Under Title I of the Every Student Succeeds Act (ESSA), Tennessee is required to identify low-performing schools for intervention. However, unlike past federal school improvement efforts, the requirements provide Tennessee lawmakers and the Tennessee Department of Education (TDOE) with significant flexibility and authority.

Three strategies may hold the key to quickly turning around Tennessee’s lowest-performing schools—labeled comprehensive support schools under ESSA—as quickly as possible. These options include:

1. **TDOE could influence district turnaround strategies by reviewing districts’ school improvement plans and by distributing federal improvement funds through competitive grants.** ESSA requires states to review and approve districts’ school improvement plans, and the law allows states to use 7 percent of Title I (federal dollars targeted to low-performing schools and districts) for competitive grants for school interventions. The TDOE should evaluate district plans against the most rigorous turnaround strategies and limit grant eligibility to districts willing to adopt them.

2. **Legislators and the TDOE could maintain and strengthen Tennessee’s Achievement School District (ASD) by protecting its autonomy and increasing its funding so that it can continue to meet the evolving needs of its schools.** State leaders should also continue to support the district-run Innovation Zones in Shelby, Davidson and Hamilton counties.

3. **To address persistently low-performing schools, legislators and the TDOE could increase school choice.** The TDOE could create the conditions for the ASD and other school interventions to be successful. By passing policies that encourage charter school expansion—such as increased transparency in authorizing and funding charter schools—Tennessee policymakers can better facilitate the availability of quality school options for students in persistently low-performing schools.

Tennessee policymakers can also help enable school improvement across the board by fostering high-quality teacher and leader pipelines, collecting and distributing accessible and useful student achievement data, and encouraging partnerships for wraparound services.

**SUMMARY OF ESSA INTERVENTION PROVISIONS**

In the transition to ESSA, the TDOE must first develop accountability plans, which will be due to the U.S. Department of Education in the spring to early fall of 2017. **See ExcelinEd’s ESSA Playbook on A-F School Accountability for details and recommendations regarding state accountability systems.**
Based on their accountability plans, the TDOE will identify schools for targeted and comprehensive support during the 2017-18 school year, and interventions will begin in the 2018-19 school year (see Fig. 1).

**ESSA REQUIREMENTS FOR TARGETED SUPPORT AND COMPREHENSIVE SUPPORT SCHOOLS**

**Targeted Support**

**Identification:** Schools that have at least one subgroup of students that are “consistently underperforming,” as defined by the state.

**Requirements for Intervention:** Targeted-support schools must develop and implement plans to improve student outcomes in the identified subgroup; the district (not the state) approves and monitors the plans. In addition, if any school identified for targeted support has a subgroup performing as poorly as the bottom 5 percent of Title I schools in the state, the TDOE must assess the allocation of resources and address inequities.

**Exit Criteria:** The TDOE must set exit criteria for schools in targeted support. If a school does not meet those criteria within a state-determined number of years, the school transitions to comprehensive support.

**Key Role of the TDOE:** Assess allocation of resources, set exit criteria, and shift persistently underperforming targeted-support schools to comprehensive-support status.

**Comprehensive Support**

**Identification:** Schools that are performing in the lowest 5 percent statewide, have a four-year graduation rate of less than 67 percent, or have a subgroup that is performing as poorly as the lowest 5 percent of schools in the state and has not improved with targeted support.

**Requirements for Intervention:** Districts must develop and implement improvement plans for schools identified for comprehensive support. The plans must include evidence-based interventions; identify resource inequities; be informed by all indicators in the state’s accountability system; and be approved by the school, district and the TDOE. The TDOE must monitor and periodically review district improvement plans, and set the criteria for schools to exit comprehensive support.

**Exit Criteria:** The TDOE must set exit criteria for schools in comprehensive support. If the exit criteria are not satisfied within a state-determined number of years—not exceeding four years—the TDOE must take more rigorous actions.

