



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

January 13, 2017

Lisa Wiltshire
Deputy Assistant Commissioner
Tennessee Department of Education
710 James Robertson Parkway
Nashville, TN 37243-1219

Dear Lisa Wiltshire:

On July 21, 2016, a team from the U.S. Department of Education (ED) (the Department), conducted a desk monitoring of the Tennessee Department of Education's (TDE) implementation of its approved Preschool Development Grant (PDG)-Development. This monitoring aims to continue the collaborative relationship that began at the grant award and development of the scope of work. It provides the Department with a deeper understanding of each State's overall performance; the successes, challenges, and strategies for the implementation of its Preschool State Plan, and the fiscal management of the grant funds. It also helps us tailor technical assistance to each State's specific needs.

The desk monitoring included discussions related to all projects in the approved scope of work, including grants management, high quality new and improvement program, early learning standards, integration of various state preschool programs including PDG, and sustainability. During the desk monitoring, ED project officers talked with staff from the Office of Early Learning and fiscal staff at the TDE.

Enclosed is a summary report based upon this review. The report includes highlights of Tennessee's implementation of PDG and a snapshot of Tennessee's progress under each PDG key area. This report will be posted on the PDG website. The report includes "next steps" to ensure that Tennessee implements PDG consistent with its approved application, scope of work, and timelines identified in its project plans.

We want to thank you and your staff for your cooperation during the desk review, and for your tremendous efforts in providing high quality preschool opportunities through the Preschool Development Grant. It is not necessary to provide a written response to this report, however, if Tennessee receives a corrective action requirement as a result of the desk monitoring, a written response is expected. We hope you will continue to communicate any needs or concerns to your ED project officer(s).

We look forward to continuing our work with you and supporting Tennessee's technical assistance needs to ensure successful implementation of PDG. Thank you for your commitment to Tennessee's youngest children.

Sincerely,

/s/

Libby Doggett, Ph.D.
Deputy Assistant Secretary for Early Learning
Office of Elementary and Secondary Education
U.S. Department of Education

Enclosure

PDG Desk Monitoring Report

Monitoring Information	
State Lead Agency	Tennessee Department of Education
State Participating Agency(s)	Tennessee Department of Education
Grant Period	January 1, 2015-December 31, 2019
Current Year of Grant	January 1, 2016-December 31, 2016
PDG Monitoring Period	May 2016 – September 30, 2016
PDG Monitoring Activity (Desk or Onsite)	Desk
Monitoring Review Date(s)	July 21, 2016
State Participants/Project Leads	Connie Casha, Beth Vorhaus, Ginny Ventro, Liz Newsome
U.S. Department of Education Project Officer(s)	Shevine G. Holeman and Kimberly Mitchell

Overview of PDG Monitoring

The Department of Education is committed to supporting States as they implement the expansion of new and improved high quality preschool for eligible children through their PDG grant. Consistent with this commitment, the Department has designed a monitoring process to assess a State's implementation of the program requirements and its approved Scope of Work for PDG and the State-level systems and processes needed to support implementation.

During the recent desk monitoring, Tennessee's implementation of PDG was reviewed across several key areas: Capacity Building and Increasing Slots, Subrecipient Monitoring, Birth to Third Grade Continuum, Budget and Sustainability, and Fiscal Accountability which represent the core priorities for implementation as outlined in the PDG Monitoring Tool. In each area, the Department identified key elements that are required under PDG and are likely to increase the access to and quality of State Preschool programs and lead to increased high quality opportunities for young children and their families.

Tennessee was identified for a site visit based on the following factors:

- Tennessee is a PDG Expansion State and the Department is conducting desk monitoring or onsite monitoring visits of all PDG grantees; and
- Tennessee had not been monitored previously during the grant period.

The report contains the following sections:

- ***Summary of Visit.*** This section describes, in brief, the topics covered, the lead agency and subrecipients visited, as well as personnel participation in any meetings or activities.
- ***Highlights of the State's Implementation.*** This section identifies key accomplishments in the State's implementation of PDG as identified during the site visit.
- ***Status of Implementation of PDG.*** This section indicates the State's implementation progress based on the monitoring and information collected.
- ***Elements Requiring Next Steps.*** This section identifies any elements for which the State is not on target for meeting its timelines outlined in the approved scope of work and includes next steps that the State must take to meet the grant outcomes, as identified during the monitoring.
- ***Recommendations to Strengthen Implementation.*** This section provides recommendations to support the State in continuing to meet the goals and timelines of its PDG grant, as identified during the monitoring.
- ***Additional Comment.*** As appropriate, this section includes any additional information related to the State's implementation of PDG not included elsewhere.

Summary of Visit

The PDG desk monitoring for Tennessee was conducted on July 21, 2016. During the desk monitoring ED and TDE officials discussed various aspects including building capacity and increasing slots; subrecipient monitoring; fiscal and budget implementation; and birth to third grade continuum. TDE provided documentation to ED officials before the scheduled monitoring call. ED officials reviewed the documents, used annual performance report (APR) information, and information obtained from various monitoring activities during the time of the grant.

