

From: [David Chambers](#)
To: [TISA Rules](#)
Subject: [EXTERNAL] Comment
Date: Monday, June 27, 2022 12:15:08 PM

With the loss that occurred as a result of the pandemic, I believe that TNReady testing for science and social studies should not begin until the 6th grade. This gives teachers more time to focus on reading and math.

--

David Chambers
Pre-K - 8th Music Specialist
District Data Specialist
Elementary District Testing Coordinator
Fentress County Schools

"You must first reach the heart then you can teach the mind."

From: [Breanna Sommers](#)
To: [TISA Rules](#); [Penny Schwinn](#)
Cc: [Charlie Bufalino](#); [Jack Powers](#); [Gini Pupo-Walker](#); [Alexza Barajas Clark](#)
Subject: [EXTERNAL] Ed Trust TN TISA Rulemaking Analysis
Date: Thursday, June 30, 2022 5:56:17 PM
Attachments: [image586608.png](#)
[image582542.png](#)
[image948519.png](#)
[image512463.png](#)
[image181691.png](#)
[6.30.22 Updated ET TN TISA Rulemaking Analysis Feedback.pdf](#)

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Dear Commissioner Schwinn,

We hope you and your family are having a great summer!

Linked [here](#) and attached is our updated analysis on the TISA draft rules. Please let us know if you or your team have any questions or if there is anything we can do to support this process.

Best,

Breanna Sommers



Breanna Sommers

Pronouns: She/Her

P12 Policy Analyst

Mobile: 678-266-8129

11 Willow Street, Suite 11

Nashville, TN 37210



Office will be closed the week of July 4-8th.

June 30th, 2022

Dr. Penny Schwinn, Commissioner
Tennessee Department of Education
710 James Robertson Parkway
Nashville, TN 37243

RE: Updated Tennessee Investment in Student Achievement (TISA) Rulemaking Analysis

Dear Commissioner Schwinn and Department staff,

The Education Trust in Tennessee has appreciated the opportunity to engage on funding reform over the past several months, and to share our feedback on TISA Rulemaking thus far. We are excited about TISA's passage and look forward to continuing to engage throughout the rulemaking process to ensure that students of color, from low-income backgrounds, in rural schools, and learning English are centered in the decision-making process. We submit the following analysis and resources on behalf of The Education Trust in Tennessee (Ed Trust), a non-profit, non-partisan research and advocacy organization. We are committed to improve educational outcomes for all students in our state from pre-K through postsecondary learning, with an explicit focus on closing the achievement and opportunity gaps.

For more information, please see our resources linked below:

[Dollars & Sense Website](#)

- [TISA Rulemaking Advocacy](#)
- [TISA Analysis & FAQs](#) updated based on passed language
- [School Finance Glossary](#)
- Funding fact sheets by student group:
 - [Funding for Students with Disabilities](#)
 - [Funding for English Learners](#)
 - [Funding for Rural Schools](#)
 - [Funding for Students from Low-Income Backgrounds](#)
- Updated [Basic Education Program Review Guide](#)
- [Dollars & Sense Learning Series](#) (with recordings, readings, & slides for all sessions)

Additionally, our Tennessee staff and national team of school finance and regulation experts would be happy to connect with you and your team further.

