since it impacts assessments on the local level.

3) Explore performance-based assessments. A good model for this approach is evidence by the New York Performance Standards Consortium (NYPSC). The NYPSC represents 28 schools across New York State. NYPSC developed an assessment system that leads to quality teaching and enhances students' education.[12]

Assessment Audit

Under ESSA, TDOE can apply for funds from the U.S. Department of Education to conduct audits of assessments and also award sub-grants to Local Education Agencies (LEAs).

Tenn. Code Ann. § 49-6-6007 provides for annual notification of parents by the department and LEAs as to mandated tests to be administered in the upcoming school year. However, it is important to go beyond the requirements in that law with the assistance of federal money under ESSA.

Recommendations:

1) Apply for federal funding under ESSA to conduct a deeper assessment analysis. Districts can then be awarded sub grants to do a deeper analysis of their tests and other administered assessments.

We believe the audit should include, at a minimum:
- An inventory of all standardized tests, including when they are taken, who takes them, in what subjects, whether they are legally required and under what authority.
- The purpose of each test.
- The origin and management of each test: who produced it and who grades it.
- Whether and how educators, principals, school leaders, and administrators use the test data to inform instruction.
- The manner test data is presented to stakeholders.
- How test data is utilized to inform decisions that affect students (placement, support services, etc.).
- How much time is spent taking each test and total time taken away from direct instruction.
- A school-by-school assessment of the technological resources and staff needed to administer each assessment.

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[11] TESP, pg. 104
[12] New York Performance Standards Consortium; http://performanceassessment.org/index.html

In addition, the audit should measure the financial cost of administering standardized tests, both direct and indirect costs, including:

- Contracts with companies providing assessments, including preparation, interim tests, test scoring and analysis.
- Staff time associated with testing, including administration and proctoring.

2) In addition to the federal money under ESSA, we recommend that the state post all district assessment schedules on a state website. Since districts already post this information on their websites and TDOE has information gathered from 2016 Regional Assessment Audit, much of this information is readily available. An example of how this can look is showcased through all of the district differentiated pay plans and salary schedules.[13]

3) Request the Office of Research and Education Accountability (OREA) to create a comparative analysis of the different assessments by district.

4) The new World-Class and Instructional Design (WIDA) assessment system is found to be favorable by many educators. We would like to see TDOE include baseline data on EL proficiency rates based on 2015-2016 ACCESS results within this section or an appendix.

5) Establish an Assessment Advisory Group that consists of 10-15 teachers from the various regions of the state and charge the group with giving feedback about the current state of assessments. This advisory group will provide guidance to the existing Tennessee Assessment Task Force (TATF).

6) The work and priorities of the TATF should be included in the state plan.

ACCOUNTABILITY

TEA supports effective and fair school accountability systems. The Association believes that accountability systems should embody the following principles:

a. Accountability should be used to focus on educational improvements, assure the appropriate uses of resources, prevent and reduce waste, fraud and abuse, and encourage continual improvement of the learning environment.

b. Accountability systems should measure education by a variety of indicators that provide a clear and accurate description of resources, processes and outcomes.

c. Any accountability processes must assure that teachers are provided with high quality, job-embedded professional development and resources needed to help align their curriculum, standards, instruction and assessment in the classroom in accordance with the adopted standards.

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[13] http://www.tennessee.gov/education/topic/differentiated-pay

d. Students must be provided with the materials and facilities needed to learn and meet adopted standards. Since statewide tests are a major component of Tennessee's accountability system, the Association encourages teachers, parents, students and administrators to use the results as a diagnostic tool. All community members should view the accountability results as only one component of a school's success.

Responsibilities, Framework, and Achievement Goals

The TESP explains that TDOE's accountability system provides a framework focused on "increasing student achievement" and when schools perform at the very bottom of the state performance curve, the state has the "obligation to remove district oversight."[14]

In our analysis of this framework, we reflected on why the district oversight should be removed. Furthermore, the focus should be on improving student achievement but it is important to more closely examine how that achievement is measured.

Tennessee Succeeds sets ambitious goals for academic proficiency, graduation rates, and EL proficiency rates. Target goals are set for each subgroup with significant gap reduction as the goal by 2025.

Recommendations:

1) Provide working definitions of student achievement and district oversight.

2) Explain and describe the methodology behind the performance goals established on pages 39-44.

