Office of Research and Education Accountability

JUSTIN P. WILSON, COMPTROLLER

Legislative Brief

Home Schooling in Tennessee

Elizabeth Swenson, Associate Legislative Research Analyst
Elizabeth.Swenson@cot.tn.gov

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Introduction

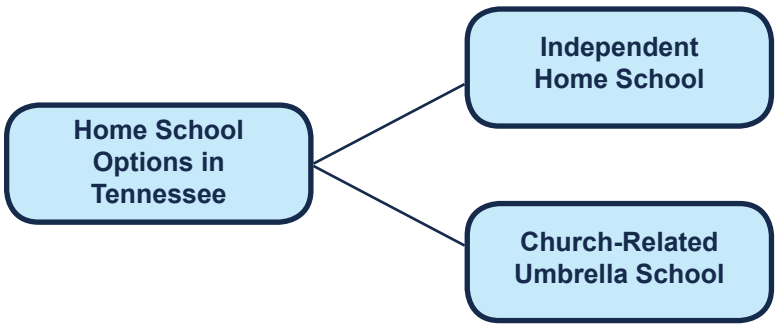
In Tennessee, K-12 students have three basic school options: public school or private school (both of which may be offered at either traditional brick and mortar sites or virtual school sites), or a home school. A home school is a school directed by a parent or legal guardian for his or her own children.

Tennessee law[1] allows parents to home school their children in grades K-12 using one of two options: an independent home school or a church-related umbrella school. For both types of home school, the parent is the teacher and bears the responsibility for selecting and following a curriculum; neither type of home school is required to follow state academic standards or any particular curriculum.

There are a number of differences between the two types of home schooling in Tennessee. In general, independent home schools are subject to more state regulations than church-related umbrella schools, though both types of schools are less regulated by the state than public schools and some private schools.

This legislative brief takes a closer look at home schooling in Tennessee and includes:

1. an explanation of the two different types of home schooling,
2. a comparison of the two types regarding testing requirements, sports participation, high school diplomas, and other issues, and
3. an estimate of the number of home school students.



Of the two types of home school options in Tennessee, **church-related umbrella schools** are by far the most commonly used method, accounting for an estimated 80 percent of Tennessee's home-schooled students. (Please see page 9 for details on the estimated number of home school students in Tennessee.)

A church-related umbrella school is, technically, an extension of a private school,[A] with a student's home authorized as a "satellite campus" of the school; umbrella schools are often referred to as satellite programs for this reason. For this report, students in umbrella home-school programs are considered home-school students, but the Tennessee Department of

[A] State Board of Education rules say that only Category IV non-public schools may operate a church-related umbrella school.

Education (TDOE) officially classifies them as private (or non-public) school students.

Umbrella schools must be members of one of eight organizations listed in Tennessee law.[B] Across the eight organizations, the standards of membership and requirements vary significantly and, accordingly, there is wide variation in the operation of umbrella schools.

Independent home schools account for about 20 percent of Tennessee's home school students. (Please see page 9 for details on the estimated number of home school students in Tennessee.) Unlike church-related umbrella schools, independent home schools are not associated with a church-related private school.

The following chart lays out the primary differences between an independent home school and a church-related umbrella home school in terms of state regulations.

Independent Home School	Church-Related Umbrella School
Reported 2016-17 enrollment: 7,381	Estimated 2016-17 enrollment: 30,000 - 35,000
Parent is the teacher	Parent is the teacher
Parents must complete Intent to Home School form & register with the public school district	Student enrolls in umbrella school, which notifies the public school district of the student's enrollment
Parent must have high school diploma or GED	No parent qualifications for grades K-8; parent must have high school diploma or GED for grades 9-12
Parent is responsible for all record-keeping	Umbrella school is responsible for record keeping; parent self-reports to the school
Standardized testing required in grades 5, 7, and 9; parents select test; results reported to local school district	Law refers to standardized testing but is unclear if standardized testing is required
Parent issues diploma	Umbrella school issues diploma
Parent must teach at least 4 hours per day for 180 days	Parent must teach 180 days per year; no requirement for hours per day

[B] The list of authorized organizations is written into the statute (TCA 49-50-801(a)): the Tennessee Association of Christian Schools, the Association of Christian Schools International, the Tennessee Association of Independent Schools, the Southern Association of Colleges and Schools, the Tennessee Association of Non-Public Academic Schools, the Tennessee Association of Church Related Schools, the Tennessee Alliance of Church Related Schools, or a school affiliated with Accelerated Christian Education, Inc.