Sincerely,

The Education Trust in Tennessee

| Rulemaking Component | TISA Law | TDOE Draft TISA Rules (6/6/22) | Our Recommendations | Analysis | Questions for Consideration |
|---|--|---|---|---|---|
| <p>Unique Learning Needs: English Learners (ELs)</p> | <p>-15%-150% weight for Unique Learning Needs (ULN) with 10 different levels</p> <p>-English Learners must have an individual learning plan and ULN rulemaking must align with TNSBE's rules</p> <p>-TNSBE will issue a positive, negative, or neutral recommendation on TDOE proposal before rulemaking</p> <p>-Rulemaking will determine how English learners are identified and differentiated across the 10 levels</p> | <p><u>EL 1 = ULN 2 @ 20%</u> - Long-term ELs (i.e., 7 years) -Transitional ELs -Waived ELs (categorization same as draft documentation, but previously also based on WIDA/TCAP)</p> <p><u>EL 2 = ULN 4 @ 60%</u> - ELs grades 4-12 (previously based on WIDA, TCAP, and/or industry credential and formal schooling and first language literacy)</p> <p><u>EL 3 = ULN 5 = 70%</u> - ELs grades K-3 (previously based on WIDA and formal schooling and first language literacy)</p> <p>-ELs can only qualify for one ULN weight (not previously specified)</p> | <p>-Students are assigned to one of 3 tiers based on the following student characteristics:</p> <p><u>EL 1 = ULN 2 @ 20%</u> -WIDA ACCESS Levels 4.4+ - Transitional ELs -Waived ELs</p> <p><u>EL 2 = ULN 4 @ 60%</u> -WIDA ACCESS Levels 3.0-4.3 -Newcomers/Recently Arrived English Learners (RAEL)</p> <p><u>EL 3 = ULN 5 = 70%</u> -WIDA ACCESS Levels 1.0-2.9 -Students with Limited or Interrupted Formal Education (SLIFE) & Long-term English Learners (LTEL)</p> <p><u>Other considerations:</u> -Students whose native languages are less common in the district -Number of English learners in a district relative to total student population -Formal schooling and first language literacy</p> | <p>-Of the 11 states that allocate additional funding for EL students through a multiple weights approach like TISA, only 1 state uses grade bands to tier funding compared to the majority that uses proficiency like the original ULN proposal that is aligned to TN's ESSA Plan. Grade level differentiation may not incentivize schools to increase their EL students' understanding. It also creates unfair comparisons between primary and secondary schools. Additionally, grade-level differentiation assumes younger students understand English less than older students. Also, it is less responsive to shifts in student demographics, particularly because TN's EL population is rapidly growing</p> <p>-Long-term ELs (LTELs) make up a too high percentage of ELs at 13% overall, and 41% of ELs in grades 6-12 are LTELs. This dire situation will continue to persist if LTELs are not provided with comprehensive support</p> <p>-Incorporating formal schooling and first language literacy supports students with different pre-existing access to education and should be added back to draft rules</p> <p>-Aligning with national RAEL and SLIFE designations and current TNSBE rules increase stakeholder transparency and efficiency</p> <p>-Additional funding for students whose native languages are less common in the district or are one of</p> | <p>-How will the State monitor and evaluate ULN weights and adjust as needed? How will they solicit and incorporate stakeholder feedback? How will it incorporate the TISA Review Committee?</p> <p>-TISA law and rulemaking mention that weighted allocations are not mutually exclusive of another. Are there any limits to how many different weights students can receive within ULN?</p> <p>-How will students who have not exited EL status after 7 years receive funding and services to support their needs?</p> <p>-How will the State address diseconomies of scale when there are few English learners overall despite still needing teachers and resources to support their learning?</p> <p>-How will the State support parents/caregivers, school/district staff, and others to understand the 10 different levels?</p> |

| Rulemaking Component | TISA Law | TDOE Draft TISA Rules (6/6/22) | Our Recommendations | Analysis | Questions for Consideration |
|--|--|--|---|---|--|
| | | | | a few ELs in their district support diseconomies of scale. The State can set a minimum EL count for districts with few EL students and provide funding on that inflated basis to ensure sufficient scale to provide a program and staff | |
| Unique Learning Needs: Students with Disabilities (SWD) | <p>-15%-150% weight for Unique Learning Needs (ULN) with 10 different levels</p> <p>-ULN includes students with disabilities, with characteristics of dyslexia, identified as gifted</p> <p>-TNSBE will issue a positive, negative, or neutral recommendation on TDOE proposal before rulemaking</p> <p>-Rulemaking will determine how students with disabilities are identified and differentiated across the 10 levels</p> | <p>-Students with disabilities are distributed across the 10 ULN categories based on hours of services per week and other select factors like homebound</p> <p>-During legislative hearings, TDOE stated they look forward to revising the current Special Education Option Codes based on best practices during rulemaking</p> <p>-TDOE must monitor IEPs for students' least restrictive environment and develop corrective plans and training and technical assistance as needed</p> <p><u>Characteristics of Dyslexia (still ULN 2) Requirements</u></p> <ol style="list-style-type: none"> 1. Student does not meet proficiency in 3+ reading domains 2. Has a finalized Dyslexia Individual Learning Plan 3. -K-8: Score below the 40th percentile on approved screener | <p>-Students are assigned to one of multiple tiers based on the skills and abilities listed in an IEP or 504, increasing funding for students with more significant needs</p> | <p>-Assigning students with disabilities across multiple levels allocates resources to differentiate support</p> <p>-Funding primarily based on time does not capture cost nuances because one hour of services can cost vastly different amounts based on teacher to student ratios and costs of services and interventions that may take the same amount of time. Most states that use a multiple weight system for students with disabilities differentiate based on specific disabilities rather than time, and Florida uses a matrix model guided by students' skills and abilities in their IEP</p> | <p>-Will the State publicly report information on corrective plans, training, and technical assistance to support stakeholder transparency?</p> <p>-How will the State monitor and evaluate ULN weights and adjust as needed? How will they solicit and incorporate stakeholder feedback? How will it incorporate the TISA Review Committee?</p> <p>-TISA law and rulemaking mention weighted allocations are not mutually exclusive of another. Additionally, ULN 2 uses “and/or” language, suggesting students could qualify for special education, EL I, and/or characteristics of dyslexia funding if students qualify. Are there any limits to how many different weights students can receive within ULN? How are primary and secondary services factored into this decision?</p> <p>-How will students with 504 plans and RTI services be categorized for ULN funding?</p> <p>-How will Dyslexia Individual Learning Plans be incorporated into existing Dyslexia law, policy, and practice? What support will schools and districts receive to implement the new plans?</p> <p>-How will the State support parents/caregivers, school/district</p> |