State Report Card and Transparency

We advocate for increased transparency with regards to public accountability metrics. It is important for the public to have more accessible information about the various non-academic factors impacting student learning.[15]

We commend TDOE for the newly redesigned State Report Card as it provides clearer district information. It will also be helpful to see the reporting of per-pupil expenditures and the source of those funds.

Subgroups

Tennessee's accountability model uses Annual Measurable Objective (AMO) targets. TN will continue to use 30 as the n-count threshold. In addition, TN will "report at the level of individual racial and ethnic groups, as well as lowering n-count to 10 for the purposes of reporting." [16]

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[14] TESP, pg. 38
[15] TESP, pgs. 45-46
[16] *Id.* at 47.

Recommendation:

1) TDOE should commit to disaggregating student data so that students, parents, schools, and districts have an accurate understanding of how well the school is serving all students. This information will help support the implementation of a multi-cultural curriculum at all levels, including training for educators on how to effectively provide supports for all students.

District Accountability

We agree that in examining district accountability it is important to gauge performance and provide equitable supports. However, it's evident that there exist significant inequities between districts that need to be outlined.

Recommendations:

Within the section outlining minimum performance goals, achievement status, subgroup status, and final district determination, it will be helpful to provide more information about how TVAAS is developed and determined.

1) Enumerate supports TDOE provides districts about how to use this information and understand the role of TVAAS in the accountability system.

2) Document and outline the supports that have the greatest impact on district accountability.

3) Consider the research that shows that TVAAS should be used for diagnostic purposes only versus high stakes decisions.

School Accountability

ESSA requires states to meaningfully differentiate schools on an annual basis. We agree with several principles outlined in the TESP for the school accountability framework.[17] It is also critical to recognize that schools vary a great deal in terms of financial and instructional resources.

Recommendations:

1) This section would benefit from details in the TDOE presentation that outlines where schools would fall with the framework with current data. We don't want the proposed framework to have a disproportionate impact on schools with high levels of poverty.

2) The State should include a definition of consistently underperforming.

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[17] *Id.* at 59.

A-F Grading Legislation

The final ESSA accountability regulations require that each state's accountability system meaningfully differentiates schools by providing them with a summative determination from among at least three distinct, clear, and understandable categories, while allowing for multiple ways for states to designate schools in each category.[18]

These categories can be the same as those that ESSA requires (i.e. comprehensive support and improvement, targeted support and improvement, and other schools) or a state may develop its own system of summative determinations to describe school performance. [19] Nothing within ESSA law or current regulations require an A-F rating system.

The Tennessee General Assembly passed a law requiring the annual report card to include an A-F grading system for all schools. This "summative" grade is intended to give parents, educators, and stakeholders a summative overview of the schools and a baseline comparison across districts. It will be helpful for TDOE to present any feedback they have received from stakeholders about the A-F grading structure. Even though it is state law, TDOE can still present an opinion on the topic and advocate for a revision to the law.

Despite the proliferation of A-F grading systems, there has been little credible research on whether letter grades validly measure and express school quality. Expressing school quality on a five-point, A-F categorical scale produces considerable imprecision. Schools with the same grade are represented as equivalent when they can differ substantially.

Recommendations:

1) Propose to the legislature that the summative rating for schools change from a letter to a category designation. Even though it is not necessarily quantifiable, having a letter grade for a school of D or F might not achieve the goal of providing the public with easy to understand information. Furthermore, we believe schools can still be held accountable without a summative letter grade.

2) Establish a clear plan and process to adjust the scale if it becomes clear that the distribution of summative ratings unduly impacts particular schools.

3) Conduct annual research on the correlation between a summative rating and local funding.

Opportunity to Learn Indicator of School Quality and School Success

We believe that we need to move beyond accountability being solely test scores and should truly have multiple factors beyond standardized scores. Examining growth through a flawed statistical model (TVAAS) does not help differentiate schools in the best way.

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[18] https://www2.ed.gov/policy/elsec/leg/essa/essafactsheet170103.pdf

[19] *Id.*

We agree that chronic absenteeism can "reduce student achievement and increase risk for future truancy."[20] Focusing on increasing seat time is important to highlight and include in the accountability structure. We also think that opportunity to learn encompasses more than attendance. The opportunity to learn is also about access to strong curriculum, well-qualified teachers and support professional, and resources.

