

The Every Student Succeeds Act (ESSA): Understanding What it Means for Tennessee's Students

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Since the passage of the Elementary and Secondary Education Act in 1965, the federal government has implemented accountability systems designed to ensure all students receive high-quality public K–12 educational experiences. As of 2015, the United States has employed Every Student Succeeds Act (ESSA) as the federal K–12 education law, replacing No Child Left Behind (2001). ESSA includes greater state flexibility, transparency for families and communities, and a greater focus on student academic growth as well as achievement, and growth specific student groups experienced.

Under ESSA, each state develops a state plan tailored to their specific context and needs that aligns to federal requirements and guardrails. Tennessee's plan was first approved in 2017 and has been changed over time through two different processes:

- Amendments that seek to make changes that meet federal requirements
- Waivers that seek exceptions to federal requirements

A well-functioning accountability system means schools and students receive the resources they need. EdTrust-Tennessee believes that states' school accountability systems should: 1) be designed and implemented to ensure all students have access to high-quality learning experiences, 2) identify schools producing the lowest outcomes for students, and 3) provide those schools with the additional resources and supports they need to improve while also providing all schools with data that can inform resource allocation and continuous improvement efforts. In pursuit of this vision, understanding the changing intricacies of both federal and state accountability systems helps to support school improvement and ensure better opportunities for all students.

Accountability in Tennessee

Tennessee's Current System

For Tennessee, there are two parallel accountability systems — the federal school accountability system (federal system) and the state school letter grades school accountability system (state system). The federal system adheres to the standards set forth in ESSA to receive funding and is designed to monitor multiple indicators of student performance and support schools that struggle to make progress. The state system reports school performance via the A–F school letter grade that is published on the State Report Card. Ultimately, although the federal and state systems prioritize different indicators of success, they both produce a score to designate schools in need of additional support. The following graphic describes the key differences of the two systems as they currently exist in Tennessee. Information in the graphic is from a school accountability resource created by the State Collaborative on Reforming Education ([SCORE](#)).

Indicator	Federal School Accountability <i>Each indicator is scored 0-4 points</i>	State A–F School Letter Grades <i>Each indicator is scored 1-5 points</i>
Achievement	<p>One-year success rate in math and English language arts (ELA).*</p> <p>Absolute performance or improved performance (annual measurable objectives, AMOs)**</p> <p>K–8: 45%, HS: 30%</p>	<p>Grade-band success rate in math, ELA, science, and social studies.</p> <p>Absolute performance only</p> <p>K–8: 50%, HS: 50%</p>
Growth	<p>Tennessee Value-Added Assessment (TVAAS) combined literacy and numeracy composite.</p> <p>K–8: 35%, HS: 25%</p>	<p>TVAAS All Subjects composite</p> <p>K–8: 40%, HS: 30%</p>
Postsecondary Readiness	<p>Ready Graduate: On-time graduates who meet at least one of four pathways.</p> <p>Absolute performance or improved performance (AMOs)</p> <ul style="list-style-type: none"> • Score 21 ACT or 1060 SAT or higher • Complete four early postsecondary opportunities (EPSOs) • Complete two EPSOs and earn an industry credential (IC) • Complete two EPSOs and score 31+ on the Armed Services Vocational Aptitude Battery Armed Forces Qualifying Test (ASVAB AFQT) <p>K–8: NA, HS: 20%</p>	<p>College and career readiness (CCR): graduates who meet one of four criteria.</p> <p>Absolute performance only</p> <ul style="list-style-type: none"> • Score 21 ACT or 1060 SAT or higher • Earn one or more postsecondary credits or passing EPSO score • Earn a Tier 3 IC OR earn a Tier 2 IC and at least one other IC • Earn a score of 31 or higher on the ASVAB AFQT <p>K–8: NA, HS: 10%</p>
Graduation Rate	<p>Graduates who earned a regular diploma or an alternate academic diploma on time.</p> <p>Absolute performance or improved performance (AMOs)</p> <p>K–8: NA, HS: 5%</p>	<p>NA</p>
Student Engagement	<p>Chronic absenteeism.</p> <p>Absolute performance or improved performance (AMOs)</p> <p>K–8: 10%, HS: 10%</p>	<p>NA</p>

