ESEA Flexibility

Peer Panel Notes

State Request: Tennessee

Date: December 6 & 7, 2011

Note: These peer comments reflect the views of the seven peers that comprised the panel that reviewed the SEA's initial submission as well as any additional materials provided by the SEA prior to and during the December 5–9, 2011 on-site peer review. Taking these comments into consideration, the U.S. Department of Education provided feedback to the SEA about aspects of the SEA's ESEA flexibility request that needed additional development or clarification. These peer notes do not reflect the peers' views on any materials, clarifications, or modifications received from the SEA following the peer review. Moreover, although the peer notes inform the Secretary's consideration of each SEA's request, the Secretary makes the final decision whether to grant an SEA's request for ESEA flexibility. For both of these reasons, these peer notes may not align with the determination made by the Secretary.

REVIEW AND EVALUATION OF REQUESTS

The U.S. Department of Education (Department) will use a review process that will include both external peer reviewers and staff reviewers to evaluate State educational agency (SEA) requests for this flexibility. This review process will help ensure that each request for this flexibility approved by the Department is consistent with the principles, which are designed to support State efforts to improve student academic achievement and increase the quality of instruction, and is both educationally and technically sound. Reviewers will evaluate whether and how each request for this flexibility will support a comprehensive and coherent set of improvements in the areas of standards and assessments, accountability, and teacher and principal effectiveness that will lead to improved student outcomes. Each SEA will have an opportunity, if necessary, to clarify its plans for peer and staff reviewers and to answer any questions reviewers may have during the on-site review. The peer reviewers will then provide comments to the Department. Taking those comments into consideration, the Secretary will make a decision regarding each SEA's request for this flexibility. If an SEA's request for this flexibility is not granted, reviewers and the Department will provide feedback to the SEA about the components of the SEA's request that need additional development in order for the request to be approved.

This document provides guidance for peer review panels as they evaluate each request during the on-site peer review portion of the review process. The document includes the specific information that a request must include and questions to guide reviewers as they evaluate each request. **Questions that have numbers or letters represent required elements.** The italicized questions reflect inquiries that reviewers will use to fully consider all aspects of an SEA's plan for meeting each principle, but do not represent required elements.

In addition to this guidance, reviewers will also use the document titled *ESEA Flexibility*, including the definitions and timelines, when reviewing each SEA's request. As used in the request form and this guidance, the following terms have the definitions set forth in the document titled *ESEA Flexibility*: (1) college- and career-ready standards, (2) focus school, (3) high-quality assessment, (4) priority school, (5) reward school, (6) standards that are common to a significant number of States, (7) State network of institutions of higher education, (8) student growth, and (9) turnaround principles.

Review Guidance

Consultation

1. Did the SEA meaningfully engage and solicit input on its request from teachers and their representatives?

    ➢ *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of teachers and their representatives at the outset of the planning and implementation process?*

    ➢ *Did the SEA indicate that it modified any aspect of its request based on input from teachers and their representatives?*

CONSULTATION QUESTION 1 PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	Educator engagement and input seemed to be meaningful.
Strengths	- Process of engagement and obtaining input was very thorough and well documented. - TN provided a detailed list of comments with a summary of suggestions and comments that it received from educators and their representatives. - TN noted that it met with teacher unions, and that teachers were partners in its RTTT efforts. - TN consulted with an array of educators, including the TESOL group, among others. - It was evident that TN made modifications in its plans based on educator input. For example, the State decided to include a safe harbor provision from a MISS designation on AMOs for LEAS that perform strongly on growth. - Engagement of educators via targeted community forums co-hosted by critical stakeholders occurred on major principles of the accountability system before ESEA flexibility was announced. The State also presented an overview of the request to all superintendents.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

2. Did the SEA meaningfully engage and solicit input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes?

    ➢ *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of relevant stakeholders at the outset of the planning and implementation process?*

    ➢ *Did the SEA indicate that it modified any aspect of its request based on stakeholder input?*

    ➢ *Does the input represent feedback from a diverse mix of stakeholders representing various perspectives and interests, including stakeholders from high-need communities?*

CONSULTATION QUESTION 2 PANEL RESPONSE *Tally of Peer Responses:* 5 Yes, 2 No	
Rationale	TN engaged a diverse mix of stakeholders and indicated that minimal input was received from these groups.
Strengths	• TN reached out to a diverse mix of stakeholders, including Stand for Children, SCORE, the United Way, and the Urban League. • TN also included special education groups; ESL task force; disability law and advocacy center; and a STEM-focused group. • TN obtained input from both urban and rural areas.
Weaknesses, issues, lack of clarity	• It was unclear whether the changes in the consequences of accountability (e.g., no longer offering a choice school option) were discussed with stakeholders, nor whether they understood the focus of accountability on only some subgroups for gap closure measures and using no subgroups for achievement measures. TN did indicate that it shared its request with stakeholders and did not receive any input on these points.
Technical Assistance Suggestions	

Overview

Note to Peers: Staff will review Questions 1 and 3

2. Does the SEA's overview sufficiently explain the SEA's comprehensive approach to implementing the waivers and principles and describe the Sea's strategy for ensuring that this approach is coherent?

OVERVIEW QUESTION 2 PANEL RESPONSE *Tally of Peer Responses:* 7 Yes, 0 No	
Rationale	TN's overview gave a general explanation of the SEA's approach to the waivers and principles.
Strengths	• TN indicated that it had begun implementation of college- and career–r-Ready (CCR) standards, and had made several changes to promote this implementation (e.g., ASD to work with schools). • TN's overview explained how the pieces fit together and across the three flexibility principles. • TN made a strong case for why the State needed flexibility. • TN also acknowledged the importance of evaluation data.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

Principle 1: College- and Career-Ready Expectations for All Students

Note to Peers: Staff will review 1.A Adopt College-And Career-Ready Standards, Options A and B.

1.B   Transition to college- and career-ready standards

1.B   Is the SEA's plan to transition to and implement college- and career-ready standards statewide in at least reading/language arts and mathematics no later than the 2013–2014 school year realistic, of high quality, and likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards?

A high-quality plan will likely include activities related to the following questions or an explanation if one or more of the activities is not included. For the activities below that the SEA selects, will the results be used to inform the intended outcome?

➢ *Does the SEA intend to analyze the extent of alignment between the State's current content standards and the college- and career-ready standards to determine similarities and differences between those two sets of standards? If so, will the results be used to inform the transition to college- and career-ready standards?*

➢ *Does the SEA intend to analyze the linguistic demands of the college- and career-ready standards to inform the development of ELP standards corresponding to the college- and career-ready standards and to ensure that English Learners will be able to access the college- and career-ready standards? If so, will the results be used to inform revision of the ELP standards and support English Learners in accessing the college- and career-ready standards?*

➢ *Does the SEA intend to analyze the learning and accommodation factors necessary to ensure that students with disabilities will have the opportunity to achieve to the college- and career-ready standards? If so, will the results be used to support students with disabilities in accessing the college- and career-ready standards on the same schedule as all students?*

➢ *Does the SEA intend to conduct outreach on and dissemination of standards? If so, does the SEA's plan reach the appropriate stakeholders, including educators, administrators, families, and IHEs? Is it likely that the plan will result in all stakeholders increasing their awareness of the State's college- and career-ready standards?*

➢ *Does the SEA intend to provide professional development and other supports to prepare teachers to teach all students, including English Learners, students with disabilities, and low-achieving students, to the new standards? If so, will the planned professional development and supports prepare teachers to teach to the new standards, use instructional materials aligned with those standards, and use data on multiple measures of student performance (e.g., data from formative, benchmark, and summative assessments) to inform instruction?*

➤ *Does the SEA intend to provide professional development and supports to prepare principals to provide strong, supportive instructional leadership based on the new standards? If so, will this plan prepare principals to do so?*

➤ *Does the SEA propose to develop and disseminate high-quality instructional materials aligned with the new standards? If so, are the instructional materials designed (or will they be designed) to support the teaching and learning of all students, including English Learners, students with disabilities, and low-achieving students?*

➤ *Does the SEA plan to expand access to college-level courses or their prerequisites, dual enrollment courses, or accelerated learning opportunities? If so, will this plan lead to more students having access to courses that prepare them for college and a career?*

➤ *Does the SEA intend to work with the State's IHEs and other teacher and principal preparation programs, to better prepare*

   o *incoming teachers to teach all students, including English Learners, students with disabilities, and low-achieving students, to the new college- and career-ready standards; and*

   o *incoming principals to provide strong, supportive instructional leadership on teaching to the new standards?*

   If so, will the implementation of the plan likely improve the preparation of incoming teachers and principals?

