State Systemic Improvement Plan: Phase I

Tennessee Department of Education
Division of Special Populations

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Frequently-Used Acronyms

Acronym	Definition
C&I	Curriculum and Instruction Division
CPM	Consolidated Planning and Monitoring Division
CTE	Career and Technical Education Division
IAIEP	Instructionally Appropriate Individualized Education Program
LRE	Least Restrictive Environment
PIE	Partners in Education Conference
RLA	Reading Language Arts
RTI²	Response to Instruction and Intervention
SIMR	State Identified Measurable Result
SLD	Specific Learning Disabilities
SPDG	State Personnel Development Grant
SSIP	State Systemic Improvement Plan
SWD	Students with Disabilities
TCAP	Tennessee Comprehensive Assessment Program
UDL	Universal Design for Learning

Introduction

The Tennessee Department of Education has a strong, unified vision for improving special education in the state. The department has conducted a thorough review of its data and infrastructure, solicited feedback from hundreds of stakeholders, and carefully aligned its strategies to tie in to current department initiatives. Tennessee is ready to implement strategies designed to improve the student outcome defined in the State Identified Measurable Result (SIMR). The department is focused on increasing capacity at the Local Education Agency (LEA) level and on maintaining open channels of communication internally between divisions at the department and externally across LEAs. The division of Special Populations has the primary responsibility for students with disabilities (SWD) in Tennessee and takes seriously the charge of identifying, implementing, and evaluating procedures for improving student outcomes.

Special Populations regularly engages with internal and external stakeholders to ensure that initiatives align with the work of other divisions and agencies. Within the department, the assistant commissioner for Special Populations works collaboratively with members of the department's Leadership Team to establish consistent priorities and messaging. These partnerships are particularly productive given that other divisions have their own external stakeholders that provide feedback.

Special Populations' own external partnerships include: superintendents (Tennessee Organization of School Superintendents and Superintendent Study Council), the Advisory Council for the Education of Students with Disabilities, the Tennessee Association for Administrators in Special Education (TAASE), special education teachers through the annual Partners in Education (PIE) conference, and various parent and advocacy groups. Finally, Special Populations convenes ad hoc stakeholder committees of experts and community members for specific initiatives as needed.

The State Advisory Council for the Education of Students with Disabilities[1] convenes quarterly and consists of professionals in the special education field as well as individuals with disabilities and

[1] For more information, visit the Council's website at: http://www.tn.gov/education/student_support/advisory_council.shtml.

their family members whom the Governor has appointed. Special Populations and other relevant divisions and agencies provide updates on initiatives, trainings, documentation, and policies. The Council then has the opportunity to ask questions and offer suggestions based on these updates. The Council's guidance plays an integral role in shaping and at times reframing the topics discussed.

Data Analysis

Process

Tennessee has a wealth of data on student demographics and outcomes that could help shape the State Systemic Improvement Plan (SSIP). Prior to initiating the data analysis phase, the Special Populations division consulted with senior leadership at the department to identify areas of particular concern for the state. Given recent stagnation and even drops in some grades in state assessment scores in literacy, the Commissioner, Deputy Commissioner, and Assistant Commissioner for Special Populations were united in the belief that the SSIP would be most valuable to the state if it focused on student outcomes in literacy, particularly in third through 8th grades. The data analysis therefore focused on state assessment data from the Reading Language Arts TCAP-Achievement test administered in the 2013-14 school year.

The data services team in the Special Populations division gathered data from several sources. The annual SPP/APR process yields data from: the statewide IEP data management system (EasyIEP), the statewide student information system (EIS), district student information systems (SISs), and results from assessments. The Office of Research and Policy at the department coded and cleaned the state assessment (TCAP) data used in the SSIP data analysis process; this data contained student-level assessment and demographic information and other relevant data fields. This information, merged with a data set from Special Populations that included data from the EasyIEP system, created one comprehensive data set that the team used for SSIP data analysis.

The data team collates information from EasyIEP, EIS, SISs, and assessment data for all 618 reports as well. Information from EdFacts files C089 and C002 populated the merged data set with assessment fields; information in those files originated in EasyIEP.

Variables[2]

The data services team within Special Populations analyzed a broad spectrum of data in conjunction with consultant Bruce Bull and Mid South Regional Resource Center representative Nancy O'Hara. The analysts focused on 2013-14 TCAP-Achievement data on the Reading Language Arts assessment from third through 8th grade for SWD. The group identified outcomes for students with disabilities by grade, compared those outcomes to the 2012-13 school year to identify any anomalies, and compared both school years' data to outcomes for students without disabilities to identify achievement gaps. The gap in reading is persistent and significant; this area is particularly crucial because students who cannot read at grade level also struggle to express their knowledge in other subjects.

[2] Please see the Excel spreadsheet labeled "TN SSIP Appendix" that is attached to Indicator 17, Data Analysis, for relevant graphs and tables.

The next step was to disaggregate the data by multiple variables, listed below. Visual representations of these data are available in the Excel appendix attached to the Data Analysis section of the SSIP.

- Percent of day students spend in the least restrictive environment, further broken down into percent of time in LRE by disability category with particular focus on students with high incidence disabilities and their time in LRE.
- Region of the state and LEA.
- English Learner status.
- Socioeconomic status.
- Race/ethnicity.
- A joint analysis of race/ethnicity and socioeconomic status.
- APR indicators including graduation rate, dropout rate, and preschool outcomes.
- Districts' compliance status (Meets Requirements, Needs Assistance, or Needs Intervention).

The most surprising and important insights came through a detailed score analysis. In this process, the Data and Research division further broke down student scores within the typical categories of Below Basic, Basic, Proficient, and Advanced into low, mid, and high scores. For example, a student with a score of high Below Basic was on the cusp of scoring Basic, whereas a student whose score was low Proficient was just barely above the threshold for proficiency. The team found that SWD scored between high Below Basic and high Basic. This information captured the team's focus because it indicates that, though about 30 percent of SWD score Below Basic, most are very close to the level of Basic, providing a realistic but ambitious goal for teachers of helping move students out of the lowest achievement category and take steps toward proficiency.

Detailed Score Analysis: Reading Language Arts 2013-14 TCAP-Achievement, Grades 3-8

	Low	Middle	High
Below Basic	**1.8%**	**5.0%**	**23.7%**
Basic	**19.2%**	**18.2%**	**14.9%**
Proficient	**8.7%**	**4.7%**	**2.4%**
Advanced	**1.4%**	**0.1%**	**0.0%**

At the same time, it is important to remember that teachers must support students who score low, middle, or high Basic or low Proficient to prevent them from sliding back into lower achievement categories. The state plans to use detailed score analyses as shown above in future years to track whether all students are making incremental progress toward proficiency. Students will require interventions of differentiated intensities and teachers will require support in identifying appropriate interventions based on their students' needs and implementing those interventions in order to ensure that all students progress through these achievement categories.

The team also disaggregated the detailed score analysis by disability category and by grade level. We noticed that students with high incidence disabilities were likely to score high Below Basic; for example, of students with Specific Learning Disabilities (SLD) that scored Below Basic, 79.4 percent were in the range for high Below Basic and thus close to attaining the level of Basic. In terms of grade level, between 21 and 30 percent of students scored high Below Basic in each grade from third through eighth, though older students (sixth grade and above) were more likely to score high Below Basic than younger students. Older students were least likely to score Basic or higher; this drop in achievement from lower grades corresponds with a drop in the percentage of students in the general education setting for at least 80 percent of the school day. In general, students who spent the least time in the general education setting were the least likely to score Basic or higher on the reading assessment as shown in the graph below.

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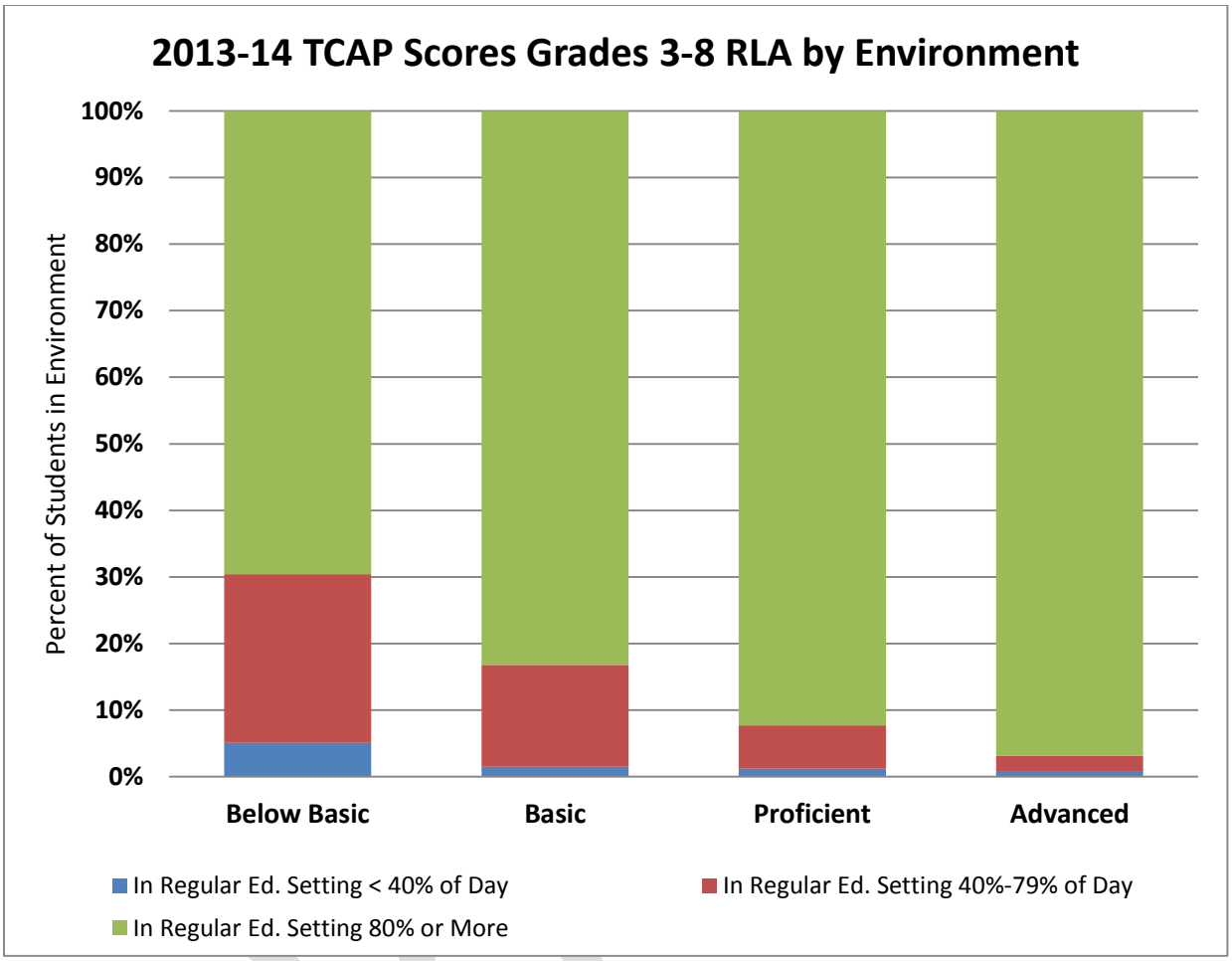

For further discussion on the root causes of the persistent achievement gap in reading for students with disabilities, please see the section on Coherent Improvement Strategies.