Indicator	Federal School Accountability <i>Each indicator is scored 0-4 points</i>	State A-F School Letter Grades <i>Each indicator is scored 1-5 points</i>
English Proficiency	Proficiency on the ELPA21 assessment. K-8: 10%, HS: 10%	NA
Student Group Performance	For each indicator, all students are weighted at 60% and subgroups of students (economically disadvantaged students, students with disabilities, English learners, and a combined group of Black, Hispanic, and Native American, or BHN, students) are weighted at 40% of final scores.	Growth25: TVAAS All Subjects composite for students with the bottom 25% TCAP test results. K-8: 10%, HS: 10%

*Success rate is the number of tests that meet or exceed expectations out of all valid tests. One-year success rate is used in the federal achievement indicator each year, whereas multiyear success rate (up to three years) is used to determine priority and focus school determinations. In the A-F school letter grade system, success rate is measured across 3-5, 6-8, and 9-12 grade bands.

**Absolute performance is actual performance relative to the state. AMOs, or annual measurable objectives, are performance targets based on prior year results that expect schools to reduce the underperforming share of students by half within eight years. The measure with better outcomes is used for accountability purposes.

Source: Tennessee Department of Education (TDOE) 2024-25 Federal Accountability Protocol and School Letter Grade Protocol

Ultimately, the purpose of designating schools as CSI, TSI, or ATSI via the federal system, which we call Priority and Focus schools in Tennessee, is so additional supports are funneled as needed. This commonly is known as school improvement. Historically, school improvement in Tennessee has meant underperforming schools were controlled by the state as part of the Achievement School District (ASD) where a charter network implemented strategies intent on improving performance. After over ten years, the ASD is sunsetting with the last two schools returning to local control at the end of the current school year. Earlier in 2025, Tennessee passed legislation to adopt a tiered approach where schools that underperform at lower tiers would receive additional funding, technical assistance, and/or intervention and those in a higher tier or continuing to underperform could face school closure. As the new tiered system is being implemented next school year, we hope there will be greater clarity on exit criteria for schools.

A New System

Currently, the state system puts less emphasis on student growth and does not account for the performance of specific student groups. TDOE is considering moving to a single accountability system for Tennessee based on the state system. The state system does not meet federal requirements, so it will need to be modified and/or seek to have those requirements waived. In a waiver process, the Secretary of Education (Secretary) can use her ESSA waiver authority, meaning her ability to waive certain statutory and regulatory requirements. However, there are certain provisions in ESSA that cannot be waived (see [ESSA Waiver 101](#) for a comprehensive list). For instance, civil rights requirements and the determination of LEAs for Title I funds

are “un-waive-able.” Still, ESSA is inherently flexible to states and we have seen state plans that have sought to sidestep some of these “un-waive-able” aspects. Advocates can play an important role in holding states accountable for what is included in state-submitted ESSA plans before they reach the Secretary as part of the public comment period.

Organizing Around the ESSA Waiver

While the state goes through a process to change the accountability system, there will be opportunity for input and thus a chance to advocate for equity. This public comment process is required by ESSA, and we anticipate Tennessee will offer an opportunity for public comment where organizations can submit statements reacting to the proposed ESSA plan. There may also be earlier opportunities to offer suggestions to the drafting of the revised accountability system.

While there are serious equity concerns, there are also parts of the state accountability plan that EdTrust-Tennessee views as positive improvements. Some examples include greater transparency for families, the inclusion of a college and career readiness indicator, and smaller data suppression thresholds. At the same time, we have serious concerns about the balance between achievement and growth, the inclusion of subgroup data in school determinations, and other components. All public comments are shared with the Secretary as well as a description of the comment process and how TDOE addressed the input provided. Once the waiver request is received, the Secretary will have 120 days to respond. If the waiver is rejected, TDOE will have a chance to resubmit within 60 days. If the waiver is rejected a third time, TDOE could request a hearing with the Secretary within 30 days.

Overall, collective engagement in the ESSA waiver process is urgent and will occur quickly. It is our responsibility to proactively act and stay alert to swiftly respond with input to ensure students and schools receive the resources they need to succeed.