



Non-Public Schools Monitoring Guidebook

Tennessee Department of Education | August 2024



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Introduction to Non-Public Schools Monitoring

Non-Public Schools Oversight

[T.C.A. § 49-1-201\(c\)\(18\)](#) authorizes the Commissioner of the Tennessee Department of Education to “inspect, approve, and classify private schools in accordance with the rules of the State Board of Education.” Further, the Tennessee State Board of Education (SBE) Rules [0520-07-01](#) and [0520-07-02](#) provide specific requirements for the approval and administration of non-public schools including reporting and monitoring. The Non-Public Schools Team within the department’s Division of Choice is responsible for developing and implementing monitoring procedures to ensure compliance with these established rules.

Monitoring Levels

There are six types of non-public schools as defined by the State Board of Education (SBE). The monitoring procedures vary according to the authorized approver for the designated category. All monitoring guidelines established by authorized approvers must align with SBE rules for the approval and administration of non-public schools and applicable state or federal laws.

Table 1. Non-Public School Authorizers

Designation	Authorized Approver
Category I, I-Special Purpose	Tennessee Department of Education
Category II	Agency Accreditation
Category III	Regional Accreditation
Category IV	Church-Related Membership Agency or State Board of Education
Category V	Tennessee Department of Education
Independent Home School	Local Education Agency (zoned public school district)

All non-public schools in Categories I, I-Special Purpose (SP), IV-State Board Approved, and V shall participate in tier 1 annual reporting each fall and spring. Also, schools may be subject to additional monitoring conducted by the Department to ensure compliance with applicable SBE rules or state and federal laws.

Categories II, III, and IV (membership or accrediting agency approved) non-public schools shall adhere to monitoring requirements established and conducted by the associated accrediting or membership agency. All accrediting and membership agencies shall complete tier 1 reporting submissions annually to the department.

Independent home school families will submit an Intent to Home School Form and report to their local school system as outlined in [T.C.A. § 49-6-3050](#). District home school coordinators are assigned in each public school district to consult with the department on questions related to home schooling families. Local school districts are responsible for tracking all students living in their district for compulsory attendance.

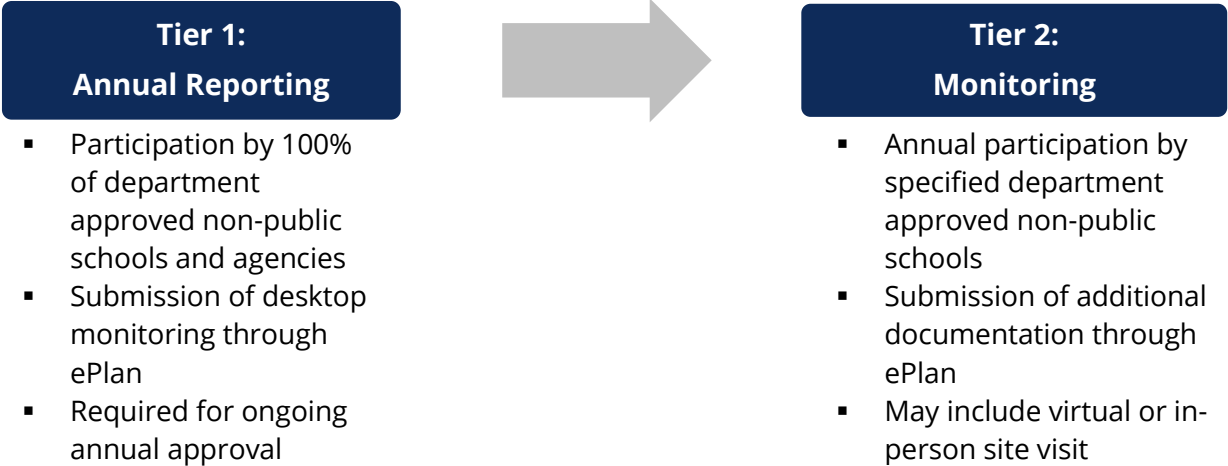


Figure 1. Monitoring Levels for Non-Public Schools

ePlan Platform

ePlan is the department’s online platform for grants management, data and information collection, and monitoring. It provides a centralized collection and storage location for tier 1 reporting and tier 2 monitoring submissions for non-public schools. The platform’s [home page](#) features a *TDOE Resources* section link and a user manual.

ePlan User Roles

Many areas of the ePlan system are publicly accessible. However, most functionality is secured by user login and password protection. In addition to a username and password, ePlan users are assigned specific user access roles within the system which allow users to initiate and/or approve actions within ePlan.

