

ZERO TOLERANCE: AN UPDATE, 2010



April 2010



STATE OF TENNESSEE

COMPTROLLER OF THE TREASURY

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Comptroller

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April 20, 2009

The Honorable Ron Ramsey
Speaker of the Senate
The Honorable Kent Williams
Speaker of the House of Representatives
and
Members of the General Assembly
State Capitol
Nashville, Tennessee 37243

Ladies and Gentlemen:

Transmitted herewith is a report on zero tolerance in Tennessee schools, as required by Public Chapter 871, 1998. This report examines zero tolerance data for school years 2005-06, 2006-07, and 2007-08, using data reported to the Tennessee Department of Education (TDOE) by local school districts.

Sincerely,

Justin P. Wilson
Comptroller of the Treasury

ZERO TOLERANCE: AN UPDATE, 2010



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EXECUTIVE SUMMARY

This report examines zero tolerance data for school years 2005-06, 2006-07, and 2007-08, using data reported to the Tennessee Department of Education (TDOE) by local school districts. The Offices of Research and Education Accountability conducted previous analyses of zero tolerance data in 1998, 2003, and 2006.

Tennessee's zero tolerance data has three components:

1. **Codified zero tolerance offenses** – These zero tolerance offenses are defined in state law: drug possession/use, firearm possession, and battery of staff.
2. **LEA-determined zero tolerance offenses** – In addition to codified zero tolerance offenses, a local education agency (LEA) may classify other offenses, such as possession of a knife, as zero tolerance offenses.
3. **LEA-determined offenses that call for a student's expulsion from school for a period greater than 10 days** – Schools must report any offense to the TDOE that is punishable in their school system by expulsion for more than 10 days. A student who commits such an offense is included in the state's zero tolerance data even if the offense is not defined as zero tolerance in state law or LEA policies.

The current report focuses on codified zero tolerance offenses to provide a more accurate comparison across districts.¹ Codified zero tolerance offenses are the same from district to district, while LEA-determined offenses vary.

An analysis of codified zero tolerance offenses spanning back to school year 1999-2000 indicates that:

- Codified offenses increased from school year 1999-2000, when standardized data collection began, to 2005-06, but have since trended downward. (See page 5.)
- The growth in drug offenses has outpaced student population growth. (See page 6.)
- In the years between 1999 and 2005, firearm offenses showed a relatively steady pattern of decline. More recently, however, the pattern of firearm offenses has been erratic. (See page 6.)
- The reliability of data regarding battery of staff is complicated by the category's subjectivity. Unlike drug and firearm offenses, which are well-defined, "battery of staff" is subject to interpretation by school officials and victims. (See page 7.)
- An increase in the number of battery offenses is indicated by the information that is available. (See page 7.)
- The majority of LEAs with no zero tolerance offenses are small school districts. (See page 18.)

The findings from an analysis of codified zero tolerance offense data from school years 2005-06, 2006-07, and 2007-08 were that:

- The proportion of codified zero tolerance offenses changes very little from year to year. (See page 8.)
- In 2007-2008, 40 percent of all codified zero tolerance offenses came from Tennessee's 5 largest school districts. (See page 8.)

- For urban districts, drug offenses were the most prevalent class of offenses and firearms were the least. (See page 8.)
- Districts are most likely to remand zero tolerance offenders to alternative school. (See page 10.)
- Urban districts varied in their utilization of different disciplinary actions. (See page 10.)
- Although the percentages vary from district to district, most zero tolerance offenders in the state (81 percent) were continuing their education. (See page 13.)
- Outcomes for zero tolerance offenders were largely dependent on district practices. (See page 13.)
- A majority of zero tolerance offenders in Tennessee are in grade 9. (See page 15.)
- Two-thirds of all zero tolerance offenders are male. (See page 16.)
- While most zero tolerance offenders are white (62 percent), African-American students continue to be disproportionately represented among zero tolerance offenders. (See page 16.)
- Although most zero tolerance offenders come from regular education classes, there were a disproportionate number of zero tolerance offenders among the disabled student population, which encompasses both special education students and students with physical disabilities. (See page 17.)

Policy Considerations

Data Accuracy

The state does not audit school districts' zero tolerance data, although the data is reviewed by TDOE officials.² During the course of this project, OREA discovered a data reporting error that was not identified by TDOE. A district reported no offenses for a whole category, although its report from the year prior indicated hundreds of offenses. It is unknown whether this data reporting error is an anomaly or represents a larger, broader problem with the accuracy of zero tolerance data.

Disproportionality

Special education students and African-American students are consistently overrepresented in Tennessee's zero tolerance offender population.

Ninth Grade Transition

Previous reports in this series (2003, 2006) have noted the significant number of zero tolerance violations in grade 9.³ Preventing suspensions and expulsions at this stage is critical because research has established a strong correlation between suspension and expulsion and dropping out of school.⁴

Policy Options

TDOE may wish to periodically audit a random sample of school districts to verify the accuracy of zero tolerance data.

TDOE may wish to administer a survey to district superintendents to determine the criteria LEAs use for zero tolerance charges and modifications.

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INTRODUCTION

Tennessee Code Annotated (T.C.A.) § 49-6-4216(d)(4) requires the Office of Education Accountability (OEA) to review zero tolerance data reported by local education agencies (LEAs) and collected by the Tennessee Department of Education (TDOE). This report reviews data for school years 2005-2006, 2006-2007, and 2007-2008.

For this fourth report in the zero tolerance series, OEA differentiated between codified zero tolerance offenses and other offenses reported by LEAs. Codified zero tolerance offenses (drug, firearm, and battery of staff) are the primary focus of the new methodology. Please note that this new methodology makes comparisons between summary data in this report and in the three preceding zero tolerance reports problematic. However, to allow limited comparisons, the new methodology was applied to data back to school year 1999-2000.

As a companion to this report, OEA is releasing a web-only feature: interactive zero tolerance maps. The statewide map, which displays the distribution of codified zero tolerance offenses across the state, can be accessed at http://www.comptroller1.state.tn.us/Repository/RE/ZeroToleranceMap_1.htm.

Methodology

In developing this report, OEA staff:

- Analyzed data collected and supplied by TDOE;
- Conducted a literature review of issues associated with zero tolerance policy;
- Consulted state and local officials; and
- Reviewed federal, state, and local zero tolerance laws and policies.

Tennessee's zero tolerance law requires TDOE to track all student expulsions.⁵ In practice, however, TDOE tracks student behaviors that local board policy dictates will result in *expulsion*, which is the removal of a student from his/her regular educational program for a period greater than 10 days.⁶ Zero tolerance offenses represent only a part of total expulsions; i.e., not all expelled students are zero tolerance offenders. In general, Tennessee law requires districts to expel a student for a full calendar year for committing a codified zero tolerance offense. However, zero tolerance policies are *permissive* at the district level because Tennessee's zero tolerance policy includes a provision that allows superintendents to modify penalties.⁷

Tennessee's zero tolerance data has three components:

1. **Codified zero tolerance offenses** – These zero tolerance offenses are defined in state law: drug possession/use, firearm possession, and battery of staff.
2. **LEA-determined zero tolerance offenses** – In addition to codified zero tolerance offenses, an LEA may classify other offenses, such as possession of a knife, as a zero tolerance offense.

3. **LEA-determined offenses that call for a student’s expulsion from school for a period greater than 10 days** – Schools must report any offense to the TDOE that is punishable in their school system by expulsion for more than 10 days. A student who commits such an offense is included in the state’s zero tolerance data even if the offense is not defined as zero tolerance in state law or LEA policies.

The current report focuses on codified zero tolerance offenses to provide for a more accurate comparison across districts.⁸ Codified zero tolerance offenses are the same from district to district, while LEA-determined offenses vary. District-level variance means that an offense considered zero tolerance and/or grounds for expulsion in one district may be punishable by a short suspension in another district. Thus, a school system’s discipline policies influence whether an offense is counted in the state’s zero tolerance data. LEAs may be overrepresented or underrepresented in state zero tolerance data based on local discipline policy decisions. Analyzing zero tolerance data without accounting for the particulars of school districts’ discipline policies may lead to a perception that those systems with a more expansive definition of a zero tolerance offense are more dangerous than schools that limit zero tolerance offenses to those listed in state law. Exhibit 2 illustrates this point. District A, with locally-defined zero tolerance offenses, reported significantly more offenses than District B, which limited its definition of zero tolerance offenses to codified offenses.

Exhibit 1: Components of Zero Tolerance Data

Zero Tolerance Data		
Codified zero tolerance offenses, which are: (1) Drugs, (2) Firearms, and (3) Battery	District zero tolerance offenses outlined in local board policy. <i>Example: Other Weapons</i>	Other district offenses that presumptively result in expulsion. <i>Example: Accumulated Misbehavior</i>
68%		32%

Exhibit 2: A Comparison of Outcomes due to Differences in Zero Tolerance Policies

	District A Codified + Local	District B Codified Only
Population	Approximately 4,000	Approximately 7,000
Mandated Offenses	Drugs, firearms and battery.	Drugs, firearms and battery.
District Offenses	Weapons, alcohol, and other.	None
Drug Offenses	17	0
Firearm Offenses	0	0
Battery Offenses	0	14
Weapon Offenses	9	11
Alcohol Offenses	1	0
Other Offenses	31	0
Total Offenses	58	25

Source: Tennessee Department of Education, Zero Tolerance Data 2007-08; Tennessee Department of Education, Report Card 2008.

Note: These two districts were chosen because their demographic characteristics were most consistent with the demographic characteristics of Tennessee’s student enrollment.

When zero tolerance legislation was first enacted, numerous districts enacted policies that included additional offenses beyond those required by statute.⁹ More recently, the trend has been for districts to remove non-codified offenses from their zero tolerance policies. In 1998, 96 percent of the districts included both guns and other weapons as zero tolerance offenses in their district policy.¹⁰ In school year 2008-09, 83 percent of districts did so. Likewise, 32 percent of the districts that responded to OEA's 1998 survey indicated that alcohol possession was a zero tolerance offense in their district. Currently, only 17 percent of districts include alcohol possession or consumption in their district policies. The only non-codified category that has increased since OEA's original report is the "other" category, which grew from 5 percent in 1998 to 17 percent in 2008. See Appendix A for an analysis of the most recent district zero tolerance policies.

Districts report non-zero tolerance offenses in the zero tolerance data if their board policies indicate that the offenses are supposed to result in expulsion. Although only 14 districts included "other offenses" in their district zero tolerance policies in 2007-08, 57 districts reported "other offenses" to TDOE. For example, although District B does not include weapon offenses in its zero tolerance policy, it is still required to report the 11 offenses that happened in the district because its general discipline policy dictates that carrying a weapon to school results in expulsion. (See Exhibit 2.)

