

From: [Martie Wood](#)
To: [TISA Rules](#)
Subject: [EXTERNAL] Comments on TISA Dyslexia Language: Knox County
Date: Sunday, July 24, 2022 4:32:59 PM

Dear TISA Rule Makers,

I am the organizer and facilitator of the Knox County Dyslexia Advisory Council. Rather than make a joint statement from our council, our members will be making individual comments. This email represents my concerns only. A former special education teacher in KCS, I am also an owner of an independent Academic Therapist group that serves public, private, and homeschooled students with reading, writing, and spelling difficulties in Knoxville and surrounding counties. Currently, many families in our area are really struggling to get the needs of their children met.

I have several concerns about the current draft of the TISA rules. I am very hopeful that you will listen to our dyslexia community and work hard to get these TISA rules right so that things can improve for all students with dyslexia in Tennessee. I have included some of my thoughts and ideas below.

Here are some concerns and ideas I have about how to improve the draft TISA rules. I have confined my comments to page 2 and pages 9-11 of the draft rules section (b) Students with Characteristics of Dyslexia.

PAGE 2

Defined term "Characteristics of Dyslexia." As written, this definition is bad. It does not mirror IDA, Dyslexia Guide or Dyslexia Law definition and will confuse districts. It must be reworked. Something like the language included in the TN Dyslexia Advisory Guide would be better. ***"Characteristics of Dyslexia" means challenges identified through the dyslexia screening process outlined in the Say Dyslexia Law (add code number) and RTI Manual which include deficits in the areas of Phonological awareness, Phonemic awareness, Alphabetic knowledge, Sound/symbol recognition, Decoding skills, Encodings skills and Rapid naming.*** Screening for characteristics of dyslexia is a proactive way to address skill deficits through appropriate interventions. Screening results that reflect characteristics of dyslexia do not necessarily mean that a student has dyslexia nor can dyslexia be diagnosed through a screening alone. It should be acknowledged to parents, educators, and policy makers that delays or gaps in skills that resemble characteristics of dyslexia may in fact be due to other causes, such as: chronic absenteeism, transience, limited cognition, medical issues, and other environmental causes. These factors should be explored or excluded before assuming from the screening and informing parents and others that a student has characteristics of dyslexia leading them to assume that means the student *has* the neurological condition of dyslexia. However, these students, though exhibiting skill gaps that mirror the characteristics but are due to factors other than dyslexia, also require funding that assures suitable instruction and accommodations.

Do not include the "three deficit" or "40%" language from page 9 in this part, but keep it specific to the definition for funding purposes. Then, page 9 can specifically define what generates funding weight.

The definition of "Dyslexia" approved by the IDA, the NIH, and the TN Dyslexia Advisory Guide should be included in addition to the definition of the more specific "characteristics of dyslexia" : PLEASE ADD THIS DEFINITION FOR "DYSLEXIA"

Dyslexia is a specific learning disability that is neurological in origin and is characterized by difficulties with accurate and fluent word recognition and by poor spelling and decoding abilities. These difficulties typically result from a deficit in the phonological component of language that is often unexpected in relation to other cognitive abilities and the provision of effective classroom instruction. Secondary consequences may include problems in reading comprehension and reduced reading experience that can impede growth of vocabulary and background knowledge.¹

Deficits are unexpected relative to cognitive abilities in that the student's skills are lower than their overall ability and are not due to a lack of intelligence. Students with dyslexia share some common characteristics, but it is important to remember that it manifests differently depending on the individual, their age, and other factors affecting his/her foundational reading skill development. On the other hand, a student's disability may impair participation in grade-level instruction, creating deficits that may be misinterpreted as characteristics of dyslexia.

PAGE 9-11

(1) The Definition. As drafted, the rule requires three things for a student to be considered a student with "Characteristics of Dyslexia."

- **1(i)(I) Under 40%.** I support that the cut score of 40% matches the Literacy Success Act definition of a "significant reading deficiency," and I like that they are broken out into grade bands. However, I would prefer to see mirrored language for K-3 and 4-8 to avoid confusion. **IMPROVEMENTS that should be added: "on a nationally normed, skills-based universal screener approved by the State Board."**
- **1(i)(II) AND Three deficits.** This part means that a student has to fall below 40% in the above part AND also must have a "deficit" in "at least three areas." Not only is the rule unclear about what a "deficit" is, but the requirement that a student have a deficit in three of the listed seven categories seems really arbitrary. Some students may present very severely in one area, but deficits in other areas might be masked by giftedness, other disabilities, etc. Also, some schools don't even test for all seven categories, so schools can selectively miss many children. **IMPROVEMENTS:** Define what a "deficit" is. Change the requirement to two deficits. Add language that requires schools to look at all seven categories. Ideally, pair the requirements with the grade level so that it is more individualized to each grade band. For example:

"A student generates a Weighed Allocation aligned to ULN 2 for Characteristics of Dyslexia if the student:

(1) (a) Is in grade K-3 and falls below the 40% on the composite score on the Tennessee Universal reading screener provided by the TNDOE or on a nationally normed, skills based universal screener approved by the State Board, AND

(b) Displays a deficit of x% in two of the following areas (list areas), each of which must be looked at for each student who meets prong (a) above.

(2) (a) *Is in grade 4-8 and falls below the 40% on the composite score of a nationally normed, skills based universal screener approved by the State Board, AND*
(b) *Displays a deficit of y% in two of the following areas (list areas), each of which must be looked at for each student who meets prong (a) above.*

(3) (a) *Is in grade 9-12 and falls below the 40% on the composite score of a nationally normed, skills based universal screener approved by the State Board, AND*
(b) *Displays a deficit of y% in three of the following areas (list areas), each of which must be looked at for each student who meets prong (a) above.*

- **1(ii) DILP Requirement.** I am extremely concerned about the requirement that for a child to be considered to be a student with Characteristics of Dyslexia, that there has to be a "**finalized ILP in accordance with TCA 49-1-229 and the State Board Rules on Dyslexia.**" We have gone through so much over the years since 2004 with delays to meet the guidelines of providing RTI dyslexia-specific interventions or getting an evaluation based on gathering enough data points. So much precious instruction time was wasted. If we have another rule here requiring that the ILP-D is completed before services and accommodations can be procured, we are taking serious steps backward and opening up opportunity for strong public opposition. Schools will be overloaded creating ILPs for students, especially initially, and that means that schools won't get funding for a long time and that hurts kids. Can we carve out that this third portion will kick in after a year to give teams time to catch up and maybe only require a draft ILP? Again, my big concern is with delay getting the ILP right.
- **2 Students who do not get weighted funding.** This part lists who will not get any funding dollars. There are three ways that a student with Characteristics would NOT get any funding dollars.
 - **(i) If the parent declines an ILP.** I disagree with this. Since TISA is a general education funding bill, parents should not have the right to turn down dollars for the school. It does not appear that ESL parents have the right to turn down an ILP.
 - **(ii) Here,** we need to be clear that if a child is in the process to determine eligibility for an IEP and that child is found *not* to be eligible, then we need to ensure that they go back into the funding bucket. Additionally, the eligibility process can take months and months, so we want to ensure that these children remain funded during that eligibility time.
- **3 LEA Requirements.** (ii) has a typo and needs to be changed to 4-12 (not 4-8.) On (iv), parents already have the right to be notified of progress monitoring. We should include that parents be notified in writing with a clear explanation of their child's progress monitoring with each quarter report card since most parents in my experience do not know how to interpret the data sheets. I know the RTI manual requires more notice, but schools are not doing it. Tying it to report cards would be helpful. (v) I am concerned that ILPs will be a lot of work for schools and will not be helpful, so I hope that the state's Dyslexia Advisory Council can work to create some draft ILPs that will help teams know what to put into them.
- **4 Accommodations:** Does the TISA funding formula ensure that those with characteristics of dyslexia will still receive the accommodations or documentation for

accommodations they need for the purpose of standardized testing such as TCAPs, EOCs, ACTs, and SATs?

Thank you for all you do for our state and our students,

Martie Wood, MS, CALT Certified Academic Language Therapist 865-207-4918

From: [Charlie Bufalino](#)
To: [Ryan Holt](#)
Cc: [Penny Schwinn](#); [TISA Rules](#); [Sara Morrison](#); [Michael J. Deurlein](#); [Angela C. Sanders](#)
Subject: Re: TISA Rules - Ryan Holt comments
Date: Sunday, July 24, 2022 4:00:32 PM
Attachments: [Outlook-vuwksejr.png](#)

Ryan,

Thanks so much for sharing this feedback with us, as well as your engagement during the workshop and board meeting. We will be sure to take this feedback under consideration.

Thanks,

Charlie Bufalino | Assistant Commissioner
Policy & Legislative Affairs
Andrew Johnson Tower, 9th Floor
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#TNBestforAll

We will set all students on a path to success

On Jul 24, 2022, at 3:09 PM, Ryan Holt <Ryan.Holt@tn.gov> wrote:

Commissioner Schwinn and Charlie:

It was good seeing you both at the SBE Workshop last Thursday. As I promised to Charlie on Friday, below is a list of my priorities for revisions to the draft TISA Rules:

1. Further clarity in the Rules that districts shall pass along all TISA funds earned by students in public charter schools (PCSs) to the PCSs in which those students are enrolled. That includes:
 - a. Direct Allocations for PCS students. Rule .05(1)(e) provides that DOE shall disburse direct allocations to authorizers. I read Rule .05(e)(2) as implying that authorizers must then distribute the base, weight, and direct allocations to PCSs, but I would respectfully request that this language make clear that authorizers shall distribute all such funds to PCSs.

