

TIPS FOR PUBLIC COMMENT ON TISA

The Tennessee Department of Education has released a DRAFT of the rules for how TISA will be put into practice. **The public can comment on the draft rules until August 2, 2022.** This is your chance to help shape education funding!

It is important that the Department of Education receive as much feedback as possible from the public. The law in Tennessee requires the state to respond to each and every public comment submitted to them. If the state sees enough people with similar comments or concerns, **they may change parts of their rules to better reflect the opinions of the public.**

There are TWO ways you can submit a public comment:

- You can write a public comment and email it by August 2nd, 2022 to tisa.rules@tn.gov
- You can attend the public comment public forum on July, 28th, 2022
 - You can find details about how to participate at [this link](#)

Here are some tips for writing a public comment:

- **Make it personal.**
 - If you have a child in public schools or work for an organization that advocates for students with disabilities and their families, mention this!
 - You could even mention that you are a concerned citizen, a taxpayer or an advocate.
- **Keep it short and to the point.**
 - Focus on the areas that can be changed by public comment.
 - You can talk about parts of TISA that you approve of and parts that you don't approve of.
 - Avoid commenting on any politics that may have influenced TISA.
 - Your comment doesn't have to be long – it could be just a few sentences, or it could be a page, but not much more.
- **You don't have to have the answers.**
 - Sometimes it is easier to talk about outcomes you would or would not like to see, or things you'd like to make sure the law does or doesn't do.
 - For example, one outcome you might want to see would be that students with disabilities get their fair share of funding – you don't always need to talk about how the law should do that
 - Provide examples where you can – if you have an issue you are concerned about, you can describe what that looks like in concrete terms
 - For example, one concern you may have is about the way that students with disabilities are “weighted” – you might say that this weighting system might result in more special education students segregated from their peers.
 - BUT – if you have some solutions to the problems you are writing about, you should include those!

- If you have any data or research that helps to prove your point, include that!
 - BUT – this is not required in order for you to comment.

Here is a sample comment for TISA:

- Remember, your comments are most impactful when you make it personal – I encourage you to make your comment your own.

To Whom it May Concern,

My name is Jeff and I work for an organization that advocates for Tennesseans with disabilities. I am also the father of a young child who will someday attend Tennessee public schools.

In general, I support TISA as a replacement for the BEP. I appreciate the Governor's commitment to increase public school funding by \$1 billion per year, and I believe TISA will be better for Tennessee students with disabilities than the BEP was. However, there are still ways that the Department of Education could improve TISA for students with disabilities.

First, the way that the draft rules define the 10 Unique Learning Needs may incentivize schools to place students with disabilities in more restrictive settings. Schools would earn more money if students received more time in the special education setting, which could influence how, where and what services a student receives in school. A better option would be to assign weights based on the actual services found in a student's IEP. This is similar to the way that Florida assigns weights, which they have done since the 1970s to great success.

Second, it would be difficult for students with disabilities to earn the outcomes bonuses. For example, it is unlikely that a student who is on track to earn a general education diploma would be taking the alternate assessment. The way that the outcome bonuses are designed is also limited to only high school seniors. None of the other outcome bonuses are limited this way. It is important that school districts have the same incentives to improve their entire special education program as they do to improve their general education program.

Thank you for the opportunity to comment on TISA, and I hope that some of the rules are changed to better serve students with disabilities.

Sincerely,
Jeff Strand



Your perspective matters!

The TN Department of Education wants to hear from the disability community about the new funding formula. Your perspective can help steer the rules that will decide how public schools are funded for many years to come. **Email your feedback to Tisa.Rules@tn.gov by August 2, 2022.**

Still have questions? We're here to help! Contact any of our organizations: [The Arc Tennessee](#), [Tennessee Council on Developmental Disabilities](#), [Tennessee Disability Coalition](#).