

To: Directors of Schools  
From: Nakia Towns, assistant commissioner for data and research  
Date: July 22, 2015  
Subject: **Defining Economically Disadvantaged Subgroup for Accountability**

The purpose of this memo is to inform districts of the method the department will use to define economically disadvantaged (ED) for purposes of identifying student subgroups for district and school accountability in 2015-16. Please share this memo with your nutrition, SIS/attendance, and testing coordinators; it is critical that they are aware of this update.

The change outlined below will only impact the definition of ED for purposes of school and district accountability. *Also, please note that this revision does not impact the way the state defines poverty and/or ED status for purposes of finance (e.g. BEP or Title I funding) or any other function. Any such changes require legislative action and are not addressed in this memo.*

### **Community Eligibility Provision Background**

Beginning in the 2014-15 school year, qualifying Tennessee schools and districts had the option to participate in the Community Eligibility Provision (CEP). CEP is a universal meal plan under the National School Lunch Program (NSLP) that permits eligible districts and schools to provide meal service to all students at no charge, regardless of economic status (*Section 104a of the Healthy, Hunger-Free Kids Act*). In 2014-15, this program allowed the state to serve 4,964,743 more meals than in the previous school year. It also presented an opportunity to rethink the way the department defines our ED subgroup because it resulted in a change in the information-collection process.

Schools and districts participating in CEP are not required to collect United States Department of Agriculture (USDA) household income eligibility applications. In order to maintain the definition of ED in 2014-15, the state created and implemented a process to collect state household income surveys in CEP schools and districts. The state will continue to collect the state survey forms in CEP schools and districts in 2015-16 for purposes other than accountability, which primarily include district and school level funding. However, for accountability purposes the state will no longer use information collected on the state household income survey forms.

### **Rationale for Change to ED Subgroup for Accountability**

The 2015-16 school-year presents the ideal time to make this change to the ED definition with the transition to a new assessment and updated district accountability framework. As you know, in the 2015-16 school year, the state will begin administering a new TCAP assessment for English language arts and mathematics called TNReady. The assessment transition will allow us to establish a new baseline for student performance, which means that comparisons to prior performance will not be appropriate. There will be no AMO targets set for student subgroups based on 2014-15 results.

Additionally, in summer 2016, the department will begin implementing a new accountability framework to assign district determinations. Under the new framework, the department will no longer use the “gap closure calculation” (comparison group *minus* subgroup *equals* gap) to evaluate the performance of historically underperforming subgroups, including ED students. With your input, the department also plans to revise the school accountability calculations that evaluate gap closure, so that the school accountability framework aligns with district accountability prior to generating the next round of focus and priority school lists. We believe these changes to assessment and accountability will ensure that the modification of the ED definition does not disadvantage any districts in the accountability process.

### **Defining Economically Disadvantaged Subgroup for Accountability in 2015-16**

For accountability purposes, the department must ensure that there is a consistent definition of ED across all districts and schools. Therefore, only students who are *directly certified*, also known as “identified students,” will be considered part of the ED subgroup for accountability. A “directly certified” student is any student eligible to receive free lunch without an application, regardless of the district or school CEP status. For more information on the direct certification definition, please see the Frequently Asked Questions (FAQ) document that accompanies this memo.

### **Changes to Student Information Systems Demographic Data Collection**

In the winter of 2015, the department worked with districts and student information system vendors to ensure that districts would have the ability to enter and send information for students directly certified through the Supplemental Nutrition Assistance Program (SNAP), those whose families participate in the Temporary Assistance for Needy Families (TANF) program, and foster certified to the Education Information System (EIS). This new field is titled “direct certification” and is now a classification in the student classification table. This classification, along with the classifications for homeless, migrant, and runaway, will be used to automatically pre-populate Code A, the code used to flag the ED subgroup, on assessments. *Please note that all other student classifications should continue to be used.* These classifications will still be used to determine economically disadvantaged counts for finance and other purposes. For more information on student classifications related to the ED accountability subgroup definition, please see the FAQ document that accompanies this memo.

The department will follow-up during the week of July 27 with more specific guidance on how to ensure the direct certified data in your student information system is entered correctly and completely, including how to use the “J” classification and other relevant classifications. The accuracy of this information is critical to ensure correct pre-population of student assessment data and quality control during student demographic data verification checks. Districts will have the first opportunity to preview Code A/B counts in EdTools during early August. Districts will then be able to continuously review and correct their demographic data for assessment purposes.

If you have questions or feedback regarding this change, please email us at [TNE.Accountability@tn.gov](mailto:TNE.Accountability@tn.gov).