IN THE CHANCERY COURT OF TENNESSEE FOR THE TWENTY-FIRST JUDICIAL DISTRICT AT FRANKLIN

TONY BOSTIC, DONNA CLEMENTS, MARGIE JOHNSON, MARY SMITH, BARBARA STURGEON, and DREW TORRES

Plaintiffs,

v.	Case No.	
LIZZETTE DEVIMOLDE : 1	JURY DEMAND	

LIZZETTE REYNOLDS, in her official capacity as TENNESSEE COMMISSIONER OF EDUCATION,

Defendant

COMPLAINT FOR DECLARATORY JUDGMENT

The plaintiffs, Tony Bostic, Donna Clements, Margie Johnson, Mary Smith, Barbara Sturgeon, and Drew Torres, pursuant to Tenn. Code Ann. § 29-14-101 et. seq. and Rule 57 of the Tennessee Rules of Civil Procedure, hereby file this Complaint for Declaratory Judgment against the defendant, Lizzette Reynolds, in her official capacity as Tennessee Commissioner of Education.

NATURE OF ACTION

1. This action seeks a declaratory judgment establishing (a) that neither Tenn. Const. Article I, Section 8 nor Tenn. Const. Article XI, Section 8 requires the "fiscal capacity formula" set out in Tenn. Code Ann. §§ 49-3-109 and 49-3-111, and (b) that neither constitutional provision prohibits the education funding formula in

place prior to *Tennessee Small Sch. Sys. v. McWherter*, 851 S.W.2d 139 (Tenn. 1993)("*Small Schools I*").

PARTIES AND JURISDICTION

- 2. Plaintiff, Tony Bostic, is a resident of Fairview, Williamson County, Tennessee. He represents the First District on the Williamson County Board of Education.
- 3. Plaintiff, Donna Clements, is a resident of Franklin, Williamson County, Tennessee. She represents the Eighth District on the Williamson County Board of Education.
- 4. Plaintiff, Margie Johnson, is a resident of Nolensville, Williamson County, Tennessee. She represents the Fifth District on the Williamson County Board of Education.
- 5. Plaintiff, Mary Smith, is a resident of Arrington, Williamson County, Tennessee. She represents District 5 on the Williamson County Commission.
- 6. Plaintiff, Barbara Sturgeon, is a resident of Franklin, Williamson County, Tennessee. She represents District 8 on the Williamson County Commission.
- 7. Plaintiff, Drew Torres, is a resident of Franklin, Williamson County, Tennessee. He represents District 8 on the Williamson County Commission. Mr. Torres is also the parent of a child with special needs who attends Williamson County Schools.

- 8. The defendant, Lizzette Reynolds, is the Commissioner of Education for the State of Tennessee. She is sued as a defendant in her official capacity. Plaintiffs seek no relief against her in her personal capacity.
- 9. This Court has subject matter jurisdiction of this matter pursuant to Tenn. Code Ann. §16-11-101 *et seq*.
- 10. Venue in this court is proper pursuant to Tenn. Code Ann. § 20-4-101 et seq.

BACKGROUND

- 11. Prior to the Supreme Court of Tennessee's decision in *Small Schools I*, Tennessee used a funding formula for its system of public education where the state contribution totaled 45% of K-12 education funding, the local government contribution totaled 45% of K-12 education funding, and the federal government contribution totaled 10% of K-12 education funding.
- 12. This formula did not unfairly discriminate against the Williamson County Board of Education, the Williamson County Commission, Williamson County taxpayers, or parents of students enrolled in Williamson County Schools.

a. The Small Schools I Holding

- 13. In *Small Schools I*, the Supreme Court of Tennessee heard a challenge to Tennessee's funding scheme for its system of public education. *Tennessee Small Sch. Sys. v. McWherter*, 851 S.W.2d 139 (Tenn. 1993).
- 14. The Plaintiffs in *Small Schools I*, a coalition of rural counties, challenged the funding scheme on three main grounds: the Tennessee education

clause, the equal protection provisions of the Fourteenth Amendment of the United States Constitution, and the equal protection provisions of the Tennessee Constitution (i.e., Article I, Section 8 and Article XI, Section 8). *Id.* at *148-152. The first two arguments proved unavailing. *Id.* The Supreme Court decided the matter on the third ground – state equal protection. *Id.* at *152-157.

- 15. At issue in the case was the lack of "equalization." *Id.* at *155. To wit,
- "The largest source of state funding is the Tennessee Foundation Program (TFP). The balance of state funding is in the form of categorical grants for textbooks, transportation, career ladder, and teacher fringe benefits. TFP funds are allocated based on an average daily attendance formula weighted for cost factors such as grade level, vocational courses, and similar factors, whereas categorical grants contain no provision for equalization among the various school districts. The TFP equalization formula accounts for differentials in assessed property values, but the amount available for equalization is less than \$60,000,000 out of an expenditure of \$2.5 billion." *Id.* at *143.
- 16. **Small Schools I** held that, as a direct result of this scheme, "wide disparit[ies]" across counties had emerged in the total current funds available per pupil. *Id.* Those areas with insufficient funds lacked the ability to provide "the programs and facilities necessary for an adequate educational system." *Id.* at *145.
- 17. In Tennessee, "Article I, Section 8 and Article XI, Section 8 of the Tennessee Constitution and the Fourteenth Amendment to the Constitution of the United States confer essentially the same protection upon the individuals subject to those provision." *Id.* at *153 (citing *Marion County Tenn. River Transp. Co. v. Stokes*, 173 Tenn. 347, 350, 117 S.W.2d 740, 741 (1938); *Motlow v. State*, 125 Tenn. 547, 560, 145 S.W. 177, 180 (1912)). As such, Tennessee

"has followed the framework developed by the United States Supreme Court for analyzing equal protection claims. *Doe v. Norris*, 751 S.W.2d at 840–42. It has utilized three standards of scrutiny, depending upon the right asserted. *See City of Memphis v. International Brotherhood of Elec. Workers Union*, 545 S.W.2d 98, 101 (Tenn.1976), (reduced scrutiny); *Mitchell v. Mitchell*, 594 S.W.2d 699, 701 (Tenn.1980) (heightened scrutiny); *Doe v. Norris*, 751 S.W.2d at 840 (strict scrutiny)." *Id.* at *153.

- 18. The Supreme Court applied the "rational basis test," the lowest level of scrutiny that "imposes upon those challenging the constitutionality of the system the greatest burden of proof. *Id*.
- 19. The standard is simple: "legislation is presumed to be valid and will be sustained if the classification drawn by the statute is rationally related to a legitimate [government] interest." *City of Cleburne, Tex. v. Cleburne Living Ctr.*, 473 U.S. 432, 440, 105 S. Ct. 3249, 3254, 87 L. Ed. 2d 313 (1985).
- 20. Indeed, "if some reasonable basis can be found for the classification, or if any state of facts may reasonably be conceived to justify it, the classification will be upheld." *Small Schools I*, 851 S.W.2d at *153 (citing *Harrison v. Schrader*, 569 S.W.2d 822, 825–826 (Tenn.1978)).
- 21. "The burden of showing that a classification is unreasonable and arbitrary is placed upon the individual challenging the statute; and if any state of facts can reasonably be conceived to justify the classification or if the reasonableness of the class is fairly debatable, the statute must be upheld." *Id*.
- 22. The State of Tennessee asserted that any "disparities in expenditures and educational opportunities in Tennessee" were reasonably justified by a rational

basis: "the benefits of local control of public schools." *Id.* at *141, 154. Local control was, at the time, a common rational basis in school funding matters. *Id.* at *154.