**Key Role of the TDOE:** Encourage the adoption of evidence-based intervention strategies; review district plans for school improvement and monitor implementation; and design and implement more rigorous action for schools that do not improve over time.
TENNESSEE’S ROLE IN SCHOOL TURNAROUND UNDER ESSA

Under ESSA, states have a limited role in schools in targeted support, but they can have a significant influence on interventions for schools in comprehensive support and for persistently low-performing schools. This state influence is possible because, under ESSA, states are freed from the federally prescribed intervention models that were required under No Child Left Behind (NCLB), the prior version of the law.

ESSA gives Tennessee’s policymakers the authority to exercise this influence through the following three key options.

**KEY STATE ACTION #1: Encourage the Adoption of More Aggressive Intervention Strategies.**

ESSA provides states with significant resources to support bold interventions. Tennessee will receive an estimated $308M in Title I dollars in FY2017. The TDOE holds the purse strings on Title I funding and can influence school interventions in three ways (see Figure 2).

First, districts must submit school improvement plans; the TDOE has the authority not only to issue a list of evidence-based practices for districts to choose from but also to review, approve and monitor the implementation of districts’ plans. Second, the TDOE must reserve 7 percent of Title I funds for school interventions. The TDOE can distribute these funds by formula to all districts serving the lowest-performing schools or use a competitive grant program to create strong incentives for districts to adopt certain evidence-based school interventions. Third, the TDOE may reserve another 3 percent of Title I funds to support a similar grant for direct student services, such as public school choice, personalized learning, transportation and credit recovery.¹
Encourage the Adoption of Evidence-Based School Interventions

In approving districts’ school improvement plans and establishing criteria for a competitive grant—for the 7 percent Title I school improvement funds—the TDOE could hew to the interventions described below.

Evidence for Successful School Interventions: Despite decades of efforts to improve persistently low-performing schools, there is a limited body of rigorous research on their success. Moreover, the research that does exist has drawn mixed conclusions. Yet several studies find that the least intrusive interventions—such as developing teacher effectiveness or redesigning instructional programs—have had little to no impact on student achievement when implemented in isolation. Other research suggests that student outcomes have improved under more transformative interventions—such as replacing school staff, restarting the school as a charter school, or closing the school and enrolling students in higher-performing schools. As a result, the TDOE using their review of district school improvement plans and their criteria for competitive grants to encourage the adoption of the most transformative interventions could produce the best results.

SCHOOL INTERVENTION OPTIONS

<table>
<thead>
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<th>Models</th>
<th>Resources</th>
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<tr>
<td>#1 — Replacing principal and significant percentage of staff.</td>
<td>Green Dot Schools is a charter management organization (CMO) that operates schools in California, Tennessee and Washington State. It has also served as a turnaround partner and provider to multiple schools. Examples of its success and an independent evaluation from UCLA’s Center for Research on</td>
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Evidence: A study of SIG-funded school reforms in California found that schools that implemented reconstitution (which SIG calls “turnaround”) showed
significant improvement in student achievement relative to counterparts that used more moderate school improvement models.\textsuperscript{vii}

### #2 — Restart as a charter: Close the school and restart it under the management of a charter school operator, a charter management organization (CMO) or an educational management organization (EMO).

**Evidence:** As part of the School District of Philadelphia’s Renaissance Schools Initiative, the CMO, Mastery Charter Schools, closed and reopened six low-performing schools — three elementary and three middle/high — enrolling the same students, but with different leadership and staff. Since the restart in 2010, Mastery’s takeover schools have seen progress in student achievement results, increased college-going rates, and drawn more demand from the local community.\textsuperscript{viii}

### #3 — Close and consolidate: Close the school and enroll its students in higher-performing schools in the district.

**Evidence:** A study of 18 school closings in Chicago found that students who transferred to the strongest receiving schools experienced an achievement gain of nearly one month in reading and more than two months in math. Research in Ohio and New York also show positive results.\textsuperscript{ix}

Evaluation, Standards and Student Testing are on the CMO’s website.

- **Mass Insight Education** partners with school districts and state education agencies (SEAs) “to redesign the way they support their lowest-performing schools ... by fixing policies, structures and incentives surrounding state and local systems.” Read about their approaches and what SEAs can do to help.

- **Mastery Public Schools** is a CMO that operates schools in Philadelphia and Camden. Key outcomes of its turnaround efforts are online.