Each Category I/I-SP, IV-State Board Approved, and V non-public school shall designate school representatives to complete the fall and spring submissions for annual reporting in ePlan. Likewise, each Category II, III, and IV membership or accrediting agency shall designate agency representatives to complete the agency’s fall reporting submission. The designated representatives are responsible for inputting responses to questions and assurances, uploading documentation, and completing the final submission. The persons selected for these roles should have extensive knowledge of the school’s or agency’s operations and the authority to report or verify whether the facility is meeting the requirements under the law.

Table 2. Required ePlan User Roles

ePlan Role	What can this role do?	Who has this role?
Fall Monitoring Director	Users with this role can enter information into the fall monitoring instruments.	The Fall Monitoring Director role is determined by the non-public school or agency’s authorized representative. This role is needed for Cat. I/I-SP, IV-State Board Approved, and V non-public schools. It’s also needed for Cat. II, III and IV accrediting and membership agencies.
		The Spring Monitoring Director is determined by the non-public school’s authorized representative and will likely be

ePlan Role	What can this role do?	Who has this role?
Spring Monitoring Director	Users with this role can enter information into the spring monitoring instruments.	the same person assigned as the Fall Monitoring Director. This role is needed for Cat. I/I-SP, IV-State Board Approved, and V non-public schools. Agencies do not need a user assigned to this role.
Authorized Representative	Users with this role provide final review and approval for monitoring documents.	This role is only assigned to the principal/headmaster or agency director. Users requesting this role will be required to verify their ability to act as the final legal authority for the non-public school or agency.

ePlan User Access

New ePlan users and existing ePlan users who need to request a User Access role must request the role using the appropriate **ePlan User Access Form**. Access the form by navigating to eplan.tn.gov→TDOE Resources→1. User Access Forms. Select the correct User Access Form according to organization type, or click on the links below:

- [ePlan User Access Form for a Single Non-Public School](#)
- [ePlan User Access Form for Multiple Non-Public Schools](#)
- [ePlan User Access Form for Non-Public School Accrediting Agency](#)

The access form for multiple non-public schools allows users who are responsible for submitting the annual reports for more than one non-public school to submit a single form, rather than a form for each school.

Users do not need to log into ePlan to access *TDOE Resources*. Follow the User Access Form instructions, then email the completed form to ePlan.Help@tn.gov or submit via Formstack if directed to do so.

Tier 1: Annual Reporting

[SBE Rules 0520-07-01-.04](#) establish required reporting and monitoring for non-public schools. Tier 1 annual reporting consists of two reporting periods for non-public schools (fall and spring) and one reporting period for agency authorizers (fall only).

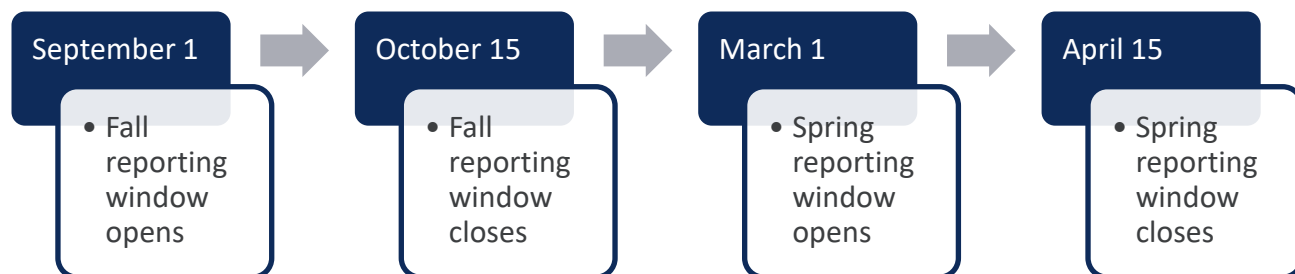


Figure 2. Tier 1 Annual Reporting Timeline

Department Monitored Non-Public Schools - Fall Submission

The appropriately authorized school representative for each Category I/I-SP, IV-State Board Approved, and V non-public school shall complete the fall submission for annual reporting in ePlan by **October 15** each year. The school representative is responsible for completing all sections of the instrument appropriate to the school's designated category as approved by the department. The fall submission contains most of the reporting required for ongoing school approval. The remaining items will be covered by the spring reporting submission.