Curriculum Access: Increasing student access to a high-quality curriculum is a key step toward more equitable schooling. Reporting this kind of information by grouping may leverage greater access and offer a more holistic picture of student offerings.[21]

Indicators of access to a full, rich curriculum and rigorous coursework could include:
- student participation in college preparatory courses
- completion of a high-quality career technical course sequence (work-based learning opportunities or internships)
- access to a well-rounded curriculum that includes science, history, writing, music, physical education, and arts and
- student participation in and completion of Advanced Placement, International Baccalaureate courses, or dual credit college courses.

Access to Well-Qualified Teachers: As the "comparability provisions" of ESSA acknowledge, the distribution of in-field, experienced, and effective teachers is often highly uneven across districts and schools. Indicators of equal access could include the proportions of educators who (1) are fully certified for the courses they teach, (2) have more than three years of experience, or (3) have achieved National Board Certification.

Access to Resources: Looking closely at the distribution of resources across schools and districts offers important information about how they might address existing inequities in opportunities and outcomes. For schools to be held accountable for providing a strong curriculum, they need resources such as:
- sufficient funding
- safe and adequate facilities
- up-to-date curriculum materials, including access to computers and other technology; and
- adequate and timely professional development opportunities for educators.[22]

Recommendations:

1) Provide ideas and plans for how the state will provide support and resources for systems that are having challenges with chronic absenteeism.

2) Acquire support from the U.S. Department of Education initiatives on this topic.

3) School and district leadership continuity is an important component to student access and improvement. It will be helpful for TDOE to provide Director of Schools and administrator retention rates (by school).

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[20] *Id.* at 65.
[21] Channa M. Cook-Harvey, Linda Darling-Hammond, Livia Lam, Charmaine Mercer, and Martens Roc*, Equity and ESSA: Leveraging Educational Opportunity Through the Every Student Succeeds Act* (November 2016).
[22] *Id.*

Identification of Schools for Comprehensive Support (Priority Schools)

We support the state in their efforts to support low-performing schools. It is important to target financial and planning resources to support school improvement.

The TESP explains that a Focus School that continues to underperform would be designated as a Priority school after three consecutive years on the Focus school list.[23] The rationale for designating a school as a Priority school if they don't meet the criteria established for that grouping of schools is not clear in the TESP.

Recommendation:

1) There should be clear criteria for entry and exit on the Priority schools list.

Identification of Schools for Targeted Support (Focus Schools)

The Focus school criteria "will be determined by reviewing the data for each of the four accountability subgroups – students with disabilities, economically disadvantaged students, students in racial/ethnic groups currently performing below the state average (Black/Hispanic/Native American student), and English learners – across all schools meeting the minimum N-size. In order for Focus schools to represent historically underserved student groups across all eligible schools, the Focus school list will be comprised from each subgroup proportionately. The department will review each school's subgroup average from the A-F framework indicators."[24]

Recommendations:

1) Establish clear procedures for the identification of Focus schools. Even though the first identification will not be until 2018, it will be helpful to clearly outline the change in methodology.

2) Schools should have more than three years on the focus list before they are shifted to the Priority list. More time and targeted support should be given to help move their schools.

Improving Our Lowest Performing Schools

ESSA affords more decision-making to both the state and districts. As the plan notes, "Tennessee expects to maximize the authority by empowering districts to lead turnaround in its low-performing schools." Furthermore, districts are "provided key decision-making authority in how to intervene in schools."[25]

In the TESP, TDOE has opted to include three interventions that were in existence through the state's ESEA waiver: Achievement School District, District-led Interventions, and School-level grants.

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[23] TESP, pg. 66
[24] *Id.*
[25] TESP, pg. 67.

District-led Interventions

The legislative intent behind ESSA is to give districts more autonomy to turn around their schools. The plan allows districts with four or more Priority schools to apply for annual funding for a three year period in school improvement funds.[26]

In Tennessee and across the country, district-led interventions have demonstrated significant success in comparison to state-led interventions.