➤ *Does the SEA plan to evaluate its current assessments and increase the rigor of those assessments and their alignment with college- and career-ready standards, in order to better prepare students and teachers for the new assessments through one or more of the following strategies:*

   o *Raising the State's academic achievement standards on its current assessments to ensure that the adjusted achievement standards reflect a level of postsecondary readiness, or are being increased over time to that level of rigor (e.g., the SEA might compare current achievement standards to a measure of postsecondary readiness by back-mapping from college entrance requirements or remediation rates, analyzing the relationship between proficient scores on the State assessments and the ACT or SAT scores accepted by most of the State's 4-year public IHEs, or conducting NAEP mapping studies)?*

   o *Augmenting or revising current State assessments by adding questions, removing questions, or varying formats in order to better align those assessments with college- and career-ready standards?*

   o *Implementing another strategy to increase the rigor of current assessments, such as using the "advanced" performance level on State assessments instead of the "proficient" performance level as the goal for individual student performance?*

   Is this activity likely to result in an increase in the rigor of the assessments and their alignment with college- and career-ready standards?

➢ *Does the SEA propose other activities in its transition plan? If so, is it likely that these activities will support the transition to and implementation of college- and career-ready standards?*

1.B PANEL RESPONSE *Tally of Peer Responses:* *6 Yes, 1 No*	
Rationale	TN presents a comprehensive approach to how the State will transition to CCR.

1.B PANEL RESPONSE *Tally of Peer Responses:* *6 Yes, 1 No*	
Strengths	• TN has laid out a plan that seems to cover all of its students, including the teachers and students associated with all of its assessments, including the ELP consortia. It also systematically addresses subgroups that historically have been left out, including students with disabilities (SWDs), English Learners (ELs), and migrant students. • As part of its plan, TN is looking at its advanced coursework and CTE. • TN's plan seems to be quite strong on public outreach; for example, the State engaged in a public awareness program called "Expect More, Achieve More" to educate parents around low scores on assessments resulting in increased rigor in the standards. Additionally, as the State moves forward with Common Core State Standards (CCSS) implementation, it will develop a comprehensive stakeholder engagement plan with representatives from key stakeholder groups, including educators. The plan includes summer training on CCSS for external stakeholders. • TN completed a crosswalk and made decisions about the gaps between its standards and CCR, and explicitly discussed the shifts that will take place to transition to CCR. It also provided evidence that it is prioritizing math in the shift to CCR, in part because math performance gaps in TN were bigger. • TN is deliberate in talking about shifts that need to take place for SWDs and ELs, including particularly thinking through the issues for students in its 2% assessment. • TN indicates a plan to create a new office to be responsible for Partnership for the Assessment of Readiness for College and Careers (PARCC) and CCR. • TN's professional development plans emphasize engaging educators so that they experience what it means to learn during the shift to new standards and develop materials themselves. • TN noted that it is working with a contractor to sub out items in its assessment as it transitions to CCSS and new assessments. • TN also noted that it plans to assign early childhood consultants regionally. • TN appears to be on timeline and on track to transition to CCR by 2013-2014; TN was candid about moving up its original timeline. • TN noted that the SAS Institute is developing modules, curriculum and assessment for Tennessee Value-Added Assessment System (TVAAS) data training in pre-service curricula.

1.B PANEL RESPONSE *Tally of Peer Responses:* *6 Yes, 1 No*	
Weaknesses, issues, lack of clarity	• TN may be too dependent on teacher workforce to make dramatic changes. Teachers have been teaching to low standards; greater attention to creating model lessons to make this transition may be needed. • If TN wants new teachers to be prepared to teach the CCR, the entire approach to IHEs needs more attention. • At the high school level, PD does not start for three years, yet the SEA indicated that high schools will be ready for implementation of CCR. • It is unclear that there will be adequate resources for the roll-out. The State is dependent on its Race to the Top (RTT) funds, and has already designated over half for IHEs. The panel was concerned that the money that remains is inadequate without additional funds.
Technical Assistance Suggestions	• The SEA may want to consider collaborating with other States to create curricular materials for its educators. • TN should be sure that CCSS experts are involved in the teacher and principal preparation on content standards. • TN should conduct professional development for math at the high school level and begin implementing it sooner. • TN should develop a step-by-step plan with specific activities, who is responsible, etc.

1.C   Develop and Administer Annual, Statewide, Aligned, High-Quality Assessments that Measure Student Growth

1.C   Did the SEA develop, or does it have a plan to develop, annual, statewide, high-quality assessments, and corresponding academic achievement standards, that measure student growth and are aligned with the State's college- and career-ready standards in reading/language arts and mathematics, in at least grades 3-8 and at least once in high school, that will be piloted no later than the 2013–2014 school year and planned for administration in all LEAs no later than the 2014–2015 school year, as demonstrated through one of the three options below? Does the plan include setting academic achievement standards?

Note to Peers: Staff will review Options A and C.

If the SEA selected Option B:
If the SEA is neither participating in a State consortium under the RTTA competition nor has developed and administered high-quality assessments, did the SEA provide a realistic, high-quality plan describing activities that are likely to lead to the development of such assessments, their piloting no later than the 2013–2014 school year, and their annual administration in all LEAs beginning no later than the 2014–2015 school year? Does the plan include setting academic achievement standards?

1.C, OPTION B PANEL RESPONSE *Tally of Peer Responses:* *NA*	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *Not applicable because the SEA selected 1.C, Option A or Option C*	

Principle 1 Overall Review

Is the SEA's plan for transitioning to and implementing college-and career-ready standards, and developing and administering annual, statewide, aligned high-quality assessments that measure student growth, comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

PRINCIPLE 1 OVERALL REVIEW PANEL RESPONSE *Tally of Peer Responses:* *6 Yes, 1 No*	
Rationale	TN has a generally comprehensive and coherent plan for transitioning to and implementing college- and career-ready standards.
Strengths	- TN has laid out a comprehensive plan for transitioning to CCR, and in doing so has addressed all of its students and teachers. - TN has systematically looked at its current standards and assessments and what needs to happen to transition to CCR and new assessments. It is participating in PARCC, National Center and State Collaborative (NCSC), and an ELP consortia, and has considered the transition of its students in the 2% assessment. - TN has begun to look at curricular and instructional needs and what it can do to ensure successful transition. - TN is establishing an officer to assist with transition and implementation, and has started to designate organizations to work on curricular modules, etc.
Weaknesses, issues, lack of clarity	- TN's approach may not be strong enough given its past history of quite low standards and an educator workforce that is used to those standards; much more attention may be needed to provide curricular and instructional supports to educators across the educational system. - TN's implementation probably needs to be more specific and stronger, given the challenges that it will face in moving to CCR. - There is a concern about whether there is full participation of ELs in assessments (and coursework) and whether they are on a path to CCR.
Technical Assistance Suggestions	- TN should consider ways to capitalize on progress other States have already made. For example, it might collaborate with other states in creating CCR materials for its educators. - TN should think through a very specific step-by-step plan if it wants to be sure that there is successful transition to and implementation of the CCR.

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

2.A   Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support

2.A.i   Did the SEA propose a differentiated recognition, accountability, and support system, and a high-quality plan to implement this system no later than the 2012–2013 school year, that is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students?

2.A.i PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	TN lacks a high-quality plan for a differentiated recognition, accountability, and support system based on all the required components.
Strengths	• The SEA has clearly thought through the Achievement School District (ASD) and the Innovation Zones, but has not brought through the same level of thinking or the content from those to their overall system. • The SEA has articulated a clear theory of action.
Weaknesses, issues, lack of clarity	• It is not clear that TN LEAs have the capacity to set their own district and school goals, nor is it clear that if LEAs do set their own goals, the SEA has the capacity to carefully evaluate and approve or disapprove the proposed goals. • TN does not include graduation rate for subgroups as part of its goals. • There does not seem to be a clear plan to move students with disabilities out of its alternate assessment system; currently there seem to be too many students in these assessments. Without action on this issue, it is unlikely that achievement among students with disabilities will improve. • TN needs legislation to be able to implement its proposed system; there was no clear indication that the legislation is expected to pass nor was a draft of the bill provided that the SEA might bring forward.
Technical Assistance Suggestions	• TN should put safeguards in place to ensure that non-performance for the same subgroup over time would be detected and acted upon in any school, not just in focus schools. • TN should develop safeguards to avoid unintended consequences of schools moving students into special schools to avoid accountability for them. • TN includes graduation rates in its report cards, and thus could easily include subgroup graduation rates in its goals. • TN may want to reconsider having LEAs set their own goals, or be asked by USED to provide assurance that the SEA and LEAs have the capacity to address areas of weakness.

a. Does the SEA's accountability system provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs based on (1) student achievement in reading/language arts and mathematics, and other subjects at the State's discretion, for all students and all subgroups of students identified in ESEA section 1111(b)(2)(C)(v)(II); (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, including the performance and progress of all subgroups?