Data Quality Concerns

A data analysis is only valuable if the data under review are valid and reliable. The data services team is confident about the sources of data it used to link assessment outcomes with student disability categories, LRE, demographics, and other variables of interest. One concern for the 2013-14 and 2014-15 school years is that the state assessment, TCAP, is not fully aligned with the Tennessee State Standards that the state began to implement in 2011. The state legislature delayed administration of aligned assessments and instructed the Tennessee Department of Education to conduct a full RFP process to identify a new assessment vendor. Given that misalignment and that the state will administer a new assessment for the 2015-16 school year, the state will reset the baseline for the SIMR following the Spring 2016 test administration.

In addition, the state will no longer administer the TCAP-MAAS, a modified assessment for students with disabilities, as of the 2014-15 school year after a three-year phase out period. The data team did not include TCAP-MAAS scores in the analysis of 2013-14 scores because the TCAP-MAAS is not a comparable test in terms of the level of mastery it requires students to demonstrate. The team suspects that, when students who had previously taken the TCAP-MAAS begin to take the TCAP-Achievement test in 2014-15, their scores will lower state averages, but cannot make a firm prediction on the actual effect that these additional test-takers will have on TCAP-Achievement scores. Students who took the TCAP-MAAS typically had more significant cognitive impairments rather than high-

incidence disabilities. The table below indicates the number of students with disabilities who took each type of assessment; approximately 14,000 students who took the TCAP-MAAS in 2013-14 will transition to the TCAP-Achievement in the 2014-15 school year.

Number of Test Takers with Disabilities, 2013-14

Category	Number of Students
Grades 3-8 TCAP Achievement	**36,825**
Grades 3-8 TCAP MAAS	**14,433**
Grades 3-8 Portfolio	**4,990**
TOTAL Grades 3-8 2013-14	**56,248**

Data Analysis Stakeholder Involvement

Internal and external stakeholders had the opportunity to comment on and help narrow the focus of the data analysis. The data analysis team brought in external expe[rti]se from education consultant Bruce Bull and Nancy O'Hara from the Mid South Regional Resource Center. Data analysts from the Special Populations division rounded out the team. This group found that, out of all the variables considered in the broad data analysis, the factors that appeared to have the greatest effect on student outcomes were type of disability, time spent in the least restrictive environment (particularly for students with high-incidence disabilities), and socioeconomic status. The team shared the data analysis with leadership in both Special Populations and the Curriculum and Instruction (C&I) division as well.

The team then presented the data at two meetings in October, 2014: the annual Special Education Supervisor's Institute to over 200 supervisors and other district leaders and the Advisory Council for the Education of Students with Disabilities that consists of stakeholders representing a variety of perspectives on special education in the state. The presentation is attached to the Data Analysis portion of Indicator 17. We asked both groups the following questions:

1. What do these data suggest to you? Why?
2. What do you see that contributes to low student performance on literacy assessments?
3. What additional analyses might increase your understanding of the challenges SWDs face regarding literacy?
4. How would you suggest we narrow our focus?
5. Do you have any additional comments or suggestions?

The feedback from these groups is organized in the table below.

Stakeholder Comments about Broad Data Analysis by Topic

Topic and Example Comments	Number of Comments per Topic
Funding/Class Size *"I believe we need to advocate for smaller class size/caseloads"; "Look at the impact of SPED staffing levels and student performance."*	14
Assessment *"Need grade level assessments for K-2"; "What type of assessments are being used to identify skills deficits?"*	11
Data *"I would like to see data broken down for my district like you did for the state"; "Need district-specific data for students with disabilities."*	64
LRE/Education Environments	42

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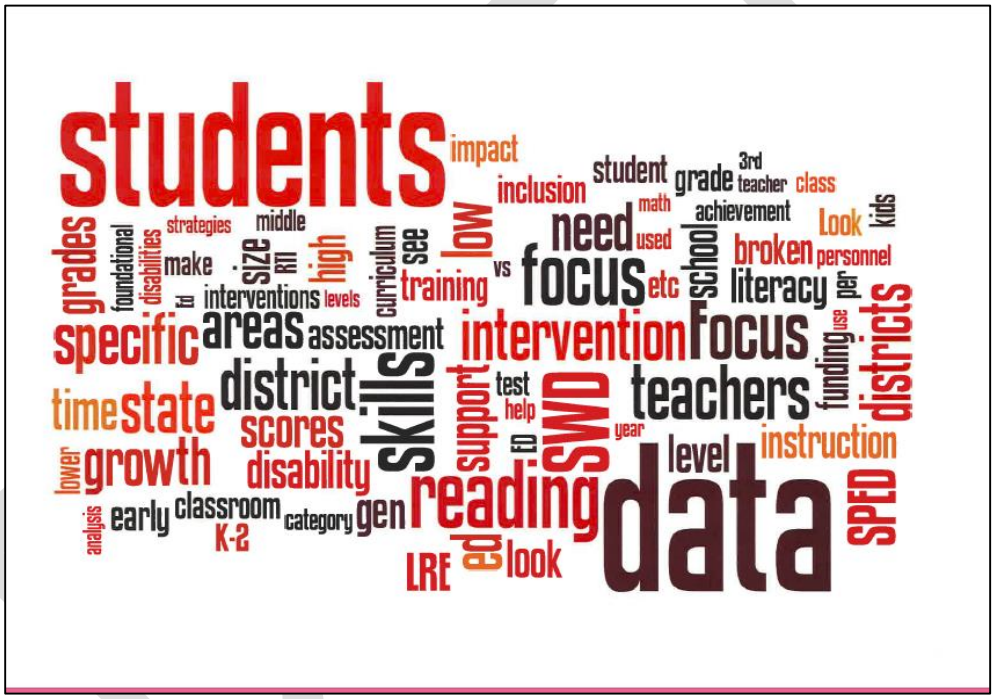
"Focus on inclusion which needs more funding"; "Need more discussion with core curriculum instruction teachers."	
Training/Materials Request *"Training for Gen Ed teachers who aren't prepared to teach SPED students in core curriculum"; "SPED teachers need more instruction in teaching literacy."*	28
Increased Coordination with General Education *"Consistent practices for all (Gen Ed and SPED)"; "Focus on training and support to Gen Ed – we won't be able to 'fix' anything in SPED until this is solid."*	19
Focus on Early Grades (K-3) *"Focus more on reading and math intervention in K-3"; "Need emphasis on K-5 instruction, growth, and gap closure."*	21

Word Cloud of Most Common Phrases in Stakeholder Feedback



In response to the overwhelming number of requests for district-level data, Special Populations sent individual emails to every district special education supervisor in the first week of November, 2014 with that district's data (an example is also attached to the Data Analysis portion of Indicator 17). The special education supervisors quickly grasped the significance of the detailed score analysis as a tool for evaluating incremental progress toward the ultimate goal of student proficiency. Another major concern was increasing the number of SWD in the least restrictive setting, coupled with a need to increase coordination with general education. As addressed in the root cause analysis in the Coherent Improvement Strategies section, time out of the general education setting too often means time with an instructor who is not highly qualified to teach grade-level content in Tennessee. The supervisors concluded that too many students with non-cognitive, high-incidence disabilities in Tennessee lack access to the core curriculum as indicated in the data on least restrictive environment.

The final round of stakeholder feedback came from internal leadership. Over the course of several months, the Special Populations team including Assistant Commissioner Joey Hassell presented its findings to then-Commissioner Kevin Huffman, current Commissioner Dr. Candice McQueen, Deputy Commissioner Kathleen Airhart, and Assistant Commissioner for Curriculum and Instruction Emily Freitag. Eva Boster from the Communications team attended as well to consider how to best disseminate updated priorities and strategies as needed. The data analysis process revealed startling information about outcomes for SWD in Tennessee. District-level leaders and state leadership drew similar conclusions from the data. Those conclusions corroborated the need for several major initiatives that the state has undertaken in recent years that are further discussed in the infrastructure analysis and also led to the articulation of the SIMR that, if achieved, will improve both the academic outcomes and broader opportunities for students with disabilities.