- **Communities in Schools** is a nonprofit organization that partners with schools and communities to provide integrated student supports (or wraparound services) to a state’s neediest students.


### Key Design Features of a Competitive Grant

Competitive grants can be useful tools for incentivizing districts and schools to adopt particular policies or approaches, and experience lends four insights for the design and
implementation of competitive grants. The following are strategies for the TDOE to consider in designing a competitive grant for school interventions:

**Leave Room for Local Ownership and Innovation:** Applications for both federal and state competitive grants often include an extensive list of detailed requirements. As a result, winning a grant can become a competition more about checking all the boxes than about the potential of an applicant’s plan. The TDOE should consider limiting grant options to the three transformative reforms described above; this will ensure that the reforms will be sufficiently intensive while still leaving room for local ownership and innovation. For example, a district may apply for a grant to close and consolidate a comprehensive support school, but retain discretion over student assignment, transportation, community engagement or other supports necessary in a school closure process.

**Create a Bright Line Between Oversight and Operation:** The TDOE is responsible for designing and administering the grant competition, evaluating proposals and funding the transformative models. It must also hold schools accountable if they fail to implement the reforms promised in their applications. Unfortunately, it is difficult for any SEA to hold a grantee accountable while simultaneously offering technical assistance to that grantee. Instead of directly providing technical assistance, the TDOE could provide for districts and schools access to high-quality implementation support from qualified outside providers. If that is not possible, the TDOE could consider creating firewalls between the TDOE offices charged with implementation support and oversight.

**Require Rigorous Evaluations:** Too often, school improvement efforts are deemed a success or a failure without a methodologically sound evaluation or consideration of other outcomes. Given the number of schools across the country struggling to improve, it is essential to invest in developing a rigorous understanding of when and how efforts succeed. The TDOE should consider ensuring that grants and school improvement plans require a high-quality evaluation through partnership with external providers such as institutions of higher education.

**Set and Enforce Strong Accountability:** Strong accountability is the linchpin of a competitive grant. Without it, applicants may shy away from the most disruptive reforms, have unrealistic timelines for implementation or set unattainable goals for improvement. However, applicants confident that there will be consequences for falling behind or coming up short will be more likely to temper their promises accordingly. The TDOE should be willing to consider withholding grant funds if a school fails to meet key milestones and to implement more rigorous interventions when reforms do not succeed.

**KEY STATE ACTION #2:**

**Maintain and Improve Alternative Governance Structures for Persistently Low-Performing Schools.**

For schools that do not improve after four years in continuous improvement, ESSA requires states to take more dramatic action. In addition, nothing in ESSA prevents states from intervening in persistently low-performing schools before then. Many schools lingered in “restructuring” under the No Child Left Behind Act, in “priority status” under the ESEA
ESSA Playbook Series | Implementing School Interventions in Nevada

waivers and are now likely to enter “comprehensive support” under ESSA. Tennessee’s Achievement School District, which currently oversees 31 charter schools, is a strong existing option for these schools. In addition, several districts in the state have also developed Innovation Zones (iZones). While iZone schools remain under the governance of the local school district, they typically have increased flexibility in staffing decisions and can explore alternative models of instruction.

When it comes to the ASD, the policies that established and now guide its operation have several strengths. First, it is clear which schools are eligible for the ASD. All schools in the bottom 5 percent of performance statewide are eligible, and the Commissioner of Education has discretion to decide which schools move to the ASD. Second, while the ASD directly manages five of its schools, charter management organizations manage most of them, and the ASD will not directly operate any additional schools going forward. This allows the ASD to develop as an authorizer, including rigorous processes for approving new schools, renewing existing schools and revoking the charters of schools that fall below expectations. Finally, legislation in 2011 provided the ASD with key autonomies in staffing and financial matters, which have helped the ASD grow and adapt in response to evolving school needs.