Highlights of the State's PDG Implementation

- TDE has worked hard to provide high quality preschool with this program in spite of negative press and negative feelings regarding preschool in Tennessee. The Brookings report, provided by the Brookings Institution, provided negative information regarding PDG implementation.
- TDE has worked hard to maintain continuity in PDG implementation regardless of critical staff changes at the state and subgrantee level. The project director left TDE and TDE staff worked hard to implement the PDG program during the critical time of the transition.

Status of Implementation of PDG

In the desk monitoring, the Department used a monitoring and accountability rubric to help determine progress of the State's implementation. The rubric includes three implementation status levels:

- **Level 1 – *Developing*:** the State is in the process of developing this activity, or the activity is very new. The State may be facing challenges in implementation, roll-out, or communications with subrecipients and other stakeholders.
- **Level 2 – *Implementing*:** the State has developed and implemented the activity, although the activity might still benefit from adjustments, training, or communications with subrecipients and other stakeholders.

- Level 3 – Sustaining & Continuing Improvement:** the activity is well-established in the State, and may be undergoing a process of evaluation or program improvement. Subrecipients, stakeholders and users have been trained and/or communications strategies have been established.

Element	Status
Capacity Building and Increasing Slots	
The State public awareness and recruitment activities are targeted towards eligible 4 years old children in high need communities and families 200 percent below poverty.	Level 2-Implementing
The State’s expansion efforts are targeted towards increasing the access to high quality preschool programs for 4 year olds.	Level 2-Implementing
The State has a plan to ensure that existing State Preschool slots met the twelve standards of a High Quality Preschool Program under the PDG funding.	Level 2-Implementing
Subrecipient Monitoring	
The State Lead Agency has a process to monitor grant and sub-recipients activities to ensure implementation of the goals and performance measures outlined in the approved PDG State Plan.	Level 2-Implementing
The State is on schedule with its monitoring of subrecipients to ensure that all of the high quality standards for Preschool are met within PDG funded preschool classrooms.	Level 1-Developing
The State is providing access to comprehensive services to all children enrolled in the PDG funded preschool classrooms.	Level 2-Implementing
Birth to Third Grade Continuum	
The State has aligned the PDG funded program within the Birth to Third Grade Continuum of early learning standards and activities that help prepare children for kindergarten thru third grade.	Level 1-Developing
The State is implementing a data collection system for tracking student outcomes from prekindergarten to kindergarten entry through third grade.	Level 1-Developing
The State is implementing a transition protocol to ensure that children transitioning from early care and education environments to kindergarten to third grade settings receive the supports necessary for a smooth transition.	Level 1-Developing
Budget and Sustainability	
The State has policies and procedures to track the State and Subrecipient budget activities to ensure that funds are expended according to State, Local and Federal procurement laws.	Level 2-Implementing
The State has in place a system to track the “use of funds” under the PDG grant.	Level 2-Implementing

The State has a plan to ensure that High Quality State Preschool Programs will remain of high quality after federal funds are no longer available.	Level 2-Implementing
Fiscal Accountability	
The State has policies and procedures in place to ensure the grant funds are expended according to the federal laws outlined in the federal Super Circular and EDGAR.	Level 2-Implementing
The State has a system in place to ensure that its Subrecipients are meeting the federal laws of the Super Circular and comply with the “supplement not supplant” requirements.	Level 2-Implementing

Elements Requiring Next Steps:

1. TDE’s current MOUs with subgrantees must be revised to include critical contractual terms of agreement for PDG implementation. Without this language, expectations between TDE and its subrecipients are not clear. At this time, MOUs include “boilerplate” language without specifying how high-quality preschool programs will be delivered to eligible children (e.g. students served, funding per students, etc.).
2. TDE must immediately and effectively implement a sub-recipient monitoring plan to ensure program compliance. Although TDE has submitted documentation showing evidence of some monitoring, TDE needs to strengthen its monitoring and develop a monitoring protocol that addresses all twelve indicators of quality for the PDG program. The report, “Obama Pre-K Program Not evaluated and Unlikely to be Effective” discussed some of the quality indicators of the PDG program. For example, this report discussed excessive transition time.

Recommendations to Strengthen Implementation:

- The Department recommends that TDE ensures that contractors involved in the evaluation of the program are forthcoming with how data obtained through the evaluation process will be used. The report, mentioned above, was written by a contractor employed by the TN PDG team. Some of the findings mentioned in the report (e.g. excessive transition time) should have been identified, followed up, and corrected by the TDE and its subgrantees. Additionally, the TDE was unaware of how the data from these contractors would be used; therefore, TDE should strengthen its monitoring protocols and the sharing of data from its contractors.
- The Department recommends that TDE align all required elements of PDG and the state funded preschool in Tennessee for subgrantees and monitoring purposes in order to reduce the burden among subgrantees and the TDE.
- The Department recommends that TDE strengthen its implementation of the PDG in the area of the Birth to third continuum.