



OFFICE OF RESEARCH AND EDUCATION ACCOUNTABILITY

**REVIEW OF THE TENNESSEE LITERACY SUCCESS ACT:
THIRD-YEAR IMPLEMENTATION**



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Introduction

During its 2021 Special Session on Education, the Tennessee General Assembly passed the Tennessee Literacy Success Act (TLSA), which seeks to ensure that students are on track to meet grade-level reading proficiency by the end of 3rd grade.¹

The TLSA requires school districts and charter schools to use foundational literacy skills instruction with a phonics-based approach for early reading instruction.^A Major components of the legislation include requirements for districts and charter schools to:

- administer a universal reading screener to students in grades K-3 to identify students needing additional reading support and intervention;
- use English language textbooks and instructional materials approved by the State Board of Education (SBE) and aligned with Tennessee standards, unless the district or charter school has been granted a waiver by SBE; and
- develop foundational literacy skills plans, detailing instruction time spent on aspects of core literacy instruction, additional student interventions and supports, and their use of screeners, instructional materials, and professional development for teachers. Plans must be posted on their websites and submitted for TDOE approval every three years.^B

The TLSA also requires TDOE to provide at least one professional development course on foundational literacy skills instruction at no cost for teachers in grades K-5 and provide a Tennessee universal reading screener at no cost to districts and charter schools. Earlier statutory provisions that were incorporated into TLSA also require TDOE to:

- identify schools with consistently low reading scores and assure that measures to make progress are addressed in those schools' improvement plans, and
- submit an annual early grades reading report to the House and Senate education committees.

In 2022, the General Assembly passed legislation requiring the Comptroller's Office to annually review the implementation of the TLSA and report its findings to the chairs of the Senate and House education committees and the SBE by November 1 of each year.² The Office of Research and Education Accountability (OREA) has been designated by the Comptroller to complete this annual review. This report is the third such review. A separate annual Comptroller review of district and charter school foundational literacy skills plans (FLSPs) is required by the TLSA. This report includes the review of plans that districts and charter schools submitted by July 1, 2024, as part of the state's first FLSP resubmission cycle.

Previous reviews from the Comptroller's Office and other state agencies related to statutory requirements in the TLSA are detailed later in the report.

Multiple reviews of the TLSA

- The TLSA required TDOE, SBE, and the Tennessee Higher Education Commission (THEC) to study the implementation of the act and report to the Senate and House education chairs by July 1, 2024.
- The TLSA requires the Comptroller's Office to annually review and report on (a) districts' and charter schools' foundational literacy skills plans and their approvals by TDOE and (b) the implementation of the Literacy Success Act. Both reviews are due to the Senate and House education chairs, as well as to the SBE, by November 1 each year.
- The Tennessee Reading Research Center, launched in 2022 and housed in the UT College of Education, Health, and Human Sciences, is tasked with evaluating the impact of the state's Reading 360 initiative and provisions of the TLSA, such as the effects of teachers' professional development on student achievement.

Sources: Public Chapter 3, 2021, 1st Extraordinary Session; Public Chapter 717, 2022; TDOE March 7, 2022 news release.

^A For the purposes of this report, early grades instruction includes grades kindergarten through 3rd grade.

^B Although many charter schools are part of traditional school districts, they can make independent instructional choices, such as in their selection of a universal reading screener, selection of textbooks and instructional materials, and development of literacy skills plans based on their charter status.

OREA’s 2024 review of the TLSA’s implementation included analyzing districts’ and charter schools’ updates of their foundational literacy skills plans after the first resubmission cycle, reviewing ongoing literacy instruction training available to educators, analyzing data provided by TDOE on universal reading screener results, revisiting educator preparation providers’ emphasis on foundational literacy skills standards, and reviewing the current status of the TLSA’s statutory requirements.

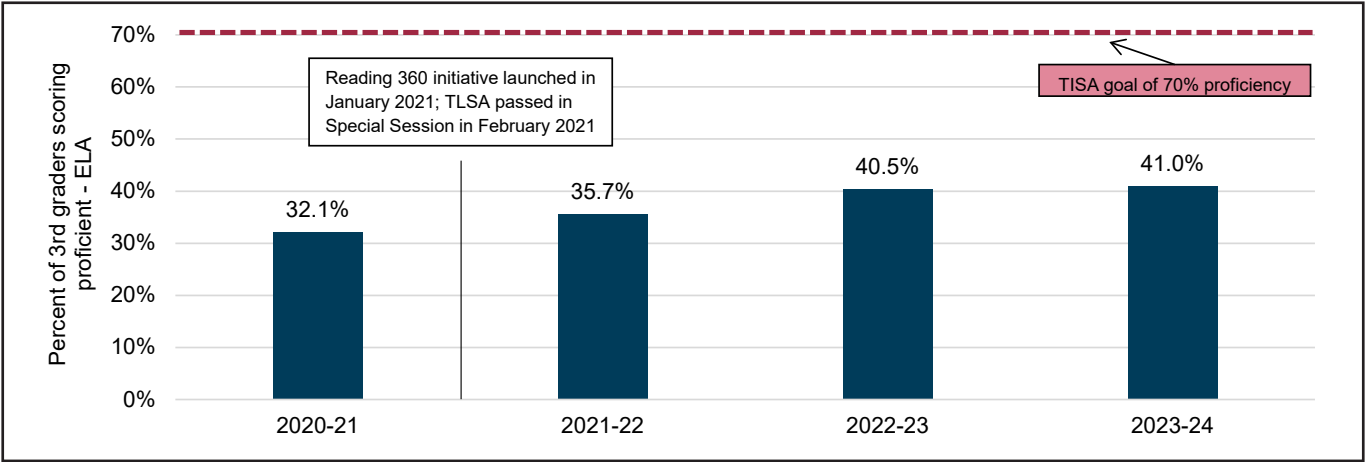
Research methods

OREA used several data sources in the development of this report. The report includes TCAP data for 3rd and 4th grade English language arts obtained from the TDOE website. OREA used universal reading screener data from TDOE and included 2023-24 results, as well as three-year trend data for two cohorts of students. For the first FLSP resubmission cycle, OREA analyzed district and charter FLSPs that were reviewed and approved by TDOE. OREA then developed a process to identify changes between a district’s or charter school’s 2024 FLSP submission and its previous FLSP submitted in either 2021, 2022 or 2023. The report also includes data on how many districts and charters made changes to each required section of their FLSP, including changes in adopted ELA curriculum, classroom instructional time for foundational literacy skills development, and more.

TCAP scores in English language arts continue to increase

The emphasis on literacy in early grades in the TLSA builds on the various efforts and programs in Tennessee to strengthen reading instruction and improve student outcomes in foundational literacy skills and reading, particularly for K-3 students. The primary measure used to assess the effectiveness of these efforts is the Tennessee Comprehensive Assessment Program (TCAP), specifically 3rd grade students’ scores on the English language arts portion of the assessment. Districts and charter schools are required by state and federal law to administer the TCAP in 3rd grade.^c (Districts and charter schools may choose to administer the ELA and math portions of the TCAP in 2nd grade, but this is not a state requirement.) The importance of 3rd grade TCAP scores are further emphasized in the state’s funding formula, Tennessee Investment in Student Achievement (TISA). The TISA law requires school districts to submit annual accountability reports addressing how the benchmark of 70 percent proficiency on the 3rd grade ELA portion of the TCAP will be met.^d

Exhibit 1: TCAP ELA proficiency rates in 3rd grade have increased over the past four years