- 23. The Supreme Court rejected the proposition that local control was a legitimate basis. *Id.* at *154-56. But even if local control were a viable basis, the Supreme Court reasoned that "there has been no showing that a discriminatory funding scheme is necessary to local control." *Id.* at *155. As such, "the proof... fail[ed] to show a legitimate state interest justifying the granting to some citizens, educational opportunities that are denied to other citizens similarly situated, and, thus, fails to satisfy even the 'rational basis' test applied in equal protection cases." *Id.* at *156. Thus, the disparities resultant from the funding scheme "violate[d] the constitutional guarantee of equal protection." *Id.*
- 24. The result was a mandate from the Supreme Court that the legislature adopt a system to provide "substantially equal educational opportunities" by looking to factors, both monetary and non-monetary, that "bear upon the quality and availability of educational opportunity." *Id*.

b. Tennessee's Response to Small Schools I

25. To comply with this mandate, the Tennessee General Assembly created a new funding formula that included a "fiscal capacity" formula. 1 "Fiscal capacity" is

¹ The legislative response to *Small Schools I* took the form of the Education Improvement Act of 1992. The General Assembly passed that Act prior to the Tennessee Supreme Court's release of its decision in *Small Schools I* but after the trial court had issued its injunction. That Act adopted the Basic Education Program ("BEP") as Tennessee's new K-12 funding formula. The State Board of Education adopted Tennessee Advisory Commission on Intergovernmental Relations's ("TACIR") fiscal capacity model for equalizing funding.

a measure of the potential ability of a particular government to generate revenue from its own sources relative to other similar governments. Tennessee's current "fiscal capacity" requirement is set out in Tenn. Code Ann. §§ 49-3-109 and 49-3-111.

- 26. Currently, and for the past several decades, the Department of Education has allocated to Williamson County Schools pursuant to this formula education funding that pales in comparison to the funding it has provided to Tennessee's other ninety-four counties.
- 27. Williamson County's final FY25 TISA ("Tennessee Investment in Student Achievement") allocation, for example, totaled \$337,851,961. (See Exhibit 1 hereto.) Using its "fiscal capacity" formula and related metrics, however, the State reduced this amount to only \$177,557.606, which represents only 52.5% of the funding Williamson County would have received in the absence of the formula. (See Exhibit 2 hereto.) Because Williamson County Schools had an average daily membership ("ADM") of 41,347 students for FY25, the State's contribution to the education of students in Williamson County Schools amounted to a paltry \$4,294 per student. Such an amount is woefully inadequate for the education of a child in Williamson County.
- 28. In contrast, Tennessee's other school districts received, on average, in FY25 funding of approximately \$7,300 per student.
- 29. Principally because its public school system has been chronically underfunded for decades, Williamson County now has debt on its balance sheet

totaling more than \$1,000,000,000. The county incurs more than \$100,000,000 in annual payments to service such indebtedness.

- 30. The "fiscal capacity" formula, which is the cause of the underfunding of Williamson County Schools and the county's resulting significant indebtedness, was a legislative response to the judicial mandate set out in *Small Schools I*.
- 31. But *Small Schools I*'s analysis of the equal protection claim in that case was erroneous.

c. The Small Schools I Court Misapplied the Rational Basis Test

- 32. As noted *supra*, in *Small Schools I* the Supreme Court of Tennessee rejected the proposition that local control was a legitimate government interest and, thus, a rational basis for the public school's funding system.
- 33. The Supreme Court noted that "the notion of local control was a 'cruel illusion' for the poor districts due to limitations placed upon them by the system itself... So long as the assessed valuation within a district's boundaries is a major determinant of how much it can spend for its schools, only a district with a large tax base will truly be able to decide how much it really cares about education. The poor district cannot freely choose to tax itself into an excellence which its tax rolls cannot provide." *Id.* at *155 (citing *Dupree v. Alma School Dist. No. 30*, 279 Ark. 340, 651 S.W.2d 90 (1983)).
 - 34. The Supreme Court was mistaken both in principle and in fact.
- 35. Under the rational basis standard, a policy must be "rationally related to a legitimate [government] interest." *Cleburne*, 473 U.S. at *440. Thus, "if some

reasonable basis can be found for the classification, or if any state of facts may reasonably be conceived to justify it, the classification will be upheld." *Small Schools*I. 851 S.W.2d at *153.

- 36. The basis must simply "[bear] a natural and reasonable relation to the object sought to be accomplished." *State v. Tester*, 879 S.W.2d 823, 829 (1994) (citing *State v. Nashville, Chattanooga & St. Louis Railway Co.*, 121 Tenn. 1, 135 S.W.773, 775-76 (1910)).
- 37. This is a very forgiving standard. If the government does not provide an adequate basis, courts will go out of their way to "conceive" of one for them. See e.g., McGowan v. State of Md., 366 U.S. 420, 425-26, 81 S. Ct. 1101, 1105, 6 L. Ed. 2d 393 (1961) ("A statutory discrimination will not be set aside if any state of facts reasonably may be conceived to justify it") (citation omitted) (emphasis added); Small School, 851 S.W.2d at *153 ("if any state of facts may reasonably be conceived to justify it") (emphasis added).
- 38. Even then, "judges in rational basis cases are instructed to place a heavy judicial thumb on the government's side of the scales in the form of an essentially irrebuttable presumption that the government is pursuing constitutionally permissible ends, regardless of whether it actually is." Clark Neily, *Litigation Without Adjudication: Why the Modern Rational Basis Test Is Unconstitutional*, 14 Geo. J.L. & Pub. Pol'y 537, 543 (2016).

- 39. A government does not even need to prove that the "asserted or 'conceived' justification for the challenged law 'actually motivated the legislature." *Id.* (citing *FCC v. Beach Comme'ns, Inc.*, 508 U.S. 307, 315 (1993)).
- 40. A rational basis test thus does not demand that the government provide every possible basis, let alone prove that a conceived basis was actual or even ideal. It asks only that the basis be *rational*.

d. Local Control Is a Legitimate Government Interest

- 41. **Small Schools I**, contrary to the above rational basis standard, erroneously defined the legitimacy of the interest based upon whether a given policy actually advanced said interest. *See Small Schools I*, 851 S.W.2d at *154-55 (local control was *not* a rational basis, in part, because the funding policy made it impossible to exert meaningful control).
- 42. This is a nonsensical test. If, for instance, a given healthcare regulation created circumstances that do not successfully enhance the quality of healthcare, that would hardly mean that quality healthcare is no longer a legitimate government interest.
- 43. A similar logic should hold here: simply because the Supreme Court worried that the funding scheme would not *actually* facilitate local control did not mean that local control itself was not a legitimate government interest under rational basis.
 - 44. To the contrary, local control is a plainly legitimate government interest.

- 45. Notwithstanding that several other states have clearly held as much², the government's legitimate interest in local control is true even ideologically. Local governments are essential to the function of American democracy. *See e.g.*, *Avery v. Midland Cnty.*, *Tex.*, 390 U.S. 474, 481, 88 S. Ct. 1114, 1118, 20 L. Ed. 2d 45 (1968) ("In a word, institutions of local government have always been a major aspect of our system, and their responsible and responsive operation is today of increasing importance to the quality of life of more and more of our citizens.").
- 46. Thus, the pursuit and preservation of autonomy at the local level is and always will be something that the government should consider—that is, a legitimate government purpose.
- 47. But even notwithstanding *Small Schools I*'s improper government interest analysis, the facts of the case did not support the Supreme Court's broad conclusions about local control.
- 48. The Supreme Court argued that because "poor district[s] cannot freely choose to tax [themselves] into an excellence which [their] tax rolls cannot provide,"