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|-----------------------|--|--|---|---|---|
| | | -9-12 students qualify through existing Early Warning System based on reading | | | staff, and others to understand the 10 different levels? |
| Direct Funding | <p>-Rulemaking will determine direct allocation amounts</p> <p>-TNSBE will issue a positive, negative, or neutral recommendation on TDOE proposal before rulemaking</p> <p><u>-Allocates additional funding for:</u></p> <p>-4th-grade literacy tutoring for students who score 'below' or 'approaching' on 3rd-grade ELA TCAP</p> <p>-CTE based on tier and student year</p> <p>-Postsecondary readiness assessments (i.e., ACT & retake)</p> <p>-K-3 students</p> <p>-Charter students (previously included as a weight)</p> | <p><u>Programs:</u></p> <p>-4th-grade students who score below or approaching on 3rd-grade ELA TCAP</p> <p>-ACT & retake</p> <p>-K-3 students</p> <p>-Charter students</p> <p>-CTE funding based on student year and 3 levels determined by Wage-Earning Potential; High-cost programs also receive additional funding</p> <p>-TISA Press Conference referenced \$376M overall for this component, but based on annual appropriations</p> <p>-Direct funding categories are stackable (e.g., students can qualify for ACT and CTE)</p> <p>-TDOE and legislators shared in multiple legislative hearings that the charter direct funding would be the same as its current allocation of \$32M, but it depends on annual budget allocations</p> <p>-Allocated per student to LEAs (excluding postsecondary</p> | <p>-Large majority of funding should be allocated through the base and weights to ensure stability and flexibility for districts</p> <p>- Regularly monitor and evaluate direct funding through the TISA Review Committee</p> | <p>-Based on the TISA Press Conference, direct funding will make up approximately 4% of the total \$9B in state and local funding for 2024. However, that number may shift over time since charter funding increased from \$16M to \$32M during the 2022 Legislative Session.</p> | <p>-How will the State monitor and evaluate direct funding allocations to adjust as needed? What role will TDOE, the TISA Review Committee, and other stakeholders play? What factors will be considered?</p> <p>-In-Demand Occupations are based on statewide demand in multiple regions. How will the State weigh if only one or a few regions need a program, but at a high level?</p> |

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| | | <p>readiness assessments)</p> <p>-No required local contribution</p> | | | |
| Outcomes Funding | <p>-TDOE allocates funding per student to LEAs, subject to available appropriations and relative to students in other LEAs using previous year data</p> <p>-TDOE will convene relevant stakeholders (based on member list in legislation) to advise on outcome incentive dollars and outcome goals</p> <p>-TDOE determines outcome goals based on rulemaking</p> <p>-TNSBE will issue a positive, negative, or neutral recommendation on TDOE proposal before rulemaking</p> | <p><u>Outcomes Goals:</u></p> <p>-3rd-grade TCAP reading proficiency (15%) with double funding for students from low-income backgrounds, ELs, & SWDs</p> <p>-4th-grade ELA TCAP growth to proficient (10%) with double funding for students from low-income backgrounds, ELs, & SWDs</p> <p>-8th grade math and ELA TCAP proficiency or growth (2+ standard errors) (10%) with double funding for students from low-income backgrounds, ELs, & SWDs</p> <p>-21 on ACT or 3 points growth (10%) with double funding for students from low-income backgrounds</p> <p>-Tier II or II industry credential (10%) with double funding for students from low-income backgrounds</p> <p>-High School students with disabilities meeting 3 or 4 annual IDEA goals</p> <p>-Leftover money goes to ReadGrad</p> | <p>-Large majority of funding should be allocated through the base and weights to ensure stability and flexibility for districts</p> <p>-Metrics should be tied to a few existing, targeted, and growth-based measures (e.g., 3rd and 8th-grade math and reading growth and Ready Grad growth) to promote stakeholder transparency, efficiency, and evaluation</p> <p>-Identify students from low-income backgrounds, in rural schools, with disabilities, and English Learners for additional outcomes-based funding</p> <p>- Regularly monitor and evaluate outcomes funding through the Outcomes or TISA Review Committee</p> | <p>-Prioritizing growth-based measures creates opportunities for more districts to earn additional funding, rather than rewarding districts that are already have higher levels of proficiency</p> <p>-Additional funding for students with disabilities and English learners recognizes that all students can reach high expectations, but may require additional support</p> <p>-Goals should be consistent across measures. For example, 3rd and 4th-grade do not include math, but 8th-grade does. Additionally, students identified for additional funding, like English learners, are not included in the high school model and receive different percentages of funding depending on the measure. Goal measures and percentages should be consistent across goals to support transparency and targeted goal setting</p> <p>-Growth measures should be consistent across goals. For example, 3rd-grade uses proficiency, 4th-grade uses growth to proficiency, and 8th-grade defines growth at 2+ standard errors. It is critical to support students who are the furthest behind or just beyond the proficiency cut-off. Outcomes measures should utilize consistent growth measures aligned to our ESSA plan to increase transparency and targeted goal setting.</p> | <p>-How will the State determine outcomes allocation amounts each year? What role will TDOE, the Outcomes Committee, and other stakeholders play? What factors will be considered?</p> <p>-How will TDOE and the Outcomes Committee monitor, evaluate, and revise outcomes goals? What factors will be considered?</p> <p>-Will TDOE publish the amount of available funding each year for outcomes funding, how schools/districts performed on each goal, and who was awarded funding (including funding amounts overall, per student, and disaggregated by students identified for additional funding)?</p> <p>-Will TISA Outcomes meetings be open to the public and recorded to increase stakeholder transparency?</p> |