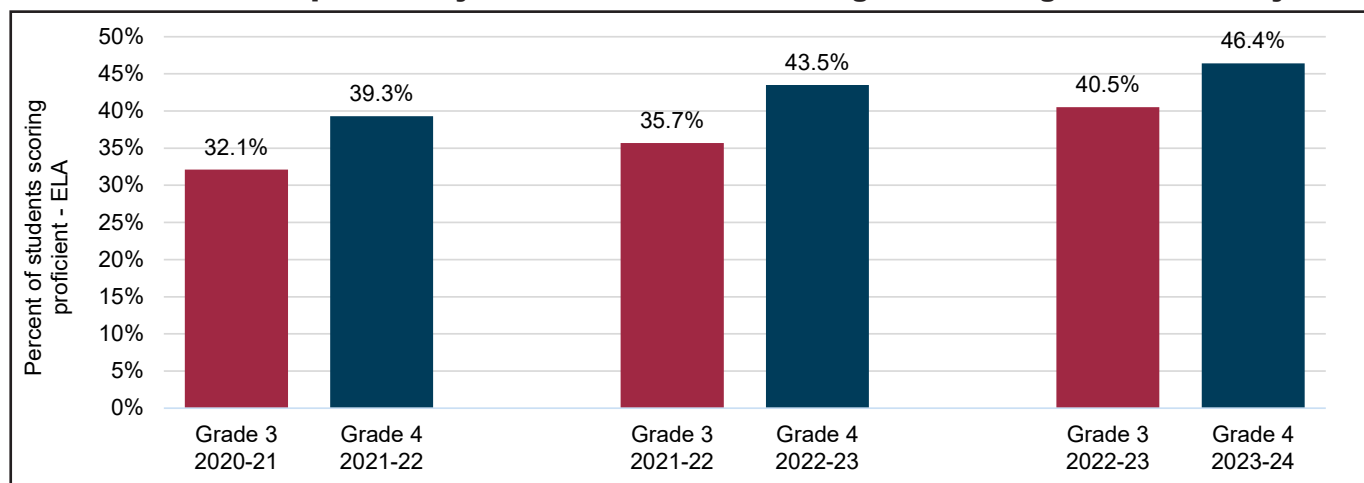
Note: Proficient scores are those that fall in the “meets” and “exceeds” grade-level expectation categories. Rates of proficiency shown above are for the ELA portion of the TCAP. Source: Tennessee Department of Education data downloads.

^c Federal law requires that states administer assessments to all students in grades 3 through 8 in English language arts (ELA) and math once a year. States are also required to administer science tests in each grade band, meaning once in grades 3 through 5, grades 6 through 8, and grades 9 through 12. In accordance with federal law, TDOE established that the 3rd grade TCAP includes ELA, math, and science sections.

^d TLSA requires that district accountability reports include a minimum goal to increase 3rd grade proficiency on the ELA portion of the TCAP to 70 percent. Districts must set their goal to incrementally increase 3rd grade proficiency to 70 percent proficient, and, at a minimum, close the gap to 70 percent proficient by at least 15 percent in three years, beginning with the results from the 2022-23 TCAP.

ELA proficiency rates in 4th grade are another important measure of Tennessee’s literacy initiatives. In Exhibit 2, 3rd and 4th grade scores on the ELA portion of the TCAP are compared from one year to the next, beginning in 2020-21. TCAP ELA scores improved from 3rd to 4th grade in each of the two-year comparisons shown. The greatest increase was for students in 3rd grade in 2021-22. TCAP ELA scores for these students were 7.8 percentage points higher on the 4th grade assessment.

Exhibit 2: TCAP ELA proficiency rates increased from 3rd grade to 4th grade in recent years



Note: Proficient scores are those that fall in the “meets” and “exceeds” grade-level expectation categories. Rates of proficiency shown above are for the ELA portion of the TCAP. Source: Tennessee Department of Education data downloads.

Universal reading screener results continue positive trends

The TLSA requires districts and charter schools to adopt a state-approved universal reading screener and administer it to their K-3 students three times per year (fall, winter, and spring) during state-determined test windows. The SBE approved seven universal reading screeners districts and charter schools may use for TLSA: aimswebPlus, DIBELS 8th edition, easyCBM, FastBridge Suite/FAST, STAR Early Literacy, Measure of Academic Progress (MAP), and i-Ready. In 2021, TDOE designated aimswebPlus, provided by NCS Pearson, Inc., as the Tennessee universal reading screener (TN URS). The TN URS is the only screener provided to districts and charter schools at no cost.

Districts and charter schools are required to note their adopted screener on their foundational literacy skills plans and must update and resubmit their plans to TDOE if there are changes to their universal reading screener. Districts may adopt multiple screeners from the approved list.

What is a universal reading screener?

A universal reading screener is a short, standardized assessment to check that students are on track in developing their early reading skills. “Universal” refers to their administration to all students in a grade level. Screeners are nationally normed, meaning a student’s results are reported relative to the performance of other students in the same grade and school year season (fall, winter, or spring). A single screener is a combination of very short subtests, each focused on a key skill. Different combinations of subtests are given to students based on their grade and school season (fall, winter, spring).

The TLSA requires that districts and charter schools be provided the Tennessee universal reading screener (TN URS) at no cost. Tennessee contracted with NCS Pearson, Inc. to make the aimswebPlus reading screener available to local districts and charter schools. Beginning in 2021, the NCS Pearson, Inc. contract was budgeted at \$2.5 million per year and covers provision of several other K-3 screeners, as well as an online reporting platform, training for district educators, and technical support.

In 2024, the state’s contract with Pearson for the TN URS was extended through June 30, 2025. TDOE indicated that federal funds will be used for fiscal year 2024-25, and then state funds will cover the cost of the state-provided screener beginning in fiscal year 2025-26.

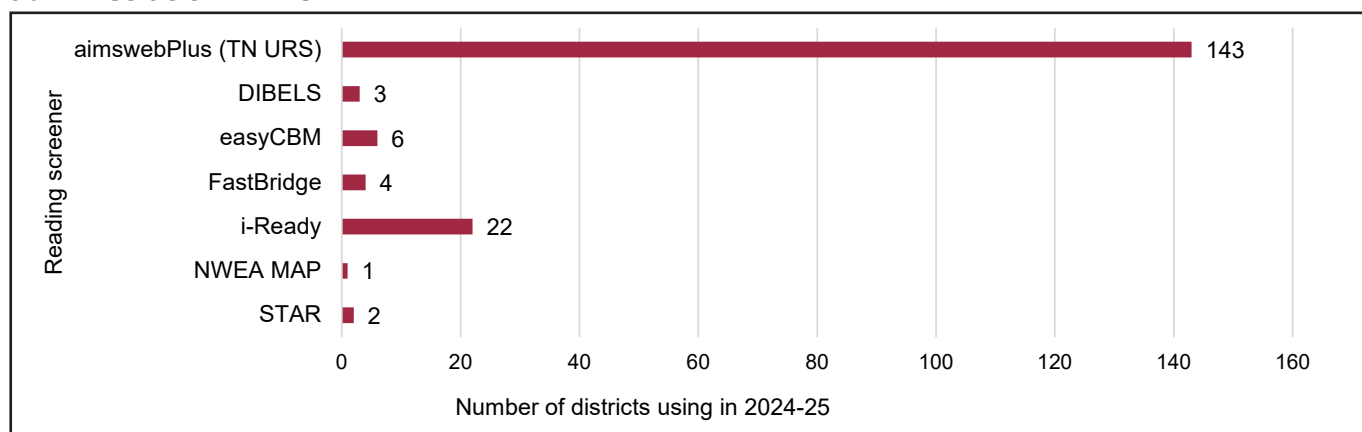
Sources: TDOE interviews, presentations, and guidelines; March 2024 contract amendment for extension with NCS Pearson, Inc.