Each submission includes the following components:

- School Directory Information
- Attestation of Accuracy
- Enrollment and Attendance Data
- Facility Annual Inspection Reports: Food Safety and Fire Safety
- School Handbook
- Staff Roster
- Teacher Credentials
- Assurances: Statements Verifying Compliance with Applicable State Board Rules

Upon submission of the completed reporting instrument, the department will complete a review and issue monitoring results. Proceed to the [Monitoring Results](#) section of this guide to learn more about that process.

Accrediting and Membership Agencies - Fall Submission

Accrediting and membership agencies authorized to approve Category II, III, and IV non-public schools shall complete the fall submission for annual reporting in ePlan by **October 15** each year. Agencies authorized to approve both Categories II and IV non-public schools must complete two sections of the instrument.

Each submission includes the following components:

- Agency Directory Information
- Attestation of Accuracy
- List of Approved Non-Public Schools
- Links to Agency Website: Accredited and/or Member schools, Accreditation Policies
- Notice of SBE Rules and Laws: Verification of Notice of Applicable SBE Rules and Laws

Accrediting and membership agencies do not participate in tier 1 spring reporting or tier 2 monitoring through ePlan. If the department receives a report of non-compliance for an agency approved non-public school, the agency will be notified, and a separate process will be implemented to address compliance concerns.

Upon submission of the completed reporting instrument, the department will complete a review and issue monitoring results. Proceed to the [Monitoring Results](#) section of this guide to learn more about this process.

Department Monitored Non-Public Schools - Spring Submission

The appropriately authorized school representative for each Category I/I-SP, IV-State Board Approved, and V non-public school shall complete the spring submission for annual reporting in ePlan by **April 15** each year. The spring submission focuses on a review of the school's operating schedule for the upcoming school year. Non-public schools must adhere to the requirements for school calendars as outlined in [SBE Rules 0520-07-02](#) by ensuring a minimum number of instructional days (180) and minimum number of hours per day (6.5) with optional allowability for accruing excess instructional time in accordance with [T.C.A. § 49-6-3004\(e\)\(1\)](#).

Each submission includes the following components:

- Basic School Directory Information
- Attestation of Accuracy
- Completed Non-Public Schools Calendar Template

- Published Version of the School Calendar

Upon completion of the reporting instrument, the department will review the submission and issue monitoring results. Proceed to the [Monitoring Results](#) section of this guide to learn more about this process.

Tier 2: Monitoring

Coming Soon!

Beginning in the 2025-26 school year, non-public schools in Categories I/I-SP, IV-State Board Approved, and V may be identified for tier 2 monitoring based on the information submitted in annual reporting documents and/or potential issues of non-compliance. The purpose is to examine the school's operations to verify alignment with the minimum requirements for the approval of a non-public school in the designated category. Tier 1 reporting is a fully desktop process that requires department approved non-public schools to submit assurances and a sampling of documentation for ongoing approval. The tier 2 process will take a closer look at a school's compliance with each of the state board rules and may culminate in a virtual or in-person site visit similar to the initial approval process. This section of the guidebook will be updated with additional details when the tier 2 process is ready to launch.

Monitoring Results

Monitoring Results—Department Issued

The ePlan platform issues automated email notifications to assigned department representatives when the school or agency user completes the final submission of a monitoring instrument. Upon receipt of the notification, the department initiates two levels of review. The department’s monitoring consultant reviews the submission for completion and accuracy. Next, the department’s monitoring director completes a final review to determine whether the results are compliant, non-compliant, or require corrections. If necessary, the monitoring consultant or director will contact the school or agency to request clarity or additional information; however, it is expected that monitoring instruments will be completed with sufficient information prior to submission. If the instrument is not fully completed, the department’s monitoring director will return the instrument and request an updated submission.

For timely submissions, the department will ensure that results are issued by December 1 for fall reporting and by June 1 for spring reporting.