| Rulemaking Component | TISA Law | TDOE Draft TISA Rules (6/6/22) | Our Recommendations | Analysis | Questions for Consideration |
|--------------------------------------|--|--|--|--|---|
| | | <p>proficiency (10%) with double funding for students from low-income backgrounds</p> <p>-TDOE projected \$104.4M in outcomes funding, but based on annual appropriations</p> <p>-No required local contribution</p> <p>-Outcomes bonuses reported at the school level</p> <p>-TDOE will engage Outcomes Committee annually (new between proposal and draft)</p> | | <p>-The number of outcomes goals, particularly at the high school level, may make it difficult for district and school leaders to budget and plan strategically to demonstrate growth in the goal areas. Instead, the rules should incentivize 3rd and 8th-grade math and reading growth at the elementary and middle school levels and Ready Grad growth at the high school level as aligned to our ESSA plan. Additionally, the Read Grad indicator already includes the ACT.</p> <p>-Requiring the TISA Outcomes Committee to meet annually supports continual improvement and stakeholder engagement</p> | |
| Data Collection and Reporting | <p>-LEA will submit an annual accountability report to TDOE on budget and 3rd-grade ELA TCAP proficiency and other student achievement goals</p> <p>-TDOE will produce an annual report</p> <p>-TISA Press Conference referenced publicly posted and federally required school and district level funding will be added to annual report cards</p> | <p><u>Data Collection:</u></p> <p>-ADM for the Base, Economically Disadvantaged, Concentrated Poverty, Small, Sparse, ULN, Grades K-4, 11, and 12, CTE membership, Charter</p> <p>-TCAP Performance Data</p> <p>-Title I Eligible Schools</p> <p><u>Data Reporting:</u></p> <p>- Sparse (county square miles)</p> <p>- CTE approved programs with courses aligned to years 1-4</p> <p>-Fiscal capacity indices</p> | <p>-State reports all existing and new data used to calculate TISA, including school and district-level funding and district, state, and federal-level per-pupil expenditure data</p> <p>-All data used to calculate TISA is publicly reported in an annual, longitudinal, comparative, transparent, and interactive format, including on the State Report Card, to promote stakeholder transparency</p> | <p>-The rule is unclear how the data will be shared with the public and would benefit from greater detail on how and when data will be published to the public</p> <p>- Additionally, it is unclear whether fast-growth stipend data will be collected or publicly reported</p> | <p>How will the TISA Review Committee support state and district-level transparent data collection and reporting?</p> <p>-Will the fiscal capacity indices reporting include the LFC calculation, underlying data, and each county's LFC based on Public Chapter 966?</p> |

From: [Therese Tuley](#)
To: [TISA Rules](#)
Subject: [EXTERNAL] TISA Comment
Date: Monday, June 27, 2022 12:42:29 PM

Hi,

I live in Chattanooga and very much support our public schools. As a TN taxpayer, former teacher, and parent, I have been following the development of TISA.

I have grave concerns about how the state will define & allocate TISA funds. I am very troubled about our tax dollars being diverted from our (already poorly-funded) public schools to private for-profit schools.

I know that TISA is called a “student-based” model, but it looks like TISA is in reality directed to support for-profit school businesses.