BACKGROUND

Definition

The National Center for Education Statistics (NCES) defines zero tolerance as "a school or district policy that mandates predetermined consequences or punishments for specific offenses."¹¹ In Tennessee, the term "zero tolerance" is used in two ways:

1. To refer to a group of specific offenses; or
2. More generically, to denote that certain behaviors always result in specified sanctions.¹²

Zero tolerance, in the strictest sense of the definition, refers to the codified offenses in *T.C.A. 49-6-3401(g)*: drug offenses, firearm offenses, and battery of staff. TDOE refers to these offenses as *state-mandated* zero tolerance offenses.¹³ However, a broader conception of zero tolerance can be found in another section of the law, *T.C.A. 49-6-4216(b)(1)*, which states that "... any rule or policy designated as a zero tolerance policy means that violations of that rule or policy will not be tolerated, and that violators will receive certain, swift, and reasoned punishment."

The History of Zero Tolerance in Tennessee

Zero tolerance policies in U.S. schools arose out of the Gun-Free Schools Act of 1994. The act required states, in order to continue to receive federal education aid, to pass laws to expel students for one calendar year for bringing a firearm to school.¹⁴ The following year, the Tennessee General Assembly (General Assembly) passed Public Chapter 268 (1995), which mandated expulsion for firearm possession.

In 1996, the General Assembly expanded zero tolerance by enacting Public Chapter No. 888, which required LEAs to file written policies and procedures to ensure safe and secure learning environments

and to impose swift, certain, and severe disciplinary actions for drug possession, weapon possession, or assault. In 1997, the General Assembly directed OEA to study the implementation of zero tolerance.¹⁵ This resulted in OEA's first zero tolerance report, *Getting Tough on Kids: A Look at Zero Tolerance*, which noted that school districts had various methods and forms for recording violations. The General Assembly passed legislation mandating the standardized collection of zero tolerance data in 1998.¹⁶

In *Seal v. Morgan*, the Sixth Circuit Court of Appeals ruled that the Knox County School Board violated the Fourteenth Amendment when it sanctioned a student who was not aware he possessed a weapon.¹⁷ In its opinion, the court stated that, "the [Knox County School] Board may not absolve itself of its obligation, legal and moral, to determine whether students intentionally committed the acts for which their expulsions are sought by hiding behind a Zero Tolerance Policy that purports to make the students' knowledge a non-issue."¹⁸ In an effort to clarify its intent, the General Assembly passed legislation in 2000 explicitly stating that "local school boards shall retain responsibility for development of disciplinary policies and student codes of conduct including assurances that students are afforded fair due process procedures."¹⁹ The federal government also clarified its intention in 2001, noting in the No Child Left Behind Act that students may only be expelled for knowingly possessing a gun in school.²⁰

ANALYSIS AND CONCLUSIONS

Tennessee's Zero Tolerance Data

Most states that collect school safety data rely on districts to record and report data. Florida's School Environmental Safety Incident Reporting (SESIR) system, which has been recognized by NCES as a model for school safety data collection,²¹ collects information this way. Although its methods are considered exemplary, Florida acknowledges several caveats: "Data reporting continues to be based on subjective decisions and interpretations made by administrators at the school level. Thus, caution must be exercised in the interpretation and application of SESIR data. Threats to data validity that have been identified include (1) inaccurate and inconsistent application of incident definitions; (2) over and under reporting of SESIR data; and (3) variations within the formats utilized by districts to record SESIR incidents."²² Florida captures a more comprehensive set of school safety violations; however, Tennessee's data is subject to the same issues that may compromise Florida's school safety data.

In Tennessee, districts compile zero tolerance reports and submit them to TDOE, which consolidates them into one data set for analysis. TDOE may identify anomalies in individual district data, in which case it follows up with the district. TDOE's accountability procedure is to contact the district to verify the reported data.²³ However, the verification process could be more robust. If the process fails to detect erroneous or missing data, district-to-district comparison and long-term trend analysis can lead policy makers to false conclusions.

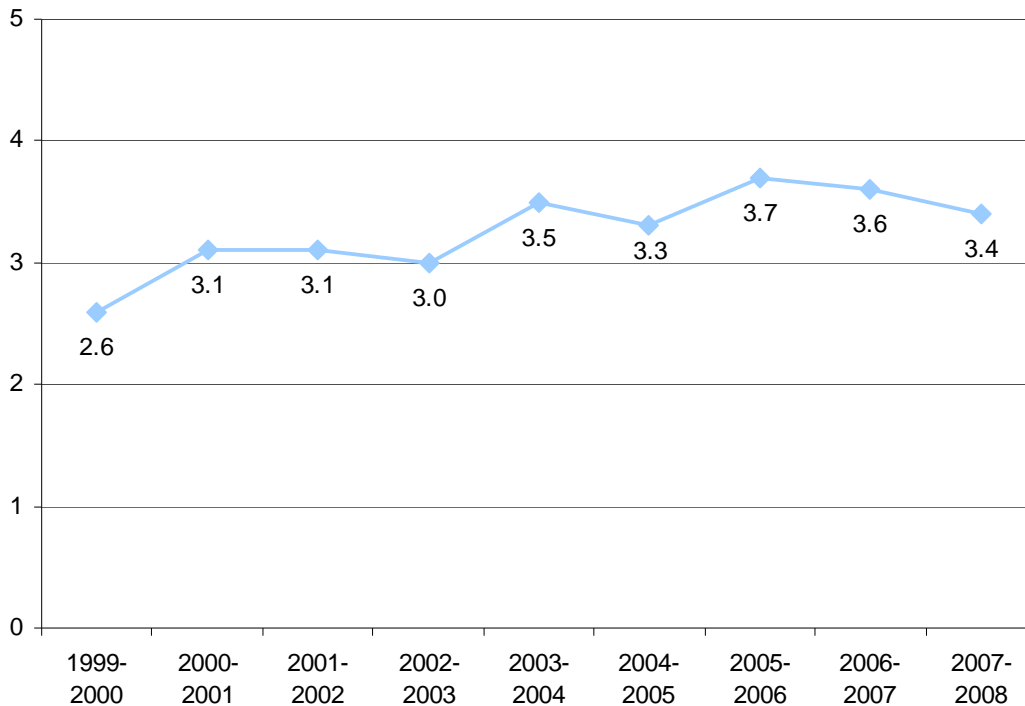
TDOE officials indicate that the recently automated data collection procedure will ensure more accurate reporting in the future.²⁴ Prior to the institution of the new system, districts would assemble end-of-year reports to submit to TDOE. Under the new procedure, districts enter school discipline information into their school's information system throughout the school year. The data is automatically uploaded into the

Education Information System (EIS) at certain district-specific intervals and later uploaded into TDOE's data warehouse.²⁵ The EIS system automatically categorizes codified offenses as zero tolerance and flags district zero tolerance offenses for inclusion in the zero tolerance data set. A result of the new system will be that the majority of non-codified zero tolerance offenses will no longer be tracked in the zero tolerance database.²⁶

Trend Analysis, 1999-2008

Codified offenses increased between school year 1999-2000, when standardized data collection began, and 2005-06, but have since trended downward. (See Exhibit 3.) In 1999-2000, there were 2.6 codified zero tolerance offenses per 1,000 students; in school year 2005-06, there were 3.7 offenses per 1,000 students; and in 2007-08, there were 3.4 offenses per 1,000 students. The number of codified offenses increased 31 percent for the entire time period.²⁷ Between 2005-06 and 2007-08, the number of codified offenses decreased by 8 percent.

Exhibit 3: Number of Codified Zero Tolerance Offenses per 1,000 Students, 1999-2008

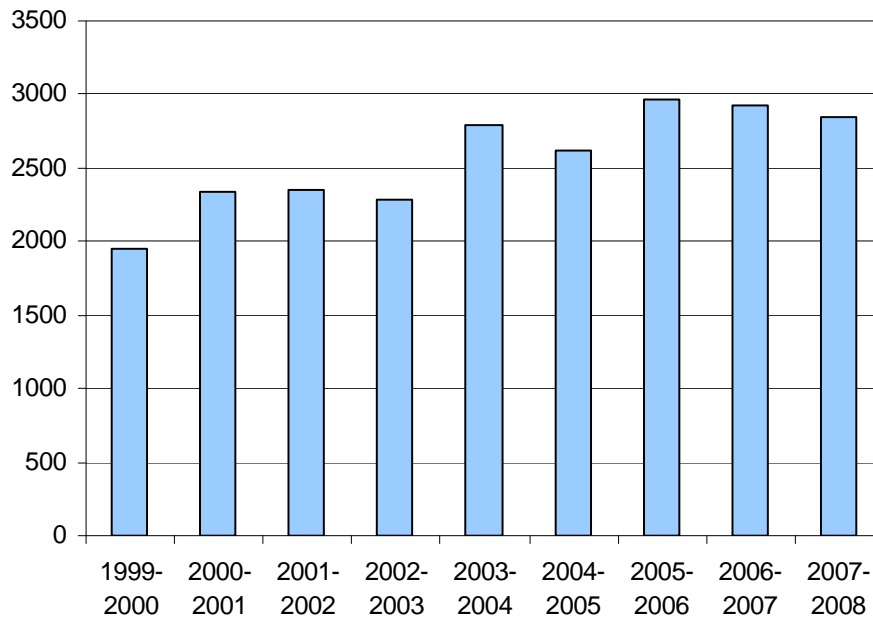


Source: Tennessee Department of Education, Zero Tolerance Data 1999-2008.

Note: In the previous two reports, zero tolerance offense rates were higher (4 to 4.5 offenses per 1,000 students) because non-codified offenses were included in the analysis.

The growth in drug offenses has outpaced student population growth. Drug offenses have increased 45 percent since 1999. Student population, on the other hand, has increased six percent since 1999. More recently, the data shows slight declines in the number of drug offenses. Between school years 2005-06 and 2007-08, the number of drug offenses decreased by four percent.

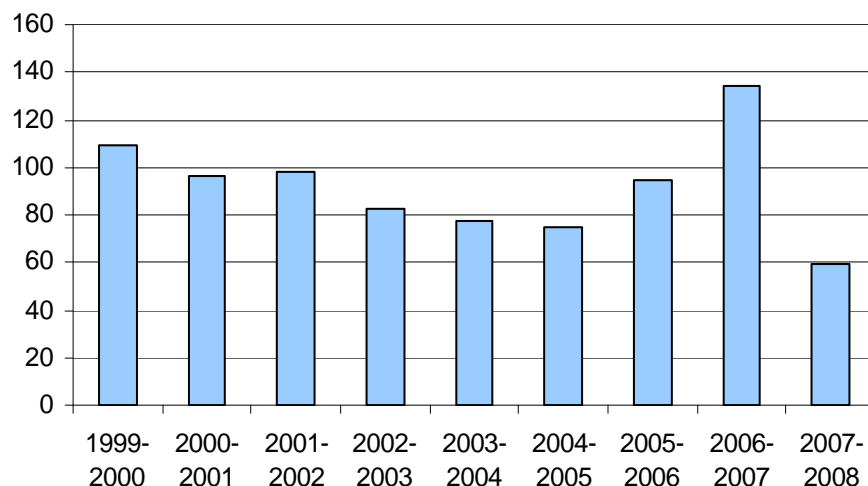
Exhibit 4: Drug Offenses, 1999-2008



Source: Tennessee Department of Education, Zero Tolerance Data 1999-2008.