2.A.i.a PANEL RESPONSE Tally of Peer Responses: *0 Yes, 7 No*	
Rationale	TN does not disaggregate graduation rates by subgroups, although it does include the other elements.
Strengths	- Gap closing is ambitious. Given existing statewide gaps and the gaps within the districts, halving those gaps within 8 years is ambitious. - TN's plan shines a light on within-school gaps. - TN's plan prioritizes SEA interventions in LEAs and LEA interventions in schools; allows autonomy for LEAs and schools.
Weaknesses, issues, lack of clarity	- TN does not include subgroup data on graduation rates. - TN gives schools credit on the accountability system for hitting 51% of their goals, which seems a very low bar. In addition, a school can hit this goal even though a subgroup consistently does not meet goals or improve; no LEA or school action is required if this happens. - Gap reduction assumes that the majority group is improving and the subgroups are improving at a faster rate; there appears to be no incentive to keep the majority group still improving.
Technical Assistance Suggestions	- TN should add a check to ensure that subgroups are moving. - The use of "white" v. "non-white" language is problematic. Also, the SEA may want to rethink its methodology for setting achievement gap goals, given that Asian students are the highest performing group.

b. Do the SEA's differentiated recognition, accountability, and support system create incentives and provide support to close achievement gaps for all subgroups of students?

2.A.i.b PANEL RESPONSE *Tally of Peer Responses:* 0 Yes, 7 No	
Rationale	TN's system does not seem to create incentives and supports to close the achievement gap of all subgroups.
Strengths	TN includes two types of accountability – absolute and relative.
Weaknesses, issues, lack of clarity	There is no real pressure for all subgroups to grow; no safeguard against repeated misses of goals for a specific subgroup or subject area because of the 49% miss allowance and the lack of subgroups in graduation goals.
Technical Assistance Suggestions	TN should add subgroups to its graduation goals. TN should provide safeguards for subgroups so that there are actions taken if a subgroup continues to not improve over multiple years even though the school overall meets its goals.

c. Does the SEA's differentiated recognition, accountability, and support system include interventions specifically focused on improving the performance of English Learners and students with disabilities?

2.A.i.c PANEL RESPONSE *Tally of Peer Responses:* 0 Yes, 7 No	
Rationale	TN did not provide interventions specifically focused on improving the performance of ELs and SWDs.
Strengths	
Weaknesses, issues, lack of clarity	- SEA indicated that it will consider and provide exemptions that allow districts or schools to exceed the 3% cap on proficiency for the modified (2%) and alternate (1%) assessment combined; this is not permitted. - Interventions for ELs and SWDs are not discussed.
Technical Assistance Suggestions	

d. Did the SEA provide a plan that ensures that the system will be implemented in LEAs and schools no later than the 2012–2013 school year?

2.A.i.d PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	TN's plan is contingent on legislation to ensure that the system will be implemented no later than the 2012-2013 school year.
Strengths	• TN indicated that its rating system is in place. It provided a description of what it is already doing in grades 3-7.
Weaknesses, issues, lack of clarity	• SEA needs the legislature to approve its plan, so cannot ensure that the timeline will be met. • No consequences attached to the goals for grades 3-7 that are already in place.
Technical Assistance Suggestions	

Note to Peers: Staff will review 2.A.ii Option A.

ONLY FOR SEAs SELECTING OPTION B: If the SEA elects to include student achievement on assessments other than reading/language arts and mathematics in its differentiated recognition, accountability, and support system by selecting Option B, review and respond to peer review questions in section 2.A.ii. If the SEA does not include other assessments, go to section 2.A.iii.

2.A.ii Did the SEA include student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools?

a. Did the SEA provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each additional assessment for all grades assessed?

b. Does the SEA's weighting of the included assessments result in holding schools accountable for ensuring all students achieve the State's college- and career-ready standards?

2.A.ii (INCLUDING QUESTIONS a AND b) PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	TN plans to include science in its system with equal weighting but only for determining reward, priority, and focus schools.
Strengths	• Science in grades 3-8 and Biology in high school is included for reward, priority, and focus school identification.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 2.A, Option A*	

2.B   Set Ambitious but Achievable Annual Measurable Objectives

2.B   *Note to Peers: Staff will review Options A and B.*

Did the SEA describe the method it will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics, for the State and all LEAs, schools, and subgroups, that provide meaningful goals and are used to guide support and improvement efforts?

If the SEA selected Option C:
Did the SEA describe another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups?

   i.   Did the SEA provide the new AMOs and the method used to set these AMOs?

   ii.   Did the SEA provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs?

   iii.   If the SEA set AMOs that differ by LEA, school, or subgroup, do the AMOs require LEAs, schools, and subgroups that are further behind to make greater rates of annual progress?

   iv.   Did the SEA attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups? (Attachment 8)

➢ *Are these AMOs similarly ambitious to the AMOs that would result from using Option A or B above?*

➢ *Are these AMOs ambitious but achievable given the State's existing proficiency rates and any other relevant circumstances in the State?*

➢ *Will these AMOs result in a significant number of children being on track to be college- and career-ready?*

2.B AND 2.B, OPTION C (INCLUDING QUESTIONS i–iv) PANEL RESPONSE Tally of Peer Responses: 0 Yes, 7 No	
Rationale	TN provided a set of Statewide AMOs, but did not create them for LEAs, schools, or subgroups; nor did it set goals in its Option C that were as rigorous as Option A or Option B.
Strengths	• Cutting the all students gap in half in eight years is slightly less ambitious than option A or B, even though it is still a stretch given where the State is starting from. • The State reduced its n-size from 45 students to 30 students, which will ensure more transparency and help to ensure that more schools have subgroup goals.
Weaknesses, issues, lack of clarity	• It is unclear whether the goals are achievable because the data provided was from other States. • The SEA's proposed AMOs under Option C are not as rigorous as they would have been under Option A or Option B. • The SEA has not created actual AMOs for subgroups, but implied AMOs for the ESEA subgroups in Appendix 5. But they do not intend to set AMOs at the school or district level that require greater improvement for some subgroups than for others. • The SEA is not requiring LEAs and subgroups who are further behind to make greater rates of annual progress as required by this waiver.
Technical Assistance Suggestions	• The state should consider setting specific AMOs that require faster progress for the subgroups.
☐ Not applicable because the SEA selected 2.B, Option A or Option B	

2.C   Reward Schools

Note to Peers: Staff will review 2.C.i and 2.C.ii.

2.C.iii Did the SEA describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools?

> *Has the SEA provided a reasonable explanation of why its proposed recognition and, where applicable, rewards are likely to be considered meaningful by schools? For example, has the SEA consulted with LEAs and schools in designing its recognition and, where applicable, rewards?*

2.C.iii PANEL RESPONSE Tally of Peer Responses: 7 Yes, 0 No	
Rationale	TN described a plan for publicly recognizing and rewarding the highest-performing and high-progress schools.
Strengths	• TN is including science for elementary schools. • The gap must be smaller than the State median, which is a good start for moving schools in the right direction. If the gaps are larger than the State median, they must be narrowing. • Schools are rewarded based on high-status or high-growth. • Schools are recognized, receive small amounts of financial rewards, and provided leadership opportunities.
Weaknesses, issues, lack of clarity	• Peers note for USED review that the method for identifying reward schools does not appear to meet Federal requirement that any significant gaps are narrowing. • TN is relying on RTT funds, and not relying on its own resources or retargeting its Title I funds. • There are concerns about the exclusion of some schools (e.g., special schools) from the differentiated accountability system.
Technical Assistance Suggestions	

2.D   Priority Schools

Note to Peers: Staff will review 2.D.i and 2.D.ii.

2.D.iii Are the interventions that the SEA described aligned with the turnaround principles and are they likely to result in dramatic, systemic change in priority schools?

    a. Do the SEA's interventions include all of the following?

        (i)   providing strong leadership by: (1) reviewing the performance of the current principal; (2) either replacing the principal if such a change is necessary to ensure strong and effective leadership, or demonstrating to the SEA that the current principal has a track record in improving achievement and has the ability to lead the turnaround effort; and (3) providing the principal with operational flexibility in the areas of scheduling, staff, curriculum, and budget;

        (ii) ensuring that teachers are effective and able to improve instruction by: (1) reviewing the quality of all staff and retaining only those who are determined to be effective and have the ability to be successful in the turnaround effort; (2) preventing ineffective teachers from transferring to these schools; and (3) providing job-embedded, ongoing professional development informed by the teacher evaluation and support systems and tied to teacher and student needs;

        (iii) redesigning the school day, week, or year to include additional time for student learning and teacher collaboration;

        (iv) strengthening the school's instructional program based on student needs and ensuring that the instructional program is research-based, rigorous, and aligned with State academic content standards;

        (v)   using data to inform instruction and for continuous improvement, including by providing time for collaboration on the use of data;

        (vi) establishing a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement, such as students' social, emotional, and health needs; and

        (vii) providing ongoing mechanisms for family and community engagement?