Sincerely,

Therese P Tuley

Chattanooga, 37405

From: [Bill Dunn](#)
To: [TISA Rules](#)
Subject: Local Share
Date: Tuesday, June 28, 2022 12:43:44 PM
Attachments: [image001.png](#)

The term “local share” is used twice in the definition section (23 and 30), but there is not a definition for local share. I suggest one be placed in the rules since there is some confusion around local share. Local cost, fiscal capacity, etc.

Thank you.

Bill



Bill Dunn | Senior Advisor

Andrew Johnson Tower, 9th Floor
710 James Robertson Parkway, Nashville, TN 37243
(615) 483-0938
Bill.Dunn@tn.gov
www.tn.gov/education

From: [Sara Morrison](#)
To: [Charlie Bufalino](#); [Christy Ballard](#); [Jack Powers](#)
Cc: [Angela C. Sanders](#); [Nathan James](#); [TISA Rules](#)
Subject: RE: SBE feedback in TISA rules
Date: Friday, July 1, 2022 11:48:05 AM
Attachments: [image001.png](#)
[image002.png](#)

Will do!

Sara

Sara Heyburn Morrison, Ed.D. | Executive Director
Tennessee State Board of Education
500 James Robertson Parkway, 5th Floor
Nashville, TN 37243
p. 615-253-5214 c. 615-945-0659
Sara.Morrison@tn.gov
www.tn.gov/sbe/
@SBEd_TN



From: Charlie Bufalino <Charlie.Bufalino@tn.gov>
Sent: Friday, July 1, 2022 11:44 AM
To: Sara Morrison <Sara.Morrison@tn.gov>; Christy Ballard <Christy.Ballard@tn.gov>; Jack Powers <Jack.Powers@tn.gov>
Cc: Angela C. Sanders <Angela.C.Sanders@tn.gov>; Nathan James <Nathan.James@tn.gov>; TISA Rules <TISA.Rules@tn.gov>
Subject: RE: SBE feedback in TISA rules

Sara,

Thanks so much for sharing this feedback with us—we appreciate you sending it along, and please pass along our thanks to Chairlady Hartgrove and Vice-Chair Eby. Yes, in the future please continue to send feedback as you have it, and if you could copy the TISA public comment email (TISA.Rules@tn.gov) that would be great.

Thanks, and have a great weekend.



Charlie Bufalino | Assistant Commissioner
Policy & Legislative Affairs

Andrew Johnson Tower, 9th Floor
710 James Robertson Parkway, Nashville, TN 37243
c. (615) 571-0449
Charlie.Bufalino@tn.gov
tn.gov/education

#TNBestforAll

We will set all students on a path to success.

From: Sara Morrison <Sara.Morrison@tn.gov>
Sent: Friday, July 1, 2022 11:21 AM
To: Christy Ballard <Christy.Ballard@tn.gov>; Charlie Bufalino <Charlie.Bufalino@tn.gov>; Jack Powers <Jack.Powers@tn.gov>
Cc: Angela C. Sanders <Angela.C.Sanders@tn.gov>; Nathan James <Nathan.James@tn.gov>
Subject: SBE feedback in TISA rules

All,

I will be sending SBE member feedback as I receive it. Attached here are comments from Bob and Lillian, received this week. Let me know if I should copy the TISA email and/or include anyone else on future submissions.

Thanks!

Sara

Sara Heyburn Morrison, Ed.D. | Executive Director
Tennessee State Board of Education
500 James Robertson Parkway, 5th Floor
Nashville, TN 37243
p. 615-253-5214 c. 615-945-0659
Sara.Morrison@tn.gov
www.tn.gov/sbe/
@SBEd_TN



From: [Charlie Bufalino](#)
To: [Sara Morrison](#); [Christy Ballard](#); [Jack Powers](#)
Cc: [Angela C. Sanders](#); [Nathan James](#); [TISA Rules](#)
Subject: RE: SBE feedback in TISA rules
Date: Friday, July 1, 2022 11:43:51 AM
Attachments: [Comments on TDOE draft rules Eby.docx](#)
[TISA Rules Feedback Hartgrove.docx](#)
[image002.png](#)
[image003.png](#)

Sara,

Thanks so much for sharing this feedback with us—we appreciate you sending it along, and please pass along our thanks to Chairlady Hartgrove and Vice-Chair Eby. Yes, in the future please continue to send feedback as you have it, and if you could copy the TISA public comment email (TISA.Rules@tn.gov) that would be great.

Thanks, and have a great weekend.