In the years between 1999 and 2005, firearm offenses showed a relatively steady pattern of decline. More recently, however, the pattern of firearm offenses has been erratic. In 2005-06, the number of gun offenses began to increase. The 134 offenses (0.14 per 1,000 students) in school year 2006-07 resulted in the highest total for any year since data collection began. However, the 59 offenses (0.06 per 1,000 students) in the following year were the fewest ever reported.

Exhibit 5: Firearm Offenses, 1999-2008



Source: Tennessee Department of Education, Zero Tolerance Data 1999-2008.

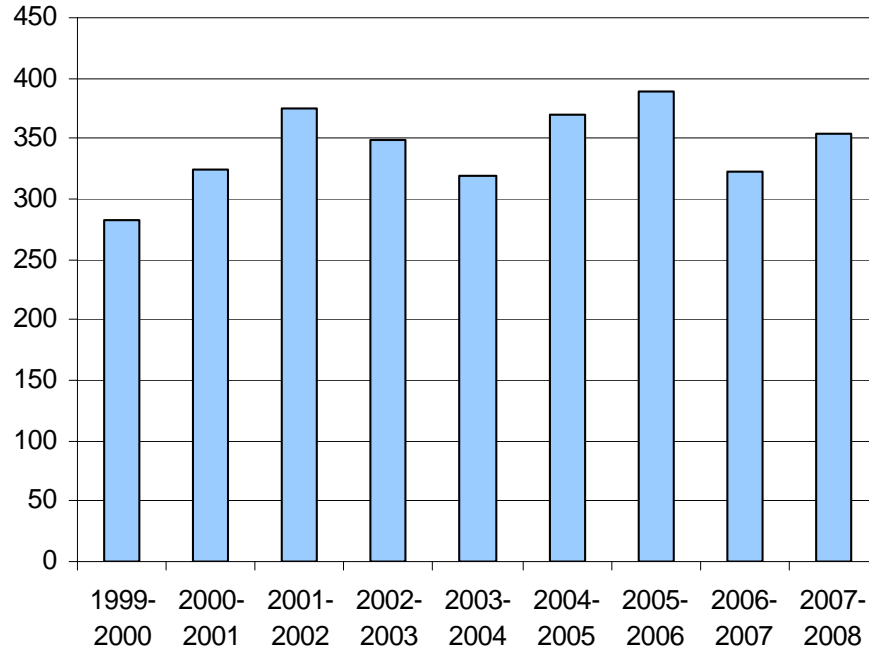
The reliability of data regarding battery of staff is complicated by the category’s subjectivity.

Unlike drug and firearm offenses, which are well-defined, “battery of staff” is subject to interpretation by school officials and victims. Victims determine whether or not to report incidents to school officials, who then determine whether an incident constitutes battery of staff. Even for similar incidents, school officials may come to different conclusions about whether battery of staff has occurred. One school may consider any aggressive physical contact between teachers and students as battery, while another school may limit the battery of staff classification to those incidents resulting in physical injury.

Over the past two years, TDOE has advocated for legislation to replace the “battery of staff” classification with “assault.” No definition for battery exists in Tennessee statute. According to TDOE’s legal department, the type and severity of contact that can lead to a charge of battery can vary significantly.²⁸ “Assault” takes levels of severity into account and is defined in Tennessee’s criminal code as “intentionally, knowingly or recklessly” (1) causing bodily injury to another, (2) causing another to reasonably fear imminent bodily injury, or (3) causing physical contact with another that a reasonable person would regard as extremely offensive or provocative.²⁹

The available information indicates an increase in the number of battery offenses. In school year 1999-2000, there were 282 incidents of battery against staff. In 2007-2008, there were 354 incidents, representing a 25 percent increase.

Exhibit 6: Battery Offenses, 1999-2008



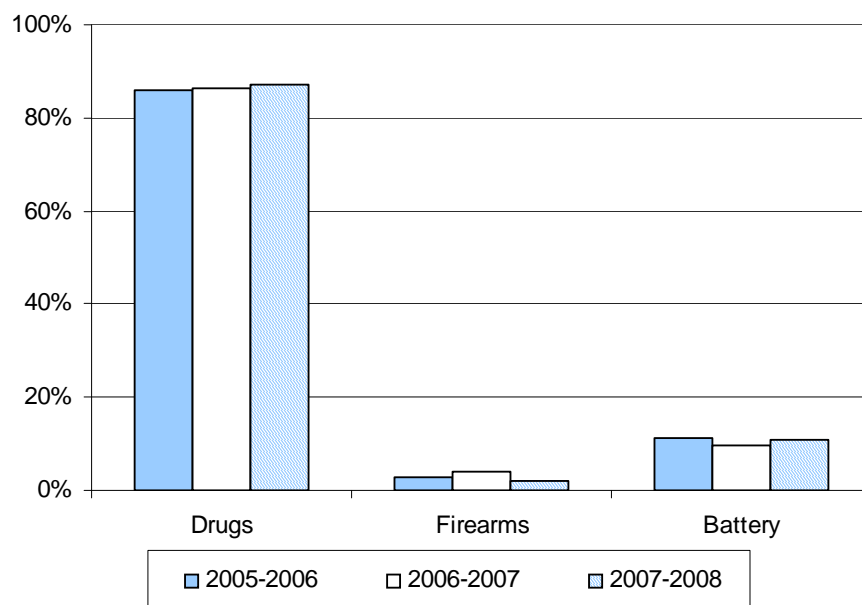
Source: Tennessee Department of Education, Zero Tolerance Data 1999-2008.

Analysis, 2005-2008

Type of Offense

In Tennessee, the proportion of offenses changes very little from year to year. Between 2005 and 2008, drug offenses represented more than 85 percent of codified zero tolerance offenses. Firearm possession represented less than 5 percent of codified zero tolerance offenses and battery of staff represented approximately 10 to 11 percent each year.

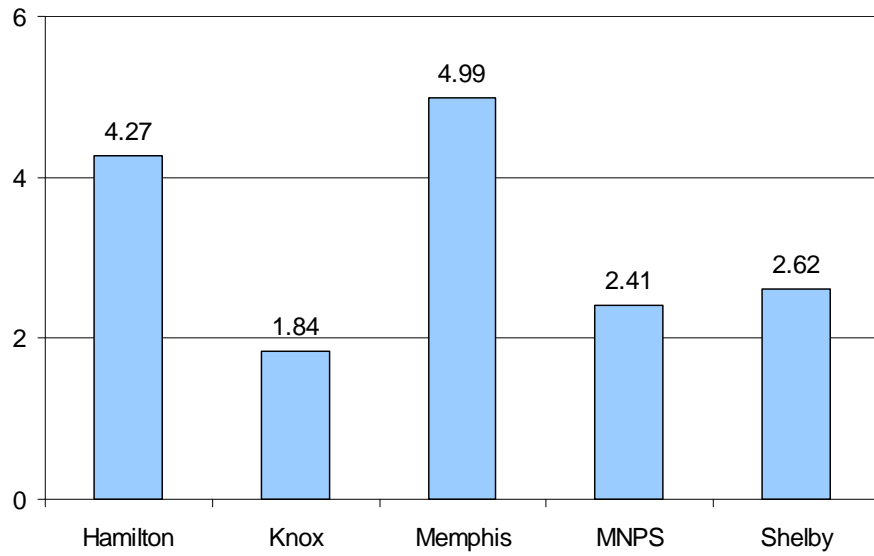
Exhibit 7: Codified Zero Tolerance Offenses by Type, 2005-2008



Source: Tennessee Department of Education, Zero Tolerance Data 2005-2008.

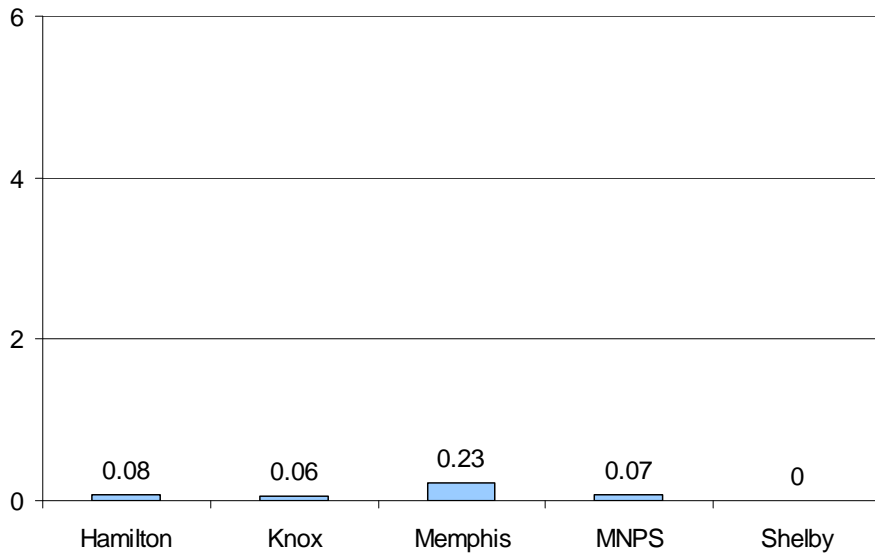
In 2007-08, 40 percent of all codified zero tolerance offenses occurred in Tennessee's 5 largest school districts (Memphis City Schools, Shelby County Schools, Metropolitan Nashville Public Schools, Knox County Schools, and Hamilton County Schools). For the urban districts, drug offenses were the most prevalent class of offenses and firearms were the least. Memphis City Schools, which had the highest rate of drug offenses, reported 5 drug offenses per 1,000 students. Hamilton County Schools reported a rate that was only slightly lower. (See Exhibit 8.) Each district reported less than 1 firearm offense per 1,000 students. (See Exhibit 9.) Metropolitan Nashville Public Schools (MNPS) experienced the highest rate of staff battery in 2007-08 with 1 offense per 1,000 students. (See Exhibit 10.)

Exhibit 8: Drug Offenses in Urban Schools per 1,000 Students, 2007-08

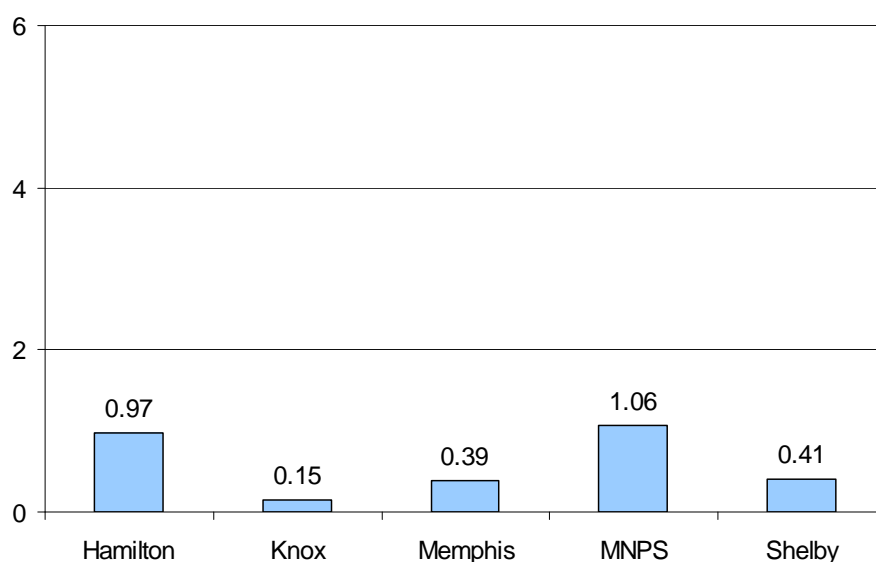


Source: Tennessee Department of Education, Zero Tolerance Data 2007-08.