Infrastructure Analysis

Relevant Representatives

Special Populations utilized feedback from multiple divisions and stakeholders to conduct the following infrastructure analysis. Specifically, Special Populations staff sent initial surveys and conducted follow-up interviews with approximately 30 department employees in August and September, 2014. These stakeholders are representative of almost every division at the department and will continue to lend their expertise to the SSIP process throughout its various phases over the coming years. The individuals and their divisions are listed in the table below.[3]

Division	Stakeholders
Office of the Commissioner	Dr. Candice McQueen, Commissioner Kevin Huffman, former Commissioner Hanseul Kang, Commissioner's Chief of Staff
Office of the Deputy Commissioner	Dr. Kathleen Airhart, Deputy Commissioner Rasheeda Washington, Chief of Staff
Special Populations	Joey Hassell, Assistant Commissioner Nathan Travis, Deputy Assistant Commissioner Allison Davey, Chief of Staff Connie Casha, Director of Early Childhood Programs Tie Hodack, Executive Director of Instructional Programming Suzanne Keefe, Director of Special Projects Theresa Nicholls, Director of Eligibility Sheryn Ordway, EasyIEP Coordinator Amy Owen, Data and Policy Analyst Gary Smith, Preschool 619 Coordinator Rachel Wilkinson, Director of Data Services
Centers of Regional Excellence (CORE)	Jacqui Garrison, Deputy Chief District Support Officer
Consolidated Planning and Monitoring	Eve Carney, Deputy Director
Curriculum and Instruction	Rebecca Wright, Policy and Communications Coordinator
Career and Technical Education	Heather Justice, Executive Director of Talent Improvement
Data and Research	Erin O'Hara, Assistant Commissioner Mary Batiwalla, Policy Analyst

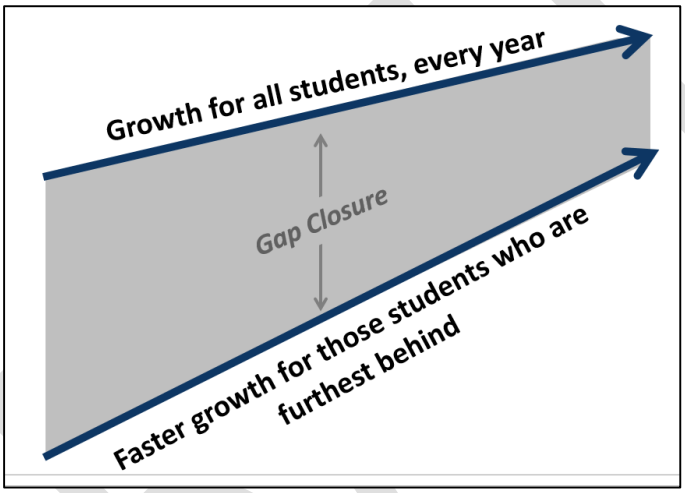
[3] This chart reflects department personnel and positions as of October 2014.

Local Finance Office	Kathi Rowe, Director of IDEA Fiscal Management
Teachers and Leaders	Luke Kohlmoos, Director of Teacher Evaluation

The division then shared the strengths and challenges that the department structure presents at the October 2014 meeting of the Advisory Council for the Education of Students with Disabilities and solicited stakeholder feedback on areas that merit increased state focus. The Advisory Council will also be a continued partner throughout Phases I and II of the SSIP.

Governance

State Priorities



Tennessee has two ambitious goals: growth for all students every year and faster growth for those students who are furthest behind. Students with disabilities have historically had low outcomes in Tennessee. At the heart of the decision-making process is the recognition that the state must better serve this population and focus on programs and initiatives that are in the best interests of and will result in a real benefit to SWD. The Special Populations leadership team, with input from the advocacy community, deeply believes in the potential of the state's new Special Education Framework – including IAIEPs, RTI^2, and increased access to the LRE – to achieve higher results in both academics and transition outcomes for SWD in the state. Coordination with other divisions and LEA partners is vital; for example, C&I's TNCore trainings and instructional materials contribute to strong Tier I instruction for the RTI^2 model and Career and Technical Education's (CTE) redesigned programs of study offer opportunities for SWD to gain career-ready skills while in the supportive environment of the K-12 system.

Strengths

- The State Board of Education has approved several policies in recent years that department leadership believe will lead to improved outcomes for SWD. These policies relate to topics ranging from special education caseload to teacher evaluation to school improvement planning.[4]

[4] 2.101 School Improvement Planning; 2.302 Model for Alternative Schools; 3.100 Early Childhood; 3.103 Early Childhood Learning Standards; 3.104 Reading; 3.206 Special Education Caseload and Class Size; 3.300 Promotion and Retention; 3.402 Guidelines for Use of TVAAS Data; 4.100 Guidelines for Exemption from Compulsory Attendance; 4.205 Guidelines for Use of Healthcare Professionals; 4.209 Mental Health Standards and Guidelines; 5.201 Teacher and Principal Evaluation Policy; 5.400 Educational Interpreters; 5.502 Educator Licensure Policy.

- In step with these policies, The Special Populations division has focused on changing the conversation around special education in the state and has a vision of special education as the most intensive intervention in a range of services that a student can receive. The division recognizes that all students are general education students first and therefore deserve access to high-quality core instruction. A major strength is this clarity of vision within the department and the alignment of all initiatives the division has undertaken to inculcate this mindset in the LEAs.
- Direct professional development from Special Populations staff has played a major role in this process; for example, the Instructional Programming team has presented its RTI^2 training in over 100 of 142 LEAs and is spending the 2014-15 school year traversing the state to roll out Instructionally Appropriate IEPs and prepare LEAs for National Center and State Collaborative (NCSC) testing.

Challenges

- It is no small task to overhaul long-held low expectations for SWD and there remain challenges to this vital work. The outmoded exclusionary view of special education as a place for "other" students who are not expected to achieve in the general education curriculum is a continuous but shrinking roadblock to raising student achievement.
- Other problematic practices include over-identification of SWD due to lack of foundational skills, particularly in literacy, and failure to sufficiently serve students who struggle academically.
- The state's CORE offices continue to grow into the role of providing special education support; data analysts and literacy and math interventionists at the regional offices support strong Tier I instruction but are not yet equipped to fully support special education instruction.

Leveraging and Improving the Governance System

Given the scope and volume of initiatives that Special Populations has rolled out over the past three years, the most important aspects of governance going forward will be continued professional development and technical assistance and program evaluation. The phased implementation of RTI^2 with middle- and high-schools beginning in 2015-16 and 2016-17 respectively will require particularly strong support to effectively improve results. The Instructional Programming team will continue to deliver direct professional development and has trained RTI^2 consultants to work more closely with specific regions. In terms of program evaluation, the Data Services Team within Special Populations works to identify LEAs in need of technical assistance and will consider longer-term projects analyzing student outcomes following policy implementation. Other state systems to leverage and improve to better support positive outcomes for SWD include results-based consolidated monitoring and improving lines of communication between Special Populations, CORE offices, and LEAs.

The SSIP also meets the department's guiding principles and proposed framework for the ESEA waiver submitted in 2015. The state's waiver proposes a system that, like the SSIP, recognizes the hard work districts do to make incremental gains such as moving students from Below Basic to Basic, even if those districts do not meet targets. Such a system would better recognize the tendency to overlook student growth when targets are binary while maintaining growth as a minimum expectation toward the overall goal of preparing <u>all</u> students to be college- and career-ready.

Fiscal

The state typically sets aside the maximum amount for discretionary grants (approximately $25 million for FY 2015) to pay for contracts and competitive grants for LEAs. The state has contracts for assessment and information systems and with universities, such as one with Vanderbilt University's Treatment and Research Institute for Autism Spectrum Disorders (TRIAD) program to provide autism therapy services. For FY 2015, the state funded approximately $4 million in LEA competitive grants out

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of about $8 million in grant applications and prioritized grants that pertained to Results Indicators from the Annual Performance Report (APR).

State and LEA allocations and grants make up smaller proportions of overall special education funding in Tennessee. Funding for special education at the department is relatively small. LEAs receive special education funding through the BEP formula. Special Populations applies for outside grants as relevant. The department has used the State Professional Development Grant (SPDG) most recently and has several grants either approved or submitted for future years as well. Moreover, SPDG has been a critical component of the work around both RTI² and IAIEP as funds from the grant have been used to employ coaches, provide trainings, evaluate training outcomes, and more essential activities.

Special Populations utilizes a combination of these funding sources to support department initiatives. The IDEA administrative funds pay the salaries of most of the Instructional Programming team that leads trainings. Trainings are generally inexpensive; the main costs are meeting spaces and discretionary allocations cover those expenses. The permissive use of funds component of IDEA allows for early intervening services for general education students and a handful of LEAs have applied to use that money for RTI^2; indeed, several LEAs that were early RTI adopters have seen such success with this option that they have reduced their special education referral rate and begun using alternate funding sources for early intervention services.

Strengths

- Communication between CPM and Special Populations is a strong suit for the state. The divisions collaborated to create a risk assessment monitoring tool that CPM uses to identify LEAs for onsite monitoring.
- Consolidated Planning and Monitoring also provides guidance documents for LEAs around acceptable uses of federal funds to support state initiatives, such as RTI^2. The department remains committed to clear messaging and maintaining internal lines of communication.

Challenges

- State and federal bureaucracy pose frequent challenges to fiscal management.
- The Request for Proposal (RFP) process for contracting with vendors is time-consuming and burdensome; further, it does not always result in a better product in that the state Central Procurement Office (CPO) prioritizes cheaper products or personnel over higher-quality, expert ones.
- The department also faces roadblocks in recruiting and hiring talent in that the state sets the number, type, and level of positions each division may have; if the right position is not open at the right time, the division may lose out on exemplary individuals.
- In terms of LEA funds, IDEA flow-through funds are distributed via formula and are not tied to results. Local Education Agencies that receive competitive grants submit a program evaluation of their work, but in general those evaluations do not inform future grant award decisions.

Leveraging and Improving the Fiscal System

There are several potential state levers regarding the fiscal system. Special Populations and the Local Finance Office at the department are planning to collaborate to provide LEA-level technical assistance around grant-writing and using grants to target specific needs. Additional staff could speed up and improve this initiative. The Local Finance Office is also working with LEA fiscal directors and directors of schools to clarify confusion around how and when to spend allocations; typically, fiscal directors prefer to use funds later in the school year to ensure that they do not run out of money, but

the department encourages districts to use funds early in the year to make a difference for students and affect educational outcomes throughout the school year.

The primary improvement in the fiscal system must come from the federal government. State personnel stressed the need for IDEA reauthorization and an updated base allocation formula, particularly because the current formula uses data from the late 1990s that is no longer accurate or appropriate. The state strongly urges Congress to take up IDEA reauthorization and provide a more accurate formula as soon as possible.