2.D.iii.a **(INCLUDING QUESTIONS (i)-(vii))** **PANEL RESPONSE** *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	TN's proposed interventions are aligned with the turnaround principles.
Strengths	• The specifications for the ASD and the Innovation Zones are very strong. • The ASD is particularly innovative for rural schools and seems likely to work for them. • The ASD takes a bold approach by moving schools out of LEAs that may have low district capacity. In addition, the Innovation Zones within LEAs will help to seed reform energy and capacity in LEAs. • The slow build up is logical given capacity issues in the SEA and LEAs. • The ASD is a promising start on staffing and planning for reform. • The LEA Innovation Zone that has slower rates of improvement compared to the ASD may not expand, which is a strong design feature and provides an incentive for districts to work hard to improve their schools.
Weaknesses, issues, lack of clarity	• There is not much information provided about instructional initiatives.
Technical Assistance Suggestions	• The SEA should be sure to tie Principle 1 and Principle 3 to this work. For example, provide information on how the link to CCR standards (Principle 1) and improvement of the teacher workforce (Principle 3) is going to improve student achievement.

b. Has the SEA identified practices to be implemented that meet the turnaround principles and are likely to —

(i) increase the quality of instruction in priority schools;

(ii) improve the effectiveness of the leadership and the teaching in these schools; and

(iii) improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students?

2.D.iii.b **(INCLUDING QUESTIONS (i)-(iii))** **PANEL RESPONSE** *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	TN's proposed interventions align with the turnaround principles and seem likely to result in change in priority schools.
Strengths	• The ASD has staffing authority and has a rigorous process for selecting charter providers. • TN clearly identified ways in its supplemental information in which it is attempting to meet the turnaround principles.
Weaknesses, issues, lack of clarity	• There is not much information included on instructional initiatives, so it is hard to determine how the needs of ELs, SWDs, and low-achieving students are being met. • For the non-ASD and non-innovation priority schools there is little structure; peers noted that this may not be a particular problem because these models are being phased out.
Technical Assistance Suggestions	

c. Has the SEA indicated that it will ensure that each of its priority schools implements the selected intervention for at least three years?

2.D.iii.c PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	TN did not provide evidence that it would ensure that its priority schools implement selected interventions for at least three years.
Strengths	• The ASD ensures that implementation of interventions occurs for the required period.
Weaknesses, issues, lack of clarity	• The LEA innovation plans do not indicate how long they will last because LEAs are determining their own length of intervention.
Technical Assistance Suggestions	

2.D.iv Is the SEA's proposed timeline for ensuring that LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year reasonable and likely to result in implementation of the interventions in these schools?

> ➢ *Does the SEA's proposed timeline distribute priority schools' implementation of meaningful interventions aligned with the turnaround principles in a balanced way, such that there is not a concentration of these schools in the later years of the timeline?*

2.D.iv PANEL RESPONSE	
Tally of Peer Responses: *7 Yes, 0 No*	
Rationale	TN provides a timeline that ensures that LEAs will have one or more priority schools implementing interventions aligned with turnaround principles by the 2014-2015 school year.
Strengths	• TN's timeline is adequate because it has a reasonable phase in; some schools are already implementing. • The SEA already has a superintendent in place for the ASD.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

2.D.v Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement exits priority status?

    a. Do the SEA's criteria ensure that schools that exit priority status have made significant progress in improving student achievement?

> ➢ *Is the level of progress required by the criteria to exit priority status likely to result in sustained improvement in these schools?*

2.D.v and 2.D.v.a PANEL RESPONSE	
Tally of Peer Responses: *0 Yes, 7 No*	
Rationale	TN provides exit criteria that seem to allow for a priority school to exit priority status after two years.
Strengths	• The ASD exit criteria are strong. As part of these criteria, there is a parent trigger that allows parents to vote on whether to return the school to the LEA from the ASD.
Weaknesses, issues, lack of clarity	• A school in the Innovation Zone can exit priority status after two years of passing half of their achievement and gap closing targets or if they are just not on the list of the bottom 5%. Therefore, they may not implement interventions for three years or may not have to actually improve to exit priority status. There is a loophole for schools in the Innovation Zone to stop interventions as determined by the LEA.
Technical Assistance Suggestions	Redefine exit criteria by requiring both meeting AMOs and no long appearing in the bottom 5% list.

2.E   Focus Schools

2.E.i   Did the SEA describe its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as focus schools?

2.E.i PANEL RESPONSE *Tally of Peer Responses:* 7 Yes, 0 No	
Rationale	TN described a set of methods for identifying low-performing schools equal to at least 10% of the State's Title I schools as focus schools.
Strengths	• TN clarified in the phone call that it is really identifying focus schools for performance by subgroup even though its plan said that it is comparing the highest and lowest performing groups.
Weaknesses, issues, lack of clarity	• Use of the non-white group is a problem because it combines low- and high-performing subgroups, thus making the gap look smaller because of the way students are grouped.
Technical Assistance Suggestions	

2.E.ii   Did the SEA include a list of its focus schools?

a. Did the SEA identify a number of focus schools equal to at least 10 percent of the State's Title I schools?

b. In identifying focus schools, was the SEA's methodology based on the achievement and lack of progress over a number of years of one or more subgroups of students identified under ESEA section 1111(b)(2)(C)(v)(II) in terms of proficiency on the statewide assessments that are part of the SEA's differentiated recognition, accountability, and support system or, at the high school level, graduation rates for one or more subgroups?

c. Did the SEA's methodology result in the identification of focus schools that have —

   (i)   the largest within-school gaps between the highest-achieving subgroup or subgroups and the lowest-achieving subgroup or subgroups or, at the high school level, the largest within-school gaps in the graduation rate; or

   (ii) a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate?

2.E.ii (INCLUDING QUESTIONS a-c) **PANEL RESPONSE** *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	TN met the basic requirements of identifying schools.
Strengths	- TN is using graduation rates below 60% and as indicated in the phone call, also low subgroup performance (below 5%) to identify schools. - TN is picking up schools with gaps.
Weaknesses, issues, lack of clarity	- The panel is concerned about the use of "white v. non-white" gap to identify focus schools; this comparison will not accurately represent within school gaps in some schools because Asian students in TN are performing higher than white students and will reduce gaps that actually exist. Also, it will be difficult to identify appropriate strategies to target the most struggling groups. - The methodology may advantage schools that have high participation in the alternate assessments based on modified achievement standards. - The gap methodology is so complex that it does not provide clear signaling to schools to know what to do for students. It is also difficult to explain to stakeholders and educators.
Technical Assistance Suggestions	

2.E.iii Did the SEA describe the process and timeline it will use to ensure that each LEA identifies the needs of its focus schools and their students and provide examples of and justifications for the interventions the SEA will require its focus schools to implement to improve the performance of students who are furthest behind?

> ➢ *Has the SEA demonstrated that the interventions it has identified are effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as focus schools?*

> ➢ *Has the SEA identified interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, targeted at the lowest-achieving students)?*

2.E.iii PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	TN did not provide a strong process and timeline for ensuring that each LEA identifies the needs of its focus schools and their students.
Strengths	
Weaknesses, issues, lack of clarity	• There is no connection made between Principle 2 and the other two principles. • The panel understands the system is supposed to be highly data driven and provide support to teachers, but that is not discussed here in Principle 2 and in discussion of interventions for focus schools. • The gap calculation methodology is complex and may be difficult for schools to understand and may encourage schools to take the path of least resistance rather than encourage an instructional transformation for the low-performing students. There is no signaling in the data for schools to know where to focus. The data may not tell schools what data are pulling them down and therefore which groups need support. • The SEA will have two forms of safe harbor, which do not require real growth to exit focus status. • The plan for implementing interventions does not discuss SWDs or ELs. • The $100,000 competitive grant may not be enough to help schools improve and all schools may not get it. This also may not be sustainable. • The strategies are extraordinarily thin and provide an incomplete, laundry list of interventions. • The reliance on the Field Service Centers (FSCs) is a concern because they may not have the capacity or expertise and because of the ambitious goals that the SEA expects of its schools. It is not clear what the SEA is doing to build the capacity of the FCSs.