Charlie Bufalino | Assistant Commissioner
Policy & Legislative Affairs
Andrew Johnson Tower, 9th Floor
710 James Robertson Parkway, Nashville, TN 37243
c. (615) 571-0449
Charlie.Bufalino@tn.gov
tn.gov/education

#TNBestforAll

We will set all students on a path to success.

From: Sara Morrison <Sara.Morrison@tn.gov>
Sent: Friday, July 1, 2022 11:21 AM
To: [Christy Ballard](mailto:Christy.Ballard@tn.gov) <Christy.Ballard@tn.gov>; [Charlie Bufalino](mailto:Charlie.Bufalino@tn.gov) <Charlie.Bufalino@tn.gov>; [Jack Powers](mailto:Jack.Powers@tn.gov) <Jack.Powers@tn.gov>
Cc: [Angela C. Sanders](mailto:Angela.C.Sanders@tn.gov) <Angela.C.Sanders@tn.gov>; [Nathan James](mailto:Nathan.James@tn.gov) <Nathan.James@tn.gov>
Subject: SBE feedback in TISA rules

All,

I will be sending SBE member feedback as I receive it. Attached here are comments from Bob and Lillian, received this week. Let me know if I should copy the TISA email and/or include anyone else on future submissions.

Thanks!
Sara

Sara Heyburn Morrison, Ed.D. | Executive Director

Tennessee State Board of Education

500 James Robertson Parkway, 5th Floor

Nashville, TN 37243

p. 615-253-5214 c. 615-945-0659

Sara.Morrison@tn.gov

www.tn.gov/sbe/

@SBEd_TN



Comments on TISA Rules/Eby

TISA 0520-12-05-.02 Chapter Definitions

Definitions (7) "Characteristics of Dyslexia" (ULN 2) means challenges identified by the universal reading screening process or Early Warning System with accurate and fluent word recognition, spelling, and decoding as a result of deficits in three or more of the following components: phonological awareness, phonemic awareness, sound-symbol recognition, alphabet knowledge, decoding, encoding, or rapid automatic naming. **Is anything that keeps a person from learning to read covered under dyslexia? Is the Department's definition of dyslexia consistent with the medical definition? If not, will this cause issues with parents of children identified either medically or through TDOE as having dyslexia?**

Definitions: (35, 36. & 37) "Special Education Direct Services"

35 (ULN 2) means special education and Related Services provided in the general or special education setting by certified or noncertified staff totaling more than or equal to **one (1), but less than four (4) hours** per week. (36) "Moderate Special Education Support Direct Services"

36(ULN 6) means special education direct and/or Related Services provided in the general or special education setting by certified or non-certified staff totaling more than **or equal to nine (9), but less than fourteen (14) hours** per week. (37) "Most Intensive Special Education Support Direct Services"

37(ULN 9) means: (a) Direct and/or Related Services provided in the general or special education setting totaling **twenty-three (23) or more hours per week**; or (b) Direct and/or Related Services to a Student in a comprehensive development classroom or self-contained setting **total thirty-two and a half (32.5) or more hours per week**.

For these 3 above, what happens between 4 hours and 9 hours and between 9 hours and 23 hours?

Definitions: "Career and Technical Program,"

pursuant to T.C.A. § 49-3-104(4), means a coordinated, non-duplicative sequence of academic and technical content that: (a) Incorporates challenging state academic standards; (b) Addresses academic and technical knowledge and skills, including employability skills; (c) Is aligned with the **needs of industries in the economy of the state, region, or local area**; **How are the needs determined?**

0520-12-05-.03 Base Funding Amount

0520-12-05-.04 Weighted Allocations

As I read this, a student can qualify for any and every category. Does this lend itself to Districts overstating a student's ULNs? How will this be managed and controlled to assure consistency across the districts?

(4) Student Eligibility and Requirements for ULN Weighted Allocations **What's the timing of ULN? Do they go into effect as soon as a student is recognized they have a ULN even if not at the beginning of the school year?**

4(a) (1) (i) Has been determined eligible for special education and Related Services in accordance with the Individuals with Disabilities Education Act (IDEA) (20 U.S.C. § 1400 et seq.); T.C.A. § 49-10-108; **and** the State Board rules for special education; **Should this be "and" as it is, or should it be "or" or are the IDEA and SBE rules consistent and the wording is good? Probably so, but just want to be sure.**

5((b) Monitor LEAs and public charter schools to ensure they are developing IEPs that provide educational services to Students in the Student's least restrictive environment....Develop appropriate corrective action plans when non-compliance with this rule or with T.C.A. § 49-3-101 et seq. is identified; **What type of "appropriate corrective actions" are contemplated? Is this clear enough or will Districts struggle over "appropriate corrective actions"?**

General Dyslexia Question/Definition

Rules: (b) Students with Characteristics of Dyslexia: Has been determined to have Characteristics of Dyslexia because the Student: (I) Meets one (1) of the following criteria:

- I. Is in grades K-3 and falls below the 40th percentile on the composite score on the Tennessee universal reading screener provided by the Department or on a universal screener approved by the State Board;
- II. Is in grades 4-8, and falls below the 40th percentile on the composite score on a nationally, normed, skills-based universal reading screener.