- b. Outcome Bonuses for PCS students. Rule .06(1) provides that DOE shall allocate outcome-incentive dollars to districts based on the achievement of PCS students authorized by such districts. I would ask that the Rule make clear that districts shall then pass through all such outcome bonuses to the PCSs whose students earned those funds. Those would be the PCSs in which those students were enrolled in the prior year (i.e., the year for which the outcome bonus was earned).
 - c. Cost-differential factor (CDF) funds created by PCS students. Rule .09(2)(a) calculates CDF funds based on TISA allocations generated within a county, including for PCS students in such counties. The intent, as I understand it, is to accommodate the higher costs in those counties. PCSs in those counties are also subject to those higher costs and therefore, I believe, should receive their share of CDF funds. I would respectfully request that the Rules make clear that LEAs must pass through these funds to PCSs located in their counties. (And, because the CDF calculation is done and disbursements are made by county and not by PCS authorizer, the requirement for districts to pass along such funds would include passing them to PCSs authorized by the Charter Commission or ASD that are located in their county.)
2. Outcome bonuses: I suggest using a true growth measure for 4th grade or at least credit for moving from "below" to "approaching." Rule .06(3)(b) only gives a bonus for students who move from below "on track," to "on track" or above. That puts a lot of emphasis right on the cut score, which I can understand given the emphasis on ELA proficiency. But, I believe we should also be incentivizing schools to get students from "below" to "approaching" so those students can take that next step.
 3. Clarity in the Rules that all data needed to calculate a PCS's entitlement to TISA funding (e.g., its weights, direct allocation share, outcome bonuses, and CDF share) and related math for each PCS will be published somewhere (e.g., DOE website) so PCSs can know exactly how much they should be receiving and the breakdown. This should help avoid duplicative administrative expense within PCSs and minimize friction between PCSs and their authorizers about the proper amount of funding.

Below are other minor clerical issues mentioned at the Workshop:

1. Clarify that the DOE "shall" disburse CDF funds to LEAs. See .09(1) (the

draft says "may")

2. A 3rd grade proficiency extra outcome bonus does not require ED "and" EL. See .05(3)(a)(should be "an" EL)
3. Clarify that a student can trigger a middle school outcome bonus through a combination of growth and proficiency. See .05(3)(d) (currently it says the bonus is triggered by on-track/mastered in 8th grade or "significantly exceeded expected growth in ELA and math"; I think we want to allow for on-track/mastered in one subject and growth in the other subject). Also, I would suggest more clarity on what it means to "significantly exceed expected growth" would be helpful here.

I know that a tremendous amount of work and expertise has gone into TISA itself and these draft Rules. I appreciate your consideration of these comments, which will impact how I plan to vote on the Rules next month.

I would be glad to discuss if helpful.

Best,
Ryan

Ryan Holt | Board Member - 5th District
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From: [Ryan Holt](#)
To: [Penny Schwinn](#); [Charlie Bufalino](#); [TISA Rules](#)
Cc: [Sara Morrison](#); [Michael J. Deurlein](#); [Angela C. Sanders](#)
Subject: TISA Rules - Ryan Holt comments
Date: Sunday, July 24, 2022 3:09:08 PM
Attachments: [Outlook-vuwnsejr.png](#)

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I would be glad to discuss if helpful.

Best,
Ryan

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From: [Belleza-Binns, Luz \(Public Defender\)](#)
To: [TISA Rules](#)
Subject: [EXTERNAL] FUNDING
Date: Friday, July 22, 2022 5:52:11 PM
Attachments: [image003.png](#)

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What about students with an occupational diploma that are working on transitioning from school to adulthood?

Can the school apply for tisa money for support with transportation, and training opportunities if it is a charter?

Luz



OFFICE OF THE METROPOLITAN PUBLIC DEFENDER

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To reserve a case consultation call/virtual visit with me please click on this link to reserve a date and time: <https://appt.link/luz-belleza-binns/consultation-cases>

From: [Meghan McLeroy](#)
To: [TISA Rules](#)
Cc: [Stephanie Kelly](#)
Subject: CTE Director Feedback
Date: Friday, July 22, 2022 2:28:08 PM
Attachments: [First Region_CTE Directors_TISA Feedback.pdf](#)
[Mid_Cumberland_CTE Directors_TISA Feedback.pdf](#)
[NW and SW_CTE Directors_TISA Feedback.pdf](#)
[South Central_CTE Directors_TISA Feedback.pdf](#)
[Southeast_CTE Directors_TISA Feedback.pdf](#)
[Upper_Cumberland_CTE Directors_TISA Feedback.pdf](#)
[image001.png](#)

Please see attached notes from regional CTE Director feedback sessions on the TISA rules conducted across the state.



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We will set all students on a path to success.

TISA Rules Feedback 1st CORE Region

6/14/2022 Rogersville

Participants:

Brandon Williams	CTE Director	Hawkins County
Donnie Frazier	CTE Director	Cocke County
Jennifer Yount	CTE Director	Hancock County
Karen Rogers	CORE CTE Consultant	1 st CORE Region

Things we like/want to keep:

- B. Williams (Hawkins) I have not found anything I do not like. It will be exciting to be able to show the community how funding is generated by CTE and be able to work with staff showing real world implications of this investment in our students.
- J. Yount (Hancock) I am excited about the widespread improvement that will be a result of this investment. I am happy to see the ability to add opportunities for our students.
- J. Yount (Hancock) I am very positive about these changes, especially how they will affect small, sparse and heavy SPED districts.
- J. Yount (Hancock) This will help with the Program of Study Evaluations for the CLNA and will help districts sunset programs no longer relevant.
- J. Yount (Hancock) I like seeing that districts will be rewarded for outcomes of students.
- B. Williams (Hawkins) I like seeing that districts will be rewarded for giving students the 4th course opportunity.
- D. Frazier (Cocke) I love seeing the student progression through coursework piece.
- B. Williams (Hawkins) I am encouraged by the part that reinforces the progression through the POS which will help CTE directors when working with counselors while creating master schedules
- B. Williams (Hawkins) While I like the fact that re-calculations will take place every two years, I am concerned that will lead to POSs being phased in and out too frequently, which will be problematic in terms of students who are partially through the POS and their opportunity to become a completer/super complete.

Potential clarifications needed:

- B. Williams (Hawkins) Will there be a local or regional calculation for high wages – for example a carpenter in Hawkins Co versus a carpenter in Davidson Co?
- B. Williams (Hawkins) Who will do the above calculations, and will it be statewide?
- B. Williams (Hawkins) Will there be weights for Dual Enrollment and Dual Credit – for example if one district has a welding I and II program through DE and one district has a welding program I and II as high school credit – will they weigh the same in the calculations?
- B. Williams (Hawkins) Part of the rules shows calculations based on ADM and part calculated by individual student level data, how will this work?
- B. Williams (Hawkins) The language on page 14 Section III is an example of how the language used in the rules is very confusing. Will the guidance document be clearer? D. Frazier (Cocke) Can the language showing the calculations and weights be converted into charts to follow easier?
- B. Williams (Hawkins) & D. Frazier (Cocke) I am concerned that good programs that serve a smaller unit of students will suffer as a result of the funding setup.
- D. Frazier (Cocke) Do you anticipate a smaller number of programs of study as a result of the new funding formula?
- J. Yount (Hancock) I think the levels are confusing without the definition of them here.
(Consensus here)
- B. Williams (Hawkins) After one year of TISA funding can we expect a report showing how much funding was actually generated by the different student weights?

Suggested revisions or considerations:

- B. Williams (Hawkins) Can weights be added for students that are actually aligned between their career assessment and their program of study?
- B. Williams (Hawkins) Can the explanation of the calculations in the rules or the guidance document include real world examples?
- J. Yount (Hawkins) Can we have a formula that will enable us to plug in the student's attributes to help make POS decisions?
- B. Williams (Hawkins) I would like to see weights for CTSO participation

I certify, on behalf of the participants in this meeting, that this feedback accurately reflects the discussion that occurred.

X

Brandon Williams

Hawkins County Career & Technical Educati...

TISA Rules Feedback 1st CORE Region

6/15/2022 Elizabethton

Participants:

Herbie Adams	CTE Director	Johnson County
Brian Culbert	CTE Director	Elizabethton City Schools
Kevin Lingerfelt	CTE Director	Unicoi County
Betsy Oliver	CTE Director	Carter County
Julia Decker	CTE Director	Johnson City Schools
Deidre Pendley	CTE Director	Bristol City Schools
Brent Palmer	Secondary Supervisor	Sullivan County
Debbie Madgett	CTE Director	Sullivan County
Bo Shadden	CTE Director	Kingsport City Schools
Karen Rogers	CORE CTE Consultant	1 st CORE Region

Things we like/want to keep:

- B. Culbert (Elizabethton) likes the new concept of funding process (**Consensus here**)
- J. Decker (Johnson City) I like the fact that the funds generated by CTE is clear.
- B. Oliver (Carter) I like the clear pathways shown for student generated funding.
- D. Pendley (Bristol) I like the fact that this funding seems to reward the goals set in CTE and makes them rise to the top. It also seems like more people are invested.
- J. Decker (Johnson City) I like the fact that we will have more data to take into meetings for planning purposes.
- H. Adams (Johnson County) I like the fact that it is more performance based than BEP.
- B. Culbert (Elizabethton) When you do more, you get more.
- K. Lingerfelt (Unicoi) I like that it seems like more money – but there are still many unknowns.
- D. Pendley (Bristol) I like the format – the outline style, much better than just paragraphs of narrative.
- B. Oliver (Carter) I particularly like the bonus on page 17 – High School IC receiving 10%

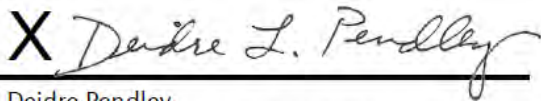
Potential clarifications needed:

- B. Oliver (Carter) Is the ACT exam mentioned the ones that all Juniors take in the Spring of their Junior year?
- B. Culbert (Elizabethton) Where did the baselines come from, and will those be shared?
- H. Adams (Johnson Co) How will this funding affect how the teaching positions will be funded?
- B. Oliver (Carter) Page 18 #4 – Please clarify the bonus opportunity for Ready Grad.
- J. Decker (Johnson City) With several data pieces being lagging, how does this affect the funding?
- H. Adams (Johnson County) I understand that the Occupations Report will be used for calculation, however some of these numbers appear to be lower than actual for my county – how will this affect the formula?
- D. Pendley (Bristol) Will the numbers used from the Occupational Report be used for the Programs of Study or for the actual jobs under the programs? These tend to vary widely.
- D. Pendley (Bristol) Will the numbers from the Occupational Report be re-calculated yearly?
- J. Decker (Johnson City) Are there any requirements for the LEA to share a percentage of the generated CTE funds with the CTE programs?
- H. Adams (Johnson County) How will high wage be determined, district, regional or state?
- H. Adams (Johnson County) Will examples of calculations be shared in the guidance document?
- J. Decker (Johnson City) Will the language be clarified in several locations in the rules? Example page 14 (2) III
- H. Adams (Johnson County) Will an appeals process be put into place in reference to program levels designation?
- D. Pendley (Bristol) We are encouraged to use our local CLNA to make Perkins program decisions – will that remain, or will we use statewide program designations?
- B. Culbert (Elizabethton) When will the program and IC level designations be released? Will these be re-evaluated each year?