Exhibit 9: Firearm Offenses in Urban Schools per 1,000 Students, 2007-08



Source: Tennessee Department of Education, Zero Tolerance Data 2007-08.

Exhibit 10: Battery Offenses in Urban Schools per 1,000 Students, 2007-08

Source: Tennessee Department of Education, Zero Tolerance Data 2007-08.

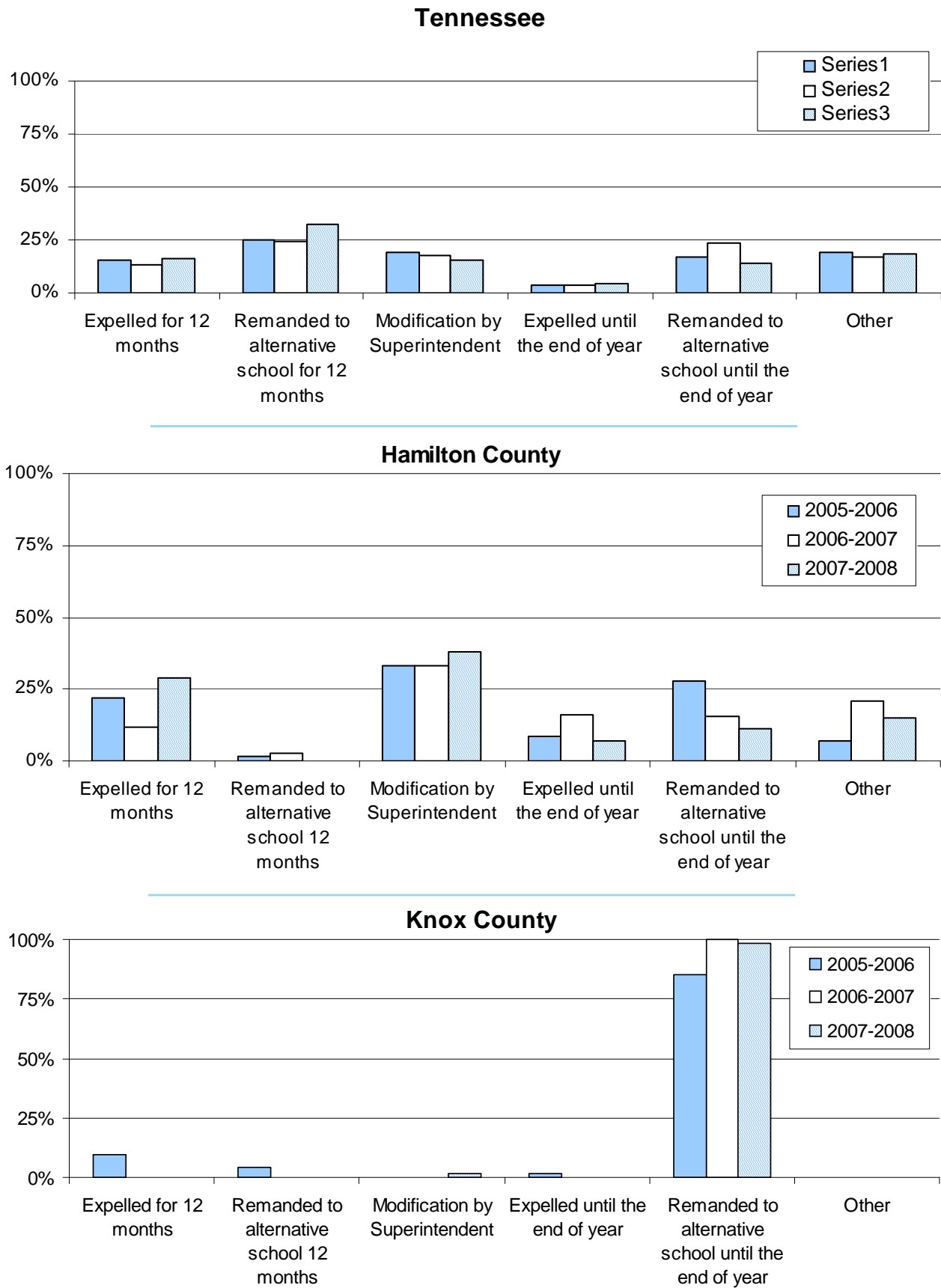
Action Taken and Disposition

“Action taken” refers to the sanction imposed at the time of the offense; categories include expulsion, remandment to alternative school, actions modified by the superintendent, and other. “Disposition” refers to the educational outcome for those students convicted of codified zero tolerance offenses; categories include alternative school, home school, GED/adult education, attendance at another school, expulsion, returned to school, dropped out, unknown, and other. “Disposition” refers to the student’s physical placement on the last day of the school year in which the violation occurred.

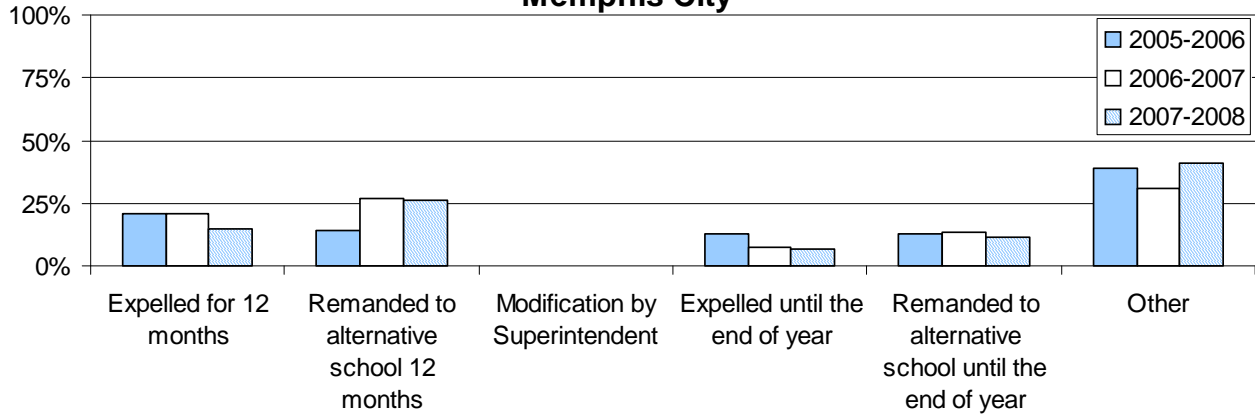
Tennessee school districts were most likely to remand zero tolerance offenders to alternative school (46 percent) in 2007-08. Approximately 20 percent of zero tolerance cases resulted in expulsion. Superintendents modified penalties for 15 percent of zero tolerance cases and systems reported taking “other” actions for about 18 percent of zero tolerance offenses, which includes such disciplinary actions as in-school suspension, out-of-school suspension, Individualized Education Plan meetings, referral to juvenile court, referral to rehabilitation programs, DCS custody, and night school.

The urban districts varied in their utilization of different disciplinary actions. Almost all zero tolerance offenders in Knox County Schools (98 percent in 2007-08) are placed in alternative school. Knox County’s School Board policy requires the superintendent to review all zero tolerance cases for alternative placement.³⁰ MNPS has instituted an alternative school pilot program.³¹ In 2007-08 MNPS remanded 84 percent of offenders to alternative school. Shelby County expelled more students for the mandated 12-month period than any other urban districts (49 percent in 2007-08). Between 2005 and 2008, Hamilton County modified between 33 and 38 percent of its zero tolerance cases. The other metropolitan districts rarely modified zero tolerance cases. Memphis City most frequently took action in the “other” category, while Knox County had no instances of “other” action.

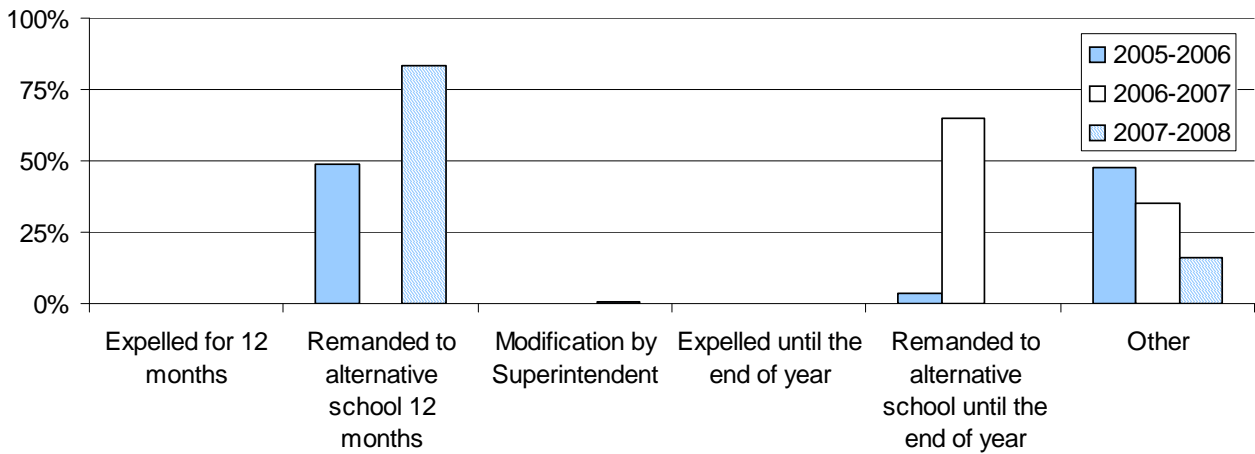
Exhibit 11: Actions Taken for Codified Zero Tolerance Offenses, Statewide and by Urban System, 2005-2008