Screeners chosen by districts and charters

For the 2024 foundational literacy skills plan (FLSP) resubmission cycle, OREA reviewed all 190 FLSPs to identify changes made to foundational literacy skills instruction, such as the universal reading screener used.^E Districts and charter schools continue to adopt the state-provided TN URS (aimswebPlus), and 98 percent of districts and charter schools serving K-3 students will use the TN URS for at least one screener administration in the 2024-25 school year.

The number of districts using the TN URS as their only K-3 screener increased from 76 districts in 2023-24 to 108 in 2024-25. Upon review of the 143 submitted district FLSPs, every district has adopted the TN URS in some capacity, whether as their primary screener or for select grades or screener administrations.^F Of the 36 districts using multiple screeners for K-3 students, most (69 percent) adopted the state-provided screener solely for 3rd grade spring screener administration.

Exhibit 3: All districts have adopted the state-provided TN URS for at least one screener administration in K-3

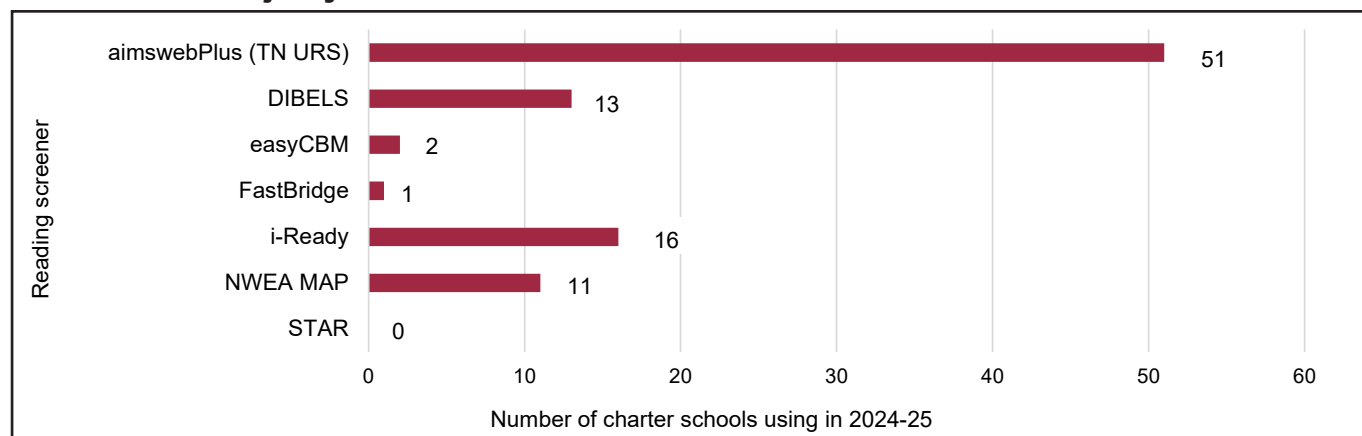


Note: The K-3 reading screener choices of the 143 districts include 181 screeners. Typically, districts using more than one screener use different screeners for different grade levels. Districts also indicated if they use multiple screeners in 3rd grade.

Source: OREA review of districts' foundational literacy skills plans through September 2024.

The number of charter schools using the TN URS has increased. For 2024-25, the state-provided screener is now the most commonly used K-3 reading screener, with 14 charters using it as their only screener and 37 using it in conjunction with another screener. In 2024-25, 51 charter schools are administering the TN URS, an increase from the nine that did so in 2023-24.^G

Exhibit 4: The majority of charter schools now use the TN URS



Note: The K-3 reading screener choices of the 57 charter schools include 94 screeners because most charter schools use multiple screeners.

Source: OREA review of charters' foundational literacy skills plans through September 2024.

^E The final FLSP was reviewed and approved by TDOE as of September 20, 2024.

^F Public Chapter 1053 (2024) established University Schools as a district beginning in 2024-25, so the total district count includes University Schools.

^G In OREA's *Review of Literacy Success Act: Second-year implementation*, two charter schools had not yet submitted their FLSP by the time of publication, so the report marked those charter screeners as "unknown." As of September 2024, the screeners used for those two charter schools in 2023-24 were identified and the rate of charters using TN URS has since been updated from seven charters (12 percent), as reported in last year's report, to nine charters (15 percent).

As of September 2024, 20 charter schools use one screener across grades K-3, which is down from last year when 52 charters administered a single screener across grades K-3. In the 51 charter schools using the state-provided screener, the screener will be used for at least one screener window (fall, winter, or spring). Thirty-five of the 51 charters indicated the screener will only be used for the spring screener window in 3rd grade.^H

Changes in 3rd grade retention policies likely impacted adopted screener

Two recent changes – one to state law and one to SBE rule – likely led to the increased use of the state-provided screener, TN URS, by districts and charter schools, whether as their primary screener or as an alternative for the spring screener window in 3rd grade.

First, the 2023 revision to the state’s 3rd grade retention and promotion law allows 3rd grade students to be promoted to 4th grade if they score at or above the 50th percentile on their most recently administered TN URS.^I For this promotion pathway, the district or charter school must also agree to provide the student with tutoring during 4th grade.

In 2024, SBE approved a rule change relative to the 3rd grade retention and promotion appeals process. SBE’s 3rd grade retention and promotion rule^J details a process called a Ground 1 appeal, by which a parent or guardian may appeal a student’s retention in 3rd grade if the student scores “approaching” on the ELA portion of their most recent TCAP and meets all other requirements for a Ground 1 appeal. One of the requirements for a Ground 1 appeal is that the student must score at or above the 40th percentile on a universal reading screener.^K In the 2023-24 school year, students were required to score at or above the 40th percentile on the SBE-approved universal reading screener administered by the district or charter school. However, for the 2024-25 school year, the rule requires students to score at or above the 40th percentile on the state-provided TN URS. These changes to law and to rule likely contributed to the increased adoption of the state-provided universal reading screener by districts and charter schools.

Screener results

Districts and charter schools are required to administer reading screeners to K-3 students three times per year (fall, winter, and spring) during state-determined test windows. Results must be reported to TDOE. The SBE adopted TDOE’s recommended scoring levels for identifying deficiencies on the screeners as required by the TLSA:

- Students scoring at the 15th percentile or below are determined to have a **significant reading deficiency**.
- Students scoring between the 16th and 40th percentile are determined to be **at risk** for a significant reading deficiency.
- Students scoring at the 41st percentile and above are not considered to be at risk of having a significant reading deficiency. These students are considered to be **on track** for meeting grade-level expectations for the skills assessed on each screener. The reading screeners approved by SBE are nationally normed with the average at the 50th percentile.

^H FLSPs were submitted by charter networks that may represent multiple charter schools. For the 2024 resubmission cycle, charter networks submitted 47 FLSPs representing 73 charter schools that serve K-5 students. Seven of the 47 FLSPs were submitted by charter networks with schools that do not serve any K-3 students. For screener data, OREA analyzed 40 of the 47 FLSPs representing 57 charter schools with K-3 students.

^I For more information on Tennessee’s 3rd grade retention and promotion, see OREA’s report [Student Retention Policies: Tennessee and Other States](#).