² Among those cases standing for this same proposition in *Small School*, most remain good law. *See*, *e.g.*, *Lujan v. Colorado State Bd. of Educ.*, 649 P.2d 1005, 1025 (Colo.1982) (*en banc*); *Board of Educ.*, *Levittown Union Free School Dist. v. Nyquist*, 57 N.Y.2d 27, 453 N.Y.S.2d 643, 439 N.E.2d 359 (1982), appeal dismissed, 459 U.S. 1138, 103 S.Ct. 775, 74 L.Ed.2d 986 (1983). *See also McDaniel v. Thomas*, 248 Ga. 632, 285 S.E.2d 156 (1981); *Thompson v. Engelking*, 96 Idaho 793, 537 P.2d 635, 647 (1975); *Hornbeck v. Somerset County Bd. of Educ.*, 295 Md. 597, 458 A.2d 758, 776 (1983); *East Jackson Pub. Schools v. State*, 133 Mich.App. 132, 348 N.W.2d 303 (1984); *Board of Educ. of the City School Dist. of Cincinnati v. Walter*, 58 Ohio St.2d 368, 390 N.E.2d 813 (1979), *cert. denied*, 444 U.S. 1015, 100 S.Ct. 665, 62 L.Ed.2d 644 (1980); *Fair School Fin. Council of Oklahoma, Inc. v. State*, 746 P.2d 1135, 1149 (Okla.1987).

then local control is in effect illusory and, impliedly, the policy is unrelated to the interest. *Small Schools I*, 851 S.W.2d at *155 (quoting *Dupree*, 651 S.W.2d at 93).

- 49. The Supreme Court was bullish: "Property and local option sales tax revenues, which constitute a substantial part of the total funds available to a district, are limited by the economic conditions of the county in which the district is located. If a county has a relatively low total assessed value of property and very little business activity, that county has, in effect, a stone wall beyond which it cannot go in attempting to fund its educational system regardless of its needs." *Id.*
- 50. Simply because a theoretical limit exists, however, does not mean that districts are *anywhere* near the threshold.
- 51. To the contrary, poor districts overwhelmingly have plenty of opportunities to increase funding. Charles W. Burson & Jane W. Young, School Finance Litigation: The State's Perspective, 61 Tenn. L. Rev. 457, 462 (1994) ("For example, [Small Schools I] plaintiffs Grundy and Crockett County school boards could have reached the average state expenditure level... if residential property owners had paid \$5.20 more each month on their property tax.").
- 52. That these districts did not raise more funding is hardly evidence of their "inability" to do so. *Id*. The rural county governments cited in *Small Schools*I could have raised property taxes to keep apace with their peers. Most simply chose not to.

- 53. Far from a "cruel illusion," the disparities in county education spending and quality were a direct exercise of local control working as intended: allowing the citizens to set academic standards that they deem appropriate or desirable.
- 54. The Supreme Court clearly took issue with how local control was wielded, perhaps, but whether the interest produces *desirable* outcomes is irrelevant to its legitimacy under a rational basis analysis. *See Tester*, 879 S.W.2d at 829 (the basis need only be "natural and reasonable").
- 55. The Supreme Court did not, indeed could not, articulate a reason why local control is an illegitimate basis.
- 56. If anything, it conceded that "the beneficial, indeed essential, role played by local responsibility for and community involvement in local education'… cannot reasonably be disputed." *Small Schools I*, 851 S.W.2d at *155.
- 57. Given the deference accorded to governments under a rational basis test and the recurring American respect for local government, local control is and should have been deemed a legitimate government purpose.
- 58. Insofar as the funding scheme rationally related to local control, it should have passed a rational basis test.

e. The Supreme Court Mistakenly Applied a Level of Scrutiny Higher than Rational Basis, Invalidating Its Conclusion

59. Further, the Supreme Court improperly considered "necessity" as a factor in evaluating the state's funding formula under a rational basis test.

- 60. The Supreme Court opined that, even if local control were a legitimate government purpose, "there has been no showing that a discriminatory funding scheme is *necessary* to local control." *Id*. (emphasis added).
 - 61. Necessity does not factor into a rational basis test.
- 62. Rather, to succeed under rational basis, a government must demonstrate that a given policy is rationally related to a legitimate government interest." *Cleburne*, 473 U.S. at *440. The basis need only be "reasonable," not necessary. *See Small School*, 851 S.W.2d at *153-54.
- 63. In arguing that the policy fails a rational basis review because it did not prove that the asserted policy was *necessary* to achieve its basis, the Supreme Court mistakenly applied a higher standard closer to intermediate or strict scrutiny. *See e.g.*, *Americans for Prosperity Found. v. Bonta*, 594 U.S. 595, 607, 141 S. Ct. 2373, 2383, 210 L. Ed. 2d 716 (2021) ("Under strict scrutiny, the government must adopt 'the least restrictive means of achieving a compelling state interest"); *United States v. Virginia*, 518 U.S. 515, 570-71, 116 S. Ct. 2264, 2293-94, 135 L. Ed. 2d 735 (1996) (Scalia, J., dissenting) ("[I]ntermediate scrutiny' ... [inquires] whether the statutory classification is 'substantially related to an important governmental objective' (citation omitted)).
- 64. The Supreme Court pointed to no classification in the case that would trigger intermediate or strict scrutiny, and it presumed to apply rational basis. See Small Schools I, 851 S.W.2d. at 153.

- 65. In no small part because it fallaciously applied a heightened standard, the Supreme Court held that the funding scheme was not rationally related to local control.
 - 66. This was in error.
- 67. Because local control is a legitimate government interest, the sole question should have been whether the policy is rationally related to local control.
 - 68. The answer to that question is yes.
- 69. Where local school districts are responsible for a greater proportion of educational funding, local governments necessarily determine a greater proportion of how much funding to raise, how to raise that funding, and perhaps more importantly how to direct expenditures toward *their*—not the State's—definition of a quality education.
- 70. The above relationship between the policy and the legitimate government interest is natural, reasonable, and above all rational.
- 71. Whether the policy is "necessary" to achieve the stated legitimate government interest should never have factored into the rational basis inquiry.
- 72. The funding scheme in question was not the only policy that could, or should, result from the pursuit of local control. It was simply one of many possible exercises of legitimate state authority.
- 73. How effectively the funding scheme achieves this goal and whether this policy is the optimal way to proceed do not factor into the analysis.

- 74. Applying such inquiries would defeat the intentionally permissive nature of the rational basis test and invite the courts to meddle in ordinary exercises of legitimate democratic authority. *See* Meghan Boone, *Perverse & Irrational*, 16 Harv. L. & Pol'y Rev. 393, 402 (2022) ("The rational basis test reflects, at its core, the idea that the government in a representative democracy should normally be permitted to pass and enforce laws because the government reflects the will of the people and the democratic process. As a result of this necessary deference to the political branches, judicial invalidation of most categories of legislation should be greatly disfavored").
- 75. The Supreme Court in *Small Schools I* misunderstood that. Necessity is not a factor properly considered when deciding whether a rational basis exists for a legislative enactment.
- 76. The standard is "rationally relates," not "most effectively facilitates." See Cleburne, 473 U.S. at *440. So long as the policy reasonably pertains to the proffered interest, as it did in Small Schools I, it should be upheld. See id.3
- 77. In *Small Schools I*, because local control was a legitimate government interest, and because the funding scheme *rationally relates* to local control by

³ The specific slant of the policy is similarly irrelevant. So long as a colorable argument can be made in favor of the policy's rational relation, it is permissible. A given public interest can be used to justify any number of policies so long as the government can make a reasonable argument that they are rationally related. For instance, a funding scheme that allocates the burden of funding schools to the state could *also* be rationally related to local control (e.g., by providing more funding, localities have more flexibility in their budgets to control education). This is not contradictory under a rational basis test—the deferential nature of the standard, provided that *some* basis can be articulated for the exercise of power, is the point.

granting them latitude to levy taxes for and design their own education system, the policy should have passed a rational basis test.