Suggested revisions or considerations:

- D. Madgett (Sullivan) The CTE list due by July 1 needs to be available in the Fall/Winter because districts do not wait until Summer to plan.
- B. Palmer (Sullivan) Clarity needed in reference to Middle School CTE courses – will they generate funding according to this formula?
- B. Culbert (Elizabethton) How will Work Based Learning fit into the funding formula?

I certify, on behalf of the participants in this meeting, that this feedback accurately reflects the discussion that occurred.



Deidre Pendley
Director of Career & Technical Education

TISA Rules Feedback 1st CORE Region

07/12/2022 Greeneville

Participants:

Cindy Bowman	CTE Director	Greene County
Chris Malone	Federal Programs	Greene County
LeAnn Myers	Middle School Supervisor	Greene County
Daniel Aldridge	CTE Director	Hamblen County

Aaron Flanary	CTE Director	Greeneville City/Greene Tech Center
Karen Rogers	CORE CTE Consultant	1 st CORE Region

Things we like/want to keep:

- D. Aldridge (Hamblen) I am encouraged by the focus on upper level CTE courses
- Flanary (Greeneville) I like the additional funding for our students with challenges.
- C. Malone (Greene) I appreciate being rewarded for industry credentials even if the student does not finish the program of study.
- Flanary (Greeneville) I appreciate the ability to earn more funds for students by encouraging them to finish the higher-level courses. - this creates more opportunities for districts.
- C. Bowman (Greene) I like seeing CTE being spotlighted and on the forefront.
- C. Bowman (Greene) I like the clear definitions on page 2 #6 A-G
- D. Aldridge (Hamblen) I also appreciate the definitions throughout the rules and hope they stay and are repeated in the guidance document.
- C. Bowman (Greene) I also like page 15 (4) iv-vi
- Flanary (Greeneville) I appreciate the focus on Economically Disadvantaged students page 17 (e)

Potential clarifications needed:

- Flanary (Greeneville) I hope for a tool for districts to use to be able to use for decision making.
- D. Aldridge (Hamblen) I would like it if all of the CTE references were in one section.
- Flanary (Greeneville) Will Ready Grad status be rewarded financially outside of a student achieving a 21 on the ACT?
- C. Bowman (Greene) pg. 20, The local contribution information is unclear.
- C. Bowman (Greene) pg. 5, #38 Please define secondary readiness
- D. Aldridge (Hamblen) How often will the high wage and in demand numbers be updated?
- D. Aldridge (Hamblen) Will the state provide a list of the Programs of Study and their "Value"?

Suggested revisions or considerations:

- C. Bowman (Greene) There is not enough information regarding the specific CTE weights (what weight for what program) at this time to make suggestions.
- Flanary (Greeneville) A template (test) of sorts needs to be included with examples of a sample student.
- Flanary (Greeneville) A spreadsheet differentiated by program would be helpful.
- L. Myers (Greene) pg.15 July 1 is too late, this deadline for the state should be December 1.

I certify, on behalf of the participants in this meeting, that this feedback accurately reflects the discussion that occurred.

Signature will be provided following certification by all participants for this meeting on 7/12/22

TISA Rules Feedback Regional Meeting

Mid Cumberland CTE Directors

June 15, 2022, via ZOOM call

Participants:

Name	District	Title
Chase Moore	Sumner	CTE Director/Mid Cumberland CTE Study Council President
Tyra Pilgrim	Rutherford	CTE Director/ Mid Cumberland CTE Study Council Secretary
Jake Hammond	Wilson	CTE Director
Jeremy Qualls	Williamson	CTE Director
Ray Lecomte	Dickson	CTE Director
Mark Gregory	Robertson	CTE Director
Will Lockert	Cheatham	CTE Assistant Director/Technology Coordinator
Connie Baggett	Stewart	CTE Director
Amy Jackson	TDOE	CTE CORE Consultant, Mid Cumberland.

Things we like/want to keep:

- Jeremy Qualls (Williamson): Like it is tied to progression in the programs of study. We fight that battle. I do like that. **(Consensus here.)**
- Chase Moore (Sumner): Glad to see emphasis on CTE. Good that additional funds are provided based on programs and ICs. I appreciate that.
- Tyra Pilgrim (Rutherford): I like the transparency of how the money is generated. BEP was a mystery. I like that it will put CTE at the forefront of things more than ever. Unlike BEP which based CTE funding on minutes, TISA appears to fund programs. For example, a program such as mechatronics would generate more money.
- Jake Hammond (Wilson): I like the data by Department of Labor that will show which programs are aligned; not just the TDOE saying which programs.
- Ray Lecomte (Dickson): I do like extra funds for economically disadvantaged students.
- Jake Hammond (Wilson): I like extra weights for economically disadvantaged students.
- Tyra Pilgrim (Rutherford): I like it does not take any program of study away; gives some credit to all programs.

Potential clarifications needed:

- Ray Lecomte (Dickson): I like a lot of it. But I have to see data from state and see rankings, then I will feel more comfortable operating. **(Consensus here.)**
- Chase Moore (Sumner): What is clear is that different programs get different funding amounts; the rules of **how** still unclear.
- Ray Lecomte (Dickson): Looks like high skill has gone away... I wonder if that would have any impact on our Size, Scope, and Quality Indicators.
- Will Lockert (Cheatham): I want to see where industry credentials are tiered. I want to know what differentiates between tiers.
- Ray Lecomte (Dickson): I send hardship forms all the time for programs. Will that be affected?
- Mark Gregory (Robertson): There is not enough info yet in the rules for me to figure out which programs will get weighted more heavily. I would like to see real word examples to see how it

really works. I have a question about the Supply and Demand report. I had to Google it. I did not see a clear ranking. Most of it was more positive than I expected.

- Jake Hammond (Wilson): One thing that is unclear currently is the ranking for the programs. Agriculture for example, the occupations supported by Agriculture are not often clearly shown as being Agriculture in the labor market data.
 - Mark Gregory (Robertson): It is hard to digest the rules at this time; does it get down to a student level in the sequence? For instance, if a student takes courses out of sequence does that impact the funding? That is what it seems to say. I am not sure if that is good or bad—just want to know if it gets that granular. The way I read it, if out of sequence, it would be funded as a first level course. And in health science it implies second level course is funded as first due to multiple programs using the same first course. I thought it was odd. I do not know if I am in favor of that or not.
 - Chase Moore (Sumner): Page 13, 2. II, reads “*Programs will receive an assigned weight for each aligned occupation designated as in demand...*” Take nursing ed, that one program leads to a ton of in demand occupations... will they say that gets, for instance 25 different occupations? Seems too broad to me. If each occupation is in 6 regions in state that is tremendous weight to those programs.
 - Jake Hammond (Wilson): Agree. Seems too subjective.
 - Mark Gregory (Robertson): On pages 13 and 14, it talks about the different numbers of regions of high demand. If I am in Northwest Tennessee without much industry or jobs, I will be stuck in level 1. From an economic development standpoint that will be a sticking point. There could be unintended consequences where the rich get richer, and the poor get poorer. If there is a large difference in funding for level 1 programs and level 10, then this would have a big impact. I think the intent is to get districts to start certain programs, but if they do not have the talent pool to hire, they will be stuck.
 - Mark Gregory (Robertson): Would be nice to have an actual formula. Nice to have an example with real numbers so we can see how it is done. We are all still waiting for more info.
- (Consensus here.)**
- Ray Lecomte (Dickson): I need more time. I would like to see it for an entire year. Once I see it more fleshed out, I will understand more.
 - Tyra Pilgrim (Rutherford): I agree. This is meant to give districts more money, but this could result in some getting less. Will this be reviewed yearly? How fluid will it be for change? How often will the rules be changed? Maybe after one year it is a success, or maybe after a year we see things missing.

Suggested revisions or considerations:

- Jake Hammond (Wilson): I do wish we could add English Language Learners and other subgroups to the weights. I wish Students with Disabilities would also be weighted more heavily for industry credentials.
- Ray Lecomte (Dickson) I do worry about the rankings of the programs. I worry some programs will not be valued due to the focus on statewide demand.
- Ray Lecomte (Dickson): On the weights, programs that “require additional resources” that is great, but on the flip side, our directors are being told TISA is a funding formula—not a spending plan, so I may not see that money. The state is looking to put more money into the CTE programs that are expensive to fund, which is good. I wish there was a report from the state where it would show LEAs how much money they earned for each program.
- Tyra Pilgrim (Rutherford): Maybe this helps people see where money should go for CTE. If expensive equipment is needed, and we have many students in the program, but a district says

money is not allocated for that... this highlights the need. How we market this will be critical for the state department.

- Ray Lecomte (Dickson): I don't want to create more paperwork, but it does seem if a program is generating a lot of money for a district, the money should go back to help fund that program.
- Tyra Pilgrim (Rutherford): Marketing and messaging is so important. All stakeholders need to understand how the programs help the districts. It may not be a spending plan, but some districts will use it that way.
- Chase: Industry credential tiers 2 and 3 are weighted the same. I think that should be revisited. Level 3 should be higher.
- Jeremy Qualls (Williamson) On page 17, 3, e... the industry credential issue; I really struggle with the investment we have done locally with YouScience that some of our industry credentials will not be considered. I think it should be up to local districts to determine which industry credentials are offered. I feel like third party vendors have the upper hand. The amount of work to get industry credentials on the state list is beyond what I have the bandwidth to do. We have higher education taking our industry credentials that are not on the state list, even though these show same skill mastery, but uses a different brand name.

I certify, on behalf of the participants in this meeting, that this feedback accurately reflects the discussion that occurred.