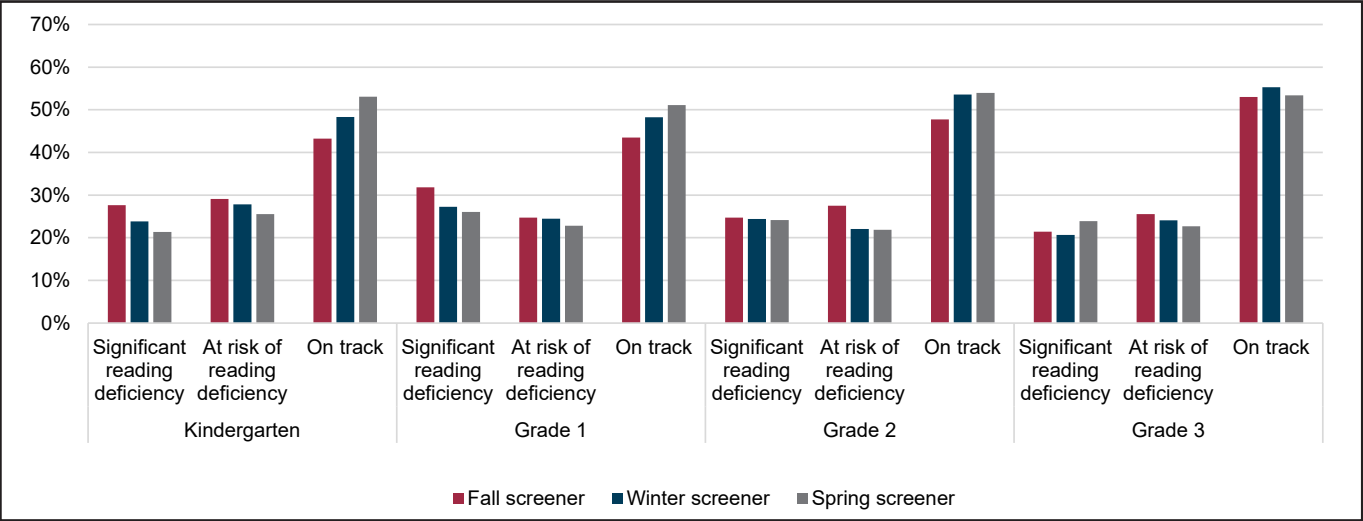
^J SBE Rule 0520-01-03-.16 relates to student promotion and retention. In *TCA 49-6-3115(d)(1)*, SBE is required to promulgate rules to establish an appeals process for a student identified for retention based on their score of “approaching” on the ELA portion of their TCAP test.

^K Requirements for a Ground 1 appeal include: (1) The parent or legal guardian of the student appeal the retention decision and acknowledge they were provided all requirements of the Ground 1 appeal, (2) the student scores at or above the 40th percentile on the TN URS, (3) the principal of the student’s school agrees to develop a remediation plan, (4) the student’s ELA teacher and principal provide a unanimous recommendation that the student be promoted to 4th grade, and (5) the student’s district or charter school agree to tutoring during 4th grade.

Screener data from the 2023-24 school year

OREA analyzed screener data from all three screener administration windows in 2023-24 for students in kindergarten through 3rd grade. The results from the 2023-24 universal reading screener assessments are shown in Exhibit 5.

Exhibit 5: The percentage of K-2 students considered to be on track for meeting grade-level expectations increased with each screener administration in 2023-24. For 3rd graders, results were mixed



Note: The data in this graph represents the percentage of unique students in each performance category for each window.
Source: Tennessee Department of Education data.

For students in kindergarten through 2nd grade, the percentage of students with a significant reading deficiency decreased with each screener administration throughout the school year. Results were mixed for 3rd grade students, as the percentage decreased between the fall and winter screener but increased between the winter and spring screener.

Kindergarten students showed the greatest percentage point increase in those scoring on track to meet grade-level expectations. Forty-three percent were on track in the fall compared to 53 percent in the spring. Third grade posted the highest percentage of those on track for meeting grade-level expectations in any screener administration, with 55 percent scoring at that level on the winter screener.

Results for the previous school year (2022-23) showed a decrease in the percentage of students with a significant reading deficiency for kindergarten, 1st grade, and 3rd grade, while 2nd grade remained the same.^L As in 2023-24, kindergarten students also showed the greatest percentage point increase in students who were on track. Forty-three percent were on track in the fall of 2022 compared to 55 percent in the spring of 2023. Third graders posted the highest percentage of those on track for meeting grade-level expectations, with 57 percent scoring at that level on the 2022-23 spring screener.

Three years of screener data shows more students achieving higher scores and fewer students demonstrating a significant reading deficiency

With three years of universal screener data now available, the trends for two cohorts of K-3 students can be analyzed through the fall, spring, and winter screener administrations for three school years (2021-22, 2022-23, and 2023-24). The analysis includes screener results by each of the three scoring categories: significant reading deficiency, at risk of a reading deficiency, and on track.

^L Universal reading screener data from 2022-23 was included in OREA's *Review of Literacy Success Act: Second-year implementation*.

OREA identified two cohorts of students:

- **Cohort 1** includes students who started kindergarten in 2021-22, were in 1st grade in 2022-23, and were in 2nd grade in 2023-24.
- **Cohort 2** includes students enrolled in 1st grade in 2021-22, 2nd grade in 2022-23, and 3rd grade in 2023-24.

The screener results for each year and cohort are displayed together and organized by scoring category because the data largely captures the same group of students.

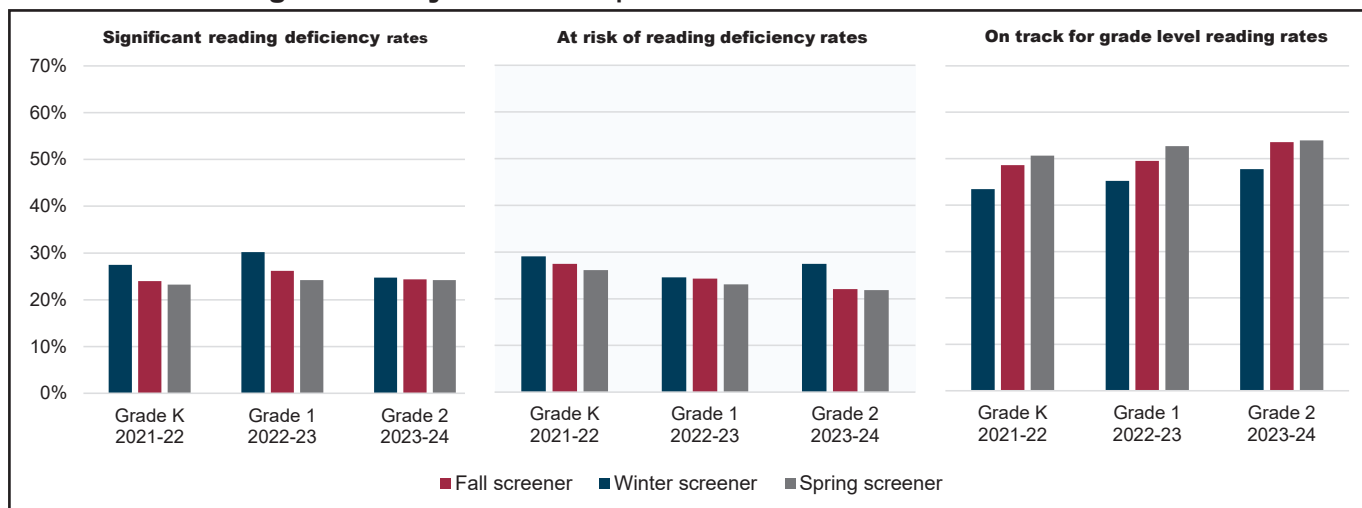
Cohort 1

For the first cohort, significant reading deficiency rates had decreased by the end of 2nd grade. Twenty-seven percent of students demonstrated a significant reading deficiency in the fall screener administration compared to 24 percent after the spring screener in 2nd grade.

Between the fall screener in kindergarten and the spring screener in 2nd grade, the percentage of students at risk of a reading deficiency decreased from 29 percent to 22 percent.

