

From: [Anna Thorsen](#)
To: [TISA Rules](#)
Subject: [EXTERNAL] Comments on TISA- Dyslexia Language: Metro Nashville Public Schools
Date: Friday, July 8, 2022 8:12:44 AM

Dear TISA Rule Makers,

Hello! I am a parent of a rising 10th grade student with dyslexia in Davidson County. My child has had an IEP for Giftedness, Dyslexia (SLD) and OHI. I also am a pro bono dyslexia advocate. I have several concerns about the current draft of the TISA rules. I am very hopeful that you will listen to our dyslexia community and work hard to get these TISA rules right so that things can improve for all students with dyslexia in Tennessee. I have included some of my thoughts and ideas below. Currently so many of us are really struggling, and it is critically important that we get this right.

Here are some concerns and ideas I have about how to improve the draft TISA rules. I have confined by comments to page 2 and pages 9-11 of the draft rules section (b) Students with Characteristics of Dyslexia.

PAGE 2

Defined term "Characteristics of Dyslexia." As written, this definition is bad. It does not mirror IDA, Dyslexia Guide or Dyslexia Law definition and will confuse districts. It must be reworked. Something like the language included in the TN Dyslexia Advisory Guide would be better. *"Characteristics of Dyslexia" means challenges identified through the dyslexia screening process outlined in the Say Dyslexia Law (add code number) and RTI Manual which include deficits in the areas of Phonological awareness, Phonemic awareness, Alphabet knowledge, Sound/symbol recognition, Decoding skills, Encodings kills and Rapid naming. Screening for characteristics of dyslexia is a proactive way to address skill deficits through appropriate interventions. Screening results that reflect characteristics of dyslexia do not necessarily mean that a student has dyslexia nor can dyslexia be diagnosed through a screening alone. Note: Do not include the "three deficit" or "40%" language from page 9 here. This definition should be more general and then page 9 should define what generates funding weight.*

PLEASE ADD A DEFINITION FOR "DYSLEXIA" since it is used throughout the document. Use the definition in the front of the TN Dyslexia Advisory Guide: *Dyslexia is a specific learning disability that is neurological in origin and is characterized by difficulties with accurate and fluent word recognition and by poor spelling and decoding abilities. These difficulties typically result from a deficit in the phonological component of language that is often unexpected in relation to other cognitive abilities and the provision of effective classroom instruction. Secondary consequences may include problems in reading comprehension and reduced reading experience that can impede growth of vocabulary and background knowledge. Dyslexia is a language-based condition rather than a vision-based condition. Students with dyslexia struggle with the relationship between letters and sounds. Because of this, they have a hard time decoding, or sounding out, unfamiliar words, and instead often misread them based on an over reliance on their sight-word memory. Deficits are unexpected relative to cognitive abilities in that the student's skills are lower than their overall ability and are not due to a lack of intelligence. Students with dyslexia share some common characteristics, but it is important to remember that it manifests differently depending on the individual, their age, and other factors affecting his/her foundational*

reading skill development. In addition, students may have co-occurring disabilities/disorders, including twice exceptionality (i.e., gifted and dyslexia). Comorbid symptoms may mask characteristics of dyslexia (e.g., inattention and behavioral issues are more apparent or gifted students may compensate well); on the other hand, a student's disability may impair participation in grade-level instruction, creating deficits that may be misinterpreted as characteristics of dyslexia.

PAGE 9-11

(1) The Definition. As drafted, the rule requires three things for a student to be considered a student with "Characteristics of Dyslexia." I will go through thoughts and ideas for each part.

- **1(i)(I) Under 40%.** I like that it makes the cut score 40% to match the Literacy Success Act definition of a "significant reading deficiency" and I like that they are broken out into grade bands. However, I would prefer to see mirrored language for K-3 and 4-8 to avoid confusion. **IMPROVEMENTS: Please add "on a nationally normed, skills-based universal screener approved by the State Board."**
- **1(i)(II) AND Three deficits.** This part means that a student has to fall below 40% in the above part AND also must have a "deficit" in "at least three areas." Not only is the rule unclear about what a "deficit" is, but the requirement that a student have a deficit in three of the listed seven categories seems really arbitrary. Some students may present very severely in one area, but deficits in other areas might be masked by giftedness, other disabilities, etc. Also, some schools don't even test for all seven categories, so schools can selectively miss many children. **IMPROVEMENTS:** Define what a "deficit" is. Change the requirement to two deficits. Add language that requires schools to look at all seven categories. Ideally, pair the requirements with the grade level so that it is more individualized to each grade band. For example:

"A student generates a Weighed Allocation aligned to ULN 2 for Characteristics of Dyslexia if the student:

(1) (a) Is in grade K-3 and falls below the 40% on the composite score on the Tennessee Universal reading screener provided by the TNDOE or on a nationally normed, skills based universal screener approved by the State Board, AND

(b) Displays a deficit of x% in two of the following areas (list areas), each of which must be looked at for each child who meets prong (a) above.