- 78. Because the Supreme Court wrongfully applied the rational basis test, and because under the facts presented a legitimate rational basis test would have favored the government, the Supreme Court's mandate to establish "substantially equal educational opportunities" was baseless under Tennessee's equal protection provisions.
- 79. Consequently, neither Tenn. Const. Article I, Section 8 nor Tenn. Const. Article XI, Section 8 requires the "fiscal capacity formula" set out in Tenn. Code Ann. § 49-3-111 and neither constitutional provision prohibits the education funding formula in place prior to *Small School*.

LEGAL CLAIMS

COUNT I (Declaratory Judgment)

- 80. The allegations set forth in paragraphs 1 through 79 are hereby incorporated by reference as fully as if set out verbatim.
- 81. Plaintiffs have legal relations that are affected by Tenn. Const. Article I, Section 8, Tenn. Const. Article XI, Section 8, and Tenn. Code Ann. §§ 49-3-109 and 49-3-111.
- 82. Specifically, the fiscal capacity formula set out in Title 49 causes a material reduction in education funding that the Tennessee Department of Education

provides to or on behalf of students who attend public schools in Williamson County, Tennessee.

- 83. Because of such reduction, Williamson County, through its duly elected County Commission, is forced to provide additional funds to the Williamson County Board of Education to educate students in its public school system.
- 84. This Court should issue a declaration that neither Tenn. Const. Article I, Section 8 nor Tenn. Const. Article XI, Section 8 requires the "fiscal capacity formula" set out in Tenn. Code Ann. §§ 49-3-109 and 49-3-111 and neither constitutional provision prohibits the education funding formula in place prior to *Small Schools I*.

WHEREFORE, Plaintiffs pray:

- A. That this Court issue a declaratory judgment establishing (a) that neither Tenn. Const. Article I, Section 8 nor Tenn. Const. Article XI, Section 8 requires the "fiscal capacity formula" set out in Tenn. Code Ann. §§ 49-3-109 and 49-3-111, and (b) that neither constitutional provision prohibits the education funding formula in place prior to *Tennessee Small Sch. Sys. v. McWherter*, 851 S.W.2d 139 (Tenn. 1993); and
- B. That this Court order such other and further relief as it deems just and equitable.

PLAINTIFFS DEMAND TRIAL BY JURY

Respectfully submitted:

s/Gino Bulso
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BILL LEE GOVERNOR

STATE OF TENNESSEE DEPARTMENT OF EDUCATION NINTH FLOOR, ANDREW JOHNSON TOWER 710 JAMES ROBERTSON PARKWAY NASHVILLE, TN 37243-0375

LIZZETTE REYNOLDS
COMMISSIONER

June 27, 2024

Dear Director Golden,

The Tennessee Investment in Student Achievement (TISA) Act passed in 2022, enacting a student-based funding formula that generates funding based on individual student need. The new funding formula generated more than one billion new dollars of state investment for students across Tennessee.

This letter and associated data file provide the **Final FY25 TISA allocation** for your district, building on six months of data verification and estimates.

FY25 TISA Allocation

Allocations in the table below include the **base, weighted and direct funding** generated by student data submitted by your district **averaged over all nine reporting periods of the 2023-24 school year**. This information was pulled on June 17, 2024, and reflects a full application of the <u>TISA Rules</u>. Additionally, a table has been included below to detail the split between state and local funds required by the formula, as well as your district's current maintenance of effort local funding level. In reviewing this information, please be mindful of the data caveats noted above your district's allocation table and in the district data files.

There are some key updates for FY25 to be aware of as your district reviews the final allocation:

- **Economically Disadvantaged Funding:** Students generated funding for the economically disadvantaged weight based on the following student classification codes: Direct Certification of economic disadvantage (J), Foster Care (FOS01), Homeless (H), Migrant (I) and Runaway (U). Students identified in the Medicaid eligibility pilot program for school nutrition who only met Medicaid Free or Medicaid Reduced criteria should have been coded as "MF" or "MR" and are not included in your Economically Disadvantaged ADM (ED ADM) for funding.
 - For some districts, economically disadvantaged counts for the current school year are lower than expected, potentially influenced by delayed timelines in certification of SNAP and TANF benefits. In recognition of these challenges, the state proactively processed automatic data appeals to ensure all districts were held harmless from the delayed certification timelines. **Unless a district requested otherwise, districts were funded at the higher ED ADM values between the 2023-24 school year or the 2022-23 school year. This provision only applied to the FY25 TISA allocations.**
- English Learners and Characteristics of Dyslexia Funding: For the 2024-25 school year, based on data generated in the 2023-24 school year, funding is allocated for all English Learner students who meet the EL Tier I-III definitions as outlined in TISA Rule and have an Individual Learning Plan (ILP) finalized in TN PULSE at their full ADM generated based on the student's enrollment date. If an EL student was enrolled in your district but transferred out prior to an ILP being established in TN PULSE, the district received credit for the student's EL ADM value in your district. These values are reflected in the allocations below and corresponding data files.

Similarly, 2024-25 school year funding is provided for all students who met the criteria for Characteristics of Dyslexia as defined in rule and have a finalized ILP-D in TN PULSE at full ADM generated based on the student's enrollment date.

District Data File

To be reviewed in combination with the table below, the department has uploaded a *FY25 Final Allocation TISA District File* to your TNShare EIS Administrator folder. Tabs within the file include the following information specific to your district:

- TISA Calculator Includes application of the TISA rules to district data, a local contribution calculator, and required funds for existing educator salary increases pursuant to T.C.A. 49-3-105(e)
- Reporting Period Summary tab with averages by funding line and reporting period
- School Calculations tab includes funding amounts by school
- School Counts tab with averaged reporting periods by funding line
- ED Hold Harmless Tab includes final ED ADM counts for 2022-23, current ED ADM counts for 2023-24 and the higher of the two for application of the hold harmless provision
- District-submitted and state level input data:
 - Base Average Daily Membership (ADM) (also used for Small, Sparse, Concentrated Poverty, Post-Secondary Test, K-3 Literacy, and Charter)
 - Economically Disadvantaged ADM by student and school
 - Concentrated poverty school list from district Consolidated Funding Application in ePlan
 - Sparse calculation inputs of square miles by county
 - Special Education ADM by student and school
 - o English Learner ADM by student and school with English Learner Tier
 - o Characteristics of Dyslexia ADM by student and school
 - Career and Technical Education ADM (CTE ADM) by student and by course
 - 2024 3rd Grade ELA TCAP results by student by school

Sincerely,

Lizzette Reynolds Commissioner

TISA- FY25 Final Allocations

The table below includes the district's FY25 final TISA allocation and is subject to the following caveats and data notes:

- Students/Services reflect the average of each input as reported by districts across Reporting Periods 1-9.
- Funding amounts are reflective of the state's final FY25 budget.
- Allocations do not include outcomes funding, fast-growth funding, or other related grants that are determined at the end of the school year or in the upcoming year.
- Total allocations represent the combined value of state funds and local required funds under TISA.

TISA – FY25 Allocations												
District	District ID	940										
Element	Amount/Weight	Students/Services		Funding								
BASE	\$7,075.00	41,347.13		\$292,530,925.91								
WEIGHTS												
Economically Disadvantaged*	25%	990.56		\$1,752,052.85								
Concentrated Poverty	5%	0.00		\$0.00								
Small	5%	0.00		\$0.00								
Sparse	5%	0.00		\$0.00								
Unique Learning Need 1	15%	3,513.98		\$3,729,206.27								
Unique Learning Need 2	20%	2,202.33		\$3,116,291.67								
Unique Learning Need 3	40%	449.89		\$1,273,175.23								
Unique Learning Need 4	60%	324.05		\$1,375,600.26								
Unique Learning Need 5	70%	442.40		\$2,190,987.28								
Unique Learning Need 6	75%	701.76		\$3,723,697.11								
Unique Learning Need 7	80%	1,192.11		\$6,747,326.15								
Unique Learning Need 8	100%	4.30		\$30,422.50								
Unique Learning Need 9	125%	919.51		\$8,131,943.46								
Unique Learning Need 10	150%	8.08		\$85,723.87								
DIRECT												
K-3 Literacy	\$500.00	11,308.66		\$5,654,327.78								
4 th Grade Supports	\$500.00	925.00		\$462,500.00								
CTE	\$5,000.00	1,276.80		\$6,384,001.04								
Post-Secondary Test	\$93.00 (per test)	7,137.42		\$663,779.80								
Charter	\$504.20	0.00		\$0.00								
OUTCOMES												
TBD												
TOTAL				\$337,851,961.17								

^{*}The ED ADM count and ED funding amount included in your district's TISA allocation reflects the application of the proactive data appeal for the Economically Disadvantaged weight. The Hold Harmless ED ADM is calculated based on the higher ED ADM value by school between the 2023-24 school year and the 2022-23 school year. Your district's actual reported ED ADM counts for the 2023-24 school year are shown in the table below.