The percentage of students on track for meeting grade-level expectations increased by 11 percentage points between the first screener in kindergarten (43 percent) and the last screener in 2nd grade (54 percent). As shown in Exhibit 6, the percentage of students on track rose across the three screeners in each grade. During the transition between grades, however, the percentage on track declined. For example, the percentage on track based on the fall screener in 1st grade was lower than that for the spring screener in kindergarten. A decline also occurred between the spring screener in 1st grade and the fall screener in 2nd grade.

Exhibit 6: As rates for students on track increased in 2nd grade, the percentage of students at risk of a reading deficiency decreased | Cohort 1



Source: Tennessee Department of Education data.

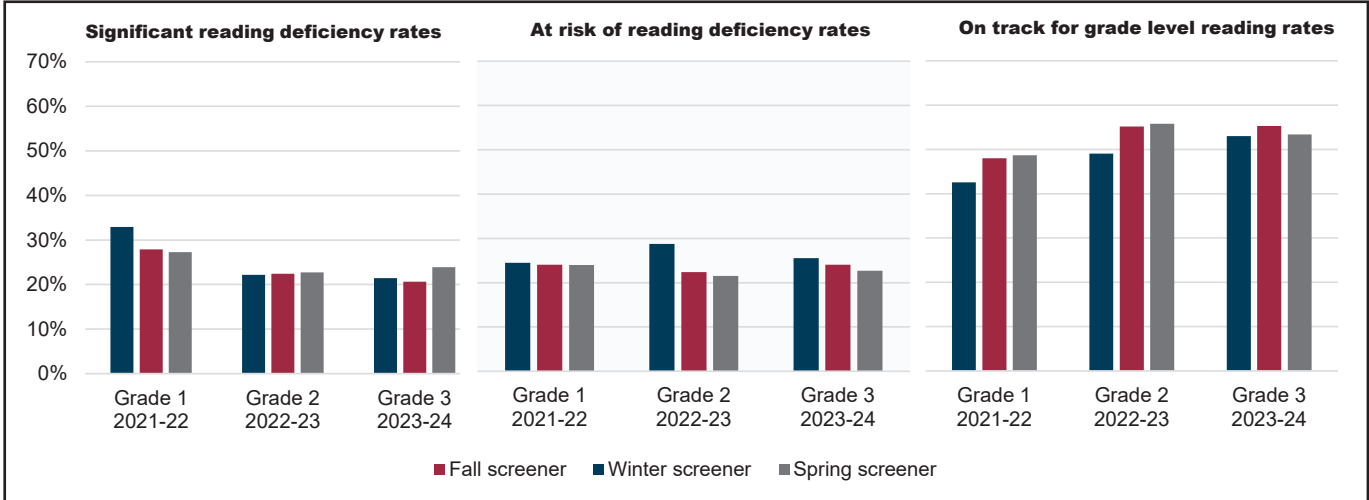
Cohort 2

For the second cohort, significant reading deficiency rates were nine percentage points lower by the end of 3rd grade.

The percentage of students at risk of a reading deficiency was almost the same at the end of 3rd grade (23 percent) as at the beginning of 1st grade (24 percent). The percentage increased over each summer between grades – from 24 to 29 percent between 1st and 2nd grade, and from 22 to 26 percent between 2nd and 3rd grade.

For students on track to meet grade-level expectations, the percentage increased from 43 percent to 53 percent.

Exhibit 7: Between the fall screener in 1st grade and the spring screener in 3rd grade, students showed a 9 percentage point decrease in students with a significant reading deficiency while the percentage of students on track increased 10 percentage points | Cohort 2

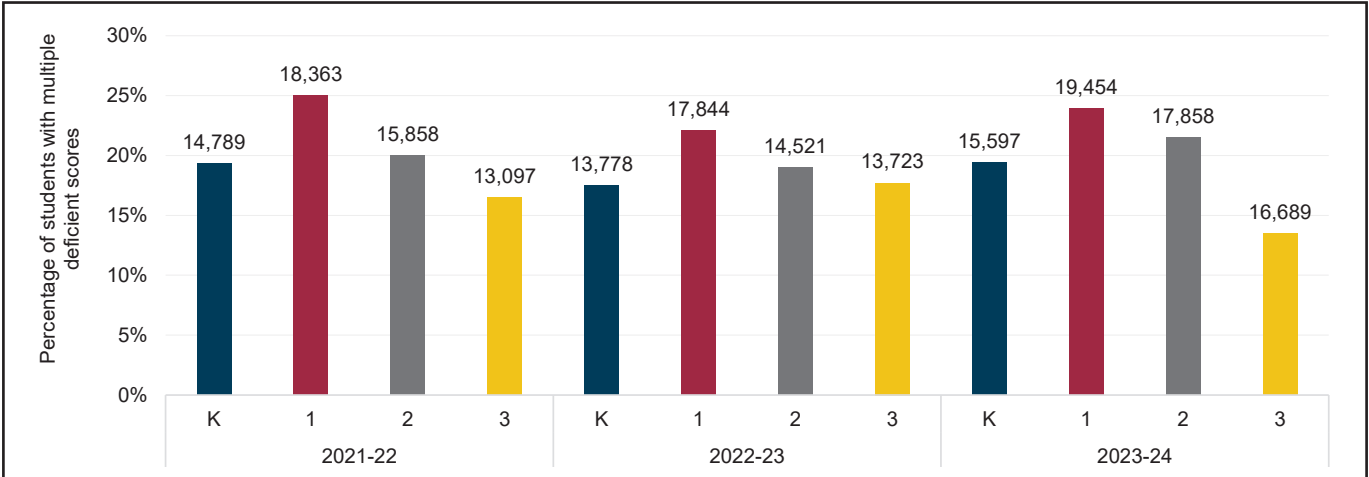


Source: Tennessee Department of Education data.

Students demonstrating a significant reading deficiency on multiple screeners

Exhibit 8 shows how many K-3 students demonstrated a significant reading deficiency (scoring at the 15th percentile or below) on more than one screener administration in a single school year. Students with a significant reading deficiency likely need the most intensive supports and interventions.

Exhibit 8: First graders were the most likely to demonstrate a significant reading deficiency on more than one screener in a single school year



Note: Many districts and charter schools adopted the TN URS for the spring screener window for 3rd grade students to be eligible for promotion pathways, but they may also administer another approved screener. The 3rd grade data in 2023-24 includes duplicated students if the student was administered both the TN URS and another approved screener, so the figure for that test administration will be inflated.
Source: Tennessee Department of Education data.

In each of the past three school years, 1st grade students were most likely to demonstrate a significant reading deficiency on multiple screeners in one school year.

First statewide FLSP resubmission cycle

TLSA requires that each district and charter school submit a foundational literacy skills plan (FLSP) detailing foundational literacy skills instruction for grades K-5 to TDOE for approval every three years.³ The first submission for all districts and charter schools was in June 2021. FLSP updates were only required in 2022 and 2023 for districts and charters that made a change in the universal reading screener or ELA curriculum. In 2024, all districts and charter schools were required to submit revised FLSPs to TDOE by July 1 for review and approval for the next three-year cycle. However, districts and charter schools with high Tennessee Value Added Assessment System (TVAAS) growth scores on the ELA portion of the TCAP test were exempt from this requirement.

Requirements for resubmission

TDOE used TVAAS data from 2021-22 and 2022-23 to establish three resubmission groups for the 2024 FLSP resubmission cycle. Each group had its own requirements for resubmission, as shown in Exhibit 9.