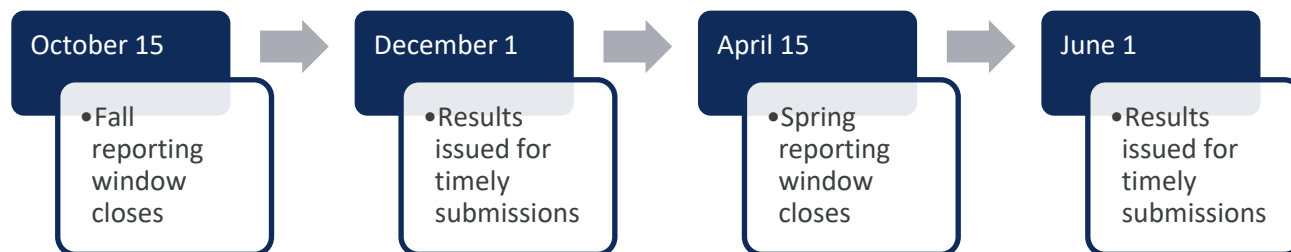


Figure 3. Tier 1 Reporting Results Timeline

Monitoring Results—LEA Response

The appropriate non-public school or agency representative receives an automated email notification from ePlan when monitoring results are ready to view. To view results, the non-public school or agency representative must change the status to **LEA Results Review Started** and **Confirm**. By hovering the mouse over the status, users can see who is able to change the status on behalf of the school or agency. Once the status has been changed, users must scroll to the bottom of the **Sections** menu and choose **Monitoring Results-LEA Response** to view results.

There are three possible results for each required section or item:

- ● ● ● ● **Finding(s) of Non-Compliance:** Compliance concerns of required components
- ● ● ● ● **Corrections Needed:** Modifications necessary to complete the review
- ● ● ● ● **Met Requirements:** Satisfactory compliance of reviewed components

Findings of Non-Compliance and Corrections Required include descriptions, action steps, and required documentation that the non-public school or agency must respond to by uploading items. Use the Pencil Icon to upload a document where required. Once the upload has been saved, the department will automatically receive a notification on Wednesday and Sunday after the upload until it has been reviewed and marked as approved or not. Reporting submissions (fall and spring) and the resolution of all corrections and/or findings of non-compliance are required for non-public schools to receive a letter of approval for the following school year.

Once all findings have been resolved, the department's director will conduct a final review and change the status to **Monitoring Closed**.

Non-Compliance Resolution: Categories I/I-SP, IV-State Board Approved, and V

As authorized by [SBE Rules 0520-07-01-.04](#), Categories I/I-SP, IV-State Board Approved, and V non-public schools shall fully comply with annual reporting processes implemented by the department. Schools in these categories shall submit reporting documents by the required deadlines established by the department and may be subject to additional monitoring, as needed, to ensure compliance with SBE Rules [0520-07-01](#), [0520-07-02](#), and any state or federal laws applicable to the school.

Non-Compliance Notification

If a Category I/I-SP, IV-State Board Approved, or V non-public school has a potential area of non-compliance with one or more of the non-public school rules, or any applicable state or federal laws, the department will issue notice to the school in one of two formats.

1. **ePlan:** If the potential non-compliance is discovered through the annual reporting process, the notification shall be issued in the Monitoring Results section of the ePlan reporting instrument. Failure to submit the instrument by the deadline and unaddressed areas of correction within the instrument shall also be considered non-compliance.
2. **Email:** If the potential non-compliance is discovered outside the reporting cycle, an electronic notification shall be issued to the email address listed in the non-public school directory. It is the school's responsibility to ensure that the contact information in the directory is current and to provide a secondary email address to ensure receipt of important communications.

Depending on the severity of the assertions, the department may request virtual or in-person meetings to discuss potential non-compliance and to provide support during the resolution process. Meetings will include, at a minimum, the department's director of non-public school programs, or their designee, and the director or head of school, or their designee. The meeting will allow all parties the opportunity to discuss the assertions and for the school to provide proof of compliance. If the school is determined to be compliant, no further action will be taken.

Non-Compliance Resolution

If it is determined that the school is not compliant, or further information is needed, the department will set a timeline, schedule additional meetings, if needed, and establish a final deadline by which the school must show evidence of compliance. The director of non-public school programs may extend the

deadline if the circumstances justify an extension. If compliance is established by the due date, no further action will be taken.

If a Category I/I-SP or V school is unable or unwilling to meet all requirements, ongoing approval will not be granted, and the school will no longer be able to operate as a Category I/I-SP or V non-public school. The director of non-public school programs will advise the school of other categories for which it may qualify. If the school does not provide sufficient proof of compliance by the final deadline, the department will issue a Notice of Revocation to the school. The Notice will be issued electronically and will state the statute/rules with which the school failed to comply, steps taken by the department and school to achieve compliance, and the effective date of the revocation. The revocation shall take effect at the end of the school year in which the non-compliance was reported to the school, or on another date identified by the department. The Notice will also provide the school with notice of appeal rights.