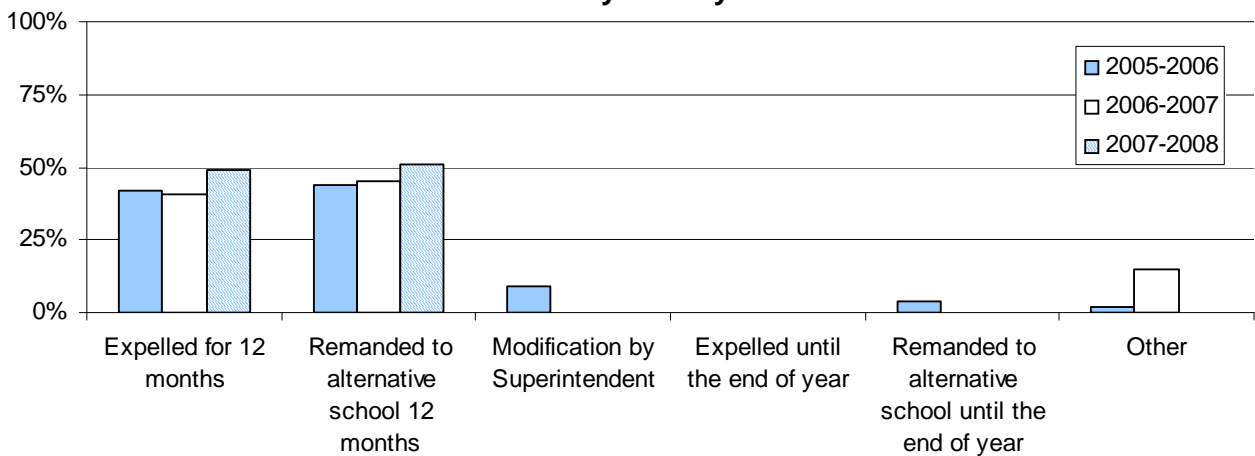
Memphis City



MNPS



Shelby County



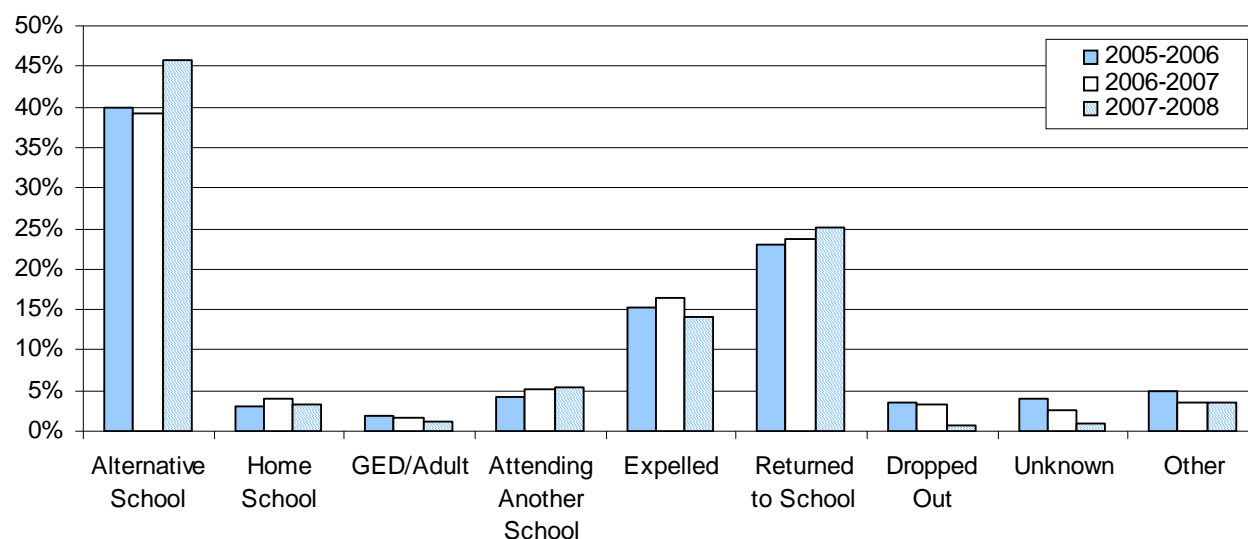
Although the percentages vary from district to district, most zero tolerance offenders in the state (81 percent) were continuing with their education.

In 2007-08, zero tolerance offenders were attending alternative school (46 percent), their original school (25 percent), another school (6 percent), home school (3 percent), or a GED/adult education program (1 percent). Approximately 16 percent of these students were receiving no education services because they were still expelled (14 percent), had dropped out (1 percent), or their whereabouts were unknown (1 percent). Three percent of students had dispositions other than the ones indicated.

Outcomes for zero tolerance offenders were largely dependent on district practices:

- In 2007-08, the most common dispositions for zero tolerance offenders in Hamilton County Schools were placement in an alternative school (33 percent) and returning to their original school (32 percent). Six percent were in another type of education setting (home school, GED/adult education program or enrolled in a school other than their school of origin). The percentage of students expelled by the end of the school year exceeded the state average (23 percent compared to 14 percent), as did the percentage of dropouts (3 percent compared to less than 1 percent). Three percent of Hamilton County students had dispositions other than the ones indicated.
- The majority of zero tolerance dispositions for offenders in Knox County were placements in alternative school (98 percent in 2007-2008). (Knox County Board Policy requires the Director of Schools to consider a possible placement of alternative school for each zero tolerance offender.³²) The remaining students were in other settings. No students were expelled without placement in Knox County.
- In 2007-08, most zero tolerance offenders in Memphis City had returned to some sort of school setting by the end of the school year. Thirty-six percent were in an alternative school setting, 30 percent had returned to their original school, 2 percent were attending a GED/adult education program, and 1 percent was attending another school. However, 22 percent of zero tolerance offenders were still expelled. Eight percent were in settings other than the ones indicated and a very small percentage of the students had whereabouts unknown (less than half of a percent).
- For MNPS, the number of students placed in alternative school increased by 47 percent in two years as a result of the alternative pilot program. In 2005-06, only 33 percent of offenders were in an alternative school setting at the end of the year. By 2007-08, the majority (85 percent) of MNPS zero tolerance offenders were in alternative school on the last day of class. The remaining 15 percent of students either returned to their original school or were home schooled. No students in MNPS were expelled without placement in 2007-08.
- The most common disposition for students in Shelby County Schools was alternative school (37 percent). About 14 percent returned to their original school and about 14 percent were expelled. More so than any other district, Shelby County zero tolerance offenders were home schooled (18 percent) or placed in another school (16 percent). None of the students dropped out or were unaccounted for.

Exhibit 12: Disposition of Offenders That Committed Codified Zero Tolerance Offenses, 2005-2008



Source: Tennessee Department of Education, Zero Tolerance Data 2005-2008.

Exhibit 13: Disposition of Offenders That Committed Codified Zero Tolerance Offenses, 2007-08

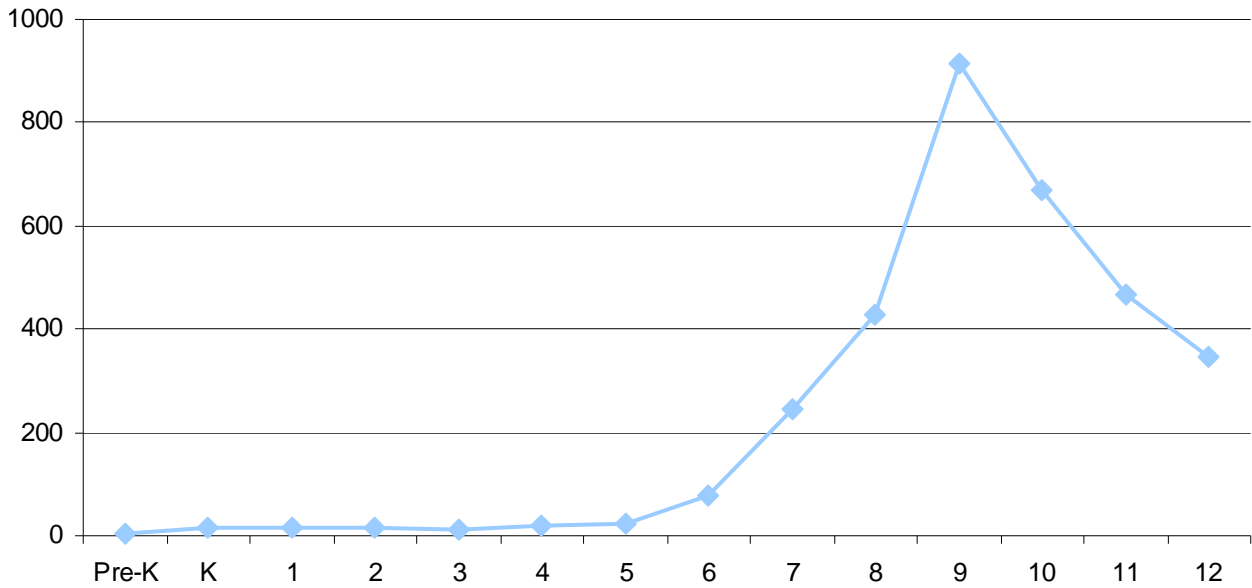
	Hamilton	Knox	Memphis	MNPS	Shelby	Tennessee
Alternative School	32.7%	98.2%	36.3%	84.7%	36.9%	45.8%
Home School	1.0%	0.0%	0.0%	0.4%	18.4%	3.3%
GED/Adult Program	1.9%	0.0%	2.3%	0.0%	0.7%	1.3%
Another School	3.4%	0.0%	0.8%	0.0%	16.3%	5.5%
Expelled	22.6%	0.0%	21.6%	0.0%	14.2%	14.0%
Returned to School	32.2%	0.0%	30.3%	14.9%	13.5%	25.0%
Dropped Out	2.9%	0.0%	0.0%	0.0%	0.0%	0.7%
Unknown	0.5%	0.0%	0.3%	0.0%	0.0%	1.0%
Other	2.9%	1.8%	8.3%	0.0%	0.0%	3.4%

Source: Tennessee Department of Education, Zero Tolerance Data 2007-2008.

Grade

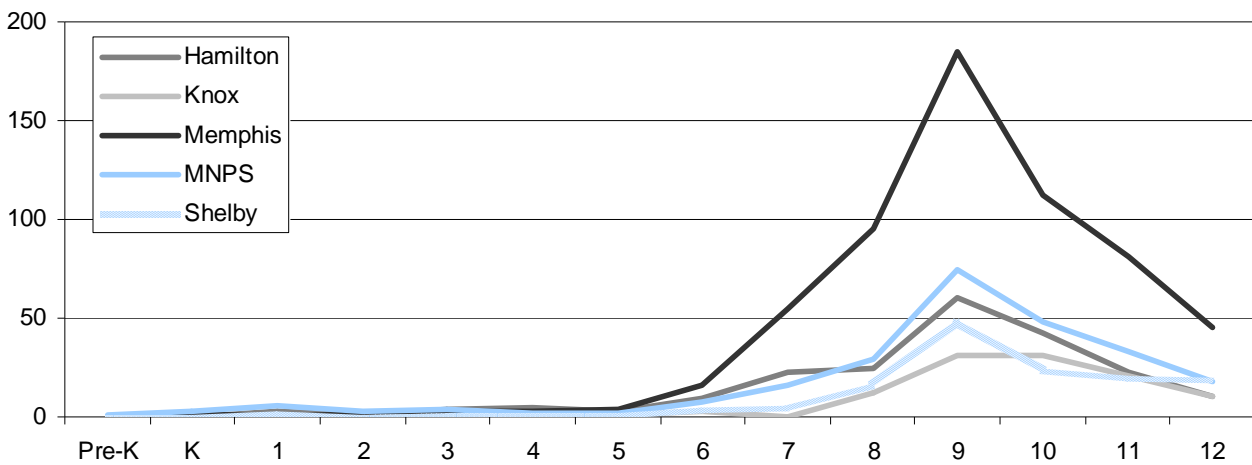
For the state as a whole and for metropolitan districts, zero tolerance offenses appear to peak in 9th grade and decline steadily thereafter. This is consistent with findings in previous reports. In 2007-08, ninth grade students represented 28 percent of all zero tolerance offenders, although they made up only 8 percent of the total student population.