X *Chase Moore*

Chase Moore
Mid Cumberland CTE Study Council President

TISA Rules Feedback Regional Meeting

NW and SW CTE Director Meeting

June 16, 2022

Participants:

Teresa McSweeney, Jackson Madison
Trey Crews, Hollow Rock Bruceston
Lindsey Parham, Weakley
George Leake, Obion
Mark Constant, Germantown
Haley Williams, Crockett
Lisa Lewis Evans, Henderson
Teresa McDaniel, South Carroll
Stuart Watson, Obion
Rory Hinson, Gibson
Mark Neal, Millington
Linda Black, West Carroll
Brett Heinrich, Collierville (virtual)
Joyce Woods, Hardeman (virtual)
James Rutherford, Hardeman (virtual)
Shane Stults, McNairy (virtual)
June McCourt, Trenton (virtual)
Clark Knight, Bartlett (virtual)

Things we like/want to keep:

- **Lindsey Parham-takes into account more than being in the classroom. More results based- that students are an active participant in the classroom learning.**
- **Teresa McDaniel-likes pg. 2, #6 (e) multiple entry and exit points in the CTE definition.**
- **Teresa McDaniel, Lindsey Parham, Lisa Lewis-Evans-pg. 2, #6 -like the definition of CTE.**
- **Teresa McDaniel- pg. 4, #27 -definition of in-demand occupations is clear; #41, pg. 6 definition of small district is clear.**
- **Lindsey Parham-pg. 13 #2 (i) (l) 1, is clear: program weights will be assigned to each program using two wage-earning potential indicators-In-Demand Occupations and High Wage Occupations.**
- **Clark Knight- I see a lot of good in these rules and most of it is pretty clear.**

Potential clarifications needed:

- **Teresa McDaniel-will CTE standards be rewritten to align to non-CTE courses? (referencing pg. 2, #6 (a))**
- **Teresa McDaniel -what does pg. 2, 6 (e) look like? Will there be any impact on concentrators and completers?**
- **Clark Knight- Page 4 #26. High Wage , 20% higher. Who is going to provide this information for us? Wages are so fluid right now in all the different industries. Entry level High Wage**

defined at 20% above median wage entry, is median wage entry minimum wage? If so that is a clearer answer, 20% more than minimum wage.

- Haley Williams, Lindsey Parham, Clark Knight, and Lisa Lewis-Evans-pg.4-under #27c, who will pull the ratio of job openings and where will it come from?
- George Leake and Clark Knight-will pg. 4 #27 be state-wide or regional; for example, one county may have different expectations and needs for agriculture occupations.
- Teresa McDaniel-how will this data be compiled and when will it be given to CTE directors? This data can be incorporated into the comprehensive local needs assessments (CLNA).
- Ethan Constant and Clark Knight-pg. 2, #6, is this the definition of a program of study? In reference to pg. 2, (e) and (f) -what if my Criminal Justice program doesn't have an EPSO/ industry credentials (IC)? If the LEA offers an industry credential early, and it doesn't culminate, how does that affect funding? Does the credential have to come at the end of the program? Is it "at some point" or at the end?
- Ethan Constant-pg. 6-at the very top-does this eliminate the free ACT? wants to keep the free test and funding for additional tests. One reason students are doing so well is the number of attempts. Would like clarification.
- Clark Knight- Page 13 #2. What are the high demand jobs in all the regions, where can we find this information? Can we get a map of the 10 different regions? I have looked them up, many smaller districts are next to high demand regions.
- Joyce Woods-pg. 16-outcome bonuses: #3, ED, students will receive a bonus if they score higher. Is this new?
- Ethan Constant-pg. 17 #3 (e), tier II and III industry credentials, can we assume the valued, preferred, and recognized align to tier II and III? Does it correlate to the current TODE approved chart, or will a new chart be released? LEAs are incentivized to not offer level 1 credentials anymore.
- Ethan Constant and Joyce Woods – pg. 13, #2, What will levels of programs of study look like? How old will data be to determine the levels?
- Ethan Constant-pg 17-18, part 4 feels that educators will feel more pressure to put funding towards ACT versus ready grad. Please add clarity. I don't think I have verbiage and/or pgs correct.
- Lindsey Parham--pg. 14, #3-4 is not clear; what will the weights be? Pg. 15 #5 (iii) and (IV), who will conduct annual reviews? Who will do annual reviews and how will we get that info?
- Brett Heinrich -pg. 17 #3 (d) , Will SAT be considered?
- Ethan Constant and Clark Knight-pg. 15, #5, (i -iv), what does this mean? There is a need to know more about this.
- Ethan Constant-pg. 2, definition-am I to understand that this is the wholistic system or at an individual level? Pg. 2 (d) includes early postsecondary instruction. Will LEAS generate funds if EPSOs are offered district wide or do they need to be offered at each program level to generate funds? Are industry credentials included?
- George Leake and Ethan Constant-For example, dual enrollment anatomy and physiology earning college credit-how is this impacted by leveled programs?
- George Leake-in reference to WBL not aligned to CTE program. LEAs are encouraging WBL in the district, but if employers are not aligned to the program, our students are doing what districts and schools have asked in workforce and WBL; however, it will generate same amount of funding as a freshman coming into a level 1 course. A discrepancy exists here.

Rory Gibson added that more students are likely to participate in WBL as a result of innovative school models.

- Brett Heinrich-will the courses that have both a G and a C code (i.e. anatomy and physiology and computer science principles) need to be coded with a C to generate the higher funding in the new funding formula?
- Rory Hinson-if the course code shows up in eTiger, can we assume it is correct and generating CTE funds? (for both CTE courses and non CTE courses in eTiger)
- Shane Stults, in reference to leveled programs, when will the LEA receive the first list of leveled programs? Where will local and regional data be used?
- Shane Stults, in terms of the direct allocations, is this an exact amount? Does this amount change based on program the student is enrolled? Does the amount change if a student is enrolled in multiple programs? Will funding be affected if students take courses out of order?
- Shane Stults, in terms of middle school, what is considered a middle school course? Will STEM middle school courses count as CTE courses and generate direct allocation?
- Shane Stults, can LEAs get a list of postsecondary readiness assessments and what allocation the LEA would receive based on students taking these assessments? Does that include the attainment of industry credentials or early postsecondary courses?
- Shane Stults-when will the tier II and III industry credential list be released? Will these be the current valued and preferred on the TDOE promoted list? Will these receive a 10% outcome bonus?
- Shane Stults, how will the data appeals process change? In the current appeals process, if ready grad data is appealed, the LEA does not receive information about what appeals were accepted and which were not accepted (to CTE director knowledge). Without this, the LEA may be under the impression the ready grad percentage is increasing but may find out it didn't a year later. Will this change since ready grad generates funding?

Suggested revisions or considerations:

- Haley Williams-until we have questions answered, it is hard to say what is liked or not
- Lindsey Parham-local workforce data help to come up with localized numbers as opposed to regional or state-wide agency. Chambers get a better snapshot "close to home".
- Ethan-concern-millions in the innovative school models initiative will be invested soon; what are the tiered programs? When will LEAs receive the levels of programs or know what those look like? How frequently will they change? A concern is if an LEA adds a program at a high level, and it then falls to a lower tier, less funding will be generated in already hard to staff positions.
- Haley Williams-dependending on source of data to calculate the tiered programs, they will look different across districts.
- Pg. 4, #27 (a), The state will identify the 10 workforce regions and will make it relevant to the amount of jobs associated with programs and courses; this is very complicated to keep up with the ranking system and hiring of teachers.
- Brett Heinrich- would like to see the number of concentrators and completers generate additional fund. Lindsey Parham mentioned she sees the words progressing through the

program, not concentrators and completers. Teresa McDaniel mentioned she did not see concentrator and completer either.

- Ethan Constant-pg. 15 are the values the same? Is level 4 the same as level 1? Tier 2 and Tier 3 Industry Credential, can we assume they are talking about valued, preferred, and recognized or is it a different chart?
- Lindsey Parham-how do you justify offering a high skill, high wage program to generate funds if there are not that many openings in a local area? Pg. 14, #2 (iii) -references there will be added percents; clarification is needed.
- Lindsey Parham- if program levels are released by July 2023, how old will the data that was used to determine those levels be?
- Joyce Woods- when will the information be released?
- Brett Heinrich-concern there is a disconnect with the comprehensive local needs assessment (CLNA) and how it will be used. The CLNA is specific to local and regional labor market data; TISA is specific to state-wide data.
- Ethan Constant-outcome funds of tier II and III industry credentials don't help LEAs to offer tier 1 industry credentials. Def on page 2 wants us to offer all tiers, but pg. 17 contradicts this.
- Clark Knight-Page 16 Can 10th graders take post-secondary credit, also is it course or credit?

Changes to funding/left out/should not have been included:

Brett Heinrich- I would prefer outcome bonuses for completers and concentrators in a similar format as earning outcome bonuses for earning tier II and III industry credentials, ACT, and ready grad.

Ethan Constant- We already offer courses based on labor market data and that already presents challenges. For example, the state allows us to offer courses that have zero state or regional support through labor market data such as fashion design. I believe that ranking in demand programs and offering more money for those programs will make this even more chaotic in choosing which programs to offer or close.

Lindsey Parham and Rory Hinson-examples of counseling and social work are a real need. Concern is over local labor market data vs state-wide labor market data since this is generating funds to run all programs.

I certify, on behalf of the participants in this meeting, that this feedback accurately reflects the discussion that occurred.


Signature & Date 7/13/22


Name & Title Instructional Supervisor

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TISA Rules Feedback Regional Meeting

SC CTE Director Study Council

July 12, 2022

+ questions from
South Central's July
12th TISA rules
meeting.