Innovation Zones (iZone)

iZone schools have been shown to increase student achievement and ensure college and career readiness for our students.[27] Vanderbilt University released a study in 2016 suggesting the city's low-performing schools would be better off in Shelby County Schools' Innovation Zone. [28]

The study shows that iZone schools have sizeable positive effects on student test scores, while the ASD effects are marginal. Students at ASD schools are performing mostly at the same levels they likely would have had if school were not been taken over by the state-run school turnaround district.[29]

iZone schools also exist in Nashville, Knoxville, and Chattanooga for particular Priority schools. Many of the iZone schools have been able to achieve success without staffing adjustments which can sometimes leave teachers displaced from their particular schools.

Community Schools

Community Schools serve over 5 million students in approximately 5,000 schools across the country.[30] Community schools implement evidence-based strategies to bring together the school, family, and community resources to make schools stronger.

When Community Schools are able to employ key strategies, their results can be sustainably transformational: increasing school attendance, decreasing suspensions and expulsions, creating healthy and safe communities, and improving academic outcomes.

In Texas, two community schools located in Austin's most high-poverty neighborhood went from the brink of closure to becoming two of the highest performing schools in their city; the city of Cincinnati was able to shrink its racial and socioeconomic achievement gap from 14.5 percent to 4.5 percent; a school in Baltimore went from being ranked 77th in the city to 2nd. [31]

Community Schools have achieved success when they adhere to the following 4 key elements:

1) Needs/Asset assessment and vision

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[26] TESP, pg. 70.

[27] http://www.scsk12.org/izone/?id

[28] http://www.tnconsortium.org/data/files/gallery/ContentGallery/ASD_Impact_Policy_Brief_Final_12.8.15.pdf

[29] *Id.* at pg. 1

[30] https://populardemocracy.org/sites/default/files/Community-Schools-Layout_e.pdf

[31] *Id.* at pg. 6.

2) Strategic Plan
3) Community School Coordinator
4) Stakeholder Community School Board

Successful community schools also employ a six point strategy as follows:

1) Strengthened curriculum
2) Improved student assessments
3) Wrap-around supports such as eye care, health care, and social and emotional services
4) Positive discipline practices such as restorative justice
5) Transformational parent and community engagement
6) Shared leadership philosophy

The iZone and Community Schools models demonstrate the success districts have in turning around traditional public schools.

State-led Interventions

Achievement School District

Under the theory of action within this section, the ASD "serves as our most rigorous intervention and lever of change."[32] Furthermore, "ASD will continue to improve educational opportunities and academic achievement for students in Priority schools."[33]

As outlined in the TESP, a priority school that has been removed from the district and placed in the ASD will remain in the ASD until the school is no longer identified as a Priority school for two consecutive cycles beginning with the 2017 Priority school list. However, no school shall remain in the ASD for more than a ten year period. [34]

TDOE has placed confidence in ASD and a deeper analysis and discussion about the achievement school district is necessary and required within this section. When the Tennessee General Assembly created the ASD in 2010, it was intended for the special school district to be a very limited arm of TDOE.

In theory, the ASD would come into local communities, take over persistently struggling schools, make necessary changes, and then return the schools to their respective local education agencies (LEAs) as soon as practicable. Under the original plan, it would take over no more than 13 schools statewide in order to establish "proof points" for successful turnaround. Contrary to the original plan, Governor Haslam and Tennessee General Assembly in 2012 turned the ASD into an authorizer of charter schools. Rather than sticking to a limited scope, as originally envisioned, the ASD now has approximately 30 schools under its purview and expanding every year in ill-advised ways.

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[32] TESP, pg. 68.
[33] *Id.* at 69.
[34] *Id.* at 76

Some notable problems and concerns with the ASD are as follows:

- Students at ASD schools are performing mostly at the same low levels they likely would have had their school not been taken over by the state-run school turnaround district.[35]

- The Tennessee Consortium on Research, Evaluation, and Development (TNRED) charts the progress of the ASD for the Tennessee Higher Education Commission (THEC) and addressed some challenges in a June 2016 report, explaining, "Absent a student population whose families sought out schools that met their values and priorities, several providers struggled to engender parent buy-in and engagement."[36]

- The first comprehensive performance audit of the ASD shows a lack of adequate control over processes in human resources and payroll, including reimbursement of excessive travel claims and payments for alcohol at an office celebration.[37]

- ASD has a graduation rate of 40.4% (a decline of 7% this year)[38]

- Only 64.9% of teachers in the ASD are highly qualified teachers. 97% of teachers in Shelby County are highly qualified.[39]

- In the 2014-15 school year, the ASD received a TVAAS level 2 for both Literacy and Numeracy. During that same year, Shelby County schools received a level 5 for both Literacy and Numeracy. [40]

Recommendations:

1) Place District-led Interventions on the same standards and criteria as the Achievement School District. It's unclear why the ASD is seen as a default intervention with significant problems with the district have been outlined and highlighted. Why open the door for more schools entering the ASD with such a limited success record?