Quality Standards

State Standards

In Tennessee, the governor and State Board of Education made the decision to adopt new Tennessee State Standards in July 2010. Tennessee began implementing the standards in the 2011-12 school year, and the standards were fully implemented in the 2013-14 school year in grades K-8 and high school. This process extended the work begun in 2007 with the Tennessee Diploma Project standards when the governor and General Assembly pushed for increased accountability in public education through higher academic standards. That year, more than 130 business leaders worked with the governor and legislators to articulate a vision for public education in the future: all high school graduates ready for a career or college. Based on multiple assessments, such as the ACT and National Assessment of Educational Progress (NAEP), the state found that Tennessee students—both those headed to college and those joining the workforce— were less prepared for life after high school than students in some neighboring states. It is vital for the economic competitiveness of the state that employers are able to find skilled individuals to fill jobs in Tennessee and the state is committed to higher standards that fulfill that vision.

There are not alternate standards for SWD. Standards describe what students should know and be able to do in each subject and in each grade. Tennessee's state Reading Language Arts and math standards provide a chance to improve access to quality content standards for SWD and English Learners. The department has created skills worksheets in RLA and math for grades K-12 to help special education teachers identify areas in which SWD will need additional support to access the general education standards. The department also sees the Tennessee state standards and RTI^2 as fundamentally linked. Both RTI^2 and the Tennessee state standards require high expectations for all students. RTI^2 is designed to help all students reach their potential. As the rigor and knowledge demands increase for students through the implementation of the Tennessee state RLA and math standards, RTI^2 provides the needed support for students through interventions to ensure that all students receive the support they require.

Coordination with Early Childhood Education

For younger students, the state revised the Tennessee Early Learning Development Standards (TN-ELDS) for children birth through age five to align with the updated state standards. The four-year-old standards are aligned directly with the standards in the areas of literacy and math as well as the state standards for other content areas and developmental domains. There are not separate standards from the TN-ELDS for children birth through five with disabilities. While the TN-ELDS are divided into age range expectations, they are designed to be looked at as a continuum of developmental milestones. Therefore, while children with disabilities may not demonstrate capabilities within their age range, the TN-ELDS still reflect their level of development and indicate the next stage in the development process that is anticipated for each domain.

In Tennessee, there is collaboration among the IDEA programs as well as with voluntary pre-K and Head Start at the state level. All IDEA programs are under the same department and that enhances

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coordination of activities. There is federal technical assistance available and opportunities to capitalize on resources that other states develop to promote improvement within the Tennessee.

Despite this coordination at the state level, Tennessee's lack of universal pre-K means that preschool age children are in a variety of settings and most are not within an LEA's purview. This fragmented system places children in care that operates under different requirements. Those agencies licensed by the Department of Human Service are under the Quality Rating and Improvement System (QRIS) and receive intensive monitoring throughout the year as well as an evaluation indicating the overall quality of the program. The agencies use this information to make ongoing improvements. The DHS shares those evaluations with the public to inform parental choice. Agencies certified by the Department of Education do not fall under the parameters of the QRIS.

Personnel Standards

The state has licensure, evaluation, and professional development requirements for all personnel. The state board approved changes to special education licensure that will go into effect on September 1, 2015. Special education licenses will fall into four categories:

- Preschool/Early Childhood/Pre-K-3,
- Interventionist/K-8,
- Interventionist/6-12, or
- Comprehensive/K-12.

Interventionists typically serve students with mild or moderate disabilities and the redesigned license reflects the state's belief that special educators should provide the most intensive interventions. The state worked closely with higher education teacher preparation programs during the process of updating licenses to ensure that Tennessee has a steady supply of qualified special education teachers. For preschool students, 619 special education lead teachers must have an endorsement from one of several categories. The department monitors each LEA preschool classroom as a part of an annual certification process. During those visits, the evaluators confirm personnel information as part of meeting the certification checklist requirements.

There are three primary components to educator evaluation: observation, achievement, and growth. The observation rubrics outline expectations related to instruction, while the quantitative portions of evaluation use student outcome data to establish performance. All educators are evaluated every year. In 2012, legislation allowed individual teacher growth score calculations to include SWD. In that way, the state could identify and reward teachers who effectively grew their SWD. Additionally, administrators committed to using the same rubric for general and special education teachers to ensure consistent quality of instructional practice. The quality standards set a clear, high expectation for the quality of education a SWD should experience and tie teacher performance to meeting those expectations for all students, including SWD. Thus far, special education teachers in Tennessee have earned growth scores that are much lower than general education teachers. This issue of personnel quality is further discussed in the Comprehensive Improvement Strategies section in terms of root causes.

Professional Development

Several divisions within the department have undertaken intensive, broad-scale professional development work over the past three years. The C&I division has provided no-cost training to support teachers in grades pre-K through 12 in deepening their understanding of the expectations of state standards; approximately 60,000 teachers have participated total between summer trainings in 2012, 2013, and 2014. In these peer-led trainings, teachers learned from and worked with other teachers in their regions. In addition to teacher training, the department has offered optional courses for principals

and school leaders in a similarly peer-led learning process. Ninety Tennessee school and LEA leaders selected as Leadership Coaches co-created the content of these courses.

In terms of special education, the state has offered professional development to all school psychologists on the RTI^2 framework and eligibility standards and special education teachers on the Special Education Framework. In summer 2014, Special Populations offered trainings to special education teachers, special education supervisors, related service providers, and school psychologists. The table below indicates the number of participants by region or district.

Location	Total
First TN	103
East TN	361
Middle TN	473
West TN	411
Shelby County	550
Metro Nashville	235
Knox County	145
Hamilton County	180
GRAND TOTAL	**2,458**

Beyond the summer 2014 trainings, the department has trained over 2,500 school psychologists to date on best practices from linking interventions to areas of reading deficit to identifying students with a Specific Learning Disability using RTI^2. The state identified LEAs with inappropriate policies, practices, or procedures that resulted in disproportionality and required specific activities for those LEAs as well. Professional development may be specific to an LEA or it may be based on the needs of LEAs within a region. Finally, LEAs may make requests for state-delivered professional development based on needs; this professional development might entail presentations or discussions at teacher in-service trainings, staff retreats, or regional conferences.

Leveraging and Improving Professional Development

The state will continue to move forward with a focus on identifying and aligning professional development opportunities based on LEA needs. The department must reach a broad scope of professionals to offer concrete guidance and training on new initiatives, policies, or areas of concern and disseminate a consistent message. The department can leverage data to target specific LEA needs through, for example, tracking implementation fidelity and supporting areas of weakness. The state can also provide guidance for LEAs on how to leverage their own fiscal and human resources to implement strong core instruction for all students in the LRE and to provide interventions aligned to areas of deficit for SWD. Special Populations will further its work with C&I and CORE to provide aligned regional support for all of the aforementioned activities. The Advisory Council for the Education of Students with Disabilities, crucial stakeholders and partners of the division, also emphasized the importance of timely, high-quality professional development.

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Data Systems

The state provides a variety of data to school LEAs to support state initiatives to improve results for SWD.

- As of 2012-13, changes in state law allowed the department to begin including data on SWD in the state's growth calculations (Tennessee's Value-Added Assessment System (TVAAS)) for teachers, schools, and LEAs.
- The state has also phased out the Modified Assessment of Academic Standards (MAAS) over the last few years which has allowed for inclusion of data on additional students with disabilities in both TVAAS and teacher, school, and LEA accountability.
- All of the state's data on assessment and accountability disaggregates for SWD in order to make this population a focus within TVAAS reporting. The Data and Research division generates these calculations in conjunction with external assessment and analysis vendors.

The Special Populations division also has strong internal capacity for data support through the Data Services team. The Data Services team typically assists with the development and implementation of state initiatives for SWD by providing data that evince the need for new policies or the revision of current policies and practices. An example of data-driven policymaking is the statewide Instructionally Appropriate IEP (IAIEP) initiative. Analysis of standards-based short-term objectives in the IEP management system revealed that school personnel used drop-down menus to provide "canned" goals for many students rather than creating individualized goals that specifically addressed student areas of deficit. This discovery contributed to the IAIEP initiative, the removal of short-term objectives, and the development of measurable annual goals predicated on students' present levels of educational performance. EasyIEP, the statewide IEP data management system, will allow the state to monitor implementation fidelity for IAIEP as well as for other initiatives like RTI^2.

The IDEA Part B and Part C staff work within Special Populations and in concert to provide data as necessary and engage in discussions about student needs and outcomes. The information for students in birth to three programs (Part C) transfers to the statewide EasyIEP system when students turn three in order to retain their records, disability categories, and service requirements. Information for students enrolled in IDEA 619 Preschool is also housed in EasyIEP for ease of data collection and reporting. In addition, a statewide longitudinal system tracks SWD after graduation to monitor post-secondary outcomes.

The division expects that LEAs will measure the results of initiatives and policies; the state monitors the results as well. Local Education Agencies and the division can use EasyIEP to sample IEPs for SWD to ensure that LEAs are employing IAIEP practices in the writing of these plans. The division has provided training on IAIEP material, sample IEPs, and guidance documents. With regard to RTI^2, the division has provided tracking logs for initial evaluations to help LEAs take a longitudinal look at how many students are referred for each disability category throughout the school year.

Strengths

- State support both at the main office in Nashville and the regional offices represents a strength for LEA support in Tennessee.
    - The Data Services team routinely presents at conferences and offers webinars to LEAs to provide instructions on how to download data reports in EasyIEP and evaluate the outputs of those reports.
    - In addition, each CORE office has a data analyst trained in all assessment and accountability data. The analysts work with LEAs to analyze data and plan for areas of focus. The state's district support staff work to support Focus Schools including those

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identified for large gaps between SWD and students who do not have demonstrated disabilities.

- As one of a few states with a statewide IEP data management system, Tennessee is in an advantageous position in that the state can provide guidance for all LEAs through the same presentations, webinars, and informational materials. The large EasyIEP system that tracks statewide data allows for more clean and consistent data on SWD and provides the opportunity to run statewide reports from one constant source. The ability for both LEAs and the state to run reports in this data system is extremely beneficial and allows all parties to track results relative to new initiatives and policies.
- The Special Populations data team presents at conferences for federal programs supervisors, attendance managers, superintendents, special education supervisors, and other LEA-level leadership to ensure consistent messaging across the state.
- The state works with a Technical Advisory Committee (TAC) and assessment vendors to ensure year to year validity and reliability. There is an expert on students with disabilities and other special populations on Tennessee's TAC.