TISA Actual 2023-24 ED ADM (For Comparison Purposes Only)												
District	Williamsor	n County	District ID	940								
Element	Amount/Weight	Students/Services		Funding								
Economically Disadvantaged	25%	858.07		\$1,517,717.02								

TISA- FY25 Restricted Funds for Existing Educator Salary Increases

Pursuant to T.C.A. 49-3-105(e) and the appropriations act, \$125M of the base funds statewide has been designated for existing educator salary increases. For the 2024-25 school year, the minimum salary will be \$44,500. The table below includes the district's share of restricted funds for existing educator salary increases.

TISA FY25- RESTRICTED FUNDS FOR EXISTIN	IG E	DUCATOR SALARY INCREASE	S
District Base ADMs	/		41,347.13
Statewide Base ADMs			968,376.25
District % of Statewide Base ADMs	=		4.27%
District % of Statewide Base ADMs			4.27%
Existing Educator Salary Increase Restricted Funds	X		\$125,000,000.00
District Restricted Funds- Existing Educator Salary Increases	=		\$5,337,172.31

FY25 TISA State & Local Contributions

The calculator reflects the math in determining local contribution in alignment with law and rules, and includes the following:

- Calculation of Local Share: This represents the total funds generated statewide for the base and the weights with 30% of each being the collective total of the formula from local funding entities.
- Application of Fiscal Capacity: Final fiscal capacity values from CBER and TACIR have been averaged together and are included in your local contribution calculator.
- Calculation of Multi-System Contributions: If your district is in a multi-system county, this step determines the proportional share of funds generated for each the base and weights by a district compared to all systems within the county. If you are a single system county, then the percent will reflect 100%.
- Final Local Contributions: The calculator provides the final determination of local contribution. The bottom, righthand corner will display the total TISA allocation for the district and the respective split between local and state funds.

Maintenance of Effort: The TISA Act did not adjust the law concerning district's obligations under maintenance of effort. For reference, the currently budgeted funding level has been included here as well. The Maintenance of Effort amount will change when your district's FY25 budget is submitted to the state via ePlan.

FY25 TISA State & Local Contributions													
		BASE		WEIGHTS									
1. Calculation of Statewide Local Share													
Statewide Total		\$6,843,088,041.00		\$1,820,041,713.54									
Multiply by Local Share %	Х	30%	Х	30%									
Statewide Local Share	=	\$2,052,926,412.30	=	\$546,012,514.06									
2. Application of County Fiscal Capacity													
Statewide Local Share		\$2,052,926,412.30		\$546,012,514.06									
Williamson County FY25 Fiscal Capacity	Х	6.74%	Χ	6.74%									
County Local Contribution (All Systems)	=	\$138,278,149.23	=	\$36,777,548.11									
3. Multi-System County Calculation													
		Base Funds Generated		Weight Funds Generated									
Williamson County		\$292,530,925.91		\$32,156,426.64									
All Systems within County Total	/	\$313,814,805.63	/	\$37,669,935.40									
Williamson County % of County Total Funds	=	93.22%	=	85.36%									
Williamson County % of County Total Funds		93.22%		85.36%									
County Local Contribution (All Systems)	Х	\$138,278,149.23	Χ	\$36,777,548.11									
Williamson County Local Contribution	=	\$128,899,702.31	=	\$31,394,652.40									
4. Total Local Contribution													
Adding Local Contribution Totals		\$128,899,702.31	+	\$31,394,652.40									
			=	\$160,294,354.72									
To	tal Fu	ınding (Base, Weights, Direct)		\$337,851,961.17									
		Local	-	\$160,294,354.72									
		State	=	\$177,557,606.46									
(State Fun	ding E	xcluding Post-Secondary Test*)		\$176,893,826.66									

*Pursuant to T.C.A. 49-3-105(d), please note that funds generated for the post-secondary test will be maintained and administered at the state level. These funds are reflected in the total state funds as being generated by TISA but will be administered by the

Current FY24 District Maintenance of Effort

department to relieve procurement and administration burden on districts.

\$294,109,113.00

FY25 TISA Final Allocations

	P tot tot	 LTICA Allegation		Barrier altra		atalan den adta.	_	stance of the same		Charles Charles	•		Average Daily
	District	I TISA Allocation		Base Funding		eighted Funding		irect Funding	_	State Share		cal Contribution	Membership (ADM)
171	Alamo	\$ 4,903,227.83		3,687,293.47	-	1,046,734.36		169,200.00	•	4,384,928.96	-	518,298.88	521.17
51	Alcoa	\$ 19,451,571.96		14,897,656.40	-	3,435,579.63		1,118,335.93	-	13,523,916.59	-	5,927,655.37	2,105.68
10	Anderson County	\$ 57,332,021.31		41,592,935.76	-	11,636,832.39	-	4,102,253.17		43,315,552.22	-	14,016,469.09	5,878.86
793	Arlington	\$ 37,168,516.16	-	31,799,688.06		3,030,764.24		2,338,063.87	-	28,594,119.95		8,574,396.21	4,494.66
541	Athens	\$ 15,553,199.47	-	11,826,923.75		3,291,481.27		434,794.44	-	11,784,600.74		3,768,598.73	1,671.65
794	Bartlett	\$ 75,861,867.86	\$	61,915,842.99	\$	10,251,949.64	\$	3,694,075.23	\$	58,203,118.27	\$	17,658,749.59	8,751.36
20	Bedford County	\$ 88,656,237.54	\$	62,046,447.59	\$	22,538,926.96	\$	4,070,862.99	\$	74,962,032.33	\$	13,694,205.22	8,769.82
172	Bells	\$ 3,348,738.95	\$	2,593,026.81	\$	619,906.59	\$	135,805.56	\$	2,997,247.68	\$	351,491.27	366.51
30	Benton County	\$ 20,219,428.83	\$	14,358,600.34	\$	4,578,620.96	\$	1,282,207.53	\$	16,740,275.71	\$	3,479,153.11	2,029.48
40	Bledsoe County	\$ 15,644,087.34	\$	10,752,157.08	\$	4,025,294.07	\$	866,636.19	\$	14,088,830.51	\$	1,555,256.83	1,519.74
50	Blount County	\$ 92,514,031.07	\$	70,194,057.30	\$	17,060,864.80	\$	5,259,108.98	\$	64,242,532.96	\$	28,271,498.11	9,921.42
274	Bradford	\$ 5,845,845.93	\$	4,132,246.84	\$	1,312,766.44	\$	400,832.65	\$	5,030,753.82	\$	815,092.11	584.06
60	Bradley County	\$ 93,332,853.01	\$	70,508,494.83	\$	17,613,156.29	\$	5,211,201.90	\$	72,645,614.08	\$	20,687,238.93	9,965.86
821	Bristol	\$ 36,139,587.25	\$	28,014,247.81	\$	5,806,236.31	\$	2,319,103.14	\$	25,612,020.09	\$	10,527,567.16	3,959.61
70	Campbell County	\$ 49,383,469.02	\$	34,444,333.83	\$	12,069,623.93	\$	2,869,511.26	\$	40,072,905.37	\$	9,310,563.65	4,868.46
80	Cannon County	\$ 16,599,454.64	\$	12,167,982.75	\$	3,251,849.51	\$	1,179,622.38	\$	14,133,890.35	\$	2,465,564.29	1,719.86
90 **	Carroll County	\$ 2,029,693.57	\$	-	\$	-	\$	-	\$	1,649,969.92	\$	379,723.65	6.73
100	Carter County	\$ 41,822,371.59	\$	30,592,682.18	\$	9,110,746.47	\$	2,118,942.95	\$	35,293,906.31	\$	6,528,465.28	4,324.05
110	Cheatham County	\$ 51,418,235.72	\$	38,311,554.77	\$	10,234,111.03	\$	2,872,569.92	\$	40,481,201.30	\$	10,937,034.43	5,415.06
120	Chester County	\$ 25,675,696.81	\$	19,108,423.06	\$	4,982,008.10	\$	1,585,265.65	\$	22,918,377.67	\$	2,757,319.14	2,700.84
130	Claiborne County	\$ 37,041,142.87	\$	26,974,613.40	\$	8,434,772.91	\$	1,631,756.55	\$	31,515,811.01	\$	5,525,331.86	3,812.67
140	Clay County	\$ 10,124,396.55	\$	7,020,889.46	\$	2,352,903.46	\$	750,603.63	\$	8,898,953.60	\$	1,225,442.94	992.35
61	Cleveland	\$ 55,462,887.51	\$	40,155,184.44	\$	12,940,292.27	\$	2,367,410.81	\$	43,018,503.17	\$	12,444,384.34	5,675.64
11	Clinton	\$ 8,329,618.22	\$	6,511,043.89	\$	1,499,390.99	\$	319,183.33	\$	6,224,584.06	\$	2,105,034.16	920.29
150	Cocke County	\$ 40,371,040.04	\$	29,546,917.48	\$	8,624,179.59	\$	2,199,942.97	\$	33,510,150.50	\$	6,860,889.54	4,176.24
160	Coffee County	\$ 41,510,514.89	\$	29,706,464.07	\$	9,008,111.26	\$	2,795,939.56	\$	32,738,016.17	\$	8,772,498.71	4,198.79
795	Collierville	\$ 79,917,144.22		65,550,590.17	-	9,259,132.99	-	5,107,421.06	-	61,575,026.74	-	18,342,117.48	9,265.10
170	Crockett County	\$ 18,486,754.39	-	13,535,523.55		3,461,798.24		1,489,432.60	-	16,626,717.59		1,860,036.80	1,913.15