- **Group 1:** Those in Group 1 were not required to resubmit FLSPs for the 2024-25 school year because they demonstrated high TVAAS growth on the 4th grade ELA portion of the TCAP test in the two previous school years. For the 2024 resubmission cycle, one charter school met the criteria for Group 1.
- **Group 2:** Districts and charter schools in Group 2 are those with 4th grade TVAAS growth below expectations or significantly below expectations on the 4th grade ELA portion of the TCAP test in the two previous school years.^M Those in Group 2 must submit FLSP revisions to TDOE annually until the 2027 resubmission cycle.^N There are 73 districts and one charter school in Group 2.
- **Group 3:** All other districts and charter schools are placed in Group 3.^O Those in Group 3 submitted a revised FLSP for the 2024 cycle but are not required to resubmit an FLSP before the 2027 resubmission cycle unless they make a change to their screener or ELA curriculum.

Districts and charter schools that choose to update their FLSP in areas other than their screener or ELA curriculum before the next cycle (e.g., make changes to their parent notifications and home literacy reports) submit the changes to TDOE for review.

TDOE will use TVAAS data from 2024-25 and 2025-26 to establish new groups for the 2027 FLSP resubmission cycle.

Regardless of resubmission group, any district or charter school that changes their ELA curriculum in kindergarten through 5th grade or changes their universal reading screener is required to update their FLSP and resubmit it to TDOE.

^M To determine resubmission groups for charter schools, TDOE reviewed each charter school's TVAAS 4th grade ELA data. Individual charter schools were placed in resubmission groups accordingly.

^N According to TDOE, beginning in the 2025-26 school year, a charter school on a yearly submission cycle will be required to submit a separate FLSP from its charter network if other schools in that charter network are on a three-year resubmission cycle.

^O There are 72 districts and 53 charter schools in Group 3.

Exhibit 9: TDOE established FLSP resubmission groups based on the last two years of TVAAS scores

Resubmission group	Requirements	FLSP resubmission status
Group 1	A district or charter school obtains a district level 4 or 5 ^P in TVAAS growth for all students in 4th grade ELA and a district level 4 or 5 in <u>all</u> subgroups on both the 2021-22 and 2022-23 TCAP tests.	No FLSP revision required until the 2027 resubmission cycle
Number of districts and charter schools in Group 1: 1		
Group 2 ^Q	A district or charter school reflects a district level 1 in TVAAS growth for all students in 4th grade ELA on both the 2021-22 and 2022-23 TCAP tests; or any school in the district or charter obtains a level 1 in TVAAS growth for 4th grade ELA on both the 2021-22 and 2022-23 TCAP tests; or any individual subgroup obtains a district level 1 or 2 in TVAAS growth on both the 2021-22 and 2022-23 TCAP tests.	FLSP revision required each year until the 2027 resubmission cycle
Number of districts and charter schools in Group 2: 74		
Group 3	A district or charter school does not fall into group 1 or 2.	FLSP revision only required in 2024 until the 2027 resubmission cycle
Number of districts and charter schools in Group 3: 125 ^R		

Notes: (1) An FLSP may represent multiple schools serving K-5 students in a district or charter network, so the number of FLSPs will not equal the combined number of districts and charter schools. (2) Based on TVAAS data, TDOE identified 200 total districts and charter schools for resubmission Group 1, Group 2, and Group 3. TDOE expected FLSPs from 190 of those districts and charter schools. See footnote R for more information.
Source: Tennessee Department of Education data.

Summary of changes and review of FLSPs

TLSA requires districts and charter schools to submit foundational literacy skills plans detailing components of K-5 literacy instruction to TDOE for approval once every three years. Districts and charter schools were required to resubmit FLSPs in 2024. (As mentioned previously, districts and charter schools that demonstrate high TVAAS growth were not required to submit FLSPs for the 2024-25 school year.)

Each district and charter school plan must cover grades K-5 and include the following six sections:

- the amount of **daily time** devoted to foundational literacy skills instruction and how that time is used;
- ELA **textbooks** and instructional materials adopted;
- the **universal reading screener** selected by the district or charter school;

Comptroller review of FLSPs

Tennessee's Literacy Success Act requires districts and charter schools to submit foundational literacy skills plans (FLSPs) to TDOE for approval every three years, and districts and charter schools were to resubmit FLSPs in 2024. Districts and charter schools can update their plans more frequently than every three years, however. Updated plans must be submitted to TDOE for approval.

The Comptroller's Office is required to review the plans – and TDOE's approval of the plans – annually. This publication marks the Comptroller's fourth annual review of FLSPs.

Source: TCA 49-1-905 (g)(l) and (6).

^P TVAAS level 4 indicates growth "above expectations," and TVAAS level 5 indicates growth "significantly above expectations."

^Q TVAAS level 1 indicates growth "significantly below expectations," and TVAAS level 2 indicates growth "below expectations."

^R According to TDOE, the department reviewed TVAAS data of 200 total districts and charter schools, but only 190 FLSPs were expected from districts and charter schools. TDOE cites several reasons for the discrepancy, such as: charter schools closed that were reviewed for TVAAS data but did not submit an FLSP; new charter schools opened in 2024-25 and were placed in Group 3; the Achievement School District and Tennessee Public Charter School Commission qualified for Group 3 but did not submit FLSPs because charter networks submitted FLSPs for schools in those districts; Alvin C. York Institute was initially included in Group 3 but does not serve grades that require an FLSP; and a single FLSP was submitted on behalf of multiple charter schools in some instances.

- a description of **reading interventions** and supports available to students with a significant reading deficiency;
- how the district or charter school intends to **notify** and **engage parents** in the student literacy process; and
- how the district or charter school will provide **professional development** in foundational literacy skills to K-5 teachers.

TDOE reported to OREA that 182 out of 190 (96 percent) of districts and charter networks submitted their revised foundational literacy skills plans by the deadline of July 1, 2024. Of the FLSPs not submitted by the July 1 deadline, six were charter schools and two were districts. By July 23, 2024, all but one FLSP had been submitted to TDOE for review. TDOE approved the final FLSP on September 20, 2024.

After FLSPs are submitted, TDOE reviews the plans to ensure they include the required components, and TDOE may request additional information or revisions before an FLSP is approved. According to TDOE, the most common revisions or information requested after an FLSP was submitted for its first review include:

- details about promotion pathways in family notification plans;
- updated references to universal screener percentiles for students at risk of a reading deficiency or identified as having a significant reading deficiency;⁵
- updated links for no-cost literacy resources for families in home literacy reports;
- specific information about phonics-based professional development; and
- plans from those districts required to resubmit FLSP revisions annually due to TVAAS data detailing supports for student subgroups or schools with low growth during the previous two years.

As of September 2024, TDOE had reviewed and approved all 190 FLSPs (100 percent of district and charter school plans). To analyze the changes for the first FLSP resubmission cycle, OREA identified the FLSPs submitted by districts and charter schools prior to 2024. For the 190 FLSPs submitted for the 2024 cycle, 105 were last submitted in 2021, 32 in 2022, and 50 in 2023. One newly established district and two new charter schools sent their first FLSP in 2024. OREA then ran a comparative analysis of each district's and charter school's pair of FLSPs to identify components that changed from their previous submission. FLSPs changed across all six required sections to various degrees, and more information regarding those changes is included below.