Registration with the local school district

To ensure compliance with truancy laws, home-schooled students must be registered with their local public school district. Parents providing independent home schools must register their students directly with the local district. Church-related umbrella schools typically notify local districts on behalf of their home-schooling parents.

Parent Qualifications

Parents must possess a high school diploma or its equivalent (GED or HiSET) to direct an independent home school, regardless of student grade level. Parents of independent home schools must provide proof of a high school diploma or its equivalent to the local director of schools.[C]

For church-related umbrella home schools, a high school diploma or its equivalent is not required for parents who teach kindergarten through 8th grade, but is required for grades 9 through 12. Parents are responsible for making sure they comply with this statutory requirement. Some umbrella schools ask parents of high school students if they have a high school diploma (or equivalent) during the enrollment process, but others do not verify that this requirement is met.

Testing

State law does not require either type of home school student (independent or umbrella program) to follow state academic standards or any particular curriculum. Independent home school students are required to take standardized tests in grades 5, 7, and 9. Independent home school students have the choice of taking the same standardized tests required of public school students at no cost, or taking an alternative standardized test of the parent-teacher's choosing at the parent-teacher's expense. The alternative standardized test must be administered by a professional testing service within 30 days of the public school assessment, and the professional testing service that administers the test must be approved by the local district. However an independent home school student chooses to test (either the state-administered tests or a private testing option), the student's test results must be reported to the parent, the director of schools for the student's local district, and the State Board of Education.

For umbrella school students, the law on standardized testing is unclear. The home school statute uses the phrase "administer or offer standardized achievement tests." The Department does not interpret this language to be a testing requirement and does not regulate umbrella school student testing. Some umbrella schools choose to require standardized testing as a part of their program, while others leave all testing decisions to the parent-teacher.[D] OREA interviews revealed a wide range of options for how umbrella programs approach standardized testing.

For either type of home school student who later transfers into public school (including re-entry), the public school has the discretion to require a placement test to determine a home

[C] Independent home school parents are also required to provide the following information to the local director of schools prior to each school year: the parent-teacher's intent to conduct a home school, the names, number, ages and grade levels of the children to be home schooled, the location of the school, the proposed curriculum to be offered, and the proposed hours of instruction.

[D] Some examples of standardized assessments available to home school parents are the Iowa Test of Basic Skills, the California Achievement Test, and the Stanford 10.

school student's grade level.[E]

If an independent home school student falls six to nine months behind the home school student's appropriate grade level according to standardized test scores, the parent must consult with a licensed teacher and design a remedial course to help the student attain grade-level proficiency. If an independent home school student tests more than one year behind grade level for two consecutive tests, the district may require the parent to enroll the child in a public or private school, instead of continuing with home schooling.

This intervention is discretionary, and the Department is not aware of any instances where a district required a home school parent to enroll his or her child in a public or private school.

There is a discrepancy between the home school testing requirements in the law and the current testing practices of public schools. School district interventions may begin if a home school student falls six to nine months behind his or her grade level. This is a holdover from previous testing methods. Current state testing results are no longer reported in a way that makes it possible to measure student test performance in terms of months.[F]

Public schools that offer Advanced Placement (AP) exams or Preliminary SAT/National Merit Scholarship Qualifying Test (PSAT/NMSQT) exams are required by Tennessee law to administer these exams to both independent and umbrella home school students choosing to take them.

Sports

Tennessee law states that home school students shall not be prohibited from trying out for an interscholastic athletics team, if the student is eligible under the rules of the organization or association, solely by reason of the student's status as a home school student.

The Tennessee Secondary School Athletic Association (TSSAA)[G] allows home school students to participate in their athletic programs for both middle school and high school, provided students meet all other eligibility requirements. Prior to 2015, only independent home school students were eligible; however, a TSSAA rule change allowed home school students registered with an umbrella school to also participate without having to register with the district as an independent home school student.

Home school students participating in TSSAA sports through an umbrella program must pay the same tuition as all other students enrolled and in regular attendance at that school. For example, if a traditional brick-and-mortar private school also operates an umbrella program, and the school has a two-tiered tuition structure where umbrella students pay a lower rate, those umbrella students wanting to participate in TSSAA sports must pay the full tuition of the traditional brick-and-mortar students.