2) Advocate for a moratorium on the ASD's ability to take over additional schools until communities see improvements with those schools.

3) Research through the Tennessee Education Research Alliance to determine what strategies are being employed within the ASD that are distinct from district-led efforts.

Support for School Improvement

ESSA requires districts with Priority schools to have a period not to exceed 4 years to develop a plan to intervene in priority schools. If intervention is unsuccessful, the state must apply a more rigorous intervention. As stated in the plan, "to address this requirement, Tennessee has

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[35] Vanderbilt TNCRED Study June 2016
[36] http://www.tnconsortium.org/data/files/gallery/ContentGallery/TNCREDBigLeaguesReport_0624162.pdf
[37] http://www.comptroller.tn.gov/repository/SA/pa16128.pdf
[38] https://www.measuretn.gov:444/ReportCard/Main/CurrentReportCard#/academic-snapshot
[39] *Id.*
[40] *Id.*

developed an intervention track for schools to be supported through a district-led partnership or by the ASD."[41]

Alpha Track 1 schools will be immediately placed in the ASD. Alpha Track 2 Schools that do not achieve a TVAAS of 4 or 5 overall in SY 2017-18 will begin ASD planning in 2018-2019. It doesn't seem like Priority schools have much time for district interventions and a heavy focus is on the ASD.

Recommendations:

1) Provide more details as to how it will determined that schools be placed immediately in the Alpha Track 1 versus Alpha Track 2.

2) Place a limit on the number of schools that can be placed in the ASD.

3) Provide increased transparency regarding the ASD in terms of their Performance Framework scores.

4) Allow districts the maximum time flexibility set forth in ESSA to turnaround schools.

State Application Process

TDOE believes that "providing districts with an evidenced-based framework and requiring districts to identify district-specific strategies and actions aligned with ESSA and allows districts to turn around schools with district-led models before more rigorous interventions are put in place."[42]

Recommendations:

1) Provide transparency with this application process and truly give districts time to work with Priority schools before turning them over to the ASD.

2) Provide more details about why TDOE selected Tier 4 as an option for interventions.

DISTRICT EMPOWERMENT

ePlan

Another strong component to improving districts is transparency and information. Having detailed information in the ePlan public portal for communities is helpful.

Recommendation:

1) Provide more information and timelines as to when additional information will be placed in the public portal.

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[41] TESP, pg. 71.
[42] TESP, pg. 79.

Tennessee Education Research Alliance (TERA)

We agree with the key areas of focus for the Tennessee Education Research Alliance: improving early reading, reimagining state support for professional learning, driving improvement in low-performing schools with evidenced-based research, and strengthening Tennessee's education labor market.

Recommendation:

1) Consistently use teachers and practitioners as part of the TERA priorities and activities.

Coordinated Spending Guide

"More Tennessee districts will be empowered to leverage funding across streams to support students."[43]

For the first time since the passage of ESEA in 1965, states and districts must now report the per-pupil expenditures of federal, state, and local funds, including actual personnel expenditures and actual non-personnel expenditures, for each school and district, disaggregated by the source of funds. This will provide greater transparency in resource allocations across states and put analyses of student outcomes into a more complete perspective that considers the investments in children's education. LEA improvement plans must identify resource inequities, and state agencies may periodically review resource allocation to support school improvement in each district.

Recommendation:

1) Provide more transparency on this spending guide. Ideally, these data would be displayed alongside data on the characteristics of students served in the district, in relationship to the average, minimum, and maximum per-pupil expenditures in the state, so that members of the public can use the data to interpret how schools are doing and how adequately they may be resourced.

2) Create transparency around special education funding differences under the new law.

Differentiated Educator Pay

While most financial incentives are targeted primarily at recruiting new teachers, such incentives can also be used to encourage experienced teachers to increase their skills and expertise and take on additional leadership responsibilities.