Participants:

Amy Roberts, Maury County
Suzanne Mitchell, Franklin County
Lori Sexton, Bedford County
Richard Skipper, Coffee County
Susan Welch, Lincoln County
Ginger Cagle, Perry County
Kim Douglas, Arlington
Lisa Thompson, Wayne County
Catherine Millsaps, Moore County
Mick Shuran, Manchester City
Jake Hammond, Giles County
Stephanie Kelly and Chuck Carter TDOE

Amy Roberts
07/12/22

Things we like/want to keep:

- JH: Keep multipliers for all SP
- AR: Generalized focus on CTE, rather than all academic focus and puts a spotlight on CTE
- LS: Appreciate the leveled funding as it encourages counselors and districts to schedule complete POS
- AR: recognizes improvement in ACT instead of just benchmark
- RS: appears to have increased funding via CTE
- AR: ADM growth bonus may be good as Williamson presses south
- LS: Appreciate levels for POS as it will help director eliminate programs that are "hanging on"

Potential clarifications needed:

- Catherine Milsaps: Industry credentials (IC) — Tier 1 and Tier 2, how does that compare to preferred, etc. on IC list?
- CM: Sparse county fewer than 25 students per square mile, how do we know or locate this information?
- CM: Where is Dual-Credit/Dual Enrollment addressed other than Ready Graduate. Any extra funds here?
- AR: .6 d Specify all aspects of industry/career cluster Ag Science classes across multiple POS. Must keep these courses generic, need to stay duplicative across the multiple POS.
- SM: Clinicals is a 4th level class. As the rules state that one which goes across multiple POS count as tier 1. This is a grave concern.

- LS: Different POS at different schools, will the courses count as different levels at different schools? Susan Welch agrees that Health Science are AP, Medical Therapeutic... This needs to be cleared up as far as tier 1, all attendees agreed.
- SW: will other states be considered? I'm 18 miles from Huntsville, can that data be counted?
- LS: In demand should be added for education. Nothing from THEC indicates education is lacking in positions.
- JH: Ag will also struggle as these are coded into different areas. Border states and seeking info for ID jobs.
- RS: This is going to kill cosmetology and agriculture using Jobs for TN. #3 is there an indication in how it reads 1st course vs 2nd course and lists are "OR" will we have something that states it must be in that order? Several programs are not offered as level 1. Does that automatically kick you out if you do not offer the freshman courses?
- SW: level 2, 3, and 4 are offered at TCAT off campus, does that eliminate us since we do not offer the initial class? (all attendees concur)
- AR: verbiage is confusing - .2 ii 2nd aligned please word more clearly. Funded like a level 2 course, but if it is Health Science, it will be funded like ag which is a lower level POS
- RS: how will they denote WBL? Tied directly to POS vs general WBL? Don't see anything in rules about this.
- SW: funding for gen ed courses that are part of CTE program.....but if state says AP can be G or C code, why will it not be funded? (according to POS guide sequence) All in agreement.
- CM: Personal finance, does that receive any funding since it is an elective?
- SW: AP computer science is listed as G but in CTE
- RS: will one-out courses be funded as level 1 (Business and Legal, Business Econ)
- AR: harmful to small schools who have limited teachers and are able to offer more POS via using Gen ed codes, which state allows. All concur.
- RS: what qualifies as a CTE student - electives, taught by CTE teacher, CTE coded course, taking a course inside a POS? This needs to be clarified.
- Will POS matrix be updated to reflect which courses must be taken when?
- JH: July 1st is way late to publish this. January 1st is needed (at the latest) for scheduling. All data, etc. must be provided by January 1st to enable us to best manage courses and funding. All concur.
- CM: if a student takes a class online for HS credit, how do we code to earn funds?
- LS: pg 23 2 b Define students in career tech programs.
- CM: concern over small districts mainly being city schools. How will that affect small districts that are rural?

Suggested revisions or considerations:

- LS: add work keys as optional assessment.
- CM: Moore County ranked 7th on earning counties. This may effect the money received. Very low numbers of economically disadvantaged.

I certify, on behalf of the participants in this meeting, that this feedback accurately reflects the discussion that occurred.

*See top of page.

Signature & Date

Name & Title

TISA Rules Feedback Regional Meeting

Southeast CTE Director Study Council

June 23, 2022

Participants:

Shelia Massengill, Rhea County- CTE Director- emailed comments
Larry Zeigler, Marion County CTE Director
Renny Whittenbarger- Cleveland City
Sherry Prince- Marion County CTE Director
Arlette Robinson- Bradley County CTE Director
Ryan Goodman, Polk County CTE Director
Carmen Choat- Meigs County CTE Director- Virtual
Elizabeth Pierce-Oswalt - McMinn County CTE Director
Mary Ellen Heuton- Hamilton County Chief Financial Officer
Gina Sons- Grundy County
Marsha Talley- Sequatchie County CTE Director
Olivia Bagby- Hamilton County CTE Director- sent questions with Mary Ellen Heuton

Things we like/want to keep:

- R. Goodman (Polk) agrees page 2 6. b.
- A. Robinson (Bradley)/ M. Talley (Sequatchie) agrees with 6. D page 2
- R. Whittenbarger (Cleveland) agrees with 6. c
- ME Heuton (Hamilton)- Keep definition for aligned with the needs of industries in the economy of the state, region or local area.
- R. Whittenbarger (Cleveland) agrees page 4 (26) clarification of entry wages defined with 20% greater than the median
- R. Goodman (Polk)- agrees with overall thought process for 27
- R. Whittenbarger (Cleveland) agrees with page 27, specifically #3 to be proactive
- A. Robinson (Bradley) agrees and gives clarity with page 15 #4 Special Considerations – Career and Technical Program Levels
- E. Pierce (McMinn)- agrees with page 15 6. Program levels and course assignment to progression will be used every other year to update TISA.
- A. Robinson (Bradley)- agrees with page 15 5. iii. Conduct an annual review of Wage-Earning Potential Indicators due to changes of POS in the district
- ME Heuton (Hamilton)- Page 17 e. agrees with the additional funding for students that are ED to decrease barriers
- R. Goodman (Polk)- page 17 e. likes that it motivates CTE teachers to offer IC's
- S Prince (Marion)- page 17 e. This allows clarity to who earns the outcome for Industry Certification.
- R. Goodman (Polk)- agrees with 3(d) and (e) as it focuses on where it should be on ACT and IC's and not end-of course exams
- R Goodman. (Polk) is grateful that CTE is a component point of emphasis with generation of funds for students
- ME Heuton (Hamilton)- glad to see the acknowledgement of the importance of CTE to our students

- S. Massengill (Rhea) #3 Outcome bonuses: Agree!

Potential clarifications needed:

- R. Whittenbarger (Cleveland)- Can clarification on page 2 6(g) be defined with three levels by the department as provided in the department's rules?
- A. Robinson (Bradley)- Is agriculture spelled out specifically in the Academic Supply and Occupational and High Wage Report? Is funding for agriculture spelled out? Seeking clarity for agriculture being reported on and can USDA or other additional sources be utilized for agriculture careers to determine in-demand and high wage occupations.
- A. Robinson (Bradley)- Are all CTE programs all required to culminate with industry credential?
- R. Whittenbarger (Cleveland)- Will all IC's be funded? Is Tier I is included in the funding source?
- R. Goodman (Polk)- Clarification of non-duplicative sequence? What does that mean?
- A. Robinson (Bradley)- Clarification if the LEA can keep courses that offer multiple credits (2 credits/class)?
- A. Robinson (Bradley)- What are multiple entry and exit points that incorporate credentialing? (6(f))
- C. Choat (Meigs)- Can this report be easily accessible for districts for determination of high wage and in demand reports?
- R. Goodman (Polk)- With the occupations listed on the Supply and Demand Report how do we get clarification from occupation to a POS?
- ME Heuton (Hamilton)- p 16. (2) Clarification in how the direct CTE funding is going to be reflected in calculations of distributions to Charters.
- ME Heuton (Hamilton)- page 3 (16). Is funding going to be from local education decisions on Title I or state determination?
- R. Goodman (Polk) – page 13- Can clarification on b 1. ii. Student progression in coursework through the program. What is the progression and how is it going to be determined?
- A. Robinson (Bradley) / Ryan- Are students required to progress through courses in sequence: Level 1, Level 2, Level 3, Level 4?
- O. Bagby (Hamilton)- Can industry certifications be funded in courses that are not coded as CTE (C) course codes?
- E. Pierce Oswalt (McMinn)- Will courses listed in POS that are G codes versus C course code, be funded? Especially Dual Enrollment A and P that only have a C course code.
- ME Heuton (Hamilton)- If updated every other year, will there be some stability where POS will be on an edge of the tier? Will it fall in the high tier? Where is the cut off for tiers?
- ME Heuton (Hamilton)- page 15 5. Iv. What is the next tier of the additional resources? Where will you go to get that information?
- A. Robinson (Bradley)- What do we do if a POS is added in the off year of review of Wage-Earning Potential indicators?
- S. Massengill (Rhea) Allocations are generated by the Tennessee General Assembly....do they change annually?
- S. Massengill (Rhea) 1 B1: It would be more beneficial to teach only level 3 and 4 classes since they can be a concentrator with only two; districts can capitalize on the funding?
- S. Massengill (Rhea) #2 & 6: I do not agree with linking funding to high wage/high demand jobs/POS. It puts rural communities at a disadvantage. In the rural setting we do what we can do with what we have.
- S. Massengill (Rhea) 4 (v): All WBL will be considered level 4?

Suggested revisions or considerations:

- R. Goodman (Polk)- page 4 (26). Add Jobs 4 TN to the definition to where High Wage occupations are being determined.
- A. Robinson (Bradley)- As a state, do we want to base all our funding decisions on one database? Economic Districts use multiple databases?
- R. Goodman (Polk)- on page 23 (c) 2.i. Strike out the first student and replace with Study to state “Program of Study by Student.”
- E. Pierce-Oswalt (McMinn)- Would like for all Promoted Industry Credentials to be included in the outcomes.
- C. Choat (Meigs)/ M. Talley (Sequatchie)- Would like for additional funding for all EPSO’s to obtain the 10% and 20% additional funding as written for industry credentials.
- R. Goodman (Polk)- Include in outcomes for Industry Credentials creation of a weight for students with disabilities and nontraditional students to provide equity in addition to what is written on page 17 (e).
- ME Heuton (Hamilton): P. 13-14, 2(i) Definition talks about state, regional and local needs but the current rule does not seem to allow for funding where there may be a local need that is not reflected in regional or state data but that is critical to that particular LEA.

I certify, on behalf of the participants in this meeting, that this feedback accurately reflects the discussion that occurred.