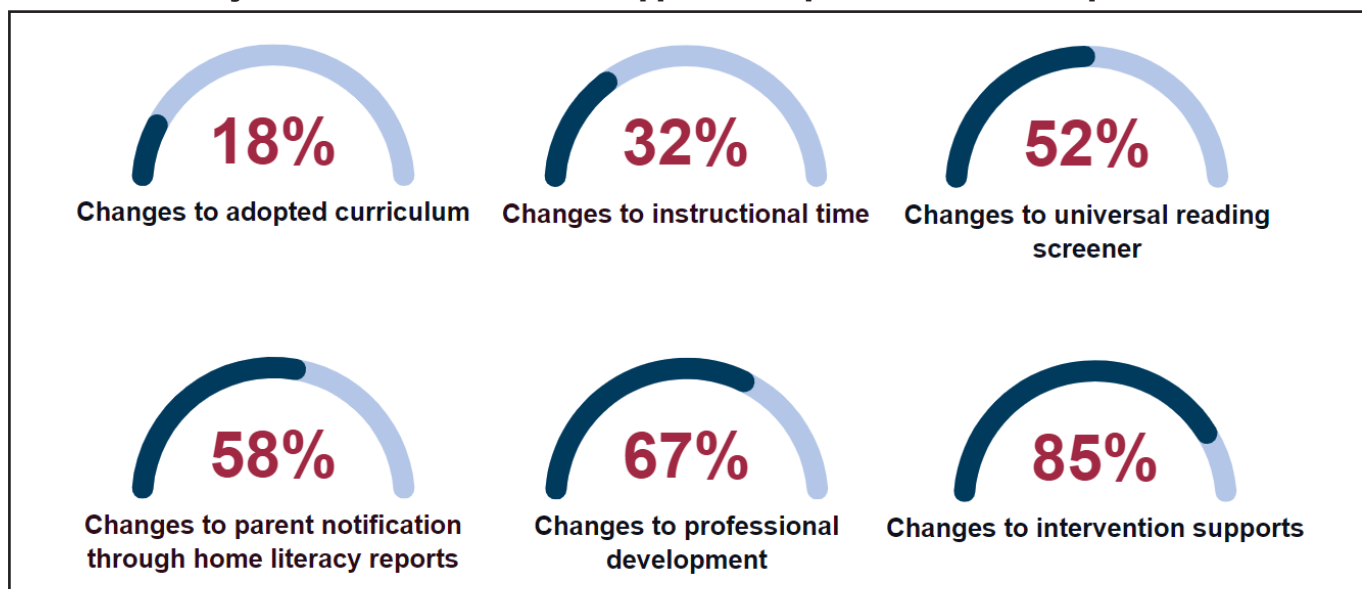
Most common changes made to FLSPs

OREA analyzed FLSPs for changes in all six required sections: instructional time dedicated to foundational literacy skills, ELA instructional materials and textbooks, universal reading screener, intervention supports, parent notifications through home literacy reports, and professional development in foundational literacy skills.

There were 35 districts and charter schools (18 percent) that opted to change some aspect of their K-5 ELA curriculum. Changes to instructional time may have either increased or decreased the amount of instructional time devoted to foundational literacy skills in K-5 classrooms. For 60 districts and charters, their revised FLSP included a change to instructional time, and 35 of these will increase such instructional time beginning in the 2024-25 school year, 23 decreased the amount of time dedicated to foundational literacy skills, and two adjusted instructional times for multiple groups so times both increased and decreased. As indicated in FLSPs, districts and charter schools increasingly adopted the TN URS, either as the primary screener for K-5 students or as one of multiple screeners used. Changes to law and rule related to 3rd grade retention likely contributed to the trend, as 52 percent of FLSPs indicated a change in their universal reading screener. See page 7 for more information on those changes.

⁵ Students scoring between the 16th and 40th percentile on a universal reading screener are considered at risk of a reading deficiency, and those at or below the 15th percentile are students with a significant reading deficiency. TDOE required that FLSPs with outdated references to screener percentiles be revised for approval.

Exhibit 10: The most common changes in district and charter school FLSPs for the 2024 resubmission cycle were to intervention supports and professional development



Note: An FLSP may represent multiple schools serving K-5 students in a district or charter network, so the number of FLSPs will not equal the combined number of districts and charter schools.

Source: OREA review of districts' and charters' foundational literacy skills plans through September 2024.

The most common change in district and charter school FLSPs for the 2024 resubmission cycle was to intervention supports (85 percent of FLSPs). For example, some districts and charters changed how they identify students for intensive reading supports or their processes related to Tennessee's established Response to Instruction and Intervention (RTI²) framework.

Other common changes included updates to professional development (67 percent of FLSPs) and parent notification through home literacy reports (58 percent of FLSPs). Changes to other sections are shown in Exhibit 10. All these changes were made by districts and charter schools in response to TDOE's review and were necessary to receive TDOE's approval of their FLSP.

Teacher training on foundational literacy skills instruction continues

The TLSA requires TDOE to provide at least one professional development course at no cost to K-5 teachers. OREA found that training opportunities and professional development courses on foundational literacy skills continue to be offered to teachers.

The TLSA requires that K-5 teachers must complete a TDOE-approved professional development course by August 1, 2023, in order to renew their educator license. In its 2023 required review, OREA found that the majority of teachers were in compliance with the professional development training requirement and submitted appropriate documentation by the deadline of August 1, 2023. To satisfy the training requirement, K-5 teachers could have completed either the Early Reading Training Course I or the Secondary Literacy Training Course I or received a passing score on an assessment called the Tennessee Early Literacy Assessment (TELA).

To support the creation of the professional development courses, TDOE has contracted with TNTP – an education nonprofit – since 2021 to develop the Early Reading Training courses and provide ongoing professional development. In March 2024, TDOE and TNTP agreed to a two-year contract extension for \$2,500,000 each year until the end date in March 2026. TNTP's new scope of work includes in-person delivery of one of the training courses (the Early Reading Training Course II) during summer 2024 and summer 2025.

After an initial launch in 2021, TDOE continues to offer the Early Reading Training Course I and Secondary Literacy Training Course I as online courses at no cost to educators, districts, and charter schools. The Early Reading Course II and Secondary Literacy Course II were also made available online in spring 2024. According to TDOE, additional training courses are offered on its online platform that emphasize early literacy and professional development. For example, the TN Early Reading Training Course III is designed for educators who completed Early Reading Training Course I and Course II and builds on the lessons from those trainings. The course includes 19 modules on topics such as phonological awareness, high frequency words, and common pitfalls of phonics instruction. TDOE states that educators and leaders who complete the TDOE trainings may be awarded Professional Development Points to utilize toward future licensure requirements.

Educator preparation programs

The TLSA requires designated educator preparation program (EPP) candidates to demonstrate their knowledge of foundational literacy skills instruction and lists several options for meeting this requirement. Designated EPP candidates include those who:

- are seeking an initial teaching license or endorsement relevant to teaching K-3 students,
- are seeking an initial instructional leader license, or
- have an initial teaching license and are enrolled in a graduate EPP program.

As reported in OREA's 2023 review *Tennessee Literacy Success Act: Second-year implementation*, the TLSA requires teachers seeking to obtain, renew, or advance a teaching license and designated EPP candidates to complete an approved foundational literacy skills course (the state-provided Early Reading Training or state-provided Secondary Literacy Training) or pass the TELA.

TDOE is also required to track another EPP-related measure – the first-time TELA pass rate of candidates seeking licensure or endorsement – to determine candidates' understanding of foundational literacy skills instruction. The pass rate for the TELA, as approved by the SBE, is 80 percent or above, and the first-time pass rate is included on the annual EPP report card prepared by SBE. In an August 2024 presentation to SBE, TDOE shared first-time TELA pass rates disaggregated by EPP. According to TDOE, 19 of the 37 reported EPPs had first-time pass rates at 80 percent or above.^T Of the remaining 18 reported EPPs, nine had first-time pass rates between 77 and 80 percent. First-time pass rates for the other nine reported EPPs were below 77 percent.