I don't disagree, but since our state average is about 1/3 does this mean that more than half the students in these grades will qualify for additional funding under this category?

Displays deficits in at least three (3) of the following areas:

- I. Phonological awareness; II. Phonemic awareness; 10 III. Sound symbol recognition; IV. Alphabet knowledge; V. Decoding skills; VI. Rapid naming; or VII. Encoding skills; **How is this "deficit" determined? Who determines it? Is it through the Universal Screener only? Do all the universal screeners appropriately and consistently evaluate students for each of these skills?**

0520-12-05-.05 Direct Allocations

0520-12-05-.06 Outcome Bonuses

Outcome Based: Middle School: A student who scored "on-track" or "mastered" on the 8th grade ELA and math TCAP, or a student who significantly exceeded expected growth...**How is significantly exceeded expected growth determined? Is that a level 5 on TVAAS?**

0520-12-05-.07 Fast Growth Eligibility and Calculation

Step 4. For each LEA eligible for a fast-growth stipend, the initial amount of the stipend shall be the state portion of the value difference of the growth measure run compared to the baseline allocation in excess of 1.25 percent. **What does this mean? Very confusing.**

5. The Department shall distribute fast-growth stipends to eligible LEAs in separate payments of one-fifth (1/5) of the full value of the difference as derived in Steps 3 and 4. Payments will be made on or before the 15th of the month in November, January, March, May, and July. The final July calculation will be a reconciliation of the verified reporting periods of the recently completed school year averaged together, mirroring the overall TISA calculation process. 6. If the value of Part 4 of Subparagraph (a) totaled for all eligible LEAs is in excess of the appropriation for fast-growth stipends, then the Department shall pro-rate the value of each LEA's award to ensure all funds are awarded in proportion to LEAs' initial amounts. 7. If the value of Part 4 of Subparagraph (a) totaled for all eligible LEAs is less than the appropriation for fast-growth stipends and all eligible infrastructure stipends have been distributed, then the Department shall lower the threshold for eligibility for fast-growth stipends from 1.25 percent until such time that all available funds have been disbursed. 8. The Department shall disburse fast-growth stipends with the TISA payments following each identified reporting period verification date. **Payments as these and elsewhere in the other rules can go up and down based on available funds. How much potential variation is expected or possible and how would the Districts be able to plan for this variability? Furthermore, under a general category it states, If state funds available for distribution are insufficient to meet an LEA's TISA allocation for a school year, then the Department shall apply a pro rata reduction to the amount that each LEA is allocated. Again, how will this potential variability impact Districts ability to plan?**

0520-12-05-.08 Local Contribution and Fiscal Capacity

The Department shall calculate CDF grant amounts for eligible LEAs by using the following methodology: (a) In each county with a CDF ratio greater than one (1), as determined annually by CBER, the Department will multiply the CDF ratio by the sum of the base, weights and direct funding TISA allocations generated by students within the given county for a given school year. If the county includes multiple LEAs, then the total allocations of all components listed above for LEAs within the county will be used and multiplied against the county's CDF. **For a county like Roane or Anderson which contains rural areas as well as financially stronger Oak Ridge, is it possible that a city like OR would be disadvantaged by this calculation?**

How is funding for LEAs that are within multiple counties and municipal funding; e.g Oak Ridge, calculated for contributions and local contribution/fiscal capacity?

Funding: The LEA that is located within a county designated as distressed or at risk by the commissioner of economic and community development and for which the LEA's Fiscal Capacity and Local Contribution increase the LEA's maintenance of effort requirements pursuant to T.C.A. § 49-3-314(c)(3)(A). Distressed or at-risk grant funding is calculated as a flat dollar value equal to the amount of the required increase in their Local Contribution **What if the MOE requirements**

is an increase and county is not distressed or at risk? I thought no MOE increase for at least 5 years would be required? Probably I don't understand what this rule is saying?

0520-12-05-.09 Cost Differential Factor Eligibility and Calculation

Cost differential” An LEA is deemed located in a county in which the cost of living is greater than the statewide average and eligible for a CDF grant if the LEA is located in a county for which the ratio between the county’s non-governmental wages and the statewide non-governmental wages is greater than one (1) Assuming approximately 50% of the counties will be above the average (ratio >1) and 50% below the average, then will about 50% of the counties get this cost differential?