Nonetheless, several policy changes could advance the success of the ASD and its schools:

Improve Funding for the ASD: The ASD cannot be successful in the long term without adequate resources. Though originally funded from Tennessee’s federal Race to the Top grant, the state never fully replaced that funding when it expired in 2015. As of the 2015-16 school year, the ASD could cover approximately half of its operating budget with a per-pupil authorizing fee and relied on philanthropic support to bridge the gap. While it’s unclear how recent changes in the control of ASD finances may affect the proportion of ASD operations covered by the authorizing fee, it will be important for state policymakers to adequately fund the ASD with public resources, perhaps through a combination of an authorizing fee and a budget line item. The percentage-based funding will help ensure that the turnaround district’s capacity grows as it expands to serve more kids, while a budget line-item can help the turnaround district hire and build in advance of new needs rather than in reaction to them.

Improve Funding for ASD Schools: Tennessee appears to do a better job than most states in equitable funding for charter schools, but a lack of clarity and transparency makes it difficult to assess. Despite the uncertainty around charter school funding, however, there are at least two main-points for policymakers to consider: special education and capital funding. Many charter schools in the ASD are responsible for serving children with low-incident, high-cost disabilities without the economies of scale possible at a district level. In addition, while the ASD law provides access to school facilities, it does not provide for their maintenance. Earlier this year, Shelby County (where most ASD schools are located) estimated $476 million in critical deferred maintenance to its school facilities. State policymakers should consider ensuring that the ASD and its schools have the necessary funding to serve all students in well-maintained buildings.

Protect the ASD’s Autonomy in Staffing and Procurement: The ASD has been a kind of skunkworks operation within the TDOE, with many of the flexibilities of a district when it
comes to key staffing decisions and procurement. However, as a unit of the TDOE, there is constant risk that it will lose those freedoms. It may be beneficial for policymakers and TDOE leadership to safeguard these autonomies, which are essential for the ASD to adapt and pivot quickly in response to the needs of the schools and students it serves.

Continue to Support and Learn from iZones: For some schools that persistently fall short of expectations, new governance and external operation may not be necessary. These schools may benefit from the iZones that several districts in Tennessee have established. A recent report from researchers at Vanderbilt University shows that some of the outcomes at iZone schools outpace the improvement of schools in the ASD, suggesting that the iZone strategy may be a worthwhile option. As a result, it may be helpful for Tennessee legislators and the TDOE to encourage the continuation of these programs, perhaps by including them in the criteria for competitive grants under Title I and/or learning from their successes so that they can be replicated across the state.

KEY STATE ACTION #3: Increase School Choice to Address Persistently Low-Performing Schools.

It may be beneficial for Tennessee policymakers to support immediate options for all students who have been languishing in low-performing schools for far too many years—not just those students in schools in the ASD. Widespread school choice gives families the freedom to leave persistently low-performing schools. Moreover, research shows that school choice, in combination with strong accountability, can have a positive effect on low-performing schools. State legislators and the TDOE should consider implementing laws and policies that advance all kinds of school choice:

Foster Strong Authorizing and Accountability Practices: The charter sector is based on a “grand bargain” in which schools have autonomy in exchange for accountability. Authorizers are often a critical player in maintaining this balance. There are five charter authorizers in Tennessee, and they vary significantly in their practices. The National Association of Charter School Authorizers indicates that Nashville Public Schools has implemented 11 out of 21 essential practices. However, other authorizers lack consistency and transparency in their charter approval, renewal and revocation decisions. In addition, Tennessee charter schools lack visibility into the funding process and struggle to find and finance their facilities. This leaves room for some improvements, including the following possible strategies:

- **Tennessee authorizers—especially Shelby County and Hamilton County Public Schools—could consider establishing and clearly communicate standards for charter school renewal or revocation.**
- **Tennessee authorizers should consider providing transparent information to charter schools about the funding they can anticipate receiving from their district authorizers.**
- **Tennessee legislators should consider stepping in to encourage or require transparent authorizer practices, such as adding provisions to the charter law that encourage or require the creation of renewal criteria and a timeline for providing schools with notice of how they are tracking against those criteria.**
• **Tennessee legislators should consider seeking policy solutions to assist charter schools with facility costs, including debt financing or a state grant program for charter facilities.**

**Leverage Direct Student Services to Facilitate Access to Choice:** The TDOE can choose to reserve 3 percent of Title I funds and direct those funds toward state-determined student services in districts with significant proportions of schools in comprehensive support. These funds can be used for multiple purposes including tutoring, credit recovery, course access or transportation.\(^{xv}\)