TEA believes that a single salary schedule is the most transparent and equitable system for compensating teachers. The development of models that provide additional compensation beyond the single salary schedule should be accomplished through a bilateral decision-making process. In addition, any performance based compensation model shall not be used solely on student achievement as measured by standardized tests; rather such models shall be designed to

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[43] TESP, pg.94.

encourage collaboration rather than competition; and shall be criterion-based so that everyone meeting an agreed-upon standard earns the award.

Recommendations:

We believe that any system providing compensation beyond the single salary schedule may:

(a) Be based upon knowledge or skill-based systems which support and reward the acquisition of critical skills that contribute to professional competency;

(b) Include incentives to attract and retain teachers with special qualifications and teachers who are willing to work in high priority schools;

(c) Be based on recognition or designation of teachers as "lead teachers", "mentoring teachers", or "accomplished teachers" provided the criteria used to determine these designations are clearly stated and subject to objective measurement.

The Association believes any compensation model should be funded without re-prioritizing existing resources and done in a sustainable manner.

Micro-credentialing

We can agree that it is important to improve professional development initiatives and pilots.

Recommendation:

1) Provide a list of the teachers involved in the micro-credentialing pilot on the state website.

Competency-Based Education

Recommendation:

1) Include this pilot in the Assessment section of TESP and provide more information about its long-term goals.

ALL MEANS ALL

Creating Self and Healthy Learning Environments

We agree that supportive learning environments are critical to schools.

Community Schools

In the TESP, TDOE noted that they will "explore the scope and cost of partnering with an external entity or develop their own model for the development and expansion of community

schools across the state, particularly in priority schools who often have a greater need for additional support and wraparound services."[44]

ESSA includes the Community Support for School Success program, which funds Full-Service Community School grants aimed at improving the integration and effectiveness of services for families and students. Community school models and wraparound services in schools serving low-income students have been found to improve student outcomes.

ESSA also encourages results-focused school-community partnerships through:

- use of Title II professional development funds to prepare educators to more effectively engage families and communities, and connect school and community resources
- consultation with families and community partners to plan for use of funds; and
- partnerships with nonprofits, community-based organizations, businesses, and institutions of higher education to support student learning.

Community Schools Key Components

1. An **asset and needs assessment** of and by both school and community; participants in the assessment process include parents, students, community members, and partners and school staff.

2. A **strategic plan** that defines how educators and community partners will use all available assets to meet specific student needs and get better results, specifically through a focus on curriculum, high-quality teaching, wraparound supports, positive discipline practices, parent and community engagement, and inclusive leadership.

3. The **engagement of partners** who bring assets and expertise to help implement the building blocks of Community Schools.

4. A **Community School Coordinator** whose job is to facilitate the development and implementation of the strategic plan in collaboration with school and community members/partners, and to ensure alignment of solutions to needs.

Community Schools that have used these strategies and mechanisms have seen transformational positive change, including improved academic success, decreased discipline incidents, increased attendance, and increased enrollment.

Recommendations:

1) Embrace Community Schools as a transformational education solution: state and local policy makers, using the opportunity created by this new law and in collaboration with their education constituencies including parents, school staff, students and community members, tap the power of community to grow the number of effective Community Schools across the state with a focus on Priority and Focus schools.

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[44] TESP, pg. 123.

2) Codify Community Schools in policy: community organizing and education advocacy groups, and Community School practitioners can join lawmakers to use policy templates to pass legislation that will enable a dramatic increase in the number of Community Schools.

3) Implement Community Schools by using key strategies and mechanisms: all key stakeholders use the model strategies and mechanisms to ensure that Community Schools are achieving the educational and social results that are possible when these strategies and mechanisms are implemented with fidelity.[45]

Response to Instruction and Intervention

It is clear TDOE has refined various components of the RTI process. As noted in the TESP, Tennessee continues to refine practices based on educator feedback.

Recommendations:

1) Provide more information within this section dealing with the challenges educators are experiencing with RTI implementation.
2) Clearly show the impact that RTI scheduling has on teacher schedules and the time to teach.

Response to Instruction & Intervention for Behavior

The RTI – B framework is being implemented in 120 schools and 21 districts. It is a good initiative, however, on top of other initiatives, it is important to protect instructional time.