0520-12-05-.10 Data Collection, Calculations, and Appeals

Data Collection... To ensure proper reporting of data needed to calculate TISA, LEAs shall submit all required data on a regular and ongoing basis as described in the TISA guide. The TISA guide shall be updated annually to ensure LEAs have an updated data submission calendar. It is apparent this will require significantly more data vs BEP. Is that correct or if not, we should be sure that everyone understands that. What feedback have you received on how much time Districts need to provide the data. Is there funding in the plan to pay for additional staff to provide the data?

0520-12-05-.11 ADM Calculations

0520-12-05-.12 Distribution of Funds

0520-12-05-.13 BEP Transition Funding

0520-12-05-.14 Educator Salary Increases

“a portion of any annual increase in the TISA base amount may be restricted by an act of the Tennessee General Assembly for the sole purpose of providing salary increases to Existing Educators. How will this increase be determined based on the number of educators on a student:teacher ratio and then a percentage increase; e.g, 4% or a flat dollar increase to be distributed by the District to only Educators in a manner they determine? If it's on a student:teacher ratio, then like the BEP for those districts that have more teachers than allocated, I assume they would have to make up the difference of the mandated educator salary increases. Would this affect other funding like fiscal capacity, MOE, etc then?

General Other:

Are gifted students eligible for extra funding? If so, under what category? I assume they are still considered special education student and eligible?

Has anyone estimated what it will take for Districts to collect and provide timely data for TISA. Is the time and personnel needed for this baked into the base dollar for students?

Has anyone done a model based on last year results, weighting factors for this year, direct funding, outcome bases etc to see how the dollars would rack up compared to what dollars are available? I know some calculations have been made to show that only 5 Districts would be scheduled to receive less funding under the new plan vs the old BEP but how accurate are those estimates. How much detail was calculated to see which of the ULNs each student would fall under. Also, how does the total funding needs rack up compare to what is expected to be provided by state funding?

Other Note for SBE rule: The 15% gap for ELA that must be made up each year needs to be clearly identified if it is 15 percentage points of 15 percent of the gap in the language, if not already there. I talked with Ragan on Friday and he said it was 15% of the gap which makes sense, but we need to be sure that the language is in our rule this way.

TDOE TISA Rules Input/Hartgrove

Page 2, 6) Career and Technical Program: (e) What does multiple entry and exit points that incorporates credentialing mean for high school students? In traditional Pathways when transitioning from high school, to TCAT, to Community College, to a 4-year college, it means a student can exit at any time to enter the workforce, then decide later to return to classes for additional education/credentialing. Expectation is that this is done seamless from institution to institution without the student needing to retake a course taken at some point in time typically because there are articulation agreements signed among the education entities.

Same page, 6) (g): Because this is the definition section, I recommend adding language that clarifies what the three (3) levels are.

Page 13, (b) 1. Does it matter if the student is taking the classes offered by a TCAT (either for dual credit or dual enrollment)? This can happen fairly often because the teacher of record is employed by TCAT? The district reimburses TCAT for the instructor costs.

Page 14, (II) I. II. III: For this to be understood more clearly, I recommend moving the paragraph that begins "Programs will be assigned initial program levels based on the program weights assigned above (will need to change to "below")" followed by I, II, and III right after #2, Page 13 that begins "Career and Technical Programs....." paragraph and before 2 (i) through I. II A-K).

Page 13/14. II. A-K. There are nine regions defined by Labor and Workforce and Economic & Community Development. Why are there 10 listed?

Page 13 2. (i) Recommend rewording by removing "The level" and starting with "Each program". Rationale: the term "level" is used repeatedly in this entire section and is confusing with the actual levels currently on page 14 of # (II) I. II. and III.

Page 14, (II) I. II. and III. Recommend rewording by stating the level in # order and beginning each sentence with the Level # as follows: I. Level 1 designations are programs in the bottom quartile of program weights. II. Level 2 designations are programs in the middle half of program weights. III. Level 3 programs are in the top quartile of program weights.

Page 14, (III). How will TDOE determine that a level two program requires additional resources to support the program? How is eligibility determined?

Page 14 and 15: Special Considerations: What are they? What courses: or these GE or CTE classes? The language in (i) through (iv) does not make it clear. Does this section apply to students taking CTE classes but who are not officially CTE students?

Pages 21/22: Data Collection. Should ADM be collected and reported separately for CTE students or is that not needed for the "direct" funding calculation? Or on page 23. (2), (b), 1. Students in Career and Technical Programs?

Page 23 (c) 2. (i) I believe this should be Program of **Study** by Student.

Page 24, (4) top of page, second sentence. It states the "Department shall provide a snapshot of the LEA's reporting, etc. To whom is the snapshot to be provided?"