**Potential strategies for the TDOE:**

- **Direct these funds to districts to encourage their participation in Tennessee’s new online course creation and sharing framework for local public schools (launching in 2017-18).**
- **Direct these funds to districts to provide transportation to students enrolled in comprehensive support schools to higher-quality options.**

**Harness the Power of Opportunity Scholarships:** The Tennessee legislature passed its first private-school choice program during the 2016 session—the Individualized Education Account (IEA) program for students with special needs. Also known as an education savings account (ESA) program, the IEA program allows parents to withdraw their children from the public schools and receive an allowance of public funds that can be used for state-approved education expenses such as private school tuition, tutoring, education therapies and online courses. This law is an important and exciting step, but there is more that can be done to increase access to high-quality private school options.

- **Currently, the IEA scholarship amounts that the TDOE grants to students with special needs do not appropriately reflect the cost of a student’s individual needs. To determine individual scholarship amounts, the TDOE averages special education funding amongst all students in a district, so that participating students with special needs receive only a small fraction of the funding intended to serve them. Instead, the TDOE might consider implementing the program in accordance with the legislature’s intent, and include the entirety of a student’s individual special education funding amount in their scholarship amount so that the IEA program can better serve participating students.**

- **Tennessee legislators might also consider expanding students’ access to high-quality education opportunities by enacting an ESA program that serves more students. An ESA program could be open to all students, or to all low-income students and other high-need populations such as foster children and students in military families. ESAs could provide these students with the opportunity to attend high-quality private schools or access tutoring or other education services that better fit their unique needs.**

**Ensure Authentic Community Engagement when Schools Open and Close:** Strong community engagement will promote the long-term success of new school options and ensure that any school closures minimize the cost to communities’ unique cultures and social capital.

To encourage authentic community engagement:
All authorizers should consider amending charter application processes to evaluate operators’ plans, activities and demonstrated success in community engagement.

Tennessee legislators (or authorizers) should consider requiring public hearings on school opening and closure decisions, so that decisions are informed by community input.

Charter authorizers (or the TDOE) should consider disseminating successful strategies for authentic community engagement, such as building community awareness, building the capacity of community leaders and fostering collaboration to surface solutions.\textsuperscript{xvi}

### COMMUNITY ENGAGEMENT: RESOURCES

#### Partners

- **Democracy Builders** helps engage parents in the school choice movement. In addition to helping schools engage with their parent communities, Democracy Builders provides parents with advocacy training and helps bridge the gap between parents and policymakers.

- **Families Empowered** was founded specifically to support families in systems of school choice by providing resources and information throughout the school application process for families stuck on waitlists.

- **Stand for Children** is a national advocacy organization that includes family engagement and organizing as one of its key strategies for supporting school improvement. It has created **Stand University for Parents** (Stand UP) to help parents get involved in their children’s education.

#### Research and Analysis


### Enabling Policy Conditions for All States

Beyond competitive grants and leveraging the power of school choice, Tennessee policymakers could advance the following policies to help create the statewide conditions necessary for school improvement:

**Staff Quality and Support:** A school’s ability to recruit and retain effective teachers has a significant impact on school quality. Strong instructional leadership from the principal and district support can also produce positive results.\textsuperscript{ xvii} As a result it may be beneficial for Tennessee legislators to work to improve existing teacher and leader preparation programs. ExcelinEd applauds the TDOE’s recent progress in reporting the performance of these programs.\textsuperscript{ xviii} The following are potential strategies:

- **Pass regulations that require or incentivize teacher preparation programs to emphasize clinical experience; require or incentivize school leader preparation programs to include budget management, human resources, community engagement and using data to drive instructional improvement.**

- **Build or recruit high-quality alternative programs.**
High-Quality Data and Reporting: Data-driven decision-making at the state, district and school level is a common component of successful school turnaround efforts. The TDOE has developed robust data systems for students, teachers, school and district leaders and state officials. However, these data systems are in silos and do not enable the rich use of data that they could.

