



STATE OF TENNESSEE
DEPARTMENT OF EDUCATION
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August 15, 2016

Ann Whalen
Delegated Authority to Perform the Function and Duties of
Assistant Secretary for Elementary and Secondary Education
Office of Elementary and Secondary Education
U. S. Department of Education
400 Maryland Way, SW
Washington, D.C. 20202

Dear Ms. Whalen:

The Tennessee Department of Education (TDOE) is requesting a Tydings waiver from the United States Department of Education for the following After School Learning Center Award Formula grants:

- CDFA/ Subprogram number 84.287C, PR/Award Number S287C120043, balance of \$721,817.40 with an award date of July 1, 2012 to September 30, 2013
- CDFA/Subprogram number 84.287C, PR/Award Number S287C130043, balance of \$458,852.99 with an award date of July 1, 2013 to September 30, 2014.

The request is made under the statutory authority for the period for obligating and expending carryover funds in the Tydings Amendment section 412(b) of the General Education Provisions Act (GEPA), 20 U.S.C. 1225(b) and in accordance with section 76.709 of the Education Department General Administrative Regulations (EDGAR), 34 C.F.R. § 76.709.

The Tennessee Department of Education (TDOE) did not expend FY 12 and FY 13 funding during the period of availability as the result of the interplay of three contributing factors:

- 1) *Extended periods of time during which vacant staff positions were not filled.*
Approximately 47% of funding budgeted for administrative costs –almost \$500,000 - for FY 12 was not expended. Similarly, 66% of funding budgeted for administrative costs in FY 13 was not expended. It was also during this period that leadership of the 21st CCLC program changed for the first time since the program's inception.

- 2) *Uncertainty regarding 21st CCLC funding.* While the funds budgeted for administrative and statewide costs could have been reallocated to subgrantees, TDOE staff were reluctant to award additional funds during this period. Sequestration discussions, the American Taxpayer Relief Act and the Bipartisan Budget Act of 2013 seemed to indicate a strong likelihood that 21st CCLC funds would be reduced going forward.
- 3) *Changes in state contracting procedures.* Finally, state procurement procedures were undergoing changes during the period when additional funds might have been allocated to existing grantees. Program staff were unable to amend grant contracts quickly enough to expend FY 12 funds during their period of availability.

Tennessee's 21st CCLC program is now fully staffed including the addition of a new grants management position. Staff are trained in contracting procedures and 21st CCLC funds are now integrated into TDOE's online consolidated grant management system.

Tennessee Succeeds is the department's strategic plan with three overarching goals:

1. Tennessee will rank in the top half of states on the National Assessment of Educational Progress (NAEP) by 2019.
2. The average composite score in Tennessee on the ACT will be 21 by 2020.
3. The majority of high school graduates from the class of 2020 will earn a postsecondary certificate, diploma, or degree.

The 21st Century Community Learning Center (CCLC) programs provide the individualized support that students need to meet these goals. The Tydings waiver will increase the capacity of programs to reach students in greatest need of support.

The TDOE is requesting to extend the period of availability for the remaining \$721,817.40 from the S287C120043 award to September 30, 2017. TDOE proposes to use these funds to increase the number of students served in high quality, afterschool programs across the state by expanding the next grant competition. The next competition will be held in January 2017. Currently, there are 11 counties in the state of Tennessee that do not receive extended learning funds either through the 21st CCLC grant or state-funded afterschool program. Priority points will be award to applicants in these counties. The additional funding will be used to eliminate maximum award limits. There will be no maximum limit of funding for qualified applications.

The TDOE is also requesting to extend the period of availability for the remaining \$458,852.99 from the S287C130043 award to September 30, 2018. The additional funding will be used to increase the capacity of subgrantees to address the non-academic factors that affect student performance such as chronic absenteeism during the regular school day. Chronically absent students are defined as individuals who miss 10% or more of the school year and includes excused and unexcused absences, expulsions and suspensions. These are also the students who are in greatest need of support services – tutoring, remediation, and counseling - that 21st CCLC programs can provide. The TDOE

is requesting to use \$300,000 of the remaining FY13 award as supplemental grants to districts with 21st CCLC programs for this work. Eligible districts will be able to use their funds to provide extended learning opportunities for chronically absent students. The eligibility criteria is discussed in the next section.

The TDOE data and research division has collected chronic absenteeism data for *every school in each district across the state*. This data will be used to prioritize the districts with 21st CCLC programs who will be eligible for additional grant funds. Eligibility will be based on the following criteria:

- the number of schools in a district with a 20% or high chronic absenteeism rate
- geographic location of the district with funds being distributed to rural, urban, and suburban districts across the state
- grade levels served with funds being distributed to districts with 20% or higher chronic absenteeism rates and across elementary, middle, and high schools.

The TDOE is requesting to use \$158,852.99 of the remaining FY13 funds to provide technical assistance to all 21st CCLC grantees around the work on chronic absenteeism. Specifically, TDOE will be able to:

- provide technical assistance to grantees on using chronic absenteeism data to identify students in need of support services during extended learning time
- provide technical assistance to grantees on identifying factors that contribute to chronic absenteeism as well as promising practices for working with these students in extended learning programs
- provide technical assistance to grantees on evaluating the effectiveness of program efforts to address chronic absenteeism during extended learning time.

Technical assistance will be provided through internal and external partnerships. Chronic absenteeism data has already been generated and disseminated to districts by the data and research team at the department. Project AWARE (Advancing Wellness and Resilience Education) is housed within the TDOE office of healthy, safe, and supportive schools and offers youth mental health first aid training. The project provides technical assistance to districts to increase awareness and to expand access to mental health services for children and families. Externally, the TDOE is working with the Tennessee Commission on Children and Youth (TCCY) to link the Adverse Childhood Experiences (ACES) research to the problem of chronic absenteeism across the state. TCCY has developed the Frameworks Children's Mental Health Tennessee Toolkit. The TDOE will work with TCCY and Project Aware to provide training to 21st CCLC program staff across the state. The University of Tennessee Social Work Office of Research and Public Service (SWORPS) is the contracted vendor to provide data collection and evaluation services.

All requested funds will be used to support activities that occur during extended learning time and only with districts that receive 21st funds.

Prior to submitting this waiver request, the TDOE provided all 21st CCLC subgrantees in the State with notice and a reasonable opportunity to comment on this request. The TDOE provided such opportunity by including the notice in the weekly Commissioner's Update and posting on the TDOE website (see copy of notice attached). All project directors were notified of the request via email. Copies of all comments that the TDOE received from subgrantees in response to this notice are attached. The TDOE has also provided notice and information regarding this waiver request to the public in the manner in which the SEA customarily provides such notice and information to the public (see attached copy of SEA's public notice).

Please feel free to contact Janell Wood by telephone at 615-770-6810, or e-mail at Janell.Wood@tn.gov, if you have any questions regarding this request.

Thank you for your consideration.

Sincerely,

Dr. Candice McQueen, Ph.D.
Commissioner

JW

enclosure