	District	Tot	al TISA Allocation		Base Funding	14	eighted Funding	_	Direct Funding		State Share	١	ocal Contribution	Average Daily Membership (ADM)
180	Cumberland County	Ċ	67,462,563.55	ć	47,636,806.24	vv \$	14,955,976.65		4,869,780.66	ć	49,587,560.28		17,875,003.28	6,733.12
190	Davidson County	ې د	812,429,633.27	۶ \$	570,501,998.02	۶ \$	208,669,416.64	۶ \$	33,258,218.61	•	339,096,743.62	۶ \$	473,332,889.65	80,636.32
721	•	ې د	8,119,949.43	•	5,803,499.28		2,032,256.54	•	284,193.61		6,566,898.02	•	1,553,051.42	820.28
200	Dayton Decatur County	ې د	13,603,566.01	-	9,922,608.89		2,874,370.60		806,586.52		11,084,440.23		2,519,125.78	1,402.49
210	DeKalb County	ې د	29,007,485.03	-	19,739,834.06		7,800,299.42	-	•	-	23,940,155.45	-		2,790.08
970 ***	•	ې د		-	19,739,634.00		7,800,299.42	-	1,467,351.55		• •	-	5,067,329.57	•
	Department Of Children's Services	\$ ¢	12,836,895.18	\$ \$	- 	\$	12 500 601 55	\$ ¢	2	\$ ¢	12,836,895.18		- 18,030,964.89	1,155.33
220	Dickson County	<u>۲</u>	71,355,777.59	•	54,192,498.23	\$	13,598,691.55		3,564,587.81	\$	53,324,812.70		• •	7,659.72
230	Dyer County	\$ \$	32,994,747.70	-	24,342,834.58		6,991,326.23	•	1,660,586.88		26,445,128.25	•	6,549,619.45	3,440.68
231	Dyersburg	\$ \$	23,474,253.51		16,950,776.31		5,263,652.23	-	1,259,824.97	-	18,837,707.66	-	4,636,545.85	2,395.87
101	Elizabethton	\$ \$	24,066,431.46		18,453,463.13		3,928,193.05		1,684,775.28		20,386,286.26		3,680,145.20	2,608.26
542	Etowah	\$ \$	3,136,010.17	-	2,312,935.42		687,338.12		135,736.63		2,388,740.32		747,269.85	326.92
240 **	Fayette County Public Schools	\$ \$	28,888,689.30	-	-	\$	-	\$	-	\$	17,056,735.57	-	11,831,953.72	2,863.05
521	Fayetteville	\$	10,237,520.69	-		\$	2,059,247.84	-	580,469.65	-	8,419,119.82	-	1,818,400.87	1,073.89
250	Fentress County	\$	20,080,754.12	-	14,908,934.12		4,035,750.80		1,136,069.21		16,561,334.06	-	3,519,420.06	2,107.27
260	Franklin County	Ş	45,786,217.80		33,480,044.96		9,273,857.99		3,032,314.85		34,362,620.57		11,423,597.23	4,732.16
941 **	Franklin SSD	\$	28,420,659.88	\$	-	\$	-	\$	-	\$	14,374,324.23	-	14,046,335.66	3,008.32
796	Germantown	\$	-,,	\$	41,743,768.57		4,129,924.04	•	2,699,685.43		37,284,138.83	-	11,289,239.22	5,900.18
275	Gibson Co Sp Dist	\$	35,022,860.89	\$	26,852,050.95	\$	5,775,950.22	\$	2,394,859.72	\$	30,139,205.33	\$	4,883,655.56	3,795.34
280	Giles County	\$	33,664,055.76	\$	24,626,669.82	\$	6,796,988.52	\$	2,240,397.41	\$	25,898,126.14	\$	7,765,929.62	3,480.80
290	Grainger County	\$	28,504,380.76	\$	20,230,637.99	\$	6,146,944.86	\$	2,126,797.92	\$	25,312,163.30	\$	3,192,217.46	2,859.45
300	Greene County	\$	55,038,033.69	\$	40,700,433.01	\$	10,909,783.69	\$	3,427,816.99	\$	43,579,723.40	\$	11,458,310.29	5,752.71
301	Greeneville	\$	26,381,613.90	\$	20,381,949.74	\$	4,463,515.21	\$	1,536,148.95	\$	20,875,334.81	\$	5,506,279.09	2,880.84
310	Grundy County	\$	16,021,600.94	\$	11,430,151.32	\$	3,590,288.18	\$	1,001,161.44	\$	13,839,091.50	\$	2,182,509.44	1,615.57
320	Hamblen County	\$	98,954,577.49	\$	70,377,288.31	\$	22,879,208.87	\$	5,698,080.31	\$	76,685,578.18	\$	22,268,999.31	9,947.32
330	Hamilton County	\$	421,695,920.37	\$	318,278,763.14	\$	83,962,610.16	\$	19,454,547.06	\$	270,087,219.45	\$	151,608,700.92	44,986.40
340	Hancock County	\$	9,100,244.60	\$	5,972,007.50	\$	2,688,540.94	\$	439,696.16	\$	8,412,993.67	\$	687,250.93	844.10
350	Hardeman County Schools	\$	29,941,494.36	\$	21,260,509.74	\$	6,707,008.69	\$	1,973,975.94	\$	25,940,316.72	\$	4,001,177.64	3,005.02
360	Hardin County	\$	30,923,524.66	\$	22,547,339.30	\$	6,353,517.78	\$	2,022,667.58	\$	22,885,661.51	\$	8,037,863.16	3,186.90
370	Hawkins County	\$	57,282,620.46	\$	42,808,132.57	\$	11,391,793.12	\$	3,082,694.77	\$	47,303,154.47	\$	9,979,465.98	6,050.62
380	Haywood County	\$	23,911,888.43	\$	16,718,526.57	\$	5,921,456.74	\$	1,271,905.11	\$	19,260,231.51	\$	4,651,656.92	2,363.04

