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DEPARTMENT OF EDUCATION
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KEVIN HUFFMAN
COMMISSIONER

MEMORANDUM

TO: Directors of Schools
FROM: Erin O'Hara, assistant commissioner for data and research
DATE: April 15, 2014
RE: Amendments to waiver for 2013-14

Under ESEA Flexiblity, states may amend their waiver in order to make improvements to the accountability system. This memo outlines Tennessee's plan and rationale for making two changes to our waiver, one for the Focus School methodology used in school accountability and one for the subgroup improvement test used in district accountability. If approved, both changes would be applied to data from the current 2013-14 school year.

I. School accountability: Focus School methodology

When Tennessee released Focus designations in 2012, the department received feedback from a number of sources that the weighted index system used to designate the schools with the largest combined achievement gap across all major subgroups made it very difficult to determine the reason that a school had landed on the Focus list. We propose simplifying the system by designating as Focus Schools the schools that have the largest achievement gap within each subgroup category. Thus, schools will be chosen, for example, because they have particularly large gaps between their economically disadvantaged students and non-economically disadvantaged students, or because they have particularly large gaps between English Learners and non-English Learners, rather than because they have a large weighted index that combined all achievement gaps into a single number.

Current method

Schools can currently land on the Focus list through any one of the following three pathways.

1. Graduation Path: The school's graduation rate falls below 60 percent
2. Subgroup Success Rate Path: The composite proficiency rate for any given subgroup falls below five percent. Note that composite proficiency rates across subjects currently excludes English I and Biology in the Focus Methodology whereas these subjects are included in the Reward/Priority calculation.
3. Achievement Gap Path: The school's weighted gap index for the school is among the highest in the state. Schools are successively chosen using this weighted gap index until the total number of schools selected through all three pathways is equal to 10 percent of all schools in the state.

Proposed method

We propose the following changes:

1. Graduation Path: The school's graduation rate falls below 60 percent (unchanged)
2. Subgroup Success Rate Path:
    a. As described in our current waiver, the threshold composite proficiency rate for any given subgroup will increase to 10 percent the second time we run the Focus list in summer 2014, as we expect fewer and fewer schools to fall below the original five percent threshold as student achievement across the state continued to improve.
    b. The success rate for Focus Schools will include English I and Biology (consistent with the Reward/Priority success rate calculation).
3. Achievement Gap Path:
    a. In place of the current methodology for Focus Schools, the department proposes the following methodology. For each of the four major subgroups – students with disabilities, economically disadvantaged students, students in racial/ethnic groups currently performing below the state average (Black/Hispanic/Native American students), and English Learners – the system will rank the size of each school's achievement gap for each particular group rather than for the combined rate of all groups. Equal proportions of schools will be drawn from each subgroup ranking, starting with the school with the largest achievement gap for that subgroup and working downward, until 10 percent of all schools in the state have been selected. Due to the federal requirement that Focus Schools include at least 10 percent of all Title I schools in the state, this method will first be applied only to Title I schools, with non-Title I schools added in once the Title I requirement has been met.
    b. Schools will be *exempt* from this pathway for a particular subgroup if the school's success rate gain is positive and is greater than the state's success rate gain for the same group.

II. District accountability: subgroup improvement test

Tennessee's approved district accountability system includes two major components, the achievement component and the gap component. The gap component of district accountability includes the subgroup improvement test. Districts that fail one or more subgroup improvement test are immediately routed either into either the "In Need of Improvement" or "In Need of Subgroup Improvement" designation, with the exact designation depending on performance on the achievement component.

In order to pass the subgroup improvement test for each subgroup, a district must pass 50 percent of the eligible subjects. Improvement on 3-8 math and 3-8 reading/language arts is straightforward; however, determining pass/fail for subgroup improvement with the End-of-Course (EOC) subjects is more complicated because of the difficulty in combining multiple EOC exams into single subject areas.

In 2013, the state included Algebra II and English III into the accountability system. As a result, Tennessee amended the subgroup improvement test to incorporate these subjects into the accountability model, collapsing Algebra I and Algebra II into a single "subject" and requiring districts to improve in both to pass the subject, and doing the same with English II and English III. Many districts felt that the new approach was overly punitive and resulted in an increased number of districts receiving the status of "In Need of Subgroup Improvement."

In response to this feedback, the state proposes to continue to use the approved methodology, but will add an additional pathway to address this issue. <u>Districts will only need to meet one of the pathways</u>. The additional pathway would allow the district to pass half or more of all available subjects, rather than needing to pass both

Algebra I and Algebra II to pass the Algebra subject. The difference is in the way the End-of-Course subjects are treated. The table below outlines the additional pathway, and provides one example of how this additional pathway could apply to a district.

<table>
<tr><th colspan="8">Improvement Test Methods</th></tr>
<tr><th colspan="4">Current Method</th><th colspan="4">Additional Pathway</th></tr>
<tr><td colspan="4">In order to pass the subgroup improvement test, each eligible subgroup must improve in at least <u>half of the available four measures</u> (3-8 math, 3-8 reading/language arts, Algebra I/II, English II/III).

To improve in Algebra I/II, the eligible subgroup must improve in both the individual subjects of Algebra I and Algebra II. The same applies for English II/III.</td><td colspan="4">In order to pass the subgroup improvement test, each eligible subgroup must improve in at least <u>half of the available six measures</u> (3-8 math, 3-8 reading language arts, Algebra I, Algebra II, English II, English III).</td></tr>
<tr><th colspan="4">District A: Example for Students with Disabilties</th><th colspan="4">District A: Example for Students with Disabilties</th></tr>
<tr><td>Subject</td><td>Improve/ Decline</td><td>Subject Status</td><td>Improvement Test Status</td><td>Subject</td><td>Improve/ Decline</td><td>Subject Status</td><td>Improvement Test Status</td></tr>
<tr><td>3-8 Math</td><td>Improve</td><td>Improve</td><td rowspan="6">Improve Percent = 25%

Status = Fail</td><td>3-8 Math</td><td>Improve</td><td>Improve</td><td rowspan="6">Improve Percent = 50%

Status = Pass</td></tr>
<tr><td>3-8 RLA</td><td>Decline</td><td>Decline</td><td>3-8 RLA</td><td>Decline</td><td>Decline</td></tr>
<tr><td>Algebra I</td><td>Improve</td><td rowspan="2">Decline</td><td>Algebra I</td><td>Improve</td><td>Improve</td></tr>
<tr><td>Algebra II</td><td>Decline</td><td>Algebra II</td><td>Decline</td><td>Decline</td></tr>
<tr><td>English II</td><td>Improve</td><td rowspan="2">Decline</td><td>English II</td><td>Improve</td><td>Improve</td></tr>
<tr><td>English III</td><td>Decline</td><td>English III</td><td>Decline</td><td>Decline</td></tr>
</table>

Next steps

If you have questions about the proposed amendments, please contact Jennifer Esswein from the data and research division at Jennifer.Esswein@tn.gov. If you would like to submit a comment on the proposed amendment as part of the official comment period, please email your comment to TNED.Accountablity@tn.gov.