The number of home school students registered with TSSAA has at least doubled since granting students registered with umbrella schools eligibility to participate. The total number of home school students who participate in TSSAA athletic programs ranges from 150 to 200 students

[E] For students transferring into public school from a Category I, II, or III private school, the public school must automatically accept the transfer without a placement test.
[F] Tennessee public schools currently use the Tennessee Comprehensive Assessment Program (TCAP), which measures students' skills and progress in terms of below basic, basic, proficient, or advanced. Students who are proficient or advanced are commonly considered to be at or above grade level.
[G] The Tennessee Secondary School Athletic Association administers the junior and senior high school athletic program and regulates the athletic relations of certain categories of secondary schools in Tennessee.

per year. (In total, TSSAA has approximately 110,000 high school and 30,000 middle school students registered to participate each year.) TSSAA indicates participation by home school students continues to increase slightly each year.

Home School Cooperatives

A resource for home schooling families is the home school cooperative, an organization formed by parent-teachers to provide tutorial, enrichment, and/or support services for home school families. Little data is available on the number of home school co-ops or the number of home school participants, though anecdotal evidence suggests co-ops are a popular resource to enhance and supplement the home school experience.

Typically, these organizations are staffed by volunteers and hold classes one to two days a week at a local church or similar borrowed facility. Co-ops are a way for home school families to pool resources to expose home school students to a variety of opportunities, such as socialization, field trips, or curriculum subjects outside a parent's expertise (for example, foreign languages or the arts). Co-ops are not home schools: they do not register home school students, do not require formal enrollment, and are not subject to state regulation.

There is a wide variety in size, format, grades served, parent requirements, facilities, and services provided by co-ops. Some co-ops also provide opportunities for adult socialization with events like mother's day out or bible study. Some co-ops assign homework and award grades, while others simply organize field trips or serve as a home school playgroup.

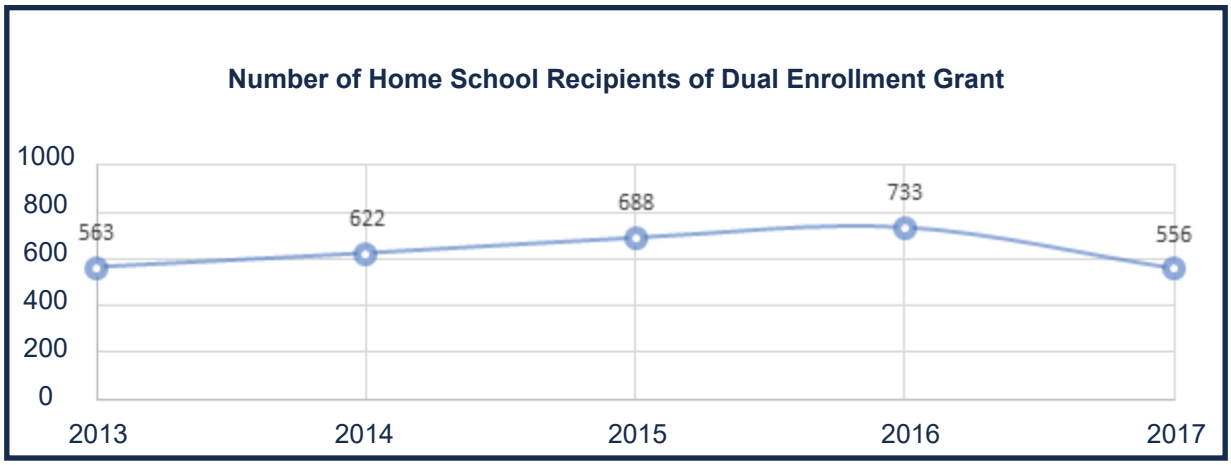
Dual Enrollment

Home school students are eligible to enroll in dual enrollment courses as well as to receive the state's dual enrollment grant funded by the Tennessee lottery. Dual enrollment courses are postsecondary courses; a high school student is enrolled at the postsecondary institution and earns postsecondary credit after successfully completing a course.[H] The dual enrollment grant pays up to $500 for the first course, up to $500 for the second course, and up to $200 for the third course for a maximum of $1,200 per year. Students may receive funding for one course per semester, with additional funding for one more course per semester if the student meets the minimum HOPE Scholarship academic requirements at the time of dual enrollment.

Since 2013, an average of approximately 632 home school students per year have taken at least one dual enrollment course through the state's dual enrollment grant program. Trends in the number of home school recipients of the Dual Enrollment Grant are shown below.

Home school students have received over $2 million in dual enrollment grants since 2013.

[H] High school credit is awarded based on local policy. Dual enrollment courses may be taught at the postsecondary campus, the high school, or online. Dual enrollment courses are taught by postsecondary faculty or credentialed adjunct faculty, who may also be employed as high school teachers. Dual enrollment instructors must meet postsecondary requirements, but do not have to meet specific Tennessee teacher licensure or endorsement requirements.