2.E.iii PANEL RESPONSE Tally of Peer Responses: 0 Yes, 7 No	
Technical Assistance Suggestions	• The SEA needs to be very specific about how these schools will use Title I funds to close the gaps. • The SEA needs to have a capacity building strategy in place to meet the needs of the FSC.

2.E.iv Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status?

     a. Do the SEA's criteria ensure that schools that exit focus status have made significant progress in improving student achievement and narrowing achievement gaps?

    ➢ *Is the level of progress required by the criteria to exit focus status likely to result in sustained improvement in these schools?*

2.E.iv and 2.E.iv.a PANEL RESPONSE Tally of Peer Responses: 0 Yes, 7 No	
Rationale	TN provided criteria to determine when a school can exit focus status, but the criteria do not align well with how schools entered focus status in the first place.
Strengths	
Weaknesses, issues, lack of clarity	• Schools can exit even if they do not make any progress. • There is a mismatch between why schools are identified for focus school status and the goals they need to meet in order to exit focus status.
Technical Assistance Suggestions	

2.F   Provide Incentives and Support for other Title I Schools

2.F   Does the SEA's differentiated recognition, accountability, and support system provide incentives and supports for other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps? Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for students?

2.F PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	TN's plan does not indicate how it will provide incentives and support for other Title I schools.
Strengths	
Weaknesses, issues, lack of clarity	• Discussion of the supports and incentives was lacking. • For supports, there was no discussion of the framework for diagnosing the LEA and school conditions that contribute to low achievement, nor were the interventions aligned to sound practices for closing gaps. It was unclear whether the SEA had sufficiently trained staff to provide support. • The only incentives seem to be report cards. • There is nothing to indicate the use of AMOs to differentiate supports or incentives.
Technical Assistance Suggestions	• FSCs should consider sharing knowledge, resources, and tools with each other. • The SEA may want to consider sharing the resources and approaches from the ASD and Innovation Zones to support other Title I schools. • The SEA should consider how Principle 1 and Principle 3 (TEAM) will support this work.

2.G   Build SEA, LEA, and School Capacity to Improve Student Learning

2.G   Is the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, likely to succeed in improving such capacity?

     i.   Is the SEA's process for ensuring timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools likely to result in successful implementation of these interventions and in progress on leading indicators and student outcomes in these schools?

> *Did the SEA describe a process for the rigorous review and approval of any external providers used by the SEA and its LEAs to support the implementation of interventions in priority and focus schools that is likely to result in the identification of high-quality partners with experience and expertise applicable to the needs of the school, including specific subgroup needs?*

2.G.i PANEL RESPONSE *Tally of Peer Responses:* 2 Yes, 5 No	
Rationale	It was not clear to the peers that TN has a sufficient plan for monitoring.
Strengths	- TN is creating a new management office for the PARCC and the CCSS. - The ASD is vetting the charter applicants through a new process. - As indicated on the call, FSC directors are being held accountable for the achievement of the districts, which could in turn strengthen their support. - The SEA can focus on the few LEAs where there are focus schools and could use this to their advantage.
Weaknesses, issues, lack of clarity	- There are few details on the SEA's monitoring process, which probably will be very important to success. - The SEA has an after-the-fact review process for technical assistance providers after the LEA approves them, which makes it hard for the SEA to make corrections if the provider is not strong.
Technical Assistance Suggestions	Going forward, the SEA should develop a pre-approved list of technical assistance providers to expedite the process.

ii. Is the SEA's process for holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools, likely to improve LEA capacity to support school improvement?

2.G.ii PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	TN's approach, particularly for turning around priority schools, seems likely to support school improvement.
Strengths	• TN will continuously identify priority schools every three years. • TN has made a conscious choice to build LEA capacity through the Innovation Zone as a new pocket of reform energy with authority that the rest of the school management organization in the LEA does not have. By linking these Innovation Zones to the ASD, it is likely to be a faster change strategy than working through normal constraints. The panel thought that this was a good approach because it was impressed by the early positive outcomes of the ASD. • This is strong, particularly for priority schools. • The FSCs, as a structure, could help build LEA capacity and will provide monitoring, TA, and support. • Using funds to add more and better staff to the LEAs.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

iii. Is the SEA's process for ensuring sufficient support for implementation in priority schools, focus schools, and other Title I schools identified under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources) likely to result in successful implementation of such interventions and improved student achievement?

2.G.iii PANEL RESPONSE Tally of Peer Responses: 0 Yes, 7 No	
Rationale	TN's approach for supporting implementation was not viewed by peers as very likely to result in successful implementation of interventions and in improved student achievement.
Strengths	• The SEA is providing financial support.
Weaknesses, issues, lack of clarity	• There is strong capacity at the SEA level, but the LEA capacity building is less evident. • TN does not discuss how the 30% of Title I resources no longer obligated will be used by LEAs. The SEA is not prescriptive about how LEAs would use these funds, which does not ensure that these funds will be used for implementation of these interventions. This flexibility for LEAs could be good or not. • There is not a framework for providing support to schools other than priority schools.
Technical Assistance Suggestions	

Principle 2 Overall Review

Is the SEA's plan for developing and implementing a system of differentiated recognition, accountability, and support likely to improve student achievement, close achievement gaps, and improve the quality of instruction for students? Do the components of the SEA's plan fit together to create a coherent and comprehensive system that supports continuous improvement and is tailored to the needs of the State, its LEAs, its schools, and its students? If not, what aspects are not addressed or need to be improved upon?

PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE *Tally of Peer Responses:* *0 Yes, 7 No*	
Rationale	TN's plan is not comprehensive or cohesive beyond the ASD and the Innovation Zone.
Strengths	• The approach for addressing priority schools is strong. • TN clearly has thought through the ASD and the Innovation Zones, but has not brought through the same level of thinking or the content from those to their overall system. • TN has articulated a clear theory of action.
Weaknesses, issues, lack of clarity	• There is not the attention needed to improve instruction, in particular for SWDs and ELs. • The SEA has all the structures, but needs to provide more detail on the actions, activities, and steps the SEA will take. • The panel has grave concerns about the gap closing measures. The panel is skeptical about the incentives related to the gap closing measures and the 50% of goals as they have been presented.
Technical Assistance Suggestions	• The SEA needs to revisit its gap closing approach. The panel would recommend an approach more like Option A. • The SEA needs to link the work in Principles 1 and 3 to the work on Principle 2. For example, how do the ASD, the Innovation Zones, and the FSCs build on this work?

Principle 3: Supporting Effective Instruction and Leadership

3.A   Develop and Adopt Guidelines for Local Teacher and Principal Evaluation and Support Systems

3.A.i   Has the SEA developed and adopted guidelines consistent with Principle 3 through one of the three options below?

If the SEA selected Option A:
If the SEA has not already developed any guidelines consistent with Principle 3:

i.   Is the SEA's plan for developing and adopting guidelines for local teacher and principal evaluation and support systems likely to result in successful adoption of those guidelines by the end of the 2011–2012 school year?

3.A.i, OPTION A.i **PANEL RESPONSE** *Tally of Peer Responses:* *NA*	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *Not applicable because the SEA selected 3.A, Option B or Option C*	

ii.   Does the SEA's plan include sufficient involvement of teachers and principals in the development of these guidelines?

3.A.i, OPTION A.ii PANEL RESPONSE *Tally of Peer Responses:* NA	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *Not applicable because the SEA selected 3.A, Option B or Option C*	

Note to Peers: Staff will review iii.

<u>If the SEA selected Option B:</u>
If the SEA has already developed and adopted one or more, but not all, guidelines consistent with Principle 3:

<u>*Note to Peers: Staff will review i and iii.*</u>

ii.   Are the guidelines the SEA has adopted likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement? (See question 3.A.ii to review the adopted guidelines for consistency with Principle 3.)

3.A.i, OPTION B.ii PANEL RESPONSE *Tally of Peer Responses:* *NA*	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *Not applicable because the SEA selected 3.A, Option A or Option C*	

iv.   Is the SEA's plan for developing and adopting the remaining guidelines for teacher and principal evaluation and support systems likely to result in successful adoption of these guidelines by the end of the 2011–2012 school year?

3.A.i OPTION B.iv PANEL RESPONSE *Tally of Peer Responses:* *NA*	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *Not applicable because the SEA selected 3.A, Option A or Option C*	

v.   Did the SEA have sufficient involvement of teachers and principals in the development of these guidelines? Does the SEA's plan include sufficient involvement of teachers and principals in the development of the remaining guidelines?