								_				_		Average Daily
	District	Tota	al TISA Allocation	_	Base Funding		eighted Funding		Direct Funding		State Share		cal Contribution	Membership (ADM)
390	Henderson County	\$	36,787,941.40	-	27,078,261.01		7,752,954.26		1,956,726.13	-	31,627,958.51		5,159,982.89	3,827.32
400	Henry County	\$	28,303,248.12		20,472,357.21		6,013,768.36	\$	1,817,122.55	-	22,523,455.19		5,779,792.93	2,893.62
410	Hickman County	\$	27,889,482.19		20,803,276.36	-	5,684,170.27		1,402,035.55		24,250,514.03		3,638,968.16	2,940.39
92	Hollow Rock - Bruceton	\$	6,040,092.42	-	4,283,919.04		1,158,383.07	-	597,790.32	-	5,319,057.11		721,035.31	605.50
420	Houston County	\$	11,610,581.99	\$	8,501,482.17	-	2,589,818.94	\$	519,280.87	\$	10,346,777.23	\$	1,263,804.76	1,201.62
271	Humboldt City Schools	\$	10,258,036.90	\$	6,982,181.09	\$	2,777,379.75	\$	498,476.06	\$	8,796,956.48	\$	1,461,080.42	986.88
430	Humphreys County	\$	24,553,637.45	\$	17,822,781.79	\$	4,991,700.18	\$	1,739,155.48	\$	19,168,895.96	\$	5,384,741.49	2,519.12
93	Huntingdon Special School District	\$	11,806,717.38	\$	9,048,375.33	\$	1,789,426.52	\$	968,915.53	\$	10,374,275.70	\$	1,432,441.68	1,278.92
440	Jackson County	\$	13,306,844.26	\$	9,520,826.01	\$	3,214,800.70	\$	571,217.55	\$	11,832,560.57	\$	1,474,283.69	1,345.70
450 *	Jefferson County	\$	63,477,862.55	\$	46,927,007.15	\$	12,915,089.37	\$	3,635,766.03	\$	49,753,581.77	\$	13,724,280.78	6,632.79
901	Johnson City	\$	66,869,110.27	\$	54,337,454.31	\$	9,570,778.97	\$	2,960,876.99	\$	45,394,947.18	\$	21,474,163.08	7,680.21
460	Johnson County	\$	40,832,915.54	\$	32,476,795.90	\$	7,091,202.34	\$	1,264,917.30	\$	37,862,310.41	\$	2,970,605.13	4,590.36
822	Kingsport	\$	66,970,137.82	\$	52,249,122.89	\$	11,289,253.56	\$	3,431,761.36	\$	47,175,116.57	\$	19,795,021.25	7,385.04
470	Knox County	\$	522,186,039.43	\$	413,292,583.77	\$	82,844,463.45	\$	26,048,992.21	\$	321,537,763.13	\$	200,648,276.30	58,415.91
480	Lake County	\$	7,238,033.02	\$	4,880,670.04	\$	1,869,539.13	\$	487,823.85	\$	6,455,464.74	\$	782,568.27	689.85
797	Lakeland	\$	19,043,770.08	\$	16,144,579.85	\$	2,286,347.58	\$	612,842.66	\$	14,524,948.33	\$	4,518,821.76	2,281.92
490	Lauderdale County	\$	32,274,373.98	\$	22,349,439.22	\$	8,145,057.82	\$	1,779,876.94	\$	28,125,056.33	\$	4,149,317.65	3,158.93
500	Lawrence County	\$	65,339,427.70	\$	47,320,241.59	\$	13,557,018.34	\$	4,462,167.77	\$	56,123,944.49	\$	9,215,483.21	6,688.37
951	Lebanon	\$	38,789,079.83	\$	29,781,010.96	\$	7,885,946.25	\$	1,122,122.62	\$	26,306,036.10	\$	12,483,043.73	4,209.33
531	Lenoir City	\$	24,638,124.74	\$	18,039,600.88	\$	5,150,023.07	\$	1,448,500.78	\$	17,832,623.15	\$	6,805,501.59	2,549.77
510	Lewis County	\$	27,995,347.03	\$	21,414,388.15	\$	4,742,190.38	\$	1,838,768.50	\$	24,811,130.20	\$	3,184,216.83	3,026.77
391	Lexington	\$	7,658,596.90	\$	5,781,218.33	\$	1,619,324.67	\$	258,053.90	\$	6,561,978.41	\$	1,096,618.50	817.13
520	Lincoln County	\$	35,477,286.47	\$	26,464,782.48	\$	6,889,284.37	\$	2,123,219.62	\$	29,197,310.86	\$	6,279,975.61	3,740.61
530	Loudon County	\$	45,424,576.58	\$	33,855,451.59	\$	9,114,985.20	\$	2,454,139.79	\$	32,809,860.52	\$	12,614,716.06	4,785.22
560	Macon County	\$	40,806,497.58	\$	29,071,006.54	\$	9,480,901.13	\$	2,254,589.90	\$	35,897,016.98	\$	4,909,480.60	4,108.98
570	Madison County	\$	119,594,816.49	\$	84,298,638.74	\$	30,088,509.95	\$	5,207,667.81	\$	81,218,552.95	\$	38,376,263.55	11,915.00
161	Manchester	\$	13,901,096.80	\$	10,492,578.75	\$	2,902,788.65	\$	505,729.40	\$	10,867,081.63	\$	3,034,015.17	1,483.05
580	Marion County	\$	36,620,076.66	\$	26,732,258.61	\$	7,751,172.23	\$	2,136,645.81	\$	28,210,103.70	\$	8,409,972.96	3,778.41
590	Marshall County	\$	49,399,249.64	\$	37,916,979.57	\$	9,061,704.80	\$	2,420,565.27	\$	39,808,194.87	\$	9,591,054.77	5,359.29
52	Maryville	\$	47,726,504.02	\$	39,816,212.38	\$	5,608,718.86	\$	2,301,572.78	\$	33,282,832.25	\$	14,443,671.77	5,627.73