Source: Tennessee Higher Education Commission, Tennessee Student Assistance Corporation.

High School Diplomas

Independent and umbrella home schools alike are exempt from any state requirements for awarding a high school diploma. For independent home school students, the parent-teacher determines the graduation requirements and issues the diploma. For students who are registered with an umbrella program, graduation requirements are determined by the umbrella program, which issues the diploma.

All departments, agencies, commissions, and entities of state and local government (including public institutions of higher education) must treat home school diplomas – whether awarded by an independent home school parent-teacher or an umbrella school – as equal to public school diplomas, according to Tennessee law. Private employers and institutions are not specifically bound by law to treat home school diplomas as equal to those issued by a public school, but the state's law that establishes equivalence for home school diplomas means that private entities typically treat them the same as a public school diploma.

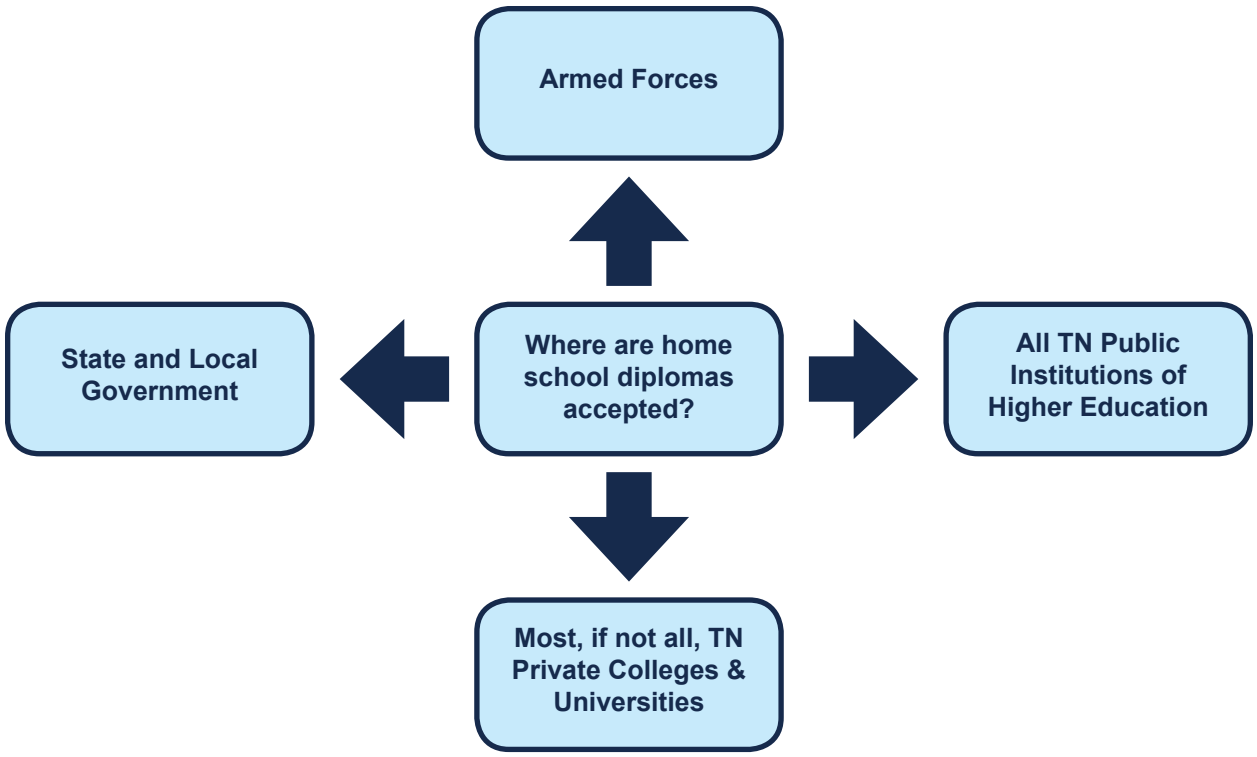
Entity	Accepts Home School Diploma for Entry?
Army	Yes
Navy	Yes
Marine Corps	Yes
Coast Guard	Yes
Air Force	Yes
Private Colleges/Universities	Most, if not all, do (at discretion of institution)
Public Institutions of Higher Education	Yes
Trade Schools (for-profit)	Maybe (at discretion of institution)
TN Public Employers	Yes

An employer or out-of-state entity that receives an application from a Tennessee home school student may inquire with the Department to determine the validity of the student's home school diploma. If the student attended an umbrella school, the Department will issue a letter explaining that transcripts and high school diplomas awarded to home school students are accepted at all state universities and government entities in Tennessee and have all the same rights and privileges of a high school diploma awarded by a public school system. This letter also verifies the specific umbrella school meets the state requirements for a Category IV private school.