Exhibit 14: Codified Zero Tolerance Offenses by Grade Level, 2007-08



Source: Tennessee Department of Education, Zero Tolerance Data 2007-2008.

Exhibit 15: Urban Codified Zero Tolerance Offenses by Grade Level, 2007-08

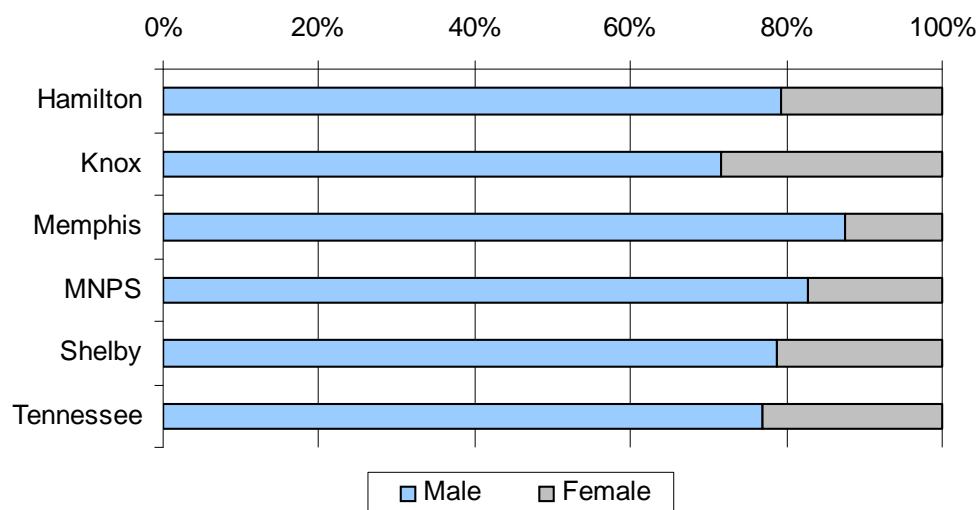


Source: Tennessee Department of Education, Zero Tolerance Data 2007-08.

Gender

In Tennessee, the ratio of male to female offenders is 3 to 1. This pattern is consistent for the metropolitan districts as well, although there is slight variation. Knox County had the highest proportion of female offenders (28 percent) and Memphis had the lowest (12 percent).

Exhibit 16: Distribution of Codified Zero Tolerance Offenses by Gender, 2007-08



Source: Tennessee Department of Education, Zero Tolerance Data 2007-08.

Race

African-American students continue to be disproportionately represented among zero tolerance offenders. Disproportionality refers to the overrepresentation of students belonging to a particular group on a particular measure. For the state as a whole and each of the metropolitan districts, the percentage of African-American zero tolerance offenders exceeds the number one would expect given population size. Disproportionality is greatest in Shelby County Schools and MNPS. In Memphis City Schools, there is a slight overrepresentation of zero tolerance offenders among white students. (See Exhibit 17.)

A 2007 legislative request to identify areas of disparity in zero tolerance data led to the following findings:

- Compared to other races, a larger percentage of offenses by African-American students were related to battery and non-codified offenses (weapons other than firearms and offenses categorized as “other,” such as verbal threats, sexual battery, and participation in gang-related fights).
- Compared to other races, African-American zero tolerance offenders were less likely to have superintendents modify actions taken by the LEA. From 2001-2006, superintendents modified the actions taken for 20 percent of offenses committed by other races and for 7 percent of offenses committed by African-American students.
- Compared to other races, African-American zero tolerance offenders were more likely to receive a punishment categorized as “other.”
- From 2001 through 2006, African-American zero tolerance offenders were less likely to be regular education students and more likely to be special education students.³³

Exhibit 17: Racial Distribution of Codified Zero Tolerance Offenses for Tennessee and the Urban Systems, 2007-08

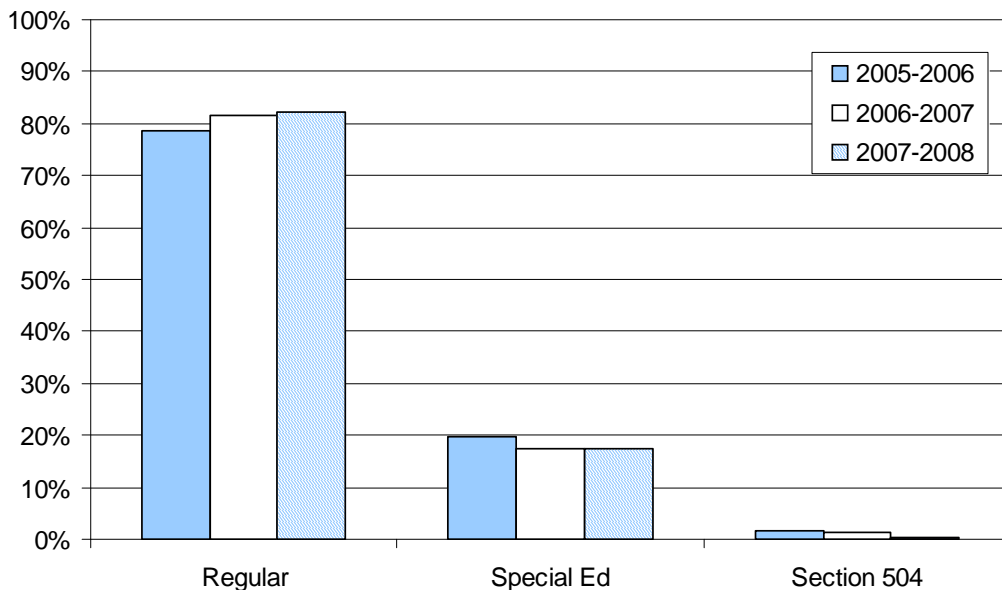
	Caucasian		African American		Hispanic		Other	
	Population	Offenders	Population	Offenders	Population	Offenders	Population	Offenders
Hamilton	60.0%	59.1%	33.3%	38.5%	4.6%	1.4%	2.1%	1.0%
Knox	79.9%	71.6%	14.6%	26.6%	3.3%	1.8%	2.2%	0.0%
Memphis	7.2%	8.3%	86.1%	88.4%	5.3%	3.0%	1.4%	0.3%
MNPS	34.2%	26.6%	48.1%	61.7%	14.2%	10.9%	3.5%	0.8%
Shelby	55.2%	44.7%	36.1%	51.1%	4.0%	3.5%	4.7%	0.7%
Tennessee	68.8%	61.5%	24.6%	34.9%	4.8%	2.9%	1.8%	0.7%

Source: Tennessee Department of Education, Zero Tolerance Data 2007-08.

Education Status

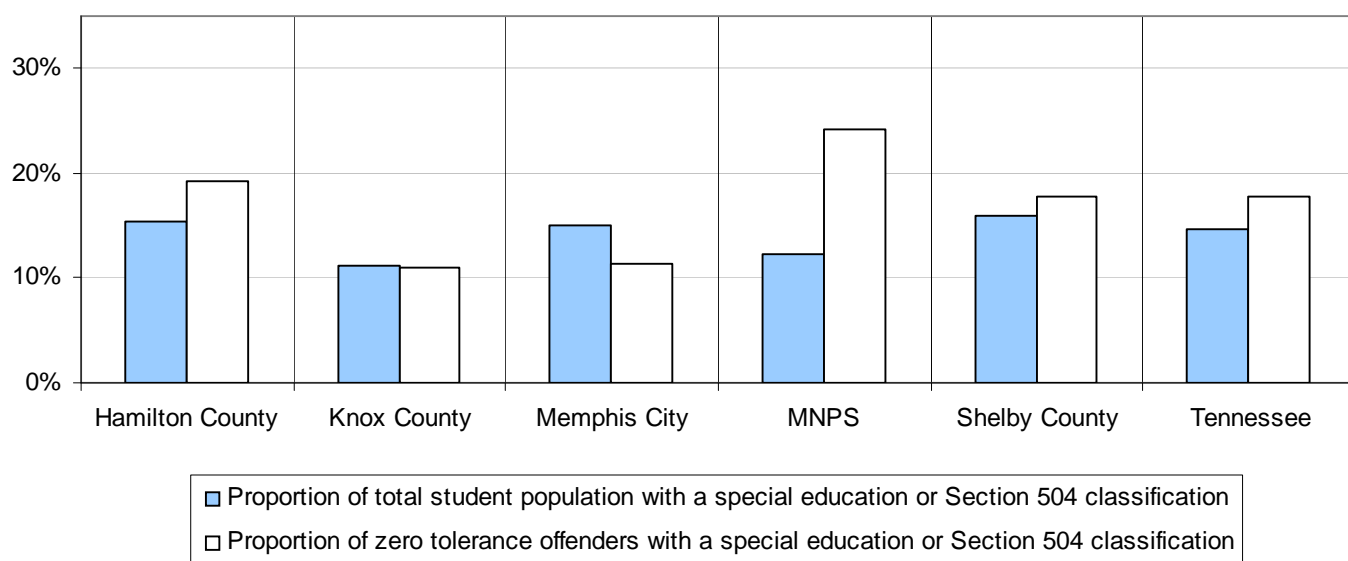
Although most zero tolerance offenders come from regular education classes (82 percent in 2007-08), Exhibit 19 reveals disproportionality based on student education status. There was a disproportionate number of zero tolerance offenders among the disabled student population, which encompasses both special education students and students with physical disabilities. This was true for the state as a whole, Hamilton County Schools, MNPS, and Shelby County Schools. MNPS had the largest proportion of disabled zero tolerance offenders. Approximately 24 percent of zero tolerance offenders in MNPS were classified as disabled, although MNPS' disabled population made up only 12 percent of the student population in 2007-08. Around 19 percent of Hamilton County's zero tolerance offenders were classified as disabled, although they comprised only 15 percent of the total student population. Sixteen percent of Shelby County students were classified as disabled, but represented nearly 18 percent of the zero tolerance offenders for the district. For the state as a whole, approximately 15 percent of students were classified as disabled, yet they comprised approximately 18 percent of the state's zero tolerance offenders.

Exhibit 18: Distribution of Codified Zero Tolerance Offenses by Education Status, 2005-2008



Source: Tennessee Department of Education, Zero Tolerance Data 2005-2008.

Exhibit 19: Special Education Student Population and Zero Tolerance Offenders from the Special Education Population, Codified Offenses, 2007-08



Source: Tennessee Department of Education, Zero Tolerance Data 2007-08.

No Offenses

The majority of LEAs with no zero tolerance offenses are small school districts. Many do not contain a high school, where most zero tolerance offenses occur.

Alamo City, Bells City, and Lexington City Schools have never reported a zero tolerance offense in the nine years examined in this report.

Ten school districts reported no offenses for the three years covered in this report: Alamo City, Clinton City, Dayton City, Lexington City, Milan SSD, Newport City, Oneida SSD, the Tennessee School for the Blind, West Carroll SSD, and the West Tennessee School for the Deaf.