Recommendations:

1) List the funding provided in the state budget related to the Tennessee Behavior Supports Project (TBSP). Explain how the program will be funded in the future.

Reduction of Exclusionary Practices and Promotion of Restorative Practices

We recognize the fact that it is important to reduce exclusionary discipline practices. We also support restorative practice training and expansion and continued funding of this initiative.

The TESP provides information that the Governor's Alternative Education Board convene a discipline task force to develop a model code of student conduct focusing on the reduction of exclusionary practices.

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[45] *Community Schools Toolkit: Transforming Struggling Schools to Thriving Schools*.
https://populardemocracy.org/sites/default/files/Community-Schools-Layout_e.pdf

Recommendations:

1) Provide detailed analysis of the benefits of including exclusionary practices as a non-academic indicator.
2) Include TEA Representation/Practitioner on the 2017 Discipline Task Force.

Ensuring Equity: Access to Highly Effective Teachers

We agree that students need to be paired with effective teachers. We think that TDOE needs to shift away from defining teacher effectiveness by TVAAS 4 and 5. By only focusing on student growth, we are not truly capturing all of the strong educators and multiple indicators that reflect teaching quality in Tennessee. Furthermore, less than half of the teachers actually have value-added scores.

There is a growing mismatch between representation of students of color and teachers of color in public schools. Additionally, education research has found that students of color have higher academic outcomes when they receive instruction from teachers that share a similar background. Therefore, it is important for districts to retain and recruit teachers of color in Tennessee. [46]

Recommendations:

1) Define effective teachers using the **overall** levels of effectiveness.
2) Focus on improving teacher practice rather than shifting around "effective" teachers.
3) Include National Board Certified Teachers in the discussion around equitable access to effective teachers.
4) Highlight administrative turnover and stability at schools and/or LEAs.
5) Provide an annual report on minority teacher statistics and recruitment efforts.

Performance Management: ESSA Programs

TCA requires the annual development and completion of a district plan in coordination with a variety of stakeholders. We applaud the transparency that allows for public viewing of school improvement plans in ePlan.

Title IV: Student Support and Academic Enrichment Grants

The new block grants support the following:

Well-rounded Educational Opportunities (ESSA 1407)
- improve access to foreign language, arts, and music education

Safe and Healthy Schools (ESSA 4108)
- Promote parent and community involvement in schools
- Promoting school climates

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[46] 2015-2016, State of Education in Tennessee (Tennessee State Collaborative on Reforming Education)

Effective Use of Technology (ESSA 4109)
-Provide students in rural communities the resources to benefit from high-quality opportunities
Districts may apply for Student Support and Academic Enrichment (SSAE) funds and prioritize
the distribution of funds to schools based on certain factors.

Recommendations:

1) Make the grant process more transparent and prioritize key areas.

Charter Schools

We support innovation in public education. At the time charter schools were authorized in
Tennessee, they were considered laboratories of experimentation where the public support
combined with the additional freedom and flexibility might encourage the use of different and
innovative teacher methods. However, with the rapid expansion of charters, the focus on sharing
best practices and innovative methods is not always prominent.

We believe that public charters need to focus on increased transparency, equal access for all
students, quality, and the sharing of best practices.

Brown University's Annenberg Institute for School Reform created seven accountability
standards that provide strong guidance for the legislature, school board, and communities. Those
key standards are as follows:

1) Traditional districts and charter schools should work together to ensure a coordinated
   approach that serves all children.
2) School governance should be representative and transparent.
3) Charter schools should ensure equal access to interested students and prohibit practices
   that discourage enrollment or disproportionately push enrolled students out of the school.
4) Charter school discipline policy should be fair and transparent.
5) All students deserve equitable and adequate school facilities. Districts and charter schools
   should work together to ensure that facilities arrangements do not disadvantage students
   in either sector.
6) Online charter schools should be better regulated for quality, transparency, and the
   protection of student data.
7) Monitoring and oversight of charter schools are critical to protect the public interest.
   They should be strong and fully funded by the state.[47]

Recommendations:

1) Ensure charters have open and transparent governance.
2) Provide more information about the impact of charter growth on traditional public school
   finances.
3) Ensure charters provide equal access to all students.

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[47] *Public Accountability for Charter Schools Standards and Policy Recommendations for Effective Oversight* (2014).
Annenberg Institute for School Reform.