Arlette Robinson
CTE Director
Bradley County Schools

TISA Rules Feedback Regional Meeting

Upper Cumberland CTE Directors Meeting
June 22, 2022

Participants:

Tim Towns – Smith Co. CTE Director
Tim Mackie – White Co. CTE Director (ends June 30)
Karen Little – Fentress Co. CTE Director
Lee Little – Fentress Co. CTE
Beth Simmons – Van Buren Co. CTE Director
Steve Reel – Bledsoe Co. CTE Director
Kathy Cothron – Macon Co. CTE Director
Mark Mosely – Bledsoe Co. High School Principal
Leslie Eldridge – Putnam Co. CTE Director
Anne Thaxton – Jackson Co. CTE Director
Crystal Kennedy – Cannon Co. CTE Director
Tony Boles – Macon Co. Director of Schools
Tracy Risinger – Warren Co. CTE Director
Greg Wilson – White Co. High School Principal
Kristy Chaffin – CTE Consultant, TDOE
Laura Luna – Data Analyst, TDOE

Things we like/want to keep:

- Tim Mackie (White) – The amount of CTE money that TISA can generate – majority agrees
- Leslie Eldridge (Putnam) - Flexibility to incorporate industry credentials on exit and entry point. We like that it focuses on Tier 2 and 3 and that its very clear and consistent. -majority agrees
- Tim Towns (Smith) – It funds middle school and that’s good – majority agrees
- Kathy Cothron (Macon) – Keep the definition of small and sparse so districts know the difference
- Beth Simmons (Van Buren) – What happens if you fall into both small and sparse? Do you get both?
- Leslie Eldridge (Putnam) – I like how it determines who is responsible for high wage and in-demand on page 14. Sometimes when we go to TSBA data dashboard, we don’t always get consistent information on programs. – majority agrees
- Leslie Eldridge (Putnam) – Continue to publish a listing of classes in Levels 1-4 – majority agrees
- Tim Towns (Smith) – It seems to be pretty clear what my funding is going to be. If I do X, I get Y. BEP was a mystery. I may not agree with everything in there, but it’s clear how it’s coming out. – majority agrees

Potential clarifications needed:

- Tim Mackie (White) - On page 13 when talking about CTE programs, there are indicators, is that regional or statewide when it breaks down the points that meet that level?
- Beth Simmons (Van Buren) – I didn’t see anything about nontraditional students in the rules.

Is that going away or no longer a part of CTE? Or did it change its wording? – majority agrees

- Steve Reel (Bledsoe) – Example: If you generate 37% of money in CTE, logic says that 37% should be spent on CTE. But based on these rules, it can be spent anywhere. Is that correct?
- Kathy Cothron (Macon) – Class size? Where does that show up? Is it connected to state board policies? Currently, CTE has to average 20 students.
- Leslie Eldridge (Putnam) – Going back to what Tim (Mackie) said at very beginning. Need more clarification on in-demand occupations. It says state-wide, but will it be broken down into regions?
- Tony Boles (Macon) – What is in-demand for UC is not in-demand for the East, West, etc.
- ***Tony Boles (Macon) – There needs to be more accurate capturing of data of income of all occupations of agriculture and geographically specific. – ALL agree
- Leslie Eldridge (Putnam) – pg. 4 (#27) goes into detail about what THEC is going to do for in-demand but isn't clear on regional in-demand occupations and the data that's going to be collected. – majority agrees
- Leslie Eldridge (Putnam) – How will the in-demand occupations be captured? Will local businesses have to report?
- Tim Towns (Smith) – UT Extension probably has the best data, but how are they providing that data to the department (TDOE)?
- Leslie Eldridge (Putnam) – pg. 4 (27C, 1, 2, 3) is not specific enough for local businesses and how will it be tracked? Where are those job postings? Who is tracking that information for every business in every county?
- Leslie Eldridge (Putnam) – Moving toward funding for tier 2 and 3 industry credentials. Are we going to be funded for any other EPSOs (DC/DE)?
- Kathy Cothron (Macon) – (pg. 18) Is Ready graduate accountability going to change for tier 1-3 industry certifications or stay as is?
- Beth Simmons (Van Buren) – (pg. 18) Is the 10% funding for industry credentials for cohort groups?
- Lee Little (Fentress) - NASS.USDA.gov – doesn't have employment data, but has agricultural data for counties.

Suggested revisions or considerations:

- Tony Boles (Macon) – Remember, it's a funding formula, not a spending plan. If you don't have a strong voice as a CTE director with Director of Schools and school board, they can put that money wherever they want.
- Leslie Eldridge (Putnam) – If you have a big CTE program and generate lots of funds, district may put some funds for CTE in other places. Where is the accountability in where we spend these funds? Is the CTE director going to have any say so?
- Tim Towns (Smith) – Outcome bonuses on page 18 (#4-5)
- Tim Mackie (White) – We need funding guaranteed for Ready Graduate; it shouldn't be a bonus.
- Leslie Eldridge (Putnam) – Just because they are Ready Graduate based on ACT doesn't take into consideration all the EPSOs students are completing that do not meet the ACT benchmark. Are they changing the Ready Graduate accountability? They have taken EPSOs out of everything, and only focusing on the 21+ on ACT and Tier 2 and 3 industry credentials.
- Tim Towns (Smith) – EPSOs like dual enrollment/dual credit need to be included in rules, not just industry credentials and ACT.
- Leslie Eldridge (Putnam) – Ready Graduate conversion chart and TCAT clock hours are confusing when we are converting to EPSOs. If we are held accountable for 20%, this chart

needs to be updated since we get 10% bonus funding. Where is the clear communication on what that looks like? (Conversion chart last update 2019 and new industry credentials on TN Promoted List not listed on that chart) We don't know how to calculate those to determine if students are Ready Graduate. On Tier 2 and 3 industry credentials, how is that reported to the state if we have, for example, 500 students earning Tier 2/3? If our funding is tied to this, it needs to be very clear on how this is reported and funded. Should we keep every certificate for every student? We only turn in the spreadsheet and we don't have to prove students earned the credential.

- Tony Boles (Macon) – pg. 17 (#2) We need to make sure CTE people are on the committee across the state (rural and inner city represented) to advise Commissioner on outcome bonuses. That is where EPSOs should be addressed. – ALL agrees
- ***Leslie Eldridge (Putnam) – There should be a clause or something with accountability on how CTE funds are spent. If CTE is thriving, where is accountability that the money goes back to CTE? - ALL agrees
- Leslie Eldridge (Putnam) – pg. 15 (4v) How are they going to align that to specific CTE courses if we use the general course code? Will we have to use practicum course codes? Ex. Culinary Arts doesn't have a practicum so we use general course code, so will we not get credit for level 4 class? I think it needs to be more clear on WBL. Smaller systems have one or two teachers who teach WBL and those students will use general course code and won't get the 4th level course.
- Tim Mackie (White) – pg. 18 (#5), I need more clarity on what determines if there is not enough funding including industry credentials. What criteria will they use to determine?
- Leslie Eldridge (Putnam) – What if a smaller district can't pay for industry credentials (and doesn't receive PRG) but funding depends on industry credentials. It feels like we are being penalized for not being able to provide funding for those students to test at Tier 2 and 3 levels, which are usually more expensive.
- Beth Simmons (Van Buren) – How can Tier 2/3 industry credentials be included in funding so that students can earn these? Funding should be included year to year.
- Tracy Risinger (Warren) – Is the money you're generating for industry credentials going to be put right back into industry credentials because they are very expensive? There needs to be accountability to make sure that money comes back to industry credentials.

I certify, on behalf of the participants in this meeting, that this feedback accurately reflects the discussion that occurred.

Tim Mackie 7-7-22
Signature & Date

Tim Mackie CTE Director
Name & Title
White Co.

From: [David Zolensky](#)
To: [TISA Rules](#)
Subject: [EXTERNAL] ATTN: TISA Rules
Date: Friday, July 22, 2022 12:12:20 PM
Attachments: [NOAH - tisa rulemaking public comments - final.pdf](#)

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Sir/Madame,

Attached is the formal Comment of Nashville Organized for Action and Hope ("NOAH") to rules proposed by the Department of Education to implement the Tennessee Investment in Student Achievement Act ("TISA").

Please direct any questions or comments to the undersigned.

David M. Zolensky
Co-Chair, State Action Committee,
Education Task Force,
Nashville Organized for Action and Hope ("NOAH")

--

DAVID M. ZOLENSKY
ATTORNEY
1500 CEDAR LANE
NASHVILLE, TN 37212
Phone (615) 293-0890

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**Formal Comments of Nashville Organized for Action and Hope (“NOAH”)
to Tennessee Department of Education Draft Rules to TISA**

NOAH has the following comments with respect to the Department’s Draft Rules to the Tennessee Investment in Student Achievement Act (“TISA”):

Amendment 1 of HB 2143/SB 2396 – Provision related to third grade reading level expectations

NOAH is very supportive of holding LEAs accountable for improving literacy. However, the 70% goal within 3 years and the annual 15% improvement expectation is untenable for many LEAs, particularly those who are in areas of concentrated poverty or are economically disadvantaged. The recently published TCAP statewide results state that only 36.4% of Tennessee’s 3rd grade students are reading at grade reading level. To expect that most of the 147 Tennessee school districts will be able to double their 3rd grade reading levels in 3 years seems impractical if not impossible. We agree that a percentage improvement approach makes sense, but 15% growth is much like the 70% goal, impractical if not impossible for a high percentage of the LEAs.

The goals are problematic primarily because the resources required to move the needle on literacy are not provided in the statute. The Tennessee Literacy Success Act (TLSA) of 2021 provided a policy foundation for reading, but again provisioned only minimal funding to support the effort at the LEA level. Without the additional funding to support either the goals in HB 2143 or the policies in the TLSA, goal achievement is highly improbable. Recent studies in multiple school districts across the country have clearly demonstrated that increases in spending, particularly when targeted for areas like literacy improvement and when applied to areas of concentrated poverty, result in increased performance.

Finally, the remedies prescribed to assist an LEA that do not meet the goals are suspect. It is difficult to see how consultation with the progress review board and the subsequent professional development offered will make any significant difference in an LEA’s ability to achieve the goals. It is our view that more resources on the front end (financial, staff training, consultation, improved student-teacher ratios, etc.) are absolutely necessary to make progress toward the 15% and 70% goals.

NOAH’s recommendation is:

All children should be reading on grade levelbut setting expectations without increasing resources is unreasonable...long-standing low percentages of students achieving mastery point to the need for additional resources. The resources needed for concentrated poverty/economically disadvantaged are even more significant. Children who do not meet benchmarks need more help, time, and resources, not less.