Six school districts reported no offenses for two of the three years: Bradford SSD, Carroll County, Hollow Rock-Bruceton SSD, McKenzie SSD, Paris SSD, and Rogersville City.

Eighteen other school districts reported no offenses for one of the three years covered in this report: Athens City, Cannon County, Etowah City, Franklin SSD, Fayetteville City, Fentress County, Grundy County, Huntingdon SSD, Jackson County, Manchester County, Moore County, Murfreesboro City, Polk County, South Carroll SSD, Sweetwater City, the Tennessee School for the Deaf, Union City, and White County.

POLICY CONSIDERATIONS

Data Accuracy

The state does not audit school districts' zero tolerance data, although the data is reviewed by TDOE officials.³⁴ During the course of this project, OREA discovered a data reporting error that was not identified by TDOE. A district reported no offenses for a whole category, although its report from the year prior indicated hundreds of offenses. It is unknown whether this data reporting error is an anomaly or represents a larger, broader problem with the accuracy of zero tolerance data. Data reporting issues must be resolved because TDOE relies on zero tolerance data reported by school districts to comply with the Unsafe School Choice Option policy under No Child Left Behind (NCLB) and to make determinations about whether schools are considered "persistently dangerous."³⁵

Audits in other states have identified major problems with school safety data. In 2005, a New York City State Comptroller's audit of a representative sample of high schools found that a majority of these schools at least one-third of the violent and disruptive incidents documented in the schools' records were not reported to the state education department. The report also found that, at several schools, more than 80 percent of the documented incidents went unreported.³⁶ That same year, the U.S. Office of the Inspector General (OIG) conducted audits of school safety data used to make persistently dangerous school determinations in five states: California, Georgia, Iowa, New Jersey, and Texas. A sample of three or four LEAs was selected from each state. For every state examined, OIG found either misreporting or issues that prevented accurate reporting of all offenses. (See Exhibit 20.)

Exhibit 20: Selected findings from US Department of Education's Inspector General

California	The four LEAs reviewed did not accurately report Unsafe School Choice Option (USCO) incidents that occurred at the schools and used different factors to assess whether an incident should be identified as "causing serious physical injury."
Georgia	OIG found that the three LEAs covered by the audit did not report all incidents of criminal offenses to Georgia's Department of Education and did not address the Unsafe School Choice transfer option.
Iowa	Audited three LEAs and found that two had underreported incidents. OIG determined that Iowa's Department of Education had not (1) initiated any monitoring activities to assess LEA compliance with its USCO policy, (2) evaluated school procedures for collecting and reporting USCO incidents, and (3) verified the accuracy of reported data.
New Jersey	A review of four school districts revealed that the interpretation of the criteria for reporting incidents of violence and the level of compliance with reporting requirements varied significantly at each school district visited.
Texas	The three LEAs that were audited did not always select the appropriate discipline code when reporting an incident to the Texas Education Agency or failed to report the incident at all.

Note: OREA did not include all findings from these reports. These audits pertained to the USCO (Unsafe School Choice Option), which is a federal mandate under NCLB. Each state selects its own criteria for designating persistently dangerous schools under USCO. The states use selected components of school safety data as criteria. These audits were chosen to provide examples of inaccurate reporting of school safety data

Sources: United States Department of Education, Office of Inspector General, *California Department of Education's Compliance with the Unsafe School Choice Option Provision*, *Georgia Department of Education's Compliance with the Unsafe Schools Choice Option Provision*, *Iowa Department of Education's Compliance with the Unsafe Schools Choice Option Provision*, *The State of New Jersey's Compliance With The Unsafe School Choice Option Provision*, and *Texas Department of Education's Compliance with the Unsafe School Choice Option*, 2005.

Disproportionality

Special education students and African-American students are consistently overrepresented in Tennessee's zero tolerance offender population. In school year 2007-08, African-Americans represented approximately 25 percent of Tennessee's student population, but made up 35 percent of offenders committing codified zero tolerance offenses. Special education students represented 15 percent of Tennessee's student population during the same period, but accounted for 18 percent of codified zero tolerance violators. Past zero tolerance reports also noted similar patterns of representation, although the prior report analysis included offenses other than codified zero tolerance offenses. The 2006 report indicated that African-American students comprised 25 percent of statewide student enrollment in 2004-05, but accounted for 34 percent of all zero tolerance violations, and that special education students comprised nearly 16 percent of the student population, but were responsible for 20 percent of zero tolerance offenses.³⁷

There is also evidence that superintendents show less flexibility with zero tolerance policies in cases involving African-American students. For school year 2007-08, superintendents modified 22 percent of the penalties for Caucasian students, but only five percent for African-American students. Superintendents in 45 districts modified 439 cases involving Caucasian students. In contrast, superintendents in 18 districts modified 50 cases involving African-American students.

Ninth Grade Transition

Previous reports in this series (2003, 2006) have noted the significant number of zero tolerance violations in grade 9.³⁸ Preventing suspensions and expulsions at this stage is critical because research has established a strong correlation between suspension and expulsion and dropping out of school.³⁹

The Southern Regional Education Board (SREB) has outlined several effective strategies for helping students make a successful transition between grades 8 and 9:

1. Use an interdisciplinary approach by combining academic studies to make learning more meaningful for students, in order to accelerate low-performing middle grade students.
2. Provide summer schools for middle grade students to prevent loss of learning for at-risk students and give them a head start in the coming school year.
3. Provide summer programs for incoming 9th graders who are below grade-level standards.
4. Provide jump-start programs for 9th graders.
5. Assemble teacher support teams to help 8th graders considered to be at risk of failure or dropping out.
6. Create freshman academies and small learning communities.
7. Provide 9th graders with double doses of English and mathematics.
8. Establish special schools to prepare students for high school and beyond.⁴⁰

TDOE encourages districts to institute transition programs for freshmen; however, districts are not required to do so. According to information provided by TDOE, there are currently freshman academies in 30 of Tennessee's 138 school districts.⁴¹ In addition, nine counties participate in the GEAR UP program (Gaining Early Awareness and Readiness for Undergraduate Programs) and a few schools offer summer transition programs.⁴² Although relatively few schools offer freshman programs, many schools offer freshman orientation classes.⁴³

POLICY OPTIONS

TDOE may wish to periodically audit a random sample of school districts to verify the accuracy of zero tolerance data. Such periodic audits would further encourage accurate data reporting by districts, verify data accuracy in the sampled districts, and provide some indication of the prevalence of data errors across the state. Although TDOE believes the newly implemented system will resolve many of the shortcomings of the previous data collection procedure, the system is still dependent on school officials accurately inputting the offenses into the data system. TDOE could also examine district data for any evidence of disproportionality in conjunction with the audit. Further, verifying offense data would likely provide district and state officials with more accurate statistics on the spike in offenses that repeatedly occurs in the ninth grade.

TDOE may wish to administer a survey to district superintendents to determine the criteria districts use for zero tolerance charges and modifications. Survey results can be compared with actual zero tolerance offense charges and modifications for each district. The results could serve as a baseline to judge the objectivity with which zero tolerance charges are brought and by which superintendents modify punishments. The charge and modification criteria that prove to be effective and consistently applied over time can be disseminated as best practices.⁴⁴ The survey could also include items pertaining to freshmen transition that may identify contributing factors to the offenses spike and identify programs to address the problem.

Endnotes

- ¹ To enable long-term trend analysis, OEA utilized the new methodology to reanalyze zero tolerance data spanning back to the year 1999-2000.
- ² Debra Bloomingburg, Division of State Audit, e-mail, Oct. 7, 2009.
- ³ Offices of Research and Education Accountability, *Zero Tolerance, An Update 2006*, July 2006; Offices of Research and Education Accountability, *Zero Tolerance in Tennessee Schools, An Update*, Aug. 2003.
- ⁴ The Civil Rights Project, *Opportunities Suspended: The Devastating Consequences of Zero Tolerance and School Discipline Policies*, Executive Summary, Harvard University, 2000.
- ⁵ T.C.A. §49-6-4216(e).
- ⁶ Mike Herrmann, Director of Office of School Safety and Learning Support, e-mail, Feb. 23, 2009.
- ⁷ T.C.A. §49-6-3401(g).
- ⁸ To enable long-term trend analysis, OEA utilized the new methodology to reanalyze zero tolerance data spanning back to the year 1999-2000.
- ⁹ Mike Herrmann, Director of Office of School Safety and Learning Support, e-mail, Feb. 23, 2009.
- ¹⁰ Offices of Research and Education Accountability, *Getting Tough on Kids: A Look at Zero Tolerance*, Feb. 1998. Note: Firearm offenses, as well as the other two codified offenses (drug offenses and battery) must be included in every district zero tolerance policy.
- ¹¹ U.S. Department of Education, National Center for Education Statistics, *Violence and Discipline Problems in U.S. Public Schools: 1996-97*, March 1998, p.18, <http://nces.ed.gov/surveys/frss/publications/98030/index.asp?sectionid=5> (accessed Jan. 23, 2009).
- ¹² Mike Herrmann, Director of Office of School Safety and Learning Support, e-mail, Feb. 23, 2009.
- ¹³ According to T.C.A. 49-6-4216(b)(1): "A zero tolerance violation shall not necessarily result in a presumptive one (1) calendar year expulsion except for those types of student misconduct set forth in § 49-6-3401(g)."
- ¹⁴ Office of Education Accountability, Comptroller of the Treasury, *Getting Tough on Kids: A Look at Zero Tolerance*, Feb. 1998, p.2.
- ¹⁵ 100th Tennessee General Assembly, Public Acts, 1997, Chapter No. 151, An act relative to zero tolerance policies, <http://state.tn.us/sos/acts/100/pub/Pubc0151.HTM> (accessed July 21, 2009).
- ¹⁶ 100th Tennessee General Assembly, Public Acts, 1998, Chapter No. 871, An act relative to school policies and procedures, <http://state.tn.us/sos/acts/100/pub/PUBC0871.htm> (accessed July 21, 2009).
- ¹⁷ Seal versus Morgan, 2000 FED App. 0358P (6th Cir.) <http://laws.findlaw.com/6th/00a0358p.html> (accessed Jan. 23, 2009).
- ¹⁸ Ibid.
- ¹⁹ 101st Tennessee General Assembly, Public Acts, 2000, Chapter No. 634, An act relative to zero tolerance and student suspensions, <http://state.tn.us/sos/acts/101/pub/pc634.pdf> (accessed March 24, 2010).
- ²⁰ U.S. Department of Education, "No Child Left Behind: A Desktop Reference," Sept. 2002, http://www.ed.gov/admins/lead/account/ncibreference/page_pg32.html (accessed Oct. 15, 2009).
- ²¹ Florida Department of Education, Office of Safe Schools, *Statewide Report on School Safety and Discipline Data 2007-2008*, p. 6," <http://www.fldoehub.org/schoolsafety/Documents/SESIRIntro0708.pdf> (accessed September 14, 2009).
- ²² Ibid.
- ²³ Dr. Nancy Stetten and James Witty, Tennessee Department of Education Consultants, interview, Nov. 7, 2008.
- ²⁴ Ibid.
- ²⁵ James Witty, Tennessee Department of Education Consultant, e-mail, Aug. 24, 2009.
- ²⁶ Dr. Nancy Stetten and James Witty, Tennessee Department of Education Consultants, interview, Nov. 7, 2008.
- ²⁷ The rates are standardized to reflect population size, therefore the increases are not due to population increases.
- ²⁸ Christy Ballard, General Counsel, Tennessee Department of Education, e-mail to Mike Hermann, Director of the Office of School Safety and Learning Support, Aug. 10, 2009.
- ²⁹ T.C.A. 39-13-101(a).
- ³⁰ Knox County Board of Education, "Zero Tolerance Expulsions," <http://board.knoxschools.org/modules/groups/homepagefiles/cms/443879/File/policymanual/policy%20manual/j/JCCC-2.pdf?sessionId=f2ead16d7d2d7828ff473b97e4dad1b6> (accessed Aug. 19, 2009).
- ³¹ T.C.A. 49-6-3402(h).