4) Hold charter schools to high standards of accountability.[48]
5) Research best practices employed by traditional public schools and charter schools. The most recent survey of charter and traditional public schools was conducted in May of 2013.[49]

EDUCATOR SUPPORT

Funding for Educator Support

Tennessee uses state and federal funds to promote the work of educator support and effectiveness.

Recommendation:

1) Provide more transparency regarding Title II funding and opportunities.

edTPA

TEA has appreciated the opportunity to collaborate with the SBE on issues involving teacher preparation and licensure over the years. Many years ago, TEA, along with SBE staff, convened education stakeholders and focus groups to discuss the positive addition of edTPA. The groups decided that dual assessments for benchmark entry into the profession was the best avenue for EPPs. Based on EPP's resources, recruitment and retention and other variables, TEA believed that providing the flexibility to offer both assessments was the best way to go.

Recommendation

1) TEA has always advocated for the maintenance of high standards in licensing professional educators. While we continue to advocate for strong teacher preparation programs and standards, we believe that prospective teachers should have both edTPA and PRAXIS options available. TEA believes that concerns in the following areas provide support for our position: multiple measures of teacher quality, recruitment and retention impact, cost, implementation timeline, and Institutions of Higher Education (IHE)/EPP flexibility.

TVAAS

The Tennessee Education Association recognizes that problems exist with the use of TVAAS.

These problems include:

a. The complicated statistical process used in TVAAS cannot be revealed to teachers due to proprietary rights held by Dr. Bill Sanders and SAS Institute, Inc.

b. The majority of teachers do not have individual value-added scores.

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[48] National Education Association Action Guide on Charter Schools, http://www.nea.org/assets/docs/20039%20NEA%20Charter%20School%20Action%20Guide%3b%20WEB.pdf
[49] https://www.tn.gov/assets/entities/education/attachments/chtr_sch_best_practices_2013.pdf

c. TVAAS does not control for students' socio-economic and demographic backgrounds when analyzing achievement data.

d. Teachers have no way to resolve problems when apparent anomalies and/or inconsistencies in the TVAAS data occur.

Recommendations:

In view of these problems, the Association believes that until TVAAS is eliminated:

a. TDOE should develop and implement a comprehensive, high quality, job-embedded training module on the use of TVAAS data.

b. High quality, job-embedded training in the use of TVAAS data should be offered to all teachers. Educators must not only understand what the scores mean, but must be thoroughly trained in how to use the scores in decision making.

c. Teachers should have open, on-line access to their TVAAS data.

d. Teacher effect data should not be published or used as the sole rating of teacher quality.

e. A clearinghouse should be developed and staffed by the Tennessee Department of Education to receive and resolve questions from teachers on data problems.

f. Extensive research should be conducted to test the use of student background controls in TVAAS to determine if such controls make a difference.

Teacher Preparation Report Card

We commend the SBE for developing a more detailed and accessible State Report Card.

Only looking at retention after one year is short-sighted. Several non-traditional programs only keep their teachers for a couple years.

Teacher and Principal Residency Programs

TDOE will utilize Title II, Part A statewide program resources and optional set aides to support teacher residency programs in high needs schools.[50]

Recommendation:

1) It is important to have high and clear standards for the teacher residency programs.

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[50] TESP, pg. 199.

Evaluation

Problems with Data Release in late November

Previous year growth and/or overall evaluation composites came very late into the school year and caused significant problems for educators.

- o Initial coaching conversations
- o Summative conferences
- o Frequency and nature (i.e. walk-throughs) of required observations
- o Tenure decisions
- o Data that can drive instruction for the current school year
- o Performance-based pay plans
- o Data that can drive decisions about the selection of achievement measures for the current school year

Recommendations:

1) Establish an advisory group of teachers to review the evaluation system biannually.
2) Provide a clear process for resolving data issues with the district, the state, and SAS.
3) Comply with the law that forbids alignment between TVAAS and qualitative observations.
4) Minimize the use of TVAAS in the evaluation system
5) Highlight some of the challenges with the evaluation system in the draft and outline steps to remedy them.

CONCLUSION

The passage of ESSA provides a great opportunity for states to take an innovative approach in the areas such as assessments, accountability, and school supports. TEA is encouraged by several elements of the state plan and will continue to provide recommendations to TDOE as they finalize their state plan.