For independent home school students, the Department will respond with a similar restatement of the law; however, verification of enrollment as an independent home school student must be provided by the local school district. Some independent home school students receive a diploma from their parent-teacher and then take a high school equivalency exam (GED or HiSET)[1] for use in employment applications.

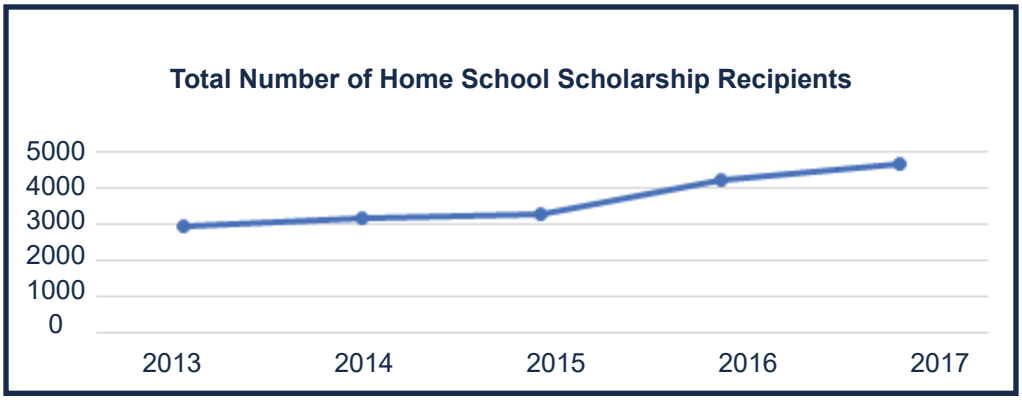
Private colleges and universities generally accept both types of home school diplomas. According to the Tennessee Independent Colleges and Universities Association (TICUA), most (if not all) of their member institutions accept home school diplomas. While each private institution tracks and reports data on home school students differently, the majority of TICUA's 34 member institutions reported at least one home school student enrolled in the fall freshman class every year over a recent five-year period (fall 2011 to fall 2016).

Home school diplomas are also accepted by all branches of the United States Armed Forces. Enlistment rates for home school students vary by branch and by recruitment area.



[1] The General Education Development (GED) test is an exam that individuals not currently enrolled in high school can pass to earn a high school equivalency diploma. The GED is one of two high school equivalency exams offered in Tennessee; the other exam is the HiSET.

Scholarships



Source: Tennessee Higher Education Commission, Tennessee Student Assistance Corporation

Home school students are generally eligible for all the same scholarships as public and non-public school students, including the Tennessee Promise. No scholarship available through the state of Tennessee makes a distinction between independent home school students and church-related umbrella students, although some scholarships require an official transcript for home school students prepared by an authorized organization (e.g., a church-related umbrella school).[J] Some scholarships require enrollment in a Tennessee postsecondary institution, and home school students' eligibility therefore relies upon the institution's enrollment policy for home school students.

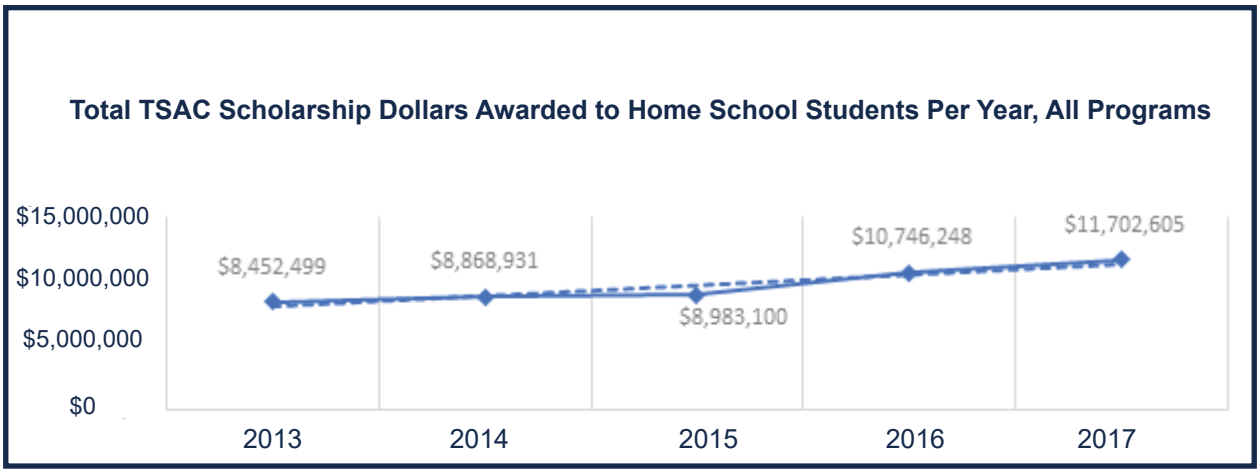
Information provided by the Tennessee Student Assistance Corporation (TSAC), which administers over 20 different state financial aid programs, shows there has been a year-over-year increase in both the number of home school recipients and the total dollar amount of scholarship awards for the previous five years.