NOAH recommends that the TDOE and the legislature commit specific resources to literacy improvement that include funding, professional development, improved teacher/student ratios, new curriculum and any other tools that can be deployed to address the critical literacy situation. Given the state's current surplus status, we see no reason why the funding cannot be made available.

As NOAH has been advocating for many years, the overall public education pie is not big enough. More dollars need to be set aside for public education and in this case directed to staff training and time for planning and implementation of targeted strategies for improving literacy achievement.

Section 0520-12-05-.06 of the rules of the TDOE for TISA - Outcome Bonuses

Providing additional funding to LEAs that produce students who meet or exceed performance expectations is admirable and welcomed. However, the outcome bonus provision as defined in the statute is highly prejudiced to LEAs that comprise already high performing schools. The criteria used to determine the awards are based on TCAP scores, ACT scores and ReadyGrad indicators and will result in a very small percentage of the funding being awarded to LEAs with concentrated poverty or higher percentages of economically disadvantaged students. The rules draft includes a 3rd to 4th grade TCAP improvement and a 3-point ACT improvement opportunity, but that too will be skewed toward high performing schools. Moving up one performance level in TCAP scores and/or achieving a 3-point improvement in ACT scores in one year is a tall order, particularly for the poverty/disadvantaged schools.

In 2020–21, 77% (or 2,331) of Williamson County students achieved the composite benchmark of 21 on the ACT. In contrast, only 48% (or 34) of Clay County (a distressed county) students achieved the benchmark, but that was 23 percentage points higher than the previous year (Williamson County scores declined 1.6%). The outcome bonus calculation will award Williamson County, with over 2,300 as its multiplier, a sizable portion of the allocation while Clay County will receive a minimal bonus based on 34 as its multiplier. It's highly likely that year after year, the wealthiest county in the state will receive the most outcome bonus dollars while the most distressed and neediest counties will be awarded a very small percentage of the allocation.

NOAH has two recommendations for department consideration.

1. The criteria for bonus awards should include a provision for an overall improvement in a school's composite TCAP or ACT scores vs. basing the award strictly on individual student scores at a certain benchmark level and an improvement number that is rarely attainable. The improvement provision in the Literacy/ELA 4th Grade goal is a step in the right direction, but it still requires achievement at the "on-track" or "mastered" level which may not be attainable by a high percentage of students in the LEAs with predominantly economically disadvantaged and concentrated poverty populations. The same is true for the 3-point improvement provision in the ACT calculation. For example, if an LEA could improve its average composite ACT score from 18.1 to 18.3 in a given year, they should be rewarded. Clay County's 23-point improvement is an outstanding accomplishment and should be rewarded accordingly.

ACT scores as a determinant of performance is flawed. According to Fairtest.org, the main purpose of tests like the ACT is to rank and sort students, not to determine whether students have learned

the material they have been taught. They do not measure anywhere near enough of what students should learn. ACT can be a part of the package, but to use ACT scores as a sole metric is unfair.

2. The advisory group appointed by the department must include representation from a cross section of rural, suburban, urban, concentrated poverty and ethnically diverse populations. NOAH would welcome the opportunity to be represented.

The definition of “economically disadvantaged”.

Under the initial TISA rules published by the TDOE, “economically disadvantaged” is defined as follows: “Economically disadvantaged” means, as defined in Tennessee's Every Student Succeeds Act (ESSA) plan established pursuant to the federal Every Student Succeeds Act (20 U.S.C. § 6301 et seq.), a homeless, foster, runaway, or migrant student or a student eligible for free or reduced-price school meals or milk through the direct certification eligibility guidelines established pursuant to 42 U.S.C. §§ 1751-1769.” The draft TDOE rules simply repeat this statutory definition. *Draft Rule 0520-12-05-.02(16)*.

By itself, the statutory language does not require that a student actually be certified through the relevant eligibility guidelines in order to receive additional weighted funding. In many districts throughout the state the number of students who actually complete the certification process—who would be counted under a strict application of the above definition—does not correspond to the number of students who are eligible for certification but not certified. There are numerous reasons for this—chief among them is the administrative burden of obtaining qualifying data on all students, many of whom have fragile living arrangements and/or may choose not to complete the qualifying paperwork.

The significance of undercounting the number of students who would be eligible for additional funding as “economically disadvantaged” is substantial: recent estimates are that over 70% of the students in public school in Davidson County, Tennessee, live below the poverty level. However, the Department’s recent projections for Davidson County applied the economically disadvantaged weight only to 40% of the district’s students. Given that this weight results in an additional 25% of base funding, the money at stake is substantial.

NOAH’s recommendation is:

The rules implemented under TISA should include a clear process for LEAs to accurately estimate their number of qualifying economically disadvantaged students so that no LEA is denied essential funding due to the administrative burden of certifying each student on an individual basis. We also recommend using a broader definition to include other determinants like TennCare enrollment or SAIPE (Small Area Income and Poverty Estimates) data which will more fairly represent true disadvantaged levels.

Application of the “Cost Differential Factor”.

TISA directs that LEAs subject to certain conditions are to receive various “grants” or “stipends”. Thus, under the statute stipends “must be allocated” to so-called “fast growth” LEAs (§49-7-107(a)); grants “shall” be distributed to LEAs located in economically distressed counties or counties having an active tourism zone agreement (§49-7-108(d)(1)(A)); and Cost Differential Factor grants “shall” be distributed to LEAs in counties with an above average cost of living (§49-7-108(d)(2)). In each of these instances, the statutory language provides that “subject to appropriations” the grant or stipend is mandatory.

In the TDOE draft rules; however, the CDF grant, alone, is no longer mandatory. The draft Rule provides that the Department may disburse Cost Differential Factor (CDF) grants. *Draft Rule 0520-12-05-.09* Under the draft rules;, however, the other measures described above remain mandatory. *Draft Rules 0520-12-05-.07; 0520-12-05-.12(5)(a-b)*.

Discussions with the TDOE staff revealed that the change from the statutory “shall” language to the permissive “may” of the draft rule was intentional and intended to reflect that the CDF grant was somehow “outside” of TISA, and that it was subject to available appropriations. These explanations do not withstand scrutiny. All these measures were within the statutory framework of TISA (indeed, the CDF grant is in the same statutory section as the grants for distressed and economic tourism zones), and all of these grants or stipends are expressly “subject to appropriations.”

There is no justification for using the permissive “may” language with respect to the CDF grant, unless it is to provide a legal justification for the Department to avoid addressing CDF grants in its annual budget proposals to the governor.

NOAH’s recommendations are:

1. The language of the draft rule with respect to CDF should be “shall” rather than “may”, as directed by the language of the Act itself, and consistent with the treatment of other statutorily mandated grants and stipends.
2. The TDOE and the legislature should consider a different metric to determine CDF eligibility. The statute stipulates that eligibility will be based on the comparison of local non-government wages vs. statewide non-government wages. We believe cost of living differences are more accurately calculated using a broader metric like the Consumer Price Index (CPI). It is understood that the TDOE cannot change that language in the rulemaking process, but we urge the TDOE and the legislature to modify the statute in the upcoming legislative session to reflect a fairer CDF.

From: [Meghan McLeroy](#)
To: [TISA Rules](#)
Subject: FW: [EXTERNAL] Re: TISA Rules Feedback Session - Option
Date: Thursday, July 21, 2022 11:09:31 AM
Attachments: [image001.png](#)
[SWCORE TISA feedback.docx](#)

Please see the attached feedback received from the Southwest region Superintendents.

From: Jason Manuel <jason.manuel@gmsdk12.org>
Sent: Thursday, July 21, 2022 10:59 AM
To: Meghan McLeroy <Meghan.McLeroy@tn.gov>
Subject: [EXTERNAL] Re: TISA Rules Feedback Session - Option

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The SWCORE discussed our questions and feedback on TISA. Please see attached.

On Tue, Jun 14, 2022 at 3:15 PM Meghan McLeroy <Meghan.McLeroy@tn.gov> wrote:

Hi Jason,

I wanted to reach out with TISA rules now open for public comment and offer to join the SW SSC group to facilitate a feedback session on the rules. I know you would likely need to schedule something separate since I don't believe you meet in the summer, but I ONLY want to do this if you all would find value in it – no pressure. I would submit the feedback provided, if desired, to the TISA.Rules@tn.gov inbox on behalf of the SW group. You would all still be welcome to submit separate group or individual feedback, this wouldn't preclude you from doing that.

Feel free to check with the group and let me know if this would be useful. I won't be offended if you all would rather just do that on your own so don't hesitate to say so. I've included available dates below but know I have also sent these to 7 other regions so it's first come, first served!

If the group does want to proceed I would ask that everyone read and make notes on the rules ([proposed rules](#)) prior to the meeting to ensure we can make good use of the time.

Let me know. Thanks!
Meghan

Available Dates*

June: 23, 24, 28, 29

July: 8, 14, 15, 19, 20, 21, 22, 26, 27, 28, 29

*Public comment is due 8/2 which is why I only provided dates through July

*The SBE will have a discussion/Q&A session with us on TISA rules on 7/21 but won't make their official recommendation until an 8/11 meeting.



Meghan McLeroy | Chief of Statewide Supports
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#TNBestforAll

We will set all students on a path to success.

--

Jason Manuel
Superintendent
Germantown Municipal School District

SWCORE TISA feedback/questions

1. Are Gifted students included under the SPED weights for funding?
2. Why is “Sparse” defined at the county LEA level not district level? (It may leave some rural, special, or municipal districts out of funding)
3. The frequency of the monthly data uploads is a concern due to staffing. EIS error resolution could be consuming.
4. Will districts receive monthly estimates/explanations of funding- Districts need additional detail on the distribution of funds. Ex. The document states that TDOE will withhold funds if LEAs have not completed all required documents. What will be considered required documents? Will EIS errors be considered incomplete documents?
5. Concern was expressed over the direct allocations from the state legislature. Ex. If funding is provided for teachers, who counts as a teacher?
6. Concerns expressed over the performance-based bonuses. What is the timeline for these allocations and how with that align with the budgeting process in districts?
7. When can districts expect clarity on the Ready Graduate Indicator and the percentages for performance-based outcomes?