- Work to make these data systems compatible with one another, so they can lead to deeper insights and better inform efforts to improve teaching and learning.

Integrated Student Services: Struggling schools, students and families often have additional health, emotional and behavioral needs but have trouble effectively accessing the maze of public and private services in the community. Organizations like Communities in Schools can work in conjunction with other transformative reforms to ensure state and local resources get to where they are most needed.

- Encourage low-performing districts to use Title I funding to partner with organizations that can help ensure students receive the wraparound services they need to succeed.

TEACHER AND LEADER PIPELINES: RESOURCES

Partners

- TNTP is a nonprofit organization that supports districts and charters in effective talent management—from classroom support to district-level functions. TNTP also operates alternative teacher preparation programs for career switchers.
- In addition to traditional school leader preparation, a number of nonprofits, including Building Excellent Schools, New Leaders, Fisher and Miles Family Fellowship and the Ryan Fellowship, train school leaders

Research and Analysis

- The National Council on Teacher Quality has developed recommended state policies for teacher preparation; its sister organization, Teacher Prep Inspection-US, helps teacher prep programs identify and address their challenges.
- TNTP has authored a number of influential reports on teacher policies, including teacher evaluation, compensation, retention and professional development.

WHAT’S NEXT?

While ESSA gives states substantially more flexibility in how they intervene in persistently low-performing schools, many are concerned that the devolution of authority from the federal government will lead to complacency at the state level.

Tennessee can help lead the way in demonstrating what thoughtful and committed policymakers can achieve when they put children first. It may be beneficial for Tennessee legislators and the TDOE to leverage the state’s flexibility under ESSA to continue implementing aggressive interventions in persistently low-performing schools through the ASD and the iZone; promote the growth of high-quality school choice; and invest their political capital and public resources to provide the talent, data and reform environment necessary for dedicated teachers and leaders to meet the needs of all students.
schools in Los Angeles by the charter management organization, Green Dot Public Schools, has produced similar
ingains in student achievement. Other cohorts using moderate school turnaround efforts saw no change or a
decrease in student achievement; Strunk et al., “The Impact of Turnaround Reform on Student Outcomes.”


The School Improvement Grant (SIG) required that 50 percent of teachers be replaced. There is no evidence that
replacing one-half of the staff is the right amount needed for successful turnaround efforts. What is important is
that districts have aligned incentives so that they are sufficiently aggressive with an appropriate proportion of
teacher replacement and that the state enforces consequences if districts fail to improve.

School District’s Public School Choice Initiative (PSCI), which sought to turn around the district’s lowest-performing
schools, found that the cohort of schools that implemented reconstitution and restarted turnaround efforts saw
significant gains in student achievement. Other cohorts using moderate school turnaround efforts saw no change or a
decrease in student achievement; Strunk et al., “The Impact of Turnaround Reform on Student Outcomes.”


http://www.cleveland.com/opinion/index.ssf/2012/05/philadelphia_charters_get_resu.html; A restart of public
schools in Los Angeles by the charter attendance management organization, Green Dot Public Schools, has produced similar
results. One study found that students at high schools restarted by Green Dot Public Schools scored higher
on California’s high school exit exam on their first attempt and had higher rates of passing the English language
and mathematics sections of the test than their peers at Los Angeles Unified School District high schools in the
area. In addition, students at Green Dot schools had a 25 percent higher graduation rate and scored 35 percent
higher on college readiness requirements. Herman, J., Wang, J., Rickles, J., Hsu, v. Monroe, S., Leon, S.,
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A study of 200 school closings in Michigan found that students who transferred to higher-performing
schools experienced academic gains; Brummet, Quentin. “The Effect of School Closings on Student Achievement.”

found that closures improved graduation rates for displaced students by 15.1 percentage points—with all of that
improvement coming through a 17.4-percentage-point increase in the share of students earning more rigorous
closures in Ohio found that closure generally had positive effects on the reading and math achievement of
displaced students; Carlson, Deven, and Stéphane Lavertu. “School Closures and Student Achievement.” Thomas B.


xvi Stand For Children University for Parents (STAND UP), http://stand.org/indiana/about/what-we-do/family-engagement-organizing.