3.A.i OPTION B.v PANEL RESPONSE *Tally of Peer Responses:* NA	
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☒ *Not Applicable because the SEA selected 3.A, Option A or Option C*	

If the SEA selected Option C:

If the SEA has developed and adopted all guidelines consistent with Principle 3:

i.   Are the guidelines the SEA has adopted likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement? (See question 3.A.ii to review the adopted guidelines for consistency with Principle 3.)

3.A.i, OPTION C.i PANEL RESPONSE *Tally of Peer Responses:* 7 Yes, 0 No	
Rationale	TN's guidelines seem likely to lead to evaluation and support systems that increase the quality of instruction for students.
Strengths	• TN has already started to implement its educator evaluation system.
Weaknesses, issues, lack of clarity	• Peers had some concerns about how teachers of ELs and SWDs are included. • Based on the review of the questions below, peers thought there was less clarity and specificity on the tools for principals.
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option A or Option B*	

Note to Peers: Staff will review ii.

iii.   Did the SEA have sufficient involvement of teachers and principals in the development of these guidelines?

3.A.i OPTION C.iii PANEL RESPONSE *Tally of Peer Responses:* 7 Yes, 0 No	
Rationale	TN involved teachers and principals in the development of its guidelines.
Strengths	- TN had a task force, which was made up of 1/3 teachers. - TN has 12 educator teams across the State working on developing assessments for non-tested grades and subjects. - TN worked with 8,000 teachers to pick the TAP rubric, which the panel thought was a good rubric. - The SEA used the RTT process to get support for its educator evaluation guidelines as well.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option A or Option B*	

ONLY FOR SEAs SELECTING OPTION B OR C: If the SEA has adopted guidelines for local teacher and principal evaluation and support systems by selecting Option B or C in section 3.A, review and respond to peer review question 3.A.ii below.

3.A.ii For any teacher and principal evaluation and support systems for which the SEA has developed and adopted guidelines, consistent with Principle 3, are they systems that:

a.   Will be used for continual improvement of instruction?

➢ *Are the SEA's guidelines likely to result in support for teachers that will enable them to improve their instructional practice?*

3.A.ii.a PANEL RESPONSE *Tally of Peer Responses:* 7 Yes, 0 No	
Rationale	TN's systems seem likely to be used for continual improvement of instruction.
Strengths	- At the State level, TN is mandating 4-6 observations; this is very unique and to be applauded. - Evaluation of principals includes an evaluation of their ability to deliver quality teacher evaluations. - The State is getting live real-time observation data through a new information system. The State can monitor data from the observations and provide a differentiated response to things that need work. - The process for choosing the final rubric, by listening to teachers' recommendations, was a good one. The rubric is tested and correlated to student achievement. The model is designed to provide instructional feedback to teachers.
Weaknesses, issues, lack of clarity	- It is unclear how the use of the TAP is linked to the CCSS and also to instruction for ELs and SWDs. - The rubric is silent on differentiating instruction based on the needs of the students, particularly ELs and SWDs. There needs to be inclusion and recognition of these groups.
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option C*	

b. Meaningfully differentiate performance using at least three performance levels?

➢ *Does the SEA incorporate student growth into its performance-level definitions with sufficient weighting to ensure that performance levels will differentiate among teachers and principals who have made significantly different contributions to student growth or closing achievement gaps?*

3.A.ii.b PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	TN's system seems to meaningfully differentiate at least three performance levels.
Strengths	• TN's system covers both teachers and principals. • The system is 50% based on growth and is on a 5-point scale for rating teachers. • TN is aiming to have 70% of teachers covered by the value added data or other individual growth measures by next year and 90% the year after. • TN has a history with its value-added system and many teachers are familiar with it. • The SEA is actively using the value-added system and correlating that with student performance and educator performance on the TAP rubric to ensure stronger student learning. • The SEA is ahead of other States in terms of principal evaluations.
Weaknesses, issues, lack of clarity	• The SEA did not provide the peers descriptive rubrics for the various levels of the principal evaluation, TILS. • For principal evaluations, there is a lot of evidence, but no calibration. There is nothing that describes the training of the raters for principals.
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option C*	

c. Use multiple valid measures in determining performance levels, including as a significant factor data on student growth for all students (including English Learners and students with disabilities), and other measures of professional practice (which may be gathered through multiple formats and sources, such as observations based on rigorous teacher performance standards, teacher portfolios, and student and parent surveys)?

(i) Does the SEA have a process for ensuring that all measures that are included in determining performance levels are valid measures, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?

3.A.ii.c and 3.A.ii.c(i) **PANEL RESPONSE** *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	TN uses several measures in determining performance levels, including student performance and observations.
Strengths	- TVAAS is the statewide measure. - The TAP rubric has research-based evidence. - TN has a process for LEAs to propose to use an alternative rubric; approval requires a year-long pilot. - There is a constrained list of what LEAs can use for the remaining 15% of measures, which could help triangulate a teacher's rating.
Weaknesses, issues, lack of clarity	- There is a lack of information on the principal evaluation system. There do not appear to be standard measurements or the SEA did not provide this information for peer review. - It is not clear how the alternate and modified assessments are included in the TN system.
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option C*	

(ii) For grades and subjects in which assessments are required under ESEA section 1111(b)(3), does the SEA define a statewide approach for measuring student growth on these assessments?

3.A.ii.c(ii) PANEL RESPONSE *Tally of Peer Responses:* *5 Yes, 2 No*	
Rationale	TN has defined an approach for including grades and subjects in which assessments are required.
Strengths	• The SEA uses TVAAS for measuring student growth.
Weaknesses, issues, lack of clarity	• It is unclear how the SEA calculates student growth for teachers who are not the primary provider of content for SWDs and ELs (i.e., serve as a resource teacher for a general education teacher). • It is unclear how growth is calculated for students who take the alternate assessments (AA-AAS and AA-MAS).
Technical Assistance Suggestions	• Clarify how teachers of SWDs and ELs are held accountable for student growth.
☐ *Not applicable because the SEA selected 3.A, Option C*	

(iii) For grades and subjects in which assessments are not required under ESEA section 1111(b)(3), does the SEA either specify the measures of student growth that LEAs must use or select from or plan to provide guidance to LEAs on what measures of student growth are appropriate, and establish a system for ensuring that LEAs will use valid measures?

3.A.ii.c(iii) PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	TN has identified a way to include most educators in evaluation for grades and subjects in which assessments are not required.
Strengths	• The SEA is requiring two local assessments when there are no statewide assessments. • TN is having statewide teams with other disciplines to find ways to assess teachers in these non-tested grades and subjects (e.g., Arts), which could then be used at the State level. The SEA will switch to them as they deem them reliable. They are ahead in moving this forward.

3.A.ii.c(iii) PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Weaknesses, issues, lack of clarity	• It is unclear how the SEA calculates student growth for teachers who are not the primary provider of content for SWDs and ELs.
Technical Assistance Suggestions	• The SEA should be sure that the teams in these disciplines (e.g., the Arts) are also considering how ELs and SWDs are included in measurement of student growth. This will ensure that all teachers are held accountable for all kids.
☐ *Not applicable because the SEA selected 3.A, Option C*	

d.   Evaluate teachers and principals on a regular basis?

3.A.ii.d PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	TN is evaluating teachers and principals on a regular basis.
Strengths	• Teachers are being observed between 4-6 times per year and teachers receive an annual TVAAS score. • Principals have annual evaluations.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option C*	

e.   Provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?
   ➢ *Will the SEA's guidelines ensure that evaluations occur with a frequency sufficient to ensure that feedback is provided in a timely manner to inform effective practice?*

   ➢ *Are the SEA's guidelines likely to result in differentiated professional development that meets the needs of teachers?*

3.A.ii.e PANEL RESPONSE *Tally of Peer Responses:* 7 Yes, 0 No	
Rationale	TN's system provides clear, timely, and useful feedback that guides professional development.
Strengths	• The frequent observations in TN's system provide feedback several times per year. • FSCs will provide differentiated support to LEAs in implementing the TEAM model. • The principal evaluation includes a schedule of feedback to principals. • The SEA and teachers will receive real time feedback on the observations. • The online system has professional development and supports for teachers.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	
☐ *Not applicable because the SEA selected 3.A, Option C*	

f.   Will be used to inform personnel decisions?

3.A.ii.f PANEL RESPONSE *Tally of Peer Responses:* 7 Yes, 0 No	
Rationale	TN's system provides clear, timely, and useful feedback that is used to inform personnel decisions.
Strengths	• Evaluations in TN are a factor in employment decisions, tenure, and compensation. • The SEA's new tenure law requires teachers to receive above average ratings; the panel commends the SEA for these changes.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	• The SEA should monitor the extent to which local LEAs use the evaluation data to inform personnel decisions.
☐ *Not applicable because the SEA selected 3.A, Option C*	

3. B Ensure LEAs Implement Teacher and Principal Evaluation and Support Systems

3.B Is the SEA's process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems consistent with the SEA's adopted guidelines likely to lead to high-quality local teacher and principal evaluation and support systems?