From: [Keith Cornelius](#)
To: [TISA Rules](#)
Subject: [EXTERNAL] Public Comment
Date: Thursday, July 21, 2022 8:48:13 AM

I respectfully submit the following comment:

While I understand the logic of weighting funding periods equally, I hope the lawmakers and rulemakers would please consider the timing districts are allowed to make such changes. I ask this for the following reasons:

- (1) Funding period 1 usually closes for most districts by August 31 (before Labor Day).
- (2) The amount of "no show" students, transient students, new students into TN, and student movement between districts is tremendous.
- (3) Funding period 1 generally takes at least until early October to reconcile. This is mainly because of the voluminous amount of student reconciliation work among districts to finally settle students.
- (4) Unique Learning Needs---many of our student classifications change based upon screening tools and diagnostic exams performed by psychologists and psychiatrists which require much time to conclude results or confirm diagnoses. Most if not of all these students have received prior intense interventions beyond the regular classroom even before the diagnoses are confirmed. Therefore the need exists to enter the classification begin date after professional testing. This is why it is essential to be able to extend the timing of most ULNs.

Please consider a more tiered approach to funding period reconciliations such as having Funding periods 1-3 reconciled by Dec 15. Periods 4-6 by March 15 and Periods 7-9 by June 15.

Thank you for any consideration.

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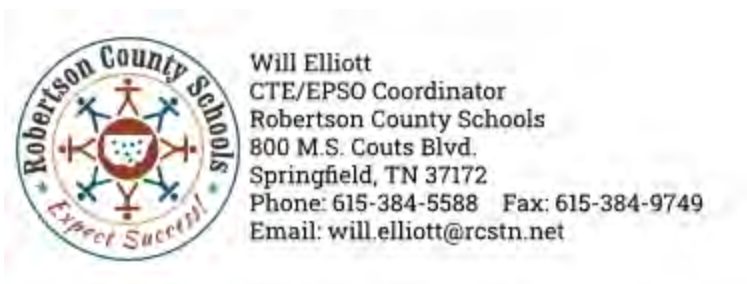
[Dr. Keith Cornelius](#)
[Attendance Director](#)
[Coffee County Schools](#)
[931-723-5150](#)

From: [Will Elliott](#)
To: [TISA Rules](#)
Subject: [EXTERNAL] Post-Secondary Definition
Date: Thursday, July 21, 2022 8:03:39 AM
Attachments: [Outlook-v5p41wmq.png](#)

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In the rules for TISA funding, it defines post-secondary as only 11th and 12th graders, but they could be 9th or 10th graders if they chose to attend TCAT or another technical school that allows underclassmen to receive a grant for dual enrollment. Something should be added for those students in a district that are taking advantage of that opportunity.

Thanks,



"The only real mistakes we make are from those which we learn nothing" John Powell

From: [Meghan McLeroy](#)
To: [TISA Rules](#)
Subject: East Superintendent Feedback
Date: Wednesday, July 20, 2022 5:52:52 PM
Attachments: [East Superintendent Meeting TISA Rules 7.7.22.pdf](#)
[image001.png](#)

Please see the attached notes from a meeting of the East region Superintendents on July 7, 2022 to discuss feedback on the TISA proposed rules. I took notes on behalf of the group during this meeting and am submitting them as public comment at their request.



Meghan McLeroy | Chief of Statewide Supports
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We will set all students on a path to success.

TISA Rules Feedback Regional Meeting

East Region Superintendent Meeting

July 7, 2022

Participants*:

Patty Thomas, Alcoa City Schools
Rebecca Stone, Alcoa City Schools
Troy Logan, Blount County Schools
Jennifer Fields, Campbell County Schools
Linda Keck, Claiborne County Schools
Kelly Johnson, Clinton City Schools
Mark Briscoe, Grainger County Schools
Tommy Arnold, Jefferson County Schools
Jeanne Barker, Lenoir City Schools
Millicent Smith, Lenoir City Schools
Chip Orr, Lenoir City Schools

Josh Reese, Loudon County Schools
Mike Winstead, Maryville City Schools
Gail Sensibaugh, Monroe County Schools
Heath Snow, Morgan County Schools
Bruce Borchers, Oak Ridge City Schools
Jeanny Phillips, Oneida
Russell Jenkins, Roane County Schools
Bill Hall, Scott County Schools
Amanda Stephens, Scott County Schools
Stephanie Huskey, Sevier County Schools
Rodney Boruff, Sweetwater City Schools
Jimmy Carter, Union County Schools

**Comments are attributed to the speaker to the extent possible.*

Things we like/want to keep:

- Weighted Allocations .04, 4(b)(1): It is important that this identification is tied to some sort of performance. It will be important to KEEP the two requirements related to students who fall below the 40th percentile on the universal screener. (M. Winstead, Maryville)

Potential clarifications needed:

- Chapter Definitions .02, (40): Is this intended to read “standard deviations” instead of “standard errors?” (M. Winstead, Maryville)
- Chapter Definitions .02, (16) "Economically Disadvantaged," pursuant to T.C.A. § 49-3-104(10), means, as defined in Tennessee's Every Student Succeeds Act (ESSA) plan established pursuant to the federal Every Student Succeeds Act (20 U.S.C. § 6301 et seq.), a homeless, foster, runaway, or migrant Student or a Student eligible for free or reduced-price school meals or milk through the direct certification eligibility guidelines established pursuant to 42 U.S.C. §§ 1751-1769. **Suggest** – additional sentence clarifying that reduced price meals are not recognized in the state of TN as economically disadvantaged. (Scott Rhea, Clinton City)
- Weighted Allocations .04, 4(b)(1): Would be helpful to clarify what is meant by the term “deficit” and how that is determined.
- Direct Allocations .05, (1)(b)(4)(i-iv): **Suggest** clarifying if districts will be funded at the year two course level if they don't offer the first year course and students enter straight to the second year course. (P. Thomas, Alcoa)
- Outcomes Bonuses .06, (3)(d): Clarify if the ACT score is Superscore or overall score. (C. Orr, Lenoir City)
- Outcomes Bonuses .06, (3)(d): With regards to this language “...a student who increases his or her ACT score by at least three (3) points between the first ACT and a subsequent ACT...” does that have to be the two tests the state pays for? Or can it be an increase between any number of tests (ex. across 6 tests)? Do the tests have to be taken in junior or senior year, or can it be tests taken earlier (ex. in 8th grade)? It might be clearer to make this mirror Section c and make this based on ACT growth. (M. Winstead, Maryville)
- Outcome Bonuses .06, (3)(c): Would be helpful to clarify the baseline for when the “expectation” is set for students that they then must “significantly exceed.” Assuming this is based on TVAAS, is it their predicted growth entering 8th grade, capturing the impact of one grade? Would suggest it be their 6th grade predicted growth for 8th grade (to capture the full middle school experience), and 9th grade predicted growth for HS. (M. Winstead, Maryville)

- Outcome Bonuses .06, (3)(f): Indicator 14 is a lagging indicator and not reported annually by districts, would be helpful to clarify how this will be captured for the annual formula. Additionally, would help to clarify what the “statewide assessment proficiency” is based on. (J. Reese, Loudon)
- Fast-Growth Eligibility and Calculation .07, (1)(a)(4): This paragraph is confusing and difficult to understand (this was largely unanimous among the group present)
- Cost Differential Factor Eligibility and Calculation .09, (1): this section reads “...the Department may disburse...” should this say “shall” instead of “may?” Or is this optional for the department? (K. Johnson, Clinton City)

Suggested revisions or considerations:

- Weighted Allocations .04, 3(e): Suggest adding students receiving Tier II or Tier III intervention services into one of the ULNs. (M. Winstead, Maryville)
- Weighted Allocations .04, 3(e): Suggest removing direct services from ULN 1, and changing direct service hours in ULN 2 to “...more than or equal to .5, but less than four (4) hours per week.” (J. Reese, Loudon & M. Winstead, Maryville)
- Weighted Allocations .04, 4(b)(1): If we are providing additional funding for students with reading difficulties, what about math? Could we include funding for students who have dyscalculia, for example? (J. Reese, Loudon)
- Direct Allocations .05, (1)(b)(2): If the Jobs4TN wage analytics that determine high-wage occupations are statewide, is there a way to do a regional analysis of high wage occupations? (J. Barker, Lenoir City & M. Winstead, Maryville)
- Direct Allocations .05, (1)(b)(4)(vi): Suggest making dual-enrollment courses that are general education courses leading into programs of study funded as part of the CTE program. (P. Thomas, Alcoa)
- Outcome Bonuses .06, (3)(c): Suggest including transitional EL students in outcomes for this part to recognize the achievements of these students as they move out of services and score “on-track” or “mastered” (M. Winstead, Maryville)
- Fast-Growth Eligibility and Calculation .07, (1)(a)(8): Suggest adjusting to read “in the reporting period immediately following.”
- Data Collection, Calculations, and Appeals .10, (4): Recommend rewording this to require districts to certify data for the current month by the end of the following month. It will be challenging to certify data on the last day of the month for that month as not all data uploads are received at that time and things may still be changing that day. (K. Johnson, Clinton City)
- Data Collection, Calculations, and Appeals .10, (4): Recommend adding a March preliminary TISA allocation release.

I certify, on behalf of the participants in this meeting, that this feedback accurately reflects the discussion that occurred.


Signature & Date

7/20/22


Name & Title

Director Clinton City Schools
East Region SSC Chair

From: [Glass, Celby](#)
To: [TISA Rules](#)
Subject: [EXTERNAL] Attending
Date: Monday, July 18, 2022 3:57:13 PM

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

Good afternoon,

I am unable to attend the hearing regarding TISA on 7/28. Will this be recorded and shared afterwards? Will there be Q&A and explanation of this new plan?

Celby Glass
Franklin Special School District
Safety and Attendance Supervisor
615-472-3117



From: [Renee Davis](#)
To: [TISA Rules](#)
Subject: [EXTERNAL] Questions
Date: Monday, July 18, 2022 9:50:55 AM

- Who is responsible for the DILP (Dyslexia Individual Learning Plan)? Is this a special education plan or would this fall under the intervention side?
- What assessments are required for dyslexia other than the universal screener?

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Renee Davis
Supervisor of Special Populations
Morgan County Schools
423.346.6214 ext. 226