Challenges

- While the state would like to ensure that ongoing, thorough data analysis occurs in all LEAs, professionals throughout the state are not always proficient with running and evaluating reports and using programs like Excel to study data and that can present challenges for in-depth data analysis at the LEA level.
- It is likely that in most small LEAs, the regional data analyst provides the sole support, whereas large LEAs are able to retain data analysts on staff.
- At a more basic level, all data systems have occasional problems; data incorrectly relaying between the statewide student information system (EIS), EasyIEP, and LEA SISs is a pervasive problem and can have a negative effect on the validity and reliability of the data. The state is always working to improve timeliness and access to data.

Leveraging and Improving Data Systems

The breadth of student information in the data systems offers great opportunity to improve results for SWD. The department can utilize demographics data, exiting information, disability information, discipline incidents, economic status, and more to study the results of SWD and work toward improving the outcomes of these students. Beyond Special Populations, the Office of Research and Policy regularly use data that exist within the state-level data systems in their work and analysis.

There are upcoming opportunities to improve data systems. LEAs adopted five new SISs this year leading to a prolonged period when the SISs did not correctly transfer student data to EIS and EasyIEP. These issues should improve in the future as the systems update their programs in an effort to ameliorate this error. Attendance monitors addressed their vendors at the Attendance Conference in September 2014 to identify issues specifically affecting their LEAs and SISs.

Technical Assistance

LEA Selection and Support

The department selects LEAs for technical assistance through multiple methods.

- LEAs may request technical assistance and reach out to the state to provide training, speak at in-service events, or present at conferences.
- The division has also utilized surveys to determine the LEAs' levels of readiness to implement RTI^2 and have provided relevant support.

- Further, the state requires LEAs with the APR local determination of "needs intervention" to receive technical assistance.

For the 2012-13 SY determinations, the state will have cursory phone calls with 15 "needs intervention" LEAs to determine areas of need, look at root cause analysis of problem areas, and assess whether current improvement activities delineated in programs like ePlan are actually addressing areas of concern. This initial call determines the level of technical assistance the LEAs will need and how the state will develop an improvement plan in conjunction with the LEA. One of the crucial steps in the improvement plan is typically having the state staff visit the LEA to provide direct training and guidance with regard to their data analysis. The department will continue following up with "needs intervention" LEAs as they work through their improvement plan and will serve as a consistent resource for any questions or concerns. As much as possible, the state re-evaluates data for these LEAs throughout the year to ascertain whether or not the LEA is making appropriate progress. Staff will encourage these LEAs to continue seeking professional development for all employees and technical assistance when needed. At this time, coaching does not involve fidelity of improvement strategies. The CORE offices are beginning to consider special education issues and SWD outcomes in their annual goals but the process is still in initial stages of implementation.

Leveraging and Improving Technical Assistance

Direct support and guidance to LEAs most in need based on APR results can help those furthest behind start the process of catching up and improving the outcomes of their students. The state will continue reaching out to these districts in greatest need and addressing areas of concern or deficit to ensure opportunities for improving results. Data-driven decision-making determines whether LEAs that are struggling are aligned with statewide initiatives and that the division addresses those state priorities when providing technical assistance. More assistance from untapped resources like CORE offices to disseminate support and guidance to LEAs will increase internal capacity and allow more LEAs to get the direct technical assistance they require to improve student outcomes. The division could also develop training content aligned to targeted areas in which multiple districts require support.

Monitoring and Accountability

The Data and Research division manages state accountability systems. Sanctions for district accountability include improvement plans and schools in the bottom five percent of the state become eligible for state takeover. The state labels schools with large achievement gaps or low subgroup performance "focus schools" and those schools receive various interventions. The top schools for achievement and growth earn recognition as reward schools. Schools and LEAs are held accountable for SWD as a subgroup and the state expects LEAs to meet targets set for SWD. LEAs that are not contributing to improved SWD outcomes are considered in need of subgroup improvement and submit improvement plans. The state can also identify focus schools that have large achievement gaps for SWD.[5]

The CPM division leads monitoring efforts relative to both ESEA and IDEA. Their comprehensive monitoring plan includes a proportionate number of IEP file reviews for every LEA in the state. The department offers technical assistance based on the results of those findings with Special Populations and CPM sharing responsibility for the delivery of content. As a proactive means of monitoring and

[5] List of priority, focus, and reward schools for the 2013-14 SY: http://www.tn.gov/education/data/accountability/schools_2014.shtml. District designations of exemplary, in need of improvement, and in need of subgroup improvement: http://www.tn.gov/education/data/accountability/index.shtml.

offering targeted technical assistance, CPM also conducts a Risk Assessment that examines key indicators of ESEA and IDEA for every LEA. Districts with the highest risk will have Results-Based Monitoring that includes RTI² while districts with specific areas of concern may have an Effectiveness and Compliance Monitoring that could include RTI² if necessary. Again, the results of this assessment are shared between divisions, and the responsibility of providing technical support depends upon the nature of the findings.

Strengths

- One of four pillars of the department's strategic plan is expanding public access to data. The department has a serious commitment to providing accessible, comprehensive data for public use and academic research and a strength is that the state shares data and accountability decisions in a timely, transparent manner.
- Consolidated Planning and Monitoring has the complementary goals of providing ePlan support and technical assistance to LEAs, streamlining processes and aligning resources through consolidated planning and funding application processes, and monitoring programs for compliance and fidelity of implementation.
- Consolidated Planning and Monitoring has implemented a new results-based monitoring process that: shifts the focus from compliance to program effectiveness; encourages collaborative conversations around LEA programs; provides a better understanding of LEA successes and challenges; is based on factors that influence student outcomes; combines IDEA and ESEA monitoring items; adds an Improvement Plan focused on suggested strategies to increase student outcomes; and includes a Compliance Action Plan. All divisions have the unified focus on improving outcomes for students. This collaboration and cohesive vision represents another strength for the department.

Challenges

- The department has limited capacity in terms of personnel and cannot provide assistance to every LEA that may desire or need it.
- The department, CORE offices, and LEAs are all in transition due to the changing special education policies around RTI², IAIEP, and the new Special Education Framework and many LEAs look to the state for support and clarity. Divisions prioritize LEAs to ensure that those most in need of technical assistance or on-site monitoring receive that assistance. The CPM division's newly-developed risk assessment tool will facilitate the identification of LEAs for monitoring.
- CORE offices will continue to grow into their role of regional support for special education as well.

Leveraging and Improving Monitoring and Accountability Systems

To best leverage monitoring and accountability systems, the state plans to move away from a focus on achievement gaps to an emphasis on realistic, feasible, rigorous, ambitious achievement goals. The division will leverage data gathered through the accountability and monitoring processes to inform technical assistance and professional development as well as LEA and state goals. In the future, the department could include a reward component for schools that are achieving particularly strong scores or growth with the SWD subgroup and identify other ways that students can improve beyond scoring Proficient or Advanced on an achievement test. It will be important for the department to track student progress as the state moves to implement new policies that affect special education in order to identify best practices and products and track implementation fidelity. Stakeholders from the Advisory Council

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for the Education of Students with Disabilities identified rigorous monitoring as an area for continued growth, indicating the importance of monitoring to a broad coalition across the state.

The Tennessee Department of Education stands ready to support the work of Special Populations and LEAs to improve outcomes for students with disabilities. Leaders from almost every division contributed to this infrastructure analysis and identified numerous areas in which their divisions' work aligns with the major initiatives of Special Populations. Stakeholders from the Advisory Council for the Education of Students with Disabilities represent the perspectives of a variety of stakeholders and their feedback on the infrastructure analysis echoed concerns of department staff in terms of areas for improvement. The infrastructure analysis provided a valuable opportunity for Special Populations to look more globally at department initiatives that align with and support the important work of increasing opportunities and improving outcomes for students with disabilities in Tennessee.

State-Identified Measurable Result (SIMR)

As a result of the data and infrastructure analyses, the Tennessee Department of Education has determined its state-identified measurable result will be to increase the percentage of students with Specific Learning Disabilities that score at least Basic on the state achievement test for grades 3-8 in Reading Language Arts. The department will support efforts designed to increase the number of SLD students scoring at least Basic and target an annual increase of three percent per year from the baseline score percentage. As shown below, this rate of improvement constitutes an ambitious yet achievable goal that will ultimately raise the percentage of students with SLD scoring Basic or higher by 15 percent over the following five years.

Baseline Data and Targets

FFY	Percent of Students with an SLD At or Above Basic
2013 (Baseline)	67.33
2014	70.33
2015	73.33
2016	76.33
2017	79.33
2018	82.33

The state has chosen to focus on students with an SLD for several reasons. As noted in the data analysis, students with an SLD have rates of proficiency that are unacceptably low for students with a non-cognitive impairment. Second, students with an SLD are the largest subset of students with disabilities in Tennessee and represented 52.86 percent of all SWD in grades 3-8 who took the Reading Language Arts achievement assessment in FFY 2013. In FFY 2013, 13,105 of 19,465 students with an SLD scored Basic or higher. That represents 67.33 percent of students with an SLD who took the Reading Language Arts assessment and 35.59 percent of all SWD who took that assessment in Tennessee. Raising the number of students with an SLD who score at least Basic would therefore improve results on Reading Language Arts assessments in the designated grades statewide.