➢ *Does the SEA have a process for reviewing and approving an LEA's teacher and principal evaluation and support systems to ensure that they are consistent with the SEA's guidelines and will result in the successful implementation of such systems?*

➢ *Does the SEA have a process for ensuring that an LEA develops, adopts, pilots, and implements its teacher and principal evaluation and support systems with the involvement of teachers and principals?*

➢ *Did the SEA describe the process it will use to ensure that all measures used in an LEA's evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?*

➢ *Is the SEA's plan likely to be successful in ensuring that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems no later than the 2013−2014 school year and implementing evaluation and support systems consistent with the requirements described above no later than the 2014−2015 school year; or (2) implementing these systems no later than the 2013−2014 school year?*

➢ *Do timelines reflect a clear understanding of what steps will be necessary and reflect a logical sequencing and spacing of the key steps necessary to implement evaluation and support systems consistent with the required timelines?*

➢ *Is the SEA plan for providing adequate guidance and other technical assistance to LEAs in developing and implementing teacher and principal evaluation and support systems likely to lead to successful implementation?*

➢ *Is the pilot broad enough to gain sufficient feedback from a variety of types of educators, schools, and classrooms to inform full implementation of the LEA's evaluation and support systems?*

3.B PANEL RESPONSE *Tally of Peer Responses:* *7 Yes, 0 No*	
Rationale	TN's system seems likely to lead to high-quality local teacher and principal evaluation and support systems.
Strengths	• TN's system is primarily State-developed, with the discretionary measures coming from an SEA-adopted list. • For non-tested grades and subjects the SEA is ahead in developing ways to include these in its system. • The SEA is in full implementation in all schools; TN has massive training in place by one of the largest and strongest organizations. • TN's system is in statute and further supported by tenure law. • The SEA is able to monitor evaluations with the real time data. • The SEA piloted the rubrics that are being used, and is phasing in the measures of non-tested grades and subjects in a systematic and rational way. • The SEA is monitoring ratings distribution versus TVAAS ratings, and intervening in districts where the ratings are misaligned and show discrepancies. In particular, it is monitoring the districts that are not using the State model to ensure that there are not major discrepancies.
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	• The SEA should consider how the rubric does or does not address SWDs and ELs, and could do so by examining its data. • The SEA should consider whether there is a way through its evaluation system to give teachers of ELs and SWDs credit for their work with students.

Principle 3 Overall Review

Is the SEA's plan for the SEA's and LEAs' development and implementation of teacher and principal evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

PRINCIPLE 3 OVERALL REVIEW PANEL RESPONSE *Tally of Peer Responses:* *6 Yes, 1 No*	
Rationale	TN's overall plan for the SEA's and LEAs' teacher and principal evaluation is quite comprehensive and coherent.
Strengths	• TN has developed, with considerable educator involvement, a comprehensive evaluation system that includes multiple measures for teachers and principals, incorporating student growth data. • TN has adopted a model system State-wide, using the TAP rubric and related supports, its own TVAAS growth model, and a State-controlled list of measures to be used for optional (15%) student achievement measure. Work is underway with educator teams in relevant content areas to recommend measures to be used where TVAAS is not available. • With implementation underway in every school in the State, TN has already completed a major round of evaluator training and evaluators have begun to conduct the required 4-6 observations a year for all teachers. • TN's ability to obtain real-time evaluation data is a unique feature of its system that can contribute to the State's monitoring of the implementation and effectiveness of the system, as well as ways in which the system might be adjusted when needed. • TN acknowledges that ongoing improvements will be needed to the system especially in the early years and has put in place feedback mechanisms to guide required changes.

PRINCIPLE 3 OVERALL REVIEW PANEL RESPONSE *Tally of Peer Responses:* *6 Yes, 1 No*	
Weaknesses, issues, lack of clarity	• There is uncertainty in how the evaluation system handles student growth for SWDs—are they included in each teacher's student learning metrics? • Also, request did not explain how TN will handle cases where there are multiple teachers of SWDs and ELs. • The instructional focus in the rubric does not call out some of the additional considerations (e.g., accommodations) for the special needs of some student groups • The SEA did not provide enough information about its principal evaluation system, especially how ratings on the TILS rubric are determined and how evaluators are trained.
Technical Assistance Suggestions	• Ensure that teachers are held accountable for SWDs and ELs and given appropriate instructional feedbacks as needed. • The TAP rubric could be modified to draw more attention to practices that help teachers differentiate instruction for students with different learning needs.

Overall Request Evaluation

Did the SEA provide a comprehensive and coherent approach for implementing the waivers and principles in its request for the flexibility? Overall, is implementation of the SEA's approach likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

OVERALL REQUEST EVALUATION PANEL RESPONSE	
Summary	In March, 2010, the State of Tennessee leapt to the forefront of State-led school reform in the US when it won one of two RTT grants. The hard, often cutting-edge work done by State and local education leaders in Tennessee in the ensuing months is fully evident in the State's request for ESEA flexibility. Clearly, this is a State whose leaders intend to stay ahead. As State leaders acknowledge in this request, they have a lot of work still ahead of them. Tennessee's schools and children have languished near the bottom in student achievement on national exams. And, until recently, the State's schools weren't aiming very high: prior to a courageous decision in 2008 to significantly raise the cut score on the State assessment, Tennessee had one of the lowest definitions of proficient in the country. Certainly, they were first in the country to develop a new method of analyzing a teacher's annual contribution to student learning, having designed and put into place the much-admired TVAAS system nearly twenty years ago. But, until recently, most educators in the state had not made full use of this powerful tool. Determined now to become the "fastest improver" of any State in the country, Tennessee's educators are using every tool they can get their hands on, and creating more and more as they build out their improvement strategy. The new CCSS will be a hugely important tool in Tennessee's efforts to move its children—and its schools—toward college and career readiness. The State adopted the CCSS in 2010, and is a part of the PARCC assessment consortium. The State's plans for transition to the CCSS—outlined in this waiver request—are generally quite strong. • Already, educators in Tennessee have completed a crosswalk between existing standards and the new CCSS, identifying the most important shifts that need to take place. Because student performance is particularly weak in mathematics, the state has prioritized work in

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	mathematics.
	• Tennessee's professional development plans emphasize engaging educators directly with the more rigorous content contemplated in the standards, so they can experience for themselves what these changes will demand both from teachers and from their students.
	• Because of the central importance of implementation, the State is creating a new office to oversee implementation of PARCC and CCSS. Among other things, they are beginning to integrate CCR-like items into their existing assessment to give educators and students more experience with the new level of assessment rigor during the transition time.
	• Knowing that CCR will demand much more from teachers, SEA and higher education leaders are working together to overhaul key aspects of teacher preparation, including program approval and licensure requirements. They have also engaged the SAS Institute to develop curriculum modules to help acquaint future educators with TVAAS.
	• SEA leaders have also been seriously attentive to the importance of CCSS for ELs and SWDs, taking advantages of the work being done in several consortia and otherwise focusing on the special challenges and opportunities here.
	• Though State leaders have been candid about the extra challenges involved in moving up their implementation timeline by one year to meet the demands of this waiver, they are confident of their ability to do so.
	Given the magnitude of the shift being expected of the State's teachers, the Peer Review Panel hopes that State leaders will both take advantage of some of the sample lessons being designed by PARRC and its members, and also consider joining a consortium working to produce a full-range of high-quality instructional materials, so schools and teachers won't be forced to make it up for themselves. Those materials should provide explicit suggestions about how to make this content accessible to all learners, including ELs and SWDs. All in all, though, the plans described in this

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	waiver request are robust and meet the requirements of Principle 1.

The plans and activities around educator evaluation described in this waiver request are even stronger—hardly surprising given that Tennessee is the first to get a redesigned evaluation and support system in place across the entire state. Despite the speed of that work, and some inevitable bumps along the way, the Peer Review Panel is struck by its quality.

- The State's evaluation system contains multiple measures, including TVAAS data for teachers in tested subjects and grades.

- They adopted the much-admired TAP observation rubric—then went further to engage NIET, perhaps the most experienced trainer of evaluators, to conduct the training for evaluators in Tennessee.

- Teachers are getting 4-6 observations during the year, with regular feedback along the way.

- And evaluation data are being used in personnel decisions.

SEA leaders have been unusually hands on during the roll out, visiting schools and LEAs regularly to see how the roll out is going and where adjustments need to be made. Moreover, they are using a new data system that enables them—not to mention LEA superintendents and others—to track real-time data from observations.