Initiatives for early grades educator effectiveness

In accordance with state law on teacher training and foundational literacy skills standards, beginning in August 2024, TDOE is required to submit an annual report to the chairs of the House and Senate education committees related to early grades educator effectiveness.⁴ According to statute, the report should include the number and percentage of educators licensed to teach K-3, performance evaluation scores for the past three years, and performance trends and goals by EPP. The report must also include the number and percentage of educators in each of the five level of effectiveness (LOE) categories per year and per EPP. TDOE is also required to set goals for reducing the percent of educators in the two lowest LOE categories each year.^U

TDOE's *Educator Effectiveness in Grades K-3 Report* was published in August 2024. Key findings include:

- most K-3 Tennessee educators (96 percent in both 2021-22 and 2022-23) earn at least a three on their LOE score each year;

^T Candidates may take the TELA more than once but are presented with a different version of the test each time.

^U Level of effectiveness categories range from 1 (significantly below expectations) to 5 (significantly above expectations). A score of three (at expectations) is considered competent and effective teaching.

- in 2022-23, 85 percent of educators from SBE-approved EPPs earned at least a three on their LOE;
- 95 percent of K-3 Tennessee educators prepared in other states or in non-SBE approved EPPs earned a three or higher on their LOE each year; and
- three Tennessee EPPs had over 50 percent of their educators earn the highest LOE score, a five, in 2022-23. Those EPPs are Belmont University, Maryville College, and Vanderbilt University.

The requirement for early grades educator effectiveness reports is ongoing, and TDOE is expected to submit its next report by August 1, 2025.

Status of TLSA requirements

The TLSA includes several requirements and deadlines for reviewing the act's implementation. In Exhibit 11, the requirements and corresponding deadlines are itemized, along with their completion status and materials that were generated to meet the statutory requirements.

Exhibit 11: As of November 2024, all of the TLSA requirements with specific deadlines have been completed, which leaves ongoing annual and triennial reviews for future analysis

Statutory requirement	Status	Relevant materials
July 1, 2021 Each district and charter must submit an FLSP to TDOE for approval	Complete	<i>Review of Foundational Literacy Skills Plans</i> , OREA, September 2021
November 1, 2021 The Comptroller's Office must review FLSPs	Complete	<i>Review of Foundational Literacy Skills Plans</i> , OREA, September 2021
March 1, 2022 TDOE must conduct a landscape analysis of literacy and literacy instruction	Complete	<i>A Landscape Analysis of Foundational Literacy Skills in Tennessee Pre-K to Grade 5</i> , University of Tennessee, April 2022
August 1, 2022 TDOE must develop a foundational literacy skills instruction course for high school students in a teaching-as-profession pathway	Complete	<i>Review of Literacy Success Act: First-year implementation</i> , OREA, November 2022 <i>Tennessee Literacy Success Act Implementation Report</i> , TDOE, July 2024
November 1, 2022 The Comptroller's Office must review the implementation of TLSA and FLSP changes	Complete	<i>Review of Literacy Success Act: First-year implementation</i> , OREA, November 2022
May 1, 2023 The Comptroller's Office must review ELA instructional materials in districts and charter schools	Complete	<i>English Language Arts (ELA) Textbooks in School Districts and Charter Schools</i> , OREA, May 2023
August 1, 2023 K-5 teachers must complete state-provided training in foundational literacy skills instruction	Complete	<i>Review of Literacy Success Act: Second-year implementation</i> , OREA, November 2023
November 1, 2023 The Comptroller's Office must review the implementation of TLSA and FLSP changes	Complete	<i>Review of Literacy Success Act: Second-year implementation</i> , OREA, November 2023
July 1, 2024 TDOE, SBE, and THEC must submit a report on TLSA implementation	Complete	<i>Tennessee Literacy Success Act Implementation Report</i> , TDOE, July 2024

Statutory requirement	Status	Relevant materials
July 1, 2024 Eligible districts and charters must resubmit an updated FLSP to TDOE for approval	Complete	<i>Review of the Tennessee Literacy Success Act: Third-year implementation</i> , OREA, November 2024
November 1, annually The Comptroller's Office must review the implementation of TLSA and FLSP changes	Ongoing	
July 1, 2027, and triennially Eligible districts and charters must resubmit an updated FLSP to TDOE for approval	Ongoing	

TDOE published its statutorily required TLSA implementation review

Another component of the TLSA required TDOE, in partnership with the SBE and the Tennessee Higher Education Commission (THEC), to report on the implementation of the TLSA by July 1, 2024. TDOE submitted its Tennessee Literacy Success Act Implementation Report by the deadline to the chairs of the House and Senate education committees and published the report online. In its report, TDOE reviewed the foundational literacy skills plans submission process, trends in the adoption of high-quality instructional materials, selection of universal reading screeners, and developments in educator preparation and training. The report also describes TDOE's implementation supports, such as the Early Literacy Network and Literacy Implementation Network, and ongoing training available to educators on TDOE's professional development platform.

Conclusions and policy option

The review found that, overall, TDOE, local districts, and charter schools continue to implement the major directives of the Tennessee Literacy Success Act and are in compliance with its requirements.

Implementation from October 2023 through September 2024

- TDOE facilitated the state's first FLSP resubmission cycle in 2024. In accordance with the TLSA, districts and charter schools first submitted FLSPs in 2021, and revised plans were due three years later on July 1, 2024. Based on high TVAAS scores from the 2021-22 and 2022-23 TCAP administrations, one charter school was not required to submit a revised FLSP in 2024. Seventy-three districts and one charter school will be required to submit revisions to their FLSP annually until new resubmission groups are established for the 2027 FLSP resubmission cycle. All other districts and charter schools may update FLSPs as needed but will only be required to submit updated FLSPs if they have a change to their ELA curriculum or universal screener. As of September 2024, TDOE had reviewed and approved 190 FLSPs (100 percent of FLSPs) from districts and charter schools.
- TDOE continues to provide a free universal reading screener to districts and schools. The state's contract for the TN URS with NCS Pearson, Inc., began in 2021 and was renewed in 2024. The 2024-25 contract year will be paid with federal funds, and state funds will cover the cost of the state-provided screener beginning in 2025-26. Pearson will continue to provide the aimswebPlus universal reading screener at no cost to districts and charter schools.

- Districts and charter schools continue to administer universal reading screeners three times per year to K-3 students. All districts (100 percent) now use the state-provided Tennessee universal reading screener, which is available to them at no cost, for at least one screener administration. Beginning in 2024-25, 51 of the 57 charter schools that serve K-3 students administer the TN URS, an increase from the nine that did so in 2023-24. Almost all (98 percent) district and charter school FLSPs indicate they offer the TN URS screener to students in the spring of 3rd grade. Recent changes to state law and SBE rule likely led to the increased use of the state-provided screener, TN URS, by districts and charter schools, whether as their primary screener or as an alternative for the spring screener window in 3rd grade.
- After the August 2023 foundational literacy skills training deadline, educators continue to have access to training on the TDOE's online platform. Early Reading Training Course I and II, Secondary Literacy Training Course I and II, and other professional development courses are available online. TDOE's contract extension with TNTP supports in-person course facilitation during the summers of 2024 and 2025.

Policy option

- With the end of the initial implementation phase of the TLSA in 2024, the General Assembly may wish to revise state law to require that the Comptroller's Office review the TLSA every three years instead of annually. If the deadline for the next Comptroller's Office review was set for 2027 and then triennially thereafter, future Comptroller's Office reviews would align with the FLSP resubmission cycle, which occurs every three years.

Endnotes

¹ Public Chapter 3, 2021 1st Extraordinary Session. Sections 1 through 3 have been incorporated into *Tennessee Code Annotated* at 49-1-901 through 49-1-909, revising the Tennessee Literacy Initiative Act of 1999. Other sections of Public Chapter 3 were codified as 49-5-5619 and 49-1-302(d)(2)(B).

² Public Chapter 717, 2022, codified as *TCA* 49-1-910.

³ *Tennessee Code Annotated* 49-1-905(f).

⁴ *Tennessee Code Annotated* 49-5-5619(b)(2).

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