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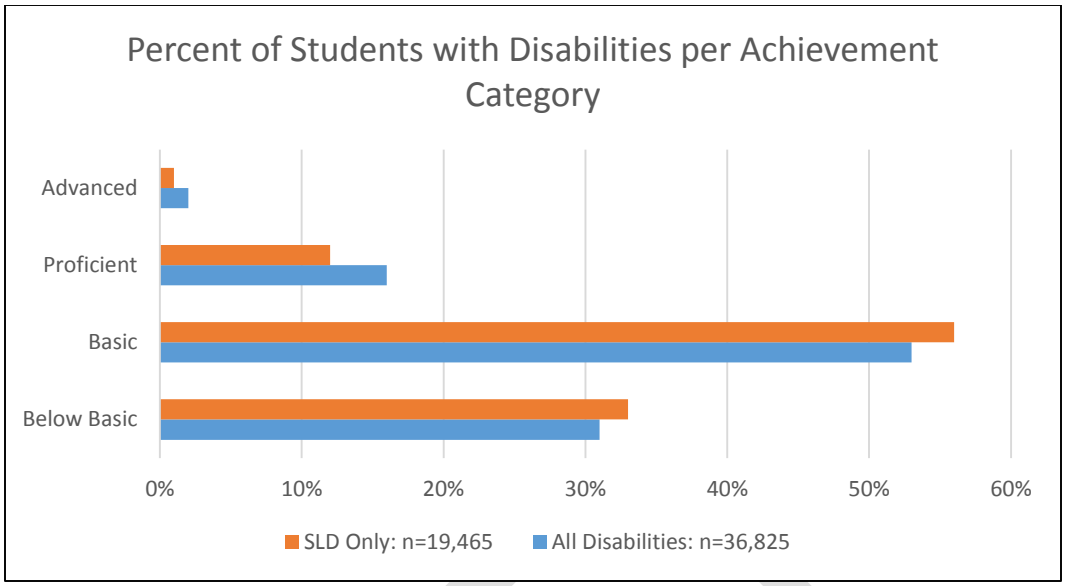

Furthermore, as the detailed score analysis below indicates, most students with an SLD currently score high Below Basic. The detailed score analysis in the data analysis section included all students with disabilities and categorized the students based on whether their scores were at the low end, in the middle of, or at the high end of each achievement category. Students with an SLD that scored High Below Basic are on the cusp of scoring Basic; improving their outcomes so that they move out of Below Basic and into Basic and beyond is an achievable, realistic goal.

Detailed Score Analysis for Students with Specific Learning Disabilities

	Low	Middle	High
Below Basic	**1.81%**	**4.91%**	**25.95%**
Basic	**21.06%**	**19.70%**	**14.59%**
Proficient	**7.62%**	**2.95%**	**1.04%**
Advanced	**0.33%**	**0.03%**	**0.01%**

In addition to the data analysis noted above, the infrastructure analysis also shaped the final selection of this SIMR. The Special Populations division, in conjunction with C&I, is in the process of implementing several policies and procedures that are designed to improve outcomes for all SWDs and are likely to be particularly effective for students with an SLD.

- Response to Instruction and Intervention, RTI^2, is ideal for meeting the needs of students with reading and math skills gaps even before special education referral and may reduce the number of students identified with an SLD in the state.
- The revised Special Education Framework, a statewide manual for providing special education services, focuses on tiered interventions designed on Instructionally Appropriate IEPs.
- Increased access to rigorous core instruction underpins all additional support and interventions. Selecting a SIMR that both supports and provides an added level of accountability and priority to these recently-implemented initiatives will benefit implementation and, ultimately, student outcomes.

The department firmly believes that these initiatives will have a broadly positive effect on all students with disabilities. A rising tide lifts all boats, and strategies that have particularly strong effects

on students with SLD will also benefit students with other disabilities as demonstrated on improved outcome measures.

Alignment to the SPP/APR

The identified SIMR aligns with Indicator 3 on the APR. The SIMR is predicated on the achievement results from Reading Language Arts assessments in grades 3-8 for students with an SLD. Indicator 3 is not limited to students with an SLD. Section C does focus particularly on achievement results for both Math and Reading Language Arts in the 3-8 grade bands. By increasing the number of students with an SLD scoring Basic or higher, there is an opportunity to see growth and improvement in the overall proficiency rate specified in Indicator 3, section C. Specifically, students with an SLD make up almost half of the SWD population participating on the achievement tests, so their improved achievement outcomes certainly can have powerful implications on rates of all students with disabilities scoring at or above proficient on grade level standards.

Stakeholder Involvement in SIMR Selection

As noted in the Data Analysis and Infrastructure Analysis sections, the department solicited feedback from multiple groups of stakeholders both internally and externally in selecting and narrowing the focus of the SIMR to the grade band, subject, and subpopulation of students selected. These stakeholders included: special education supervisors across the state, the Advisory Council for the Education of Students with Disabilities, external experts from the Regional Resource Centers, and internal leadership from multiple divisions. High-level department leadership, including the Commissioner, Deputy Commissioner, Assistant Commissioner for Special Populations, and Assistant Commission for Curriculum and Instruction all met to review the data and infrastructure analyses and came to a consensus around this SIMR. Special Populations personnel presented the SIMR, potential strategies, and the theory of action to an audience of special education teachers and leaders from across the state at the annual Partners in Education (PIE) conference in January 2015 and will present it at the Advisory Council's April 2015 meeting.

Coherent Improvement Strategies

Selection Process

Tennessee has placed an emphasis on selecting strategies that are not only likely to positively affect student outcomes but also are realistic based on current and projected infrastructure at the state and local levels. The data analysis showed the need to focus on students with SLD due to the percentage of the overall population of students with disabilities (SWD) that they comprise and their low performance in the target area of Grades 3-8 reading/language arts. The data analysis also suggested that increased time in the general education setting corresponded with higher academic achievement; thus, the state's coherent improvement strategies focus on increasing access to the core curriculum with supports of varying intensity. The strategies are: **increasing access to the least restrictive environment, providing struggling students with appropriate supports through RTI^2, and writing and implementing IAIEPs for students who are referred for special education services.**

After selecting these strategies, the state reviewed its infrastructure analysis to determine what areas will be able to contribute to carrying out these strategies and what areas will require further development before they can support implementation. Several strategies are already works-in-progress; our focus is now on ensuring coordination of these policies within an implementation science framework that will produce positive academic results for students with disabilities. The overall takeaways from each section of the infrastructure analysis are below.

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- Governance: All three strategies currently merit high-priority status for department leadership. The State Board of Education has approved policies for phased-in RTI^2 implementation between July 1, 2014 and July 1, 2016.
- Fiscal: The Consolidated Planning and Monitoring division produced guidance for districts on how to leverage federal and state funding for RTI^2-related expenses. Special Populations also plans to fund research- and skills-based progress monitoring tools for districts to use with SWD. The state, districts, and schools continue to seek increased funding to implement multi-tiered systems of support.
- Quality Standards
    - Standards for Students: Special Populations has increased its cross-team training efforts with C&I during the 2014-15 school year. Special Populations deeply values its relationship with C&I and recognizes the importance of cultivating this connection as it seeks to increase access to high-quality core instruction for SWD. Increasing general education teachers' knowledge of strategies for collaborating with special education teachers and differentiating instruction for SWD is a crucial component to the success of the state's coherent improvement strategies.
    - Standards for Teachers: The State Board of Education approved more rigorous standards for special education teachers in 2014; these changes included more courses in intensive intervention for teachers who work primarily with students with mild to moderate disabilities.
    - Standards for Leaders: The Principal Evaluation Framework now includes components evaluating a school leader's use and support of multi-tiered systems of support.
- Professional Development and Technical Assistance: The state must refine its support as it moves from initial roll-out of RTI^2 and IAIEPs from broad-scale professional development to targeted technical assistance based on district need.
- Data Systems: The state plans to track progress monitoring data for SWD through its statewide IEP data management system, EasyIEP. It will continue to track districts' rates of restrictive placement through APR determinations. The quality of IEPs will also be evaluated through the EasyIEP system, which houses all special education documents, to ensure that students' areas of deficit and need are being adequately and appropriately reflected in the present levels and goals of the IEP.
- Monitoring and Accountability: The state will consider ways to incorporate the SIMR into its ESEA flexibility waiver. It will also review the results of the first year of CPM's risk-based assessment to determine if the categories related to special education achieved the goal of identifying districts in need of more intensive monitoring and support.

This review process provided clarity around the state's needs moving forward and the resources available to support strategy implementation.

The strategies are aligned, consistent, and logically build on each other as shown visually in the Theory of Action graphics. The first and foremost strategy is to increase the number of SWD who spend 80 percent or more of their school day in the least restrictive environment. To support students who may struggle in the general education setting and who would have traditionally had to "wait to fail" under the prior discrepancy model of identifying students with an SLD, the state will continue its support for RTI^2 implementation via ongoing professional development, targeted technical assistance, and state-level program evaluation. Some struggling students may in fact close their skill gaps with interventions through RTI^2 alone and never require a referral to special education. Students with more significant skills deficits who are referred to special education through the RTI^2 process will have already had the benefit of early interventions and progress monitoring; the data from these interventions will assist special

education teachers in quickly planning more intensive interventions than those the student has already received. Finally, the shift to IAIEPs and accompanying trainings and guidance from the state focus on providing supports for students who do need special education services in the least restrictive environment that is appropriate for the student.

Addressing Root Causes

Through the data and infrastructure analyses, the state believes that the root cause of low performance for students with an SLD is a lack of access to the general education curriculum with appropriate supports. Historically, the view of special education in Tennessee was as a separate place for "other" students to go; students with disabilities were not considered first as general education students who deserved equitable access to high-quality core instruction. In 2013-14, 25 percent of students with an SLD were in the general education environment less than 80 percent of the school day. Research shows that students who spend less time learning the intended curriculum are less likely to perform well on outcome measures.[6] Based on both the research and the data analysis around LRE, it is logical that increasing the percentage of their day that students with an SLD spend engaging with the core curriculum will improve their outcomes on the reading assessments.

Research on RTI programs nationwide and in Tennessee further substantiates implementation of RTI^2 as a viable strategy for redressing the root cause of low outcomes for students with an SLD. Studies suggest that RTI can have particularly positive effects on reading outcomes, notably at early grade levels, by increasing the efficacy and intensity of interventions for at-risk students and preventing those students from experiencing chronic school failure.[7] Additionally, more recent students found that, with thoughtful adaptations from elementary programs and alignment to evidence-based literacy curricula, secondary schools can also experience benefits from RTI.[8] Several districts in Tennessee implemented RTI programs prior to the state's rollout of RTI^2 with positive results. In Lauderdale County, for example, third grade reading proficiency increased from 35.2 percent to 45.3 percent from 2012 to 2014 following RTI implementation. Based on past successes both in Tennessee and nationally, the state is confident that the coherent improvement strategies will ameliorate the root cause of low performance for students with an SLD.