(2) (a) Is in grade 4-8 and falls below the 40% on the composite score of a nationally normed, skills based universal screener approved by the State Board, AND

(b) Displays a deficit of y% in two of the following areas (list areas), each of which must be looked at for each child who meets prong (a) above.

(3) (a) Is in grade 9-12 and falls below the 40% on the composite score of a nationally normed, skills based universal screener approved by the State Board, AND

(b) Displays a deficit of y% in three of the following areas (list areas), each of which must be looked at for each child who meets prong (a) above.

- **1(ii) DILP Requirement.** First off, DILP is a terrible name. Please change it to ILP -D. "D" and "P" are visually confusing for many with people with dyslexia, and there are two many ways this can be read: blip, dild, etc. ILP is clearer and a bit less confusing. Next, I am concerned about the requirement that for a child to be considered to be a student with Characteristics of Dyslexia, that there has to be a **"finalized ILP in accordance with TCA 49-1-229 and the State Board Rules on Dyslexia."** I have not seen the State Board Rules. Schools will be overloaded created ILPs for students, especially initially, and that means that schools won't get funding for a long time and that hurts kids. Can we do a carve out that this third portion will kick in after a year to give teams time to catch up and maybe only require a draft ILP? Again, my big concern is with delay getting the ILP right.
- **2 Students who do not get weighted funding.** This part lists who will not get any funding dollars. There are three ways that a student with Characteristics NOT to get any funding dollars. understand
 - **(i) If the parent declines an ILP.** I disagree with this. Since TISA is a general education funding bill, parents should not have the right to turn down dollars for the school. It does not appear that ESL parents have the right to turn down an ILP.
 - **(ii)** Here, we need to be clear that if a child is in the process to determine eligibility for an IEP and that child is found not to be eligible, then we need to ensure that they go back into the funding bucket. Additionally, the eligibility process can take months and months, so we want to ensure that these children remain funded during that eligibility time.
- **3 LEA Requirements.** (ii) has a typo and needs to be changed to 4-12 (not 4-8.) On (iv), parents already have the right to be notified of progress monitoring. We should change this that parents be notified in writing with "a complete written report on their child's progress monitoring with each quarter report card." I know the RTI manual requires more notice, but schools are not doing it. Tying it to report cards would be helpful. (v) I am concerned that ILPs will be a lot of work for schools and will not helpful, so I hope that our Dyslexia Advisory Council can work to create some draft ILPs that will help teams know what to put in.

Thank you for taking the time to solicit input from the community.

Sincerely,

Anna Thorsen
 MNPS High School Parent
 Nashville, TN

From: [Carter, Danetta](#)
To: [TISA Rules](#)
Subject: [EXTERNAL] Comments
Date: Tuesday, July 5, 2022 12:51:09 PM

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Good Afternoon,

I just wanted to say that I am full support of the amended to TISA that the Governor suggested. I believe a student-based funding allows schools to accommodate students, especially those who are gifted and those who are disabilities. It allows room for early intervention programs to target students before their delays become severe. I love it because I can see that it is about being proactive instead of reactive. I pray that it happens.

Danetta Carter, MSW, LCSW, CCM

Manager II GBD Special Programs, LTSS, Choices Intake & Enrollment
22 Century Blvd, Suite 220, Nashville, Tennessee 37214
M: (901) 633-2726 | F: (888) 826-9601
danetta.carter@amerigroup.com

Connect with Amerigroup on social media!



CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information or may otherwise be protected by law. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message and any attachment thereto.

From: [Laura Ahanj](#)
To: [TISA Rules](#)
Subject: [EXTERNAL] Funding for schools
Date: Wednesday, July 6, 2022 4:31:20 PM

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Hello,

I do not approve of TISA.

In my opinion:

1. NO taxpayer dollars should be going to charter schools.
2. Hillsdale College should have absolutely nothing to do with education in Tn.
3. Mr. Arnn “education advisor” should have been immediately fired after calling all teachers dumb.

Thank you,

Laura Ahanj
Williamson County Resident
[Sent from the all new AOL app for iOS](#)