For school year 2016-17, a total of 4,628 home school students received scholarship money from a TSAC-administered program. The program with the highest number of home school recipients was the HOPE Scholarship, with Dual Enrollment Grants and the Tennessee Student Assistance Award Program (TSAA) also being popular across all five years of data.[K]

Across all programs, home school students received a total of $11.7 million in scholarship dollars in 2017.

Home school students also receive federal aid and institutional aid. According to the Tennessee Independent Colleges and Universities Association (TICUA), member institutions granted more than $2 million in institutional financial aid to home school students in fall of 2016.

[J] This requirement may prove problematic for independent home school students as they do not have a high school diploma issued by a third party (the parent creates and issues the diploma). How independent home school students may fulfill the requirement for an official transcript varies by scholarship and program.
[K] While home school students are eligible for the HOPE Scholarship, they are not eligible for the HOPE Access Grant. Grant rules require students to graduate from an "eligible" high school, and home schools do not qualify.

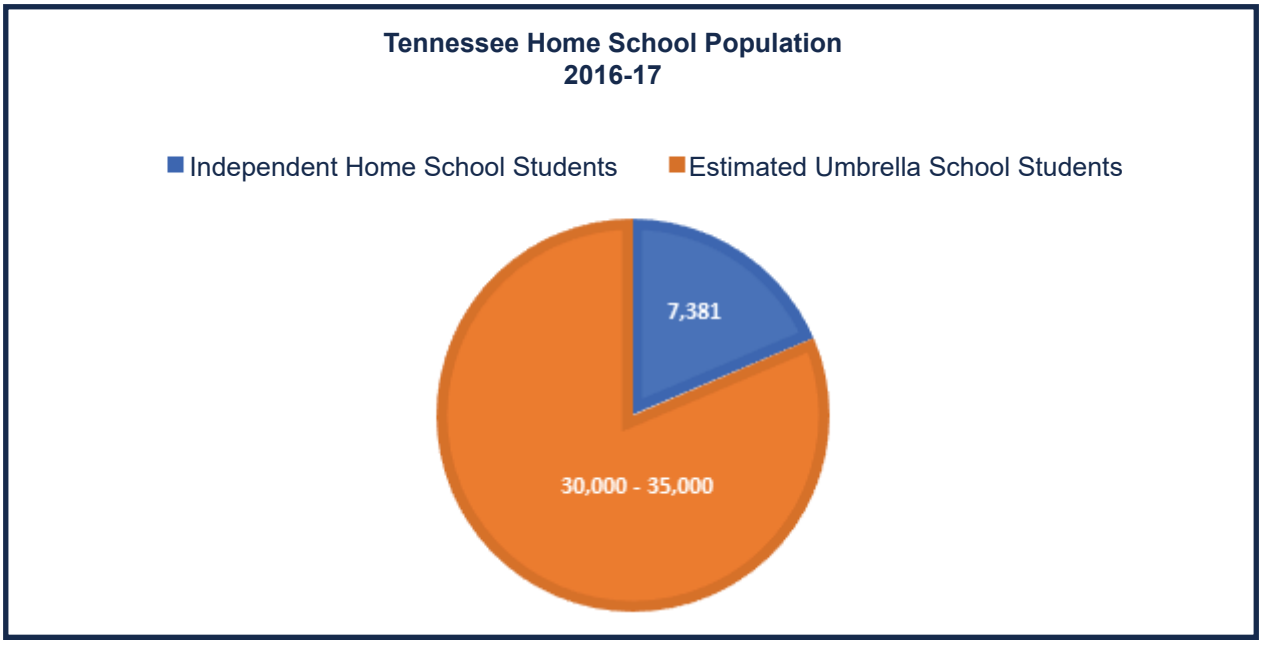


Source: Tennessee Higher Education Commission, Tennessee Student Assistance Corporation.