We applaud the SEA leaders for acknowledging that some adjustments will be needed throughout the early years of implementation at least. Indeed, SEA leaders are currently proposing some "tweaks" in their systems. And the Peer Review Panel knows there are many issues still to be worked out, including exactly how growth of ELs and SWDs will be included in the measurements of teacher impact. But the State's work is compelling and the plans set forth in the waiver request appear to meet all of the requirements of ESEA flexibility.

The Peer Review's problems with the State's plans on Principle 2—differentiated accountability |

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	and support—do not revolve around its ambition. Indeed, the overarching goals for the system are quite bold, including a 3-5 percentage point increase each year in the number of students proficient on the State's assessments and a halving of the gaps between major student groups over an eight year period. Those are, indeed, ambitious. Though we are not sure they are achievable because the State provided no evidence of past improvements at that level, ambitious goals are exactly what we would expect of a State that aspires to be the nation's fastest improver. We are concerned, however, that some of the features of their proposed system fall short of meeting federal requirements and that others will actually get in the way of their improvement efforts. 1. For starters, instead of setting AMOs for all LEAs and schools that flow from the two statewide goals, they are proposing a process of negotiating those goals with each of their LEAs—with the understanding that those LEA goals would have to "add up" to the statewide goal. Similarly, each LEA would negotiate goals with each of its schools—once again, with the understanding that those goals, in turn, would have to "add up" to the LEA's goals. While we appreciate the logic behind this approach—that LEA and school leaders are more likely to "own" goals that they had a hand in shaping—we are not sure it is permissible and we worry both that this process will take a lot of time away from other improvement tasks and that many of the LEAs literally won't have the capacity, across schools of different configurations and demographic compositions, to distribute goals in a way that will truly "add up" to their own goals. Trade-offs between districts and schools may be necessary, and may pit districts and schools against each other. 2. The particular configuration of the State's goal structure actually will make this process more difficult. That configuration includes two parts: both an overall improvement goal and a gap-closing goal, with "gap" defined as a weighted average of the "white/non-white gap," the "Students with Disabilities/non disabled gap" and the "Low-income/non-low income gap" (with different weights for every school and LEA). State leaders made clear that they chose

OVERALL REQUEST **EVALUATION PANEL RESPONSE**	
	this approach over the approach recommended in Option A of the waiver request—a focus on halving the gaps between where each group is and 100 percent proficient—because they thought it was less of a communications challenge. We respect their right to make that choice under the requirements of this package, but we strongly recommend that State leaders reconsider that decision, for four reasons: • First, all of our experience tells us that when the focus is within school gaps, recalcitrant school leaders will often avoid doing what they need to do to move all groups of children forward, and deflect criticism by telling anyone who will listen—but especially privileged parents—that "the best way to meet that goal is to keep your children (or white children, or…) from advancing. If that is not a huge communications challenge, we don't know what is. • Even in schools without recalcitrant leaders, a focus on simple gaps between groups deflects educators from where they should be focusing—on moving all kids toward proficiency as fast as they can, with the groups that have been behind moving faster. In any year, gap size can feel random—especially when it is a weighted amalgam of lots of gaps. Rates of improvement are something for which educators can truly feel responsible. • The assessment results provided by the State show unusually small gaps between SWDs and those without—until high school. We suspect that is because the State has unusually high numbers of students assessed with alternate assessments. As Tennessee moves more SWDs into the regular assessment system, which it intends to do, these gaps are likely to widen significantly—ruining the state's gap-narrowing metrics. • Finally, especially if the State is determined to hang on to its LEA and school goal-setting process, a more Option A-like way of focusing on gaps would lend itself to far easier LEA and school-level modeling. (It could also be more easily re-set as SWDs are moved into

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	the regular assessment system, and as the PARCC assessments come on line.)
	3. Furthermore, while the Peer Reviewers are most impressed with the work done on priority schools—particularly the designs for the ASD and the new LEA Innovation Zones—we do not believe that anywhere near that care and depth of thinking has been put into the issue of supports and incentives for focus schools or for other Title I Schools. The strategies described in the request are extremely thin, and do not seem likely to provide a real framework for LEAs and schools to take action on the conditions that lead to underperformance. Oddly, there is no link between this work, and the work on the CCSS and teacher evaluation and support (Principles 1 and 3). Too, the criteria for exiting focus status are not aligned with the reasons they were identified in the first place: some will undoubtedly "escape" because of statistical flukes; others by meeting goals that had nothing to do with advancing the achievement of the group whose performance resulted in focus status to begin with.
	4. Finally, the feature of the proposed system requiring schools and LEAs to meet only half plus one of their gap-closing targets means that one or more groups of students can languish for many years if other "gap" groups are moving forward—or, frankly, if white or higher-income students are falling backward. This does not meet the Federal requirement that accountability and support systems promote improvement and gap closing for all groups of students. Perhaps more important, it means that Tennessee itself won't meet its own gap-closing goals.
	Among all of these, the last is the most important and clearly out of line with Federal requirements. Fortunately, it is also easily fixable.
	The Peer Review Panel hopes that Tennessee will think hard about each of these recommendations for improving its proposed system, making some tweaks before enacting that system into law. At the very least, though, the State should be certain to create a safeguard in its system assuring attention and action in any LEA or school, including those otherwise meeting overall targets, where one group of students is being left out of that improvement for two or more years.

OVERALL REQUEST EVALUATION PANEL RESPONSE	
Strengths	Principle 1: College and Career Ready Expectations for All Students
	• TN has laid out a comprehensive plan for transitioning to CCR, and in doing so has addressed all of its students and teachers.
	• TN has systematically looked at its current standards and assessments and what needs to happen to transition to CCR and new assessments. It is participating in PARCC, NCSC, and an ELP consortia, and has considered the transition of its students in the 2% assessment.
	• TN has begun to look at curricular and instructional needs and what it can do to ensure successful transition.
	• TN is establishing an officer to assist with transition and implementation, and has started to designate organizations to work on curricular modules, etc.
	Principle 2: State Developed Differentiated Recognition and Accountability , and Support
	• The approach for addressing priority schools is strong.
	• TN clearly has thought through the ASD and the Innovation Zones, but has not brought through the same level of thinking or the content from those to their overall system.
	• TN has articulated a clear theory of action.
	Principle 3: Supporting Effective Instruction and Leadership
	• TN has developed, with considerable educator involvement, a comprehensive evaluation system that includes multiple measures for teachers and principals, incorporating student growth data.
	• TN has adopted a model system State-wide, using the TAP rubric and related supports, its own TVAAS growth model, and a State-controlled list of measures to be used for optional (15%) student achievement measure. Educator teams in relevant content areas are working to recommend measures to be used where TVAAS is not available is underway with teams of content educators.
	• With implementation underway in every school in the State, TN has already completed a major round of evaluator training and evaluators have begun to conduct the required 4-6 observations a year for all teachers.
	• TN's ability to obtain real-time evaluation data is a unique feature of its system that can contribute to the State's monitoring of the implementation and effectiveness of the system, as well as ways in which the system might be adjusted when needed.
	• TN acknowledges that ongoing improvements will be needed to the system especially in the early years and has put in place feedback mechanisms to guide required changes.

OVERALL REQUEST **EVALUATION PANEL RESPONSE**	
Weaknesses, issues, lack of clarity	Principle 1: College and Career Ready Expectations for All Students • TN's approach may not be strong enough given its past history of quite low standards and an educator workforce that is used to those standards; much more attention may be need to be given to providing curricular and instructional supports to educators across the educational system. • TN's implementation probably needs to be more specific and stronger, given the challenges that it will face in moving to CCR. • There is a concern about whether there is full participation of ELs in assessments (and coursework) and whether they are on a path to CCR. Principle 2: State Developed Differentiated Recognition, Accountability, and Support • There is not the attention needed to improve instruction, in particular for SWDs and ELs. • The SEA has all the structures, but needs to provide more detail on the actions, activities, and steps the SEA will take. • The panel has grave concerns about the gap closing measures. The panel is skeptical about the incentives related to the gap closing measures and the 50% of goals as they have been presented. Principle 3: Supporting Effective Instruction and Leadership • There is uncertainty in how the evaluation system handles student growth for SWDs—are they included in each teacher's student learning metrics? • Also, request did not explain how TN will handle cases where there are multiple teachers of SWDs and ELs. • The instructional focus in the rubric does not call out some of the additional considerations (e.g., accommodations) for the special needs of some student groups. • The SEA did not provide enough information about its principal evaluation system, especially how ratings on the TILS rubric are determined and how evaluators are trained.
Technical Assistance Suggestions	