Growth scores raise serious concerns about the quality of special education teachers in the state. Despite similar levels of experience and education and similar observation scores, special education teachers are much more likely than general education teachers to receive the lowest possible growth scores on a scale of one to five based on student outcomes.[9]

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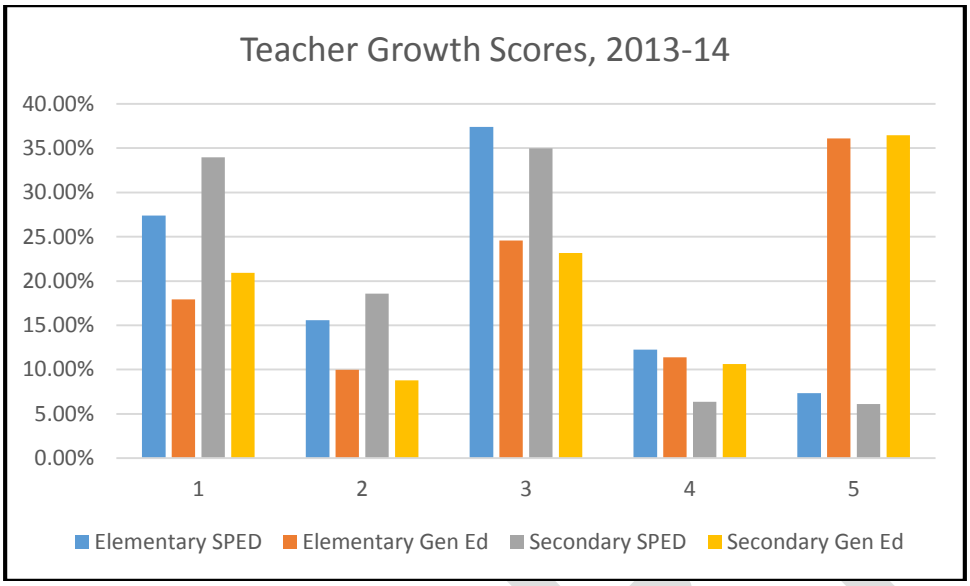
[6] Alexander Kurz, 2011, Opportunity to Learn the Intended Curriculum: Measuring Key Instructional Indicators and Examining Relations to Achievement for Students with Disabilities, http://etd.library.vanderbilt.edu/available/etd-12082011-122919/unrestricted/Kurz.pdf.

[7] Douglas Fuchs & Lynn S. Fuchs, "Introduction to Response to Intervention: What, Why, and How Valid Is It," Reading Research Quarterly, 2006.

[8] Prewett et al., "Response to Intervention in Middle Schools: Practices and Outcomes," Learning Disabilities Research and Practice, 2012; Ehren, Deschler, & Graner, "Using the Content Literacy Continuum as a Framework for Implementing RTI in Secondary Schools," Theory into Practice, 2010.

[9] More graphs about teacher quality are available in the data analysis appendix.



While students with disabilities face additional challenges when compared to general education students, they also have a higher potential to show growth.[10] Low quality of special education teachers exacerbates the problem of SWD lacking access to the LRE; not only are students missing out on the core curriculum, they are missing time with a potentially more effective educator. The department recognizes the need for continued professional development for special educators and will incorporate training in its implementation plan for coherent improvement strategies. The state has already submitted a State Personnel Development Grant that would support statewide, intensive, evidence-based teacher training programs and continues to look for further opportunities to advance our teachers' knowledge and skills.

Framework for Systemic Change at Multiple Levels

The state firmly believes that increasing the number of SWD in the general education classroom will redress years of a systemic view of special education as wholly separate from general education and will contribute to a culture shift of seeing all students as general education students first. This work will require capacity-building at the state, district, and school levels and collaboration between the Special Populations, C&I, and Teachers and Leaders divisions, among others, at the state department of education.

Recent research supports the use of intensive interventions in the framework of a multi-tiered system of support.[11] Tennessee is in the process of refining its system of support through RTI^2 interventions at the general education level and more intensive interventions through special education services via IAIEPs and the revised state Special Education Framework. The following section on effectively taking strategies to scale will address more fully how Special Populations has begun and plans to continue addressing areas of need at the state and local levels.

[10] We anticipate variability in teacher effectiveness data, particularly for special education teachers, as the state eliminated the modified state assessment, TCAP-MAAS, in 2014-15 and will transition to a new assessment aligned with college- and career-ready standards in 2015-16.

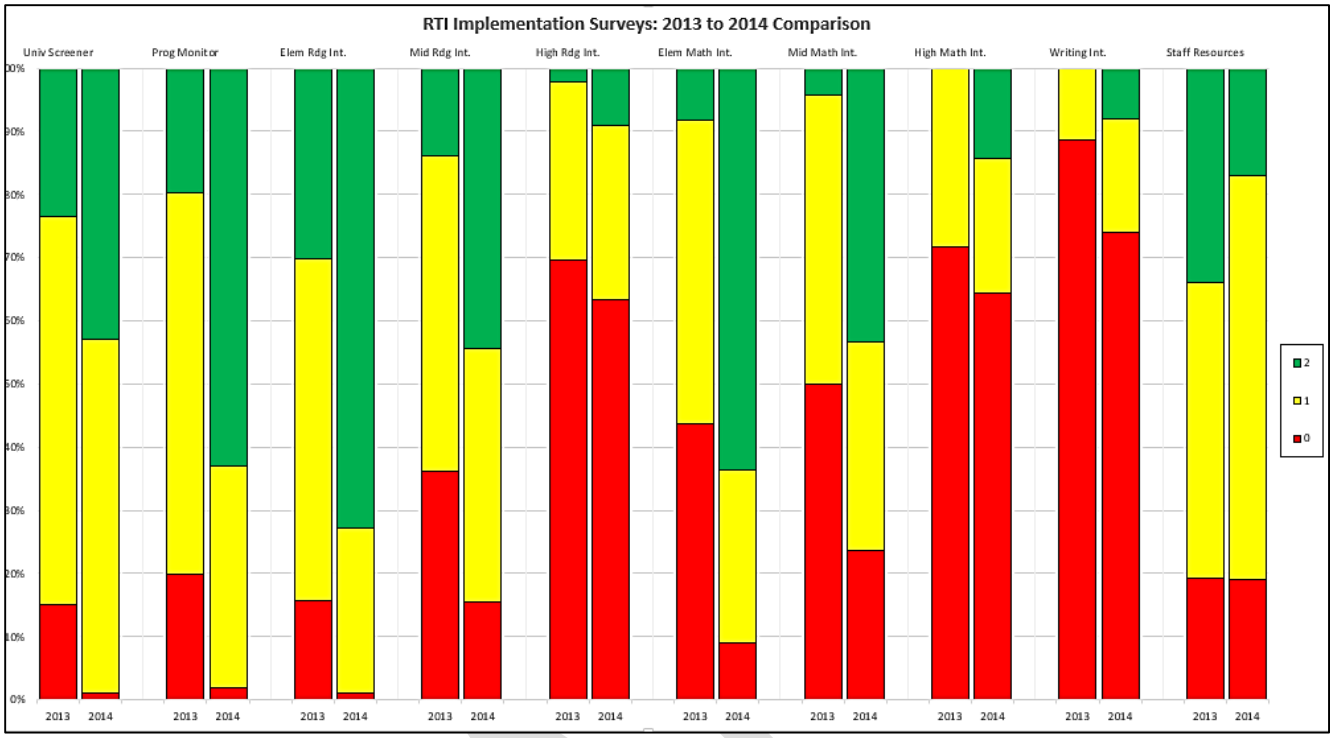
[11] NCII at AIR Implementing Intensive Intervention: Lessons Learned From the Field, Oct. 2013.

Scaling Up Effectively

The infrastructure analysis identified scaling up while maintaining quality and integrity of initiatives as an area of concern across multiple divisions of the Tennessee Department of Education. This area of focus is unsurprising given that Tennessee has implemented myriad new policies since winning Race to the Top funding in 2010 and is now in the process of supporting and monitoring program implementation across 145 districts with multiple and disparate needs. Tennessee's coherent improvement strategies comprise several recent policy shifts within the Special Populations division that are in varying stages of implementation. At the midpoint of the 2014-15 school year, the division has completed the following activities designed to scale up its improvement strategies.

- Identifying Appropriate Universal Screeners and Progress Monitoring Tools for RTI^2. Special Populations conducted an RFP process to identify three skills-based universal screeners and progress monitoring tools. Districts can choose to purchase these products at the reduced rate the state negotiated or can select alternate measures. This process was designed to use the state's capacity, expertise, and negotiating clout to save districts the time and money of having to research dozens of available products to select the best option for their students.
- Updating Functions in EasyIEP. To ease the transition to IAIEPs, the division updated the functions of EasyIEP to remove drop-down boxes with pre-populated, standards-based goals to encourage districts to develop goals specifically tailored to individual students. Guidance on language to use and ways to think through identifying measurable annual goals based on students' present levels has been provided through examples in EasyIEP within the IEP document creation process and training materials posted to the EasyIEP main menus pages for district staff.
- Annual RTI Implementation Survey. The division requested that districts complete a survey indicating their current level of preparedness for RTI^2 implementation in both the 2013-14 and 2014-15 school years. The categories include selecting a universal screener, progress monitoring tools, interventions for reading, math, and writing, and retaining adequate staff resources. The chart below shows that, in most categories, districts reported increased readiness for RTI implementation in the 2014-15 school year.[12]

[12] A larger, easier-to-view version of this chart is available in the data analysis appendix.



- State-Led Trainings. Special Populations staff have conducted professional development events in over 100 of 145 districts since the 2013-14 school year. The topics were: RTI^2 implementation including topics like scheduling and math or literacy interventions, IAIEPs, the National Center and State Collaborative (NCSC) assessment, and the Special Education Framework. The infrastructure analysis contains more specific information on the number of professionals trained at various events.

Scaling-up activities that are currently underway or are planned for the 2015-16 school year include:

- RTI^2 Reflection and Training Meetings. Special Populations and C&I are jointly conducting Reflection and Training meetings via a series of two courses: one for district leaders and staff and another for school leaders and staff. The 2014-15 courses particularly focus on middle and high school RTI^2 planning and implementation. The department is also working to identify districts with excellent RTI^2 implementation at the elementary level to spotlight their practices and to provide guidance and support to schools and districts that are struggling with their elementary RTI^2 implementation.
- State Procurement of Progress Monitoring Tool for SWD. Special Populations plans to procure one or more options for progress monitoring tools for SWD to provide to districts free of charge. This more uniform system of tracking the efficacy of interventions in special education aligns with the view of special education as the most intensive intervention as set out in the state Special Education Framework and supported through IAIEPs. The state will update the EasyIEP system to include a function that allows teachers, districts, and the state to track the results of the progress monitors in real time; this capability will have benefits ranging from a teacher's ability to show parents how a student is progressing in special education each marking period to the state using the data in the aggregate for program evaluation.
- Resources and Materials. The state shares resources, materials, and communication with districts through a variety of means. The websites www.TNCore.org and www.TNspdg.com have a plethora of resources for core instruction, RTI^2 implementation, IAIEPs, and many other topics.