For more information on scholarships, please see Appendix A and B.

Home School Enrollment Numbers

OREA estimates the total number of home school students in Tennessee in school year 2016-17 was in the range of approximately 37,000 to 42,000. To estimate the number of students, OREA combined the reported number of independent home school students with an estimated number of umbrella school students.



Source: TDOE data and OREA contact of 54 Category IV schools reporting operating umbrella programs.

The number of independent home school students as of March 2017 was 7,381, according to the Tennessee Department of Education. The March 2017 figure is more than double the 3,457 independent home schoolers reported in 2011. The five counties with the most independent home school students in 2017 are Knox County (683), Davidson County (474), Rutherford County (391), Hamilton County (381), and Montgomery County (363).

The number of umbrella program home school students is estimated by OREA at between 29,750 and 34,982 for the 2016-17 school year. The precise number of umbrella program students is unknown.

OREA reviewed TDOE's 2016-17 list of all Category IV schools, eliminating those that reported not having an umbrella (satellite) program.[L] OREA was able to contact through telephone and/or email 54 of the 100 Category IV schools that potentially operated umbrella programs to identify enrollment numbers. Those contacted represent 81 percent of total enrollments, as OREA focused on the largest schools.[M]

The low end of the range, 29,750, represents the approximate enrollment provided to OREA by the 54 schools contacted during summer 2017. The high end of the range, 34,982, includes 5,232 students enrolled in Category IV private schools that fall into one of two categories: they operated an umbrella program or they did not specify whether they operated an umbrella program. Thus, the additional 5,232 students are either all umbrella home school students, all enrolled in a private school's traditional program, or some mix of the two. Some schools that indicated having umbrella programs did not report enrollment to TDOE, so any home school students attending these programs are not counted in OREA's estimate if OREA could not reach the school or the school would not provide the requested enrollment figure.

Based on the schools contacted, the websites reviewed, and the relatively stable enrollments reported to TDOE from 2016-17 to 2017-18, OREA believes its estimate of between approximately 30,000 to 35,000 umbrella school students to be reasonable.

L The list is publicly available online at https://www.tn.gov/education/topic/non-public-schools.
M The remaining schools were determined unlikely to have umbrella programs based on a review of their websites or did not respond, refused to provide the requested enrollment figure, or could not be reached.

Appendix A: TSAC Scholarship Awards to Home School Students

The amounts in Appendix A reflect a combination of independent home school students and umbrella home school students.

2013	Program Name	Recipients	Dollars
	Dependent Children Scholarship	2	$19,512
	Dual Enrollment Grant	563	$354,546
	Helping Heroes Grant	4	$8,000
	HOPE Scholarship	1,797	$6,896,959
	Minority Teaching Fellows	1	$5,000
	Ned McWherter Scholarship	2	$6,000
	Robert C. Byrd Honors Scholarship	8	$11,250
	Tennessee Teaching Scholars	2	$7,500
	TSAA Tennessee Grants	465	$1,056,103
	Wilder-Naifeh Technical Skills Grant	61	$87,629
		2,905	$8,452,499

2014	Program Name	Recipients	Dollars
	Dependent Children Scholarship	2	$15,057
	Dual Enrollment Grant	622	$407,480
	GEAR UP TN Scholarship	1	$1,000
	Helping Heroes Grant	5	$10,000
	HOPE Scholarship	1,932	$7,222,102
	Ned McWherter Scholarship	3	$9,000
	Robert C. Byrd Honors Scholarship	6	$9,000
	Tennessee Teaching Scholars	1	$5,000
	TSAA Tennessee Grants	500	$1,118,162
	Wilder-Naifeh Technical Skills Grant	56	$72,130
		3,128	$8,868,931

2015	Program Name	Recipients	Dollars
	Dependent Children Scholarship	2	$23,748
	Dual Enrollment Grant	688	$448,904
	GEAR UP TN Scholarship	1	$1,000
	Helping Heroes Grant	8	$10,000
	HOPE Scholarship	1,974	$7,367,695
	Ned McWherter Scholarship	2	$6,000
	Robert C. Byrd Honors Scholarship	1	$750
	TSAA Tennessee Grants	494	$1,004,673
	Wilder-Naifeh Technical Skills Grant	88	$120,330
		3,258	$8,983,100