If a Category IV-State Board Approved school does not provide sufficient proof of compliance by the final deadline, the department will provide electronic notice to the school of its intent to recommend to the SBE that the school's approval be revoked. The department shall provide the SBE information regarding the non-compliance, reasons supporting the recommendation to revoke school approval, and all notices provided to the school regarding non-compliance and responses from the school. Representatives of the school may request to speak at the SBE meeting at which revocation is under consideration pursuant to [State Board Policy 1.400](#). If the SBE votes to revoke approval of a school, the revocation shall take effect at the end of the school year in which the vote takes place, or on another date identified by the SBE.

Appeals Process

Category I/I-SP and V non-public schools may appeal the department's decision to revoke the school's approval. Appeals must be submitted to the department within fourteen (14) calendar days of the department electronically sending a Notice of Revocation. The appeal form can be accessed on the [Non-Public Schools webpage](#) under *Non-Public School Monitoring and Annual Reporting*.

Non-Compliance Resolution: Categories II, III, and IV

School Non-Compliance

If the department becomes aware of the potential non-compliance with SBE rules or any state or federal laws applicable to an agency approved non-public school, the department will send notification to the school and the accrediting or membership agency regarding the non-compliance. The notice shall include a deadline by which the agency shall produce evidence of compliance. The department may conduct an on-site visit to a school to verify that compliance has been established, in consultation with the accrediting or membership agency. The agency shall communicate the resolution of the non-compliance concern to the department by providing evidence of compliance or notice of revocation of school approval by the established deadline.

Agency Non-Compliance

If the department becomes aware of potential agency non-compliance with SBE rules, the department shall send notice to the agency regarding the non-compliance. The notice shall contain the specific SBE rule or rules for which the agency is not in compliance and a deadline by which the agency shall demonstrate evidence of compliance.

Category II or III accrediting agencies that are unable to demonstrate compliance by the established deadline may receive a notice from the department of its intent to recommend to the SBE that the agency be placed on probationary approval status. If the department recommends to the SBE that an agency be placed on probationary approval, it will provide information regarding the non-compliance, reasons supporting the recommendation, and all notices provided to the agency regarding non-compliance and responses of the agency. Representatives of the agency may request to speak at the SBE meeting at which probationary approval is under consideration pursuant to [State Board Policy 1.400](#). Agencies placed on probationary approval by the SBE will be required to submit a corrective action plan to the department. Upon successful completion of the action plan, the department will recommend to the SBE removal of the probationary status and reinstatement of full approval. If the agency does not successfully complete the terms of the corrective action plan, the department may recommend that the SBE revoke the agency's approval. If the SBE revokes approval of the agency, the agency's approval shall expire at the end of the school year during which the vote takes place, or a date specified by the SBE.

If a Category IV agency does not produce evidence of compliance of a member school by the specified deadline, the department may provide notice of the continued non-compliance to the chairs of the Education Committees of the Tennessee House and Senate.

Resources and Support

Resources

The *Non-Public Schools Monitoring Guidebook* will be updated yearly to ensure alignment with revisions to State Board Rules and/or state and federal laws applicable to the annual reporting process. The most current edition of the handbook will be published on the [Non-Public Schools webpage](#) as an ongoing resource.

Department monitored non-public schools and accrediting agencies will receive notifications by email and through the *Non-Public Schools Quarterly Newsletter* with reminders of upcoming reporting cycles. The non-public school programs team will make every effort to keep contact lists current. Ultimately, it is the school and agency's responsibility to report changes in contact information to the department at Private.Schools@tn.gov. Technical guides containing step-by-step instructions for ePlan submissions for each reporting cycle (fall and spring) will be available to schools and agencies through ePlan and distributed via email during the notification process. Schools and agencies will be able to participate in weekly office hours during the reporting cycle window. Additional training or support will be offered, as needed.



Figure 4. Resources for Annual Reporting

Extensions to Deadlines

If a non-public school or an agency must request an extension to the annual reporting submission deadline or a monitoring results deadline, please email Private.Schools@tn.gov before the due date to request an extension and include the reason for the request and a new requested deadline that is reasonable. All written requests will be considered within two business days and the user who made the request will receive a reply via email.

Program Contacts

Please contact the following people for support, including support about how to answer questions that do not seem clear or addressing specific uploads in ePlan.

Diana Burton

Director of Non-Public School
Programs

Diana.Burton@tn.gov

(865) 253-0901

Sandy Couch

Non-Public and Home School
Coordinator

Sandy.Couch@tn.gov

(865) 978-4854

April Keel

Non-Public Schools Coordinator

April.Keel@tn.gov

(629) 259-0339

General Email

Private.Schools@tn.gov

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