The state also designed and provided training on an Early Warning System for use in high school RTI^2 implementation. Special Populations sends biweekly email updates to all special education supervisors in the state and C&I send monthly TNCore Updates to any teacher who chooses to subscribe. The department as a whole also sends weekly updates to district superintendents that include opportunities for trainings, grants, and how to access other resources. Special Populations hosts an annual conference that typically garners over 2,000 professionals from across the state. Finally, the department has a blog at www.TNClassroomChronicles.org that highlights teachers using best practices and sharing strategies. It has included posts on RTI^2 implementation and strategies for achieving high growth with SWD.

In the second phase of the SSIP, the state will go into further depth discussing activities at the state, district, and school levels that will go even further toward increasing the student outcome identified in the SIMR.

Stakeholder Involvement in Strategy Selection

Special Populations staff presented at the annual Partners in Education (PIE) conference, formerly the Special Education Conference, on January 27, 2015. At the session on the PIE conference, stakeholders such as special education teachers and supervisors and general education teachers responded to a questionnaire with their input on the SIMR and coherent improvement strategies. This group of educators, specialists, and parents affirmed that they currently struggle to help students with SLD attain proficiency in reading and engaged in a lively exchange of ideas on ways to support those students. Several school administrators from schools that serve upper elementary or middle grades noted that students come to them behind on reading without a history of interventions; statewide implementation of RTI^2 for all grades Kindergarten and above should ameliorate this issue. Finally, the majority of respondents indicated a need for greater coordination with general education teachers. One administrator commented that "many [general educators] still view differentiation as, for example, do fewer math problems rather than a variety of methods and/or content." Overall, this feedback corroborated the need for the state's selected coherent improvement strategies and provided an on-the-ground view of the challenges that teachers and administrators will require support to overcome to ultimately improve student outcomes.

There were several other opportunities for stakeholder involvement in strategy selection. The division presented information on the SIMR and options for coherent improvement strategies at the Advisory Council for the Education of Students with Disabilities meeting on January 12, 2015. A team from the state that included the Assistant Commissioner for Special Populations participated in the Mid South Regional Resource Center's SSIP Forum on January 7-8, 2015, in Louisville, Kentucky, and gleaned valuable feedback from neighboring states and from literacy experts that the RRC brought in to provide guidance. Finally, the division leadership updated the incoming education commissioner, Dr. Candice McQueen, and other senior department leadership on progress related to the SSIP and related strategies on January 13, 2015. This meeting included the Assistant Commissioner for C&I, Emily Frietag, as part of the continued effort to align special education with general education in the state.

Theory of Action

Based on the needs identified in the data and infrastructure analyses, the department believes that the theory of action outlined below will result in improvement to the SIMR through the implementation of the coherent improvement strategies. If we promote and provide for support for using RTI^2 as a method for early intervention, closing skills deficits, and changing school culture to increase access to the general education curriculum, then districts statewide will implement RTI^2 with fidelity. If districts implement RTI^2 with fidelity, then the percentage of students with SLD scoring at least Basic on Reading Language Arts assessments in third through 8th grades will increase. Further, if the

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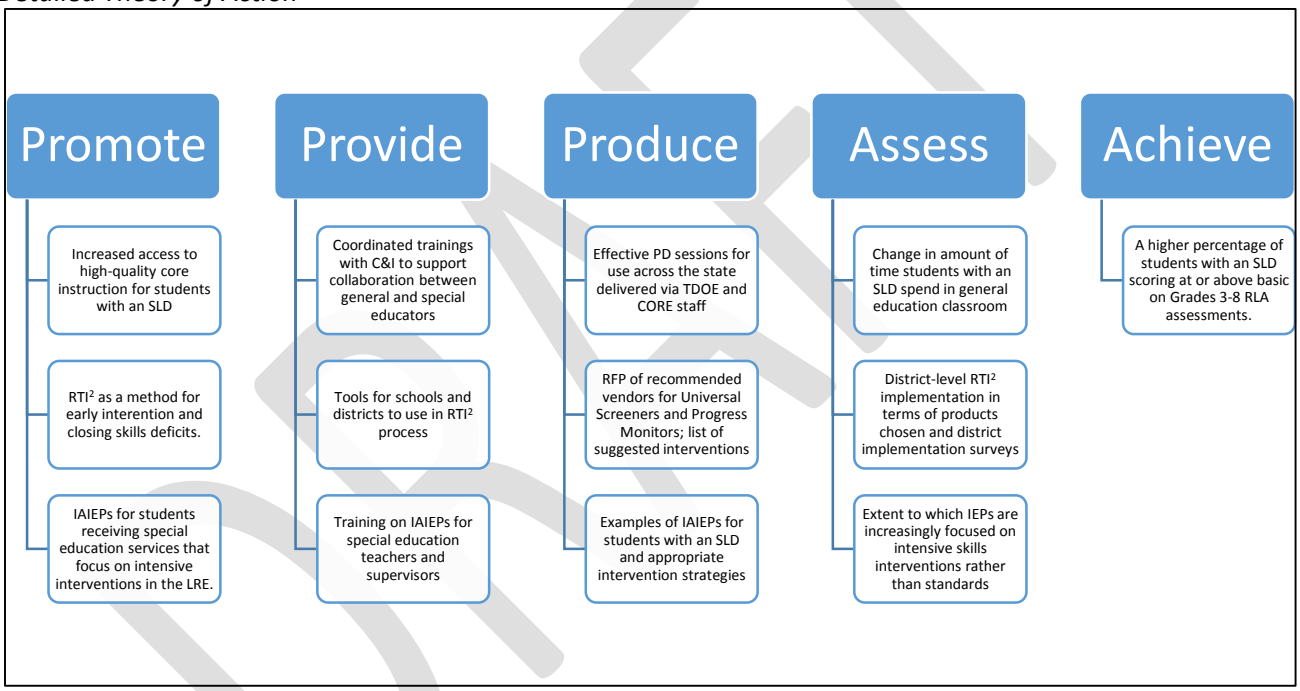
department promotes and provides support for writing IAIEPs that focus on intensive interventions in the LRE in conjunction with the state Special Education Framework, then special education supervisors will expect and special education teachers will write IEPs that are focused on intensive skills interventions. If IEPs become increasingly focused on intensive skills interventions in reading, then the percentage of students with SLD scoring at least Basic on Reading Language Arts assessments in third through 8th grades will increase.

This theory of action is the culmination of our entire SSIP process and builds on the work and feedback of stakeholders from across the department, districts and teachers, and parents and advocates as represented on the Advisory Council. The state is also grateful to the Mid South Regional Resource Center and the National Center on Intensive Intervention for their support and guidance throughout the development of this SSIP. We look forward to sharing our completed Phase I SSIP with the Advisory Council and the Tennessee Association for Administrators in Special Education in April, 2015, and working with those stakeholders to develop an approach toward Phase II.

Detailed Theory of Action



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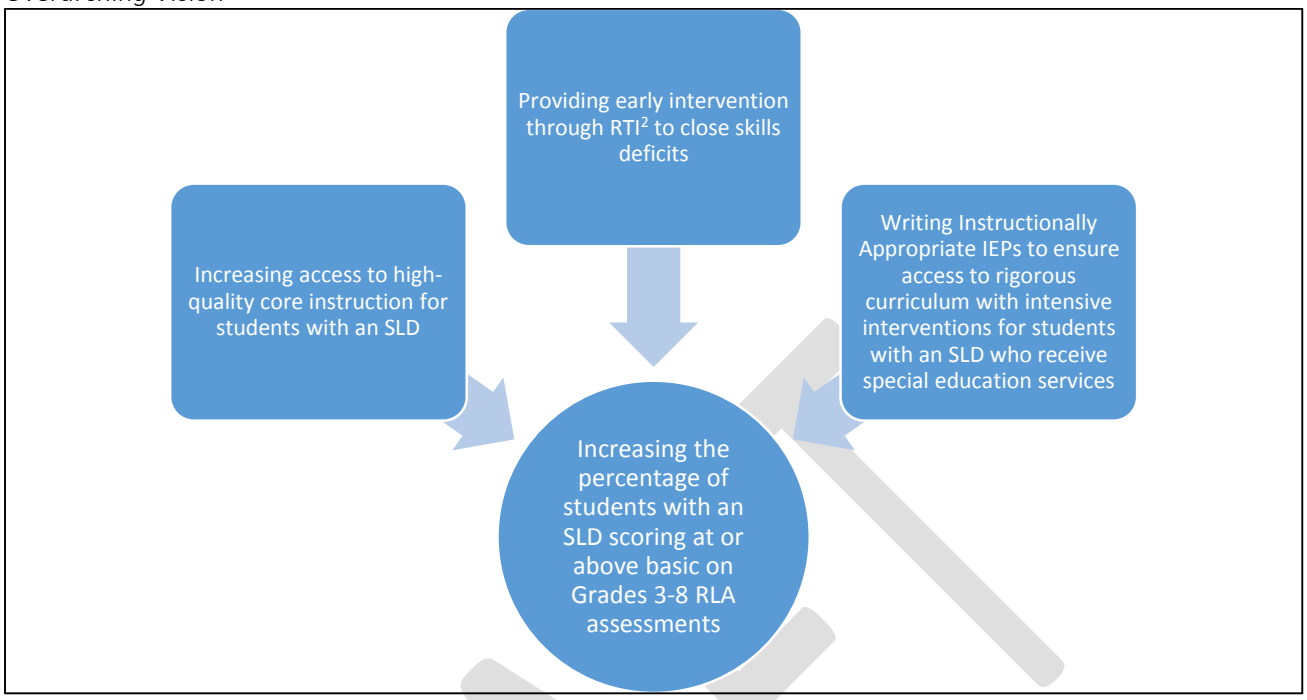
Overarching Vision



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