- ³² Knox County Board of Education, "Zero Tolerance Expulsions," <http://board.knoxschools.org/modules/groups/homepagefiles/cms/443879/File/policymanual/policy%20manual/j/JCCC-2.pdf?sessionid=f2ead16d7d2d7828ff473b97e4dad1b6> (accessed Aug. 19, 2009).
- ³³ Offices of Research and Education Accountability, *An Analysis of Zero Tolerance Data: Statewide and Metro Nashville Public Schools, 2001-2006*, May 2007.
- ³⁴ Debra Bloomingburg, Division of State Audit, e-mail, Oct. 7, 2009.
- ³⁵ Tennessee State Board of Education, "Unsafe School Choice Policy: 4.202," Aug. 22, 2003, p.1 <http://www.tennessee.gov/sbe/Policies/4.202%20Unsafe%20School%20Choice%20Policy.pdf> (accessed July 1, 2009).
- ³⁶ Office of the New York State Comptroller, *State Education Department: Reporting of Violent and Disruptive Incidents by Public Schools*, May 2006, p.2, <http://www.osc.state.ny.us/audits/allaudits/093006/05s38.pdf> (accessed Sept. 14, 2009).
- ³⁷ Offices of Research and Education Accountability, *Zero Tolerance, An Update 2006*, July 2006.
- ³⁸ Ibid.; Offices of Research and Education Accountability, *Zero Tolerance in Tennessee Schools, An Update*, Aug. 2003.
- ³⁹ The Civil Rights Project, *Opportunities Suspended: The Devastating Consequences of Zero Tolerance and School Discipline Policies*, Executive Summary, Harvard University, 2000.
- ⁴⁰ Southern Regional Education Board, *Opening Doors to the Future: Preparing Low Achieving Middle Grades Students to Succeed in High School*, 2002, pp. 5-6, [http://www.sreb.org/programs/hstw/Outstanding/2002_Outstanding_Pract\(02V21\).pdf](http://www.sreb.org/programs/hstw/Outstanding/2002_Outstanding_Pract(02V21).pdf) (accessed August 19, 2009).
- ⁴¹ There are freshmen academies in Alcoa City, Anderson County, Blount County, Campbell County, Cheatham County, Claiborne County, Clarksville-Montgomery County, Clay County, Cumberland County, DeKalb County, Dickson County, Dyersburg City, Fayette County, Greeneville City, Hamblen County, Hawkins County, Henry County, Knox County, Lincoln County, Jackson-Madison County, Maryville City, McNairy County, Metropolitan Nashville, Roane County, Robertson County, Rutherford County, Sevier County, Sumner County, White County and Williamson County School Systems.
- ⁴² Branson Townsend, Executive Director, Office of Secondary Education Division of Accountability, Teaching and Learning, e-mails, Oct. 9, 2009 and Oct. 14, 2009.
- ⁴³ Branson Townsend, Executive Director, Office of Secondary Education Division of Accountability, Teaching and Learning, e-mail, Oct. 14, 2009.
- ⁴⁴ Mike Herrmann, Director of Office of School Safety and Learning Support, e-mail, Nov. 13, 2009.

APPENDIX A: DISTRICT ZERO TOLERANCE POLICIES, 2009

School District	Drugs	Firearms	Battery	Weapons	Alcohol	Other
Alamo	✓	✓	✓	✓		
Alcoa	✓	✓	✓	✓		
Alvin C. York	✓	✓	✓			
Anderson	✓	✓	✓	✓	✓	
Athens	✓	✓	✓	✓		
Bedford	✓	✓	✓	✓		
Bells	✓	✓	✓	✓		
Benton	✓	✓	✓	✓		✓
Bledsoe	✓	✓	✓	✓		
Blount	✓	✓	✓	✓	✓	
Bradford	✓	✓	✓	✓		
Bradley	✓	✓	✓	✓		
Bristol	✓	✓	✓			
Campbell	✓	✓	✓	✓		
Cannon	✓	✓	✓	✓		
Carroll	✓	✓	✓	✓		
Carter	✓	✓	✓	✓		
Cheatham	✓	✓	✓	✓	✓	
Chester	✓	✓	✓	✓		
Claiborne	✓	✓	✓	✓		
Clarksville-Montgomery	✓	✓	✓			
Clay	✓	✓	✓			✓
Cleveland	✓	✓	✓	✓		
Clinton	✓	✓	✓	✓		
Cocke	✓	✓	✓	✓		
Coffee	✓	✓	✓	✓		
Crockett	✓	✓	✓	✓		
Cumberland	✓	✓	✓	✓		
Davidson	✓	✓	✓			
Dayton	✓	✓	✓	✓		
Decatur	✓	✓	✓	✓		
DeKalb	✓	✓	✓			
Dickson	✓	✓	✓	✓		
Dyer	✓	✓	✓	✓		
Dyersburg	✓	✓	✓	✓		
Elizabethton	✓	✓	✓	✓		
Etowah	✓	✓	✓	✓		
Fayette	✓	✓	✓			
Fayetteville	✓	✓	✓	✓		
Fentress	✓	✓	✓	✓	✓	✓
Franklin City	✓	✓	✓	✓		
Franklin	✓	✓	✓			
Gibson	✓	✓	✓	✓		
Giles	✓	✓	✓	✓		
Grainger	✓	✓	✓	✓		
Greene	✓	✓	✓	✓	✓	✓
Greeneville	✓	✓	✓	✓		
Grundy	✓	✓	✓	✓		
Hamblen	✓	✓	✓			

Hamilton	✓	✓	✓	✓		
Hancock	✓	✓	✓	✓		
Hardeman	✓	✓	✓	✓		
Hardin	✓	✓	✓	✓		
Hawkins	✓	✓	✓	✓		
Haywood	✓	✓	✓	✓	✓	✓
Henderson	✓	✓	✓	✓	✓	✓
Henry	✓	✓	✓			✓
Hickman	✓	✓	✓	✓		
Hollow Rock-Bruceton	✓	✓	✓	✓		
Houston	✓	✓	✓	✓	✓	
Humbolt	✓	✓	✓	✓		
Humphreys	✓	✓	✓	✓	✓	
Huntingdon	✓	✓	✓	✓		
Jackson-Madison	✓	✓	✓	✓	✓	✓
Jefferson	✓	✓	✓			
Johnson City	✓	✓	✓	✓		
Johnson	✓	✓	✓	✓		
Kingsport	✓	✓	✓			
Knox	✓	✓	✓			
Lake	✓	✓	✓	✓	✓	
Lauderdale	✓	✓	✓	✓	✓	
Lawrence	✓	✓	✓	✓		
Lebanon	✓	✓	✓	✓	✓	
Lenior	✓	✓	✓	✓	✓	
Lewis	✓	✓	✓	✓		
Lexington	✓	✓	✓	✓	✓	
Lincoln	✓	✓	✓	✓		
Loudon	✓	✓	✓	✓		
Macon	✓	✓	✓			
Manchester	✓	✓	✓			
Marion	✓	✓	✓	✓		
Marshall	✓	✓	✓	✓		
Maryville	✓	✓	✓	✓		✓
Maury	✓	✓	✓			✓
McKenzie	✓	✓	✓	✓		
McMinn	✓	✓	✓	✓		✓
McNairy	✓	✓	✓	✓		
Meigs	✓	✓	✓	✓		
Memphis	✓	✓	✓			✓
Milan	✓	✓	✓	✓		
Monroe	✓	✓	✓	✓		
Moore	✓	✓	✓			
Morgan	✓	✓	✓	✓		
Murfreesboro	✓	✓	✓			
Newport	✓	✓	✓	✓		✓
Oak Ridge	✓	✓	✓	✓	✓	✓
Obion	✓	✓	✓	✓	✓	
Oneida	✓	✓	✓	✓		

Overton	✓	✓	✓	✓		
Paris	✓	✓	✓	✓		
Perry	✓	✓	✓	✓		
Pickett	✓	✓	✓	✓		
Polk	✓	✓	✓	✓		
Putnam	✓	✓	✓	✓		
Rhea	✓	✓	✓	✓		
Richard City	✓	✓	✓	✓		✓
Roane	✓	✓	✓	✓		
Robertson	✓	✓	✓	✓	✓	
Rogersville	✓	✓	✓	✓		
Rutherford	✓	✓	✓	✓		✓
Scott	✓	✓	✓	✓		✓
Sequatchie	✓	✓	✓	✓		
Sevier	✓	✓	✓	✓		
Shelby	✓	✓	✓		✓	✓
Smith	✓	✓	✓	✓		
South Carroll	✓	✓	✓	✓		
Stewart	✓	✓	✓	✓	✓	✓
Sullivan	✓	✓	✓	✓		
Sumner					Did not provide their policy	
Sweetwater	✓	✓	✓			
Tennessee School for the Blind	✓	✓	✓	✓	✓	
Tennessee School for the Deaf	✓	✓	✓	✓		
Tipton	✓	✓	✓	✓	✓	
Trenton	✓	✓	✓	✓		
Trousdale	✓	✓	✓	✓		✓
Tullahoma	✓	✓	✓	✓		
Unicoi	✓	✓	✓	✓		
Union City	✓	✓	✓	✓		
Union	✓	✓	✓	✓		✓
Van Buren	✓	✓	✓	✓		
Warren	✓	✓	✓	✓		✓
Washington	✓	✓	✓	✓		
Wayne	✓	✓	✓	✓		
Weakley	✓	✓	✓	✓		✓
West Carroll	✓	✓	✓	✓		
White	✓	✓	✓	✓		
Williamson	✓	✓	✓	✓	✓	✓
Wilson	✓	✓	✓			

The Offices of Research and Education Accountability provide non-partisan, objective analysis of policy issues for the Comptroller of the Treasury, the General Assembly, other state agencies, and the public.

The Office of Research provides the legislature with an independent means to evaluate state and local government issues. The office assists the Comptroller with preparation of fiscal note support forms for the Fiscal Review Committee, monitors legislation, and analyzes the budget.

The Office of Education Accountability monitors the performance of Tennessee's elementary and secondary school systems and provides the legislature with an independent means to evaluate the impact of state policy on the public education system.



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