2016	Program Name	Recipients	Dollars
	Dependent Children Scholarship	3	$33,996
	Dual Enrollment Grant	733	$560,841
	Helping Heroes Grant	4	$5,500
	HOPE Scholarship	2,003	$7,491,457
	Ned McWherter Scholarship	2	$6,000
	TCAT Reconnect	27	$3,750
	Tennessee Promise	476	$854,241
	Tennessee Teaching Scholars	2	$10,000
	TSAA Tennessee Grants	813	$1,601,601
	Wilder-Naifeh Technical Skills Grant	133	$178,862
		4,196	$10,746,248

2017	Program Name	Recipients	Dollars
	Dependent Children Scholarship	3	$36,828
	Dual Enrollment Grant	556	$443,094
	Helping Heroes Grant	4	$4,000
	HOPE Scholarship	2,078	$7,617,790
	Minority Teaching Fellows	1	$2,500
	Ned McWherter Scholarship	1	$3,000
	TCAT Reconnect	21	$2,824
	Tennessee Promise	783	$1,429,432
	TSAA Tennessee Grants	1,046	$2,025,338
	Wilder-Naifeh Technical Skills Grant	135	$137,799
		4,628	$11,702,605

Appendix B: TSAC Scholarship Eligibility for Home School Students

Scholarship	Description	Home School Eligible?[N]
General Assembly Merit Scholarship (GAMS)	Up to $1,500 supplement to the HOPE Scholarship. The award is divided equally between fall, spring and summer semesters. Awards to part-time students are prorated.	Yes
HOPE	4-year institutions: Up to $1,750 per full-time enrollment semester as a freshmen and sophomore; then up to $2,250 per full-time enrollment semester as a junior and senior. 2-year institutions: Up to $1,500 per full-time enrollment semester.	Yes
Dual Enrollment Grant	Up to $500. Course 1 & 2, decreasing amounts thereafter.	Yes
TN Promise	Variable – will provide students a last-dollar scholarship, meaning the scholarship will cover any remaining tuition costs and mandatory fees after all other grant aid is applied.	Yes
Aspire Award	4-year institutions: Up to $750 per semester as a supplement to the HOPE Scholarship. 2-year institutions: Up to $250 per semester as a supplement to the HOPE Scholarship.	Yes
HOPE Access Grant	4-year institutions: Up to $1,250 per full-time enrollment semester. 2-year institutions: Up to $875 per full-time enrollment semester.	No[O]
Wilder-Naifeh Technical Skills Grant	Up to $2,000. This grant is for students seeking a diploma or certificate from a Tennessee College of Applied Technology (TCAT).	Yes

[N] Home school eligibility may be contingent on additional factors, such as enrollment into a qualifying post-secondary institution or financial need.
[O] The HOPE Access Grant rules require students to graduate from an “eligible” high school, and home schools do not qualify.

Scholarship	Description	Home School Eligible?
Dependent Children Scholarship	Scholarship for dependent children of a Tennessee law enforcement officer, fireman, or an emergency medical service technician who has been killed or totally and permanently disabled in the line of duty. Except as provided by other educational aid, the award shall include tuition and other required fees, an allowance for books, supplies, and room and board as reflected in the cost of attendance determined by the institution for other students in the same financial aid category. The amount of the award will depend on the availability of funds.	Yes
Helping Heroes Grant	For certain military veterans who have been awarded one of three specific medals. $1,000 per semester for a student who successfully completes twelve (12) or more semester hours with no failing final grade; $500 per semester for successfully completing six (6) to eleven (11) semester hours with no failing final grade.	Yes
Minority Teaching Fellows Program	$5,000 per year for students who pursue a teacher certification at an eligible Tennessee college or university.	Yes
Ned McWherter Scholars Program	$6,000 per academic year: $3,000 from the State of Tennessee and $3,000 from the college or university attended	Yes
TCAT Reconnect Grant	Award amount varies based on amount of remaining tuition and mandatory fees after all other gift aid has been applied.	Yes
Tennessee Student Assistance Award (TSAA)	4-year/2-year private institutions: $4,000 4-year public institutions: $2,000 2-year public institutions: $1,300 Career Schools: $2,000 TCATs: $1,000 (The final amount of the award is determined by the institution.)	Yes

Endnotes

1 *Tennessee Code Annotated* 49-6-3050.

OFFICE OF RESEARCH AND EDUCATION ACCOUNTABILITY
Russell Moore, Director
425 Fifth Avenue North
Nashville, Tennessee 37243 • (615) 401-7866
www.comptroller.tn.gov/orea