														Average Daily
	District	To	tal TISA Allocation	_	Base Funding		eighted Funding		Direct Funding	_	State Share		cal Contribution	Membership (ADM)
600	Maury County	\$,	120,430,385.10	-	89,644,495.00	\$	24,015,526.13	\$	6,770,363.97		84,987,428.32	-	35,442,956.77	12,670.60
94	McKenzie	\$	11,538,449.18	-	8,606,529.33	-	2,223,923.94		707,995.92		10,104,091.68		1,434,357.50	1,216.47
540	McMinn County	\$	47,381,530.68	-	34,386,498.95	-	9,916,404.52		3,078,627.20		36,342,930.33	-	11,038,600.35	4,860.28
550	McNairy County	\$	34,945,201.72	-	25,759,414.96		6,504,194.80	-	2,681,591.96		30,476,438.87	-	4,468,762.85	3,640.91
610	Meigs County	\$	16,640,396.21	-	11,777,982.71	\$	3,617,715.02	\$	1,244,698.48		14,689,236.40	\$	1,951,159.81	1,664.73
792	Memphis-Shelby County Schools	\$	1,109,229,363.06	-	786,253,418.09	\$	271,477,535.54	\$	51,498,409.44		853,683,626.45	\$	255,545,736.61	111,131.23
272	Milan	\$	18,336,699.31		13,319,444.96		3,887,320.97		1,129,933.38		15,761,004.52		2,575,694.79	1,882.61
798	Millington Municipal Schools	\$	23,047,532.19	\$	17,653,327.56	\$	4,207,716.07	\$	1,186,488.56	\$	17,728,088.22	\$	5,319,443.97	2,495.17
620	Monroe County	\$	48,328,614.97	\$	34,414,242.19	\$	10,990,841.64	\$	2,923,531.14	\$	38,682,960.56	\$	9,645,654.41	4,864.20
630	Montgomery County	\$	348,953,032.74	\$	271,978,196.16	\$	62,912,393.68	\$	14,062,442.90	\$	279,855,549.06	\$	69,097,483.67	38,442.15
640	Moore County	\$	8,014,125.27	\$	6,018,717.99	\$	1,561,067.55	\$	434,339.73	\$	5,693,882.03	\$	2,320,243.25	850.70
650	Morgan County	\$	26,341,602.79	\$	19,085,599.54	\$	5,701,565.16	\$	1,554,438.09	\$	23,984,177.02	\$	2,357,425.77	2,697.61
751	Murfreesboro	\$	84,969,630.81	\$	63,620,312.86	\$	18,060,918.26	\$	3,288,399.69	\$	63,167,695.71	\$	21,801,935.10	8,992.27
151	Newport	\$	6,080,323.57	\$	4,587,794.03	\$	1,300,293.86	\$	192,235.68	\$	5,021,527.10	\$	1,058,796.47	648.45
12	Oak Ridge	\$	43,479,752.95	\$	33,814,773.92	\$	7,314,325.85	\$	2,350,653.17	\$	32,678,102.70	\$	10,801,650.25	4,779.47
660	Obion County	\$	27,891,307.47	\$	20,159,767.03	\$	6,128,713.72	\$	1,602,826.72	\$	22,231,115.14	\$	5,660,192.33	2,849.44
761	Oneida	\$	12,479,582.97	\$	9,404,144.49	\$	2,336,430.49	\$	739,007.98	\$	11,020,260.97	\$	1,459,322.00	1,329.21
670	Overton County	\$	27,346,292.93	\$	20,018,413.13	\$	5,646,243.55	\$	1,681,636.25	\$	23,262,978.31	\$	4,083,314.62	2,829.46
401	Paris	\$	14,253,740.42	\$	10,518,109.50	\$	3,032,960.16	\$	702,670.76	\$	11,295,762.43	\$	2,957,977.98	1,486.66
680	Perry County	\$	10,459,885.96	\$	7,030,838.85	\$	2,812,798.69	\$	616,248.42	\$	8,733,447.73	\$	1,726,438.23	993.76
690	Pickett County	\$	5,855,426.38	\$	4,189,596.86	\$	1,350,745.87	\$	315,083.65	\$	4,688,515.37	\$	1,166,911.01	592.17
700	Polk County	\$	20,162,865.55	\$	14,214,240.27	\$	4,610,029.44	\$	1,338,595.84	\$	17,492,844.53	\$	2,670,021.02	2,009.08
710	Putnam County	\$	109,387,718.91	\$	79,102,773.36	\$	24,898,280.46	\$	5,386,665.08	\$	79,843,861.67	\$	29,543,857.23	11,180.60
720	Rhea County	\$	37,150,877.54	\$	26,766,410.75	\$	8,455,610.99	\$	1,928,855.80	\$	30,145,306.17	\$	7,005,571.37	3,783.24
581 **	Richard City	\$	2,008,175.44	\$	-	\$	-	\$	-	\$	1,513,138.68	\$	495,036.75	179.90
730	Roane County	\$	58,746,283.53	\$	42,922,040.07	\$	12,407,662.84	\$	3,416,580.62	\$	43,235,371.78	\$	15,510,911.75	6,066.72
740 **	Robertson County	\$	109,550,714.69	\$	-	\$	-	\$	-	\$	85,798,867.11	\$	23,751,847.57	11,083.72
371	Rogersville	\$	5,794,745.69	\$	4,417,472.78	\$	1,195,013.68	\$	182,259.23	\$	4,761,362.41	\$	1,033,383.28	624.38
750	Rutherford County	\$	457,995,771.43	\$	359,063,559.74	\$	74,669,213.95	\$	24,262,997.74	\$	343,375,620.45	\$	114,620,150.99	50,751.03
760	Scott County	\$	23,314,871.64	\$	16,562,120.79	\$	4,809,321.99	\$	1,943,428.86	\$	20,660,792.30	\$	2,654,079.34	2,340.94

		 		 	_					Average Daily
	District	tal TISA Allocation	Base Funding	eighted Funding		Direct Funding	State Share		cal Contribution	Membership (ADM)
770	Sequatchie County	\$ 18,624,870.17	\$ 13,417,681.35	\$ 4,272,377.43	\$	934,811.39	\$ 15,233,713.74	\$	3,391,156.43	1,896.49
780	Sevier County	\$ 136,295,845.28	\$ 99,396,023.87	\$ 31,402,013.51	\$	5,497,807.90	\$ 52,910,019.46	\$	83,385,825.82	14,048.91
800	Smith County	\$ 28,209,572.58	\$ 20,543,637.10	\$ 5,969,413.00	\$	1,696,522.47	\$ 23,424,630.83	\$	4,784,941.75	2,903.69
95	South Carroll	\$ 3,062,627.82	\$ 2,264,900.98	\$ 554,467.59	\$	243,259.25	\$ 2,689,399.95	\$	373,227.87	320.13
810	Stewart County	\$ 17,834,002.93	\$ 13,434,643.35	\$ 3,375,126.72	\$	1,024,232.86	\$ 14,948,599.01	\$	2,885,403.92	1,898.89
820	Sullivan County	\$ 73,472,001.05	\$ 55,268,666.61	\$ 14,350,444.18	\$	3,852,890.27	\$ 51,694,553.57	\$	21,777,447.48	7,811.83
830	Sumner County	\$ 270,661,721.27	\$ 213,323,017.60	\$ 41,308,928.82	\$	16,029,774.85	\$ 202,305,849.43	\$	68,355,871.84	30,151.66
621	Sweetwater	\$ 13,524,166.65	\$ 10,102,412.15	\$ 2,889,389.85	\$	532,364.65	\$ 10,755,975.71	\$	2,768,190.95	1,427.90
840	Tipton County	\$ 89,112,892.87	\$ 68,181,202.20	\$ 16,100,169.02	\$	4,831,521.64	\$ 76,613,192.11	\$	12,499,700.76	9,636.92
273	Trenton	\$ 11,928,268.17	\$ 8,985,717.92	\$ 2,246,307.35	\$	696,242.91	\$ 10,247,020.50	\$	1,681,247.67	1,270.07
850	Trousdale County	\$ 12,618,969.43	\$ 9,714,603.89	\$ 2,321,900.03	\$	582,465.51	\$ 10,518,582.58	\$	2,100,386.85	1,373.09
162	Tullahoma	\$ 31,350,780.68	\$ 24,698,710.45	\$ 4,897,334.01	\$	1,754,736.22	\$ 24,656,546.15	\$	6,694,234.53	3,490.98
860	Unicoi County	\$ 19,455,175.33	\$ 14,003,456.70	\$ 4,546,341.48	\$	905,377.14	\$ 15,931,530.24	\$	3,523,645.09	1,979.29
661	Union City	\$ 14,580,048.09	\$ 10,784,339.75	\$ 2,836,220.97	\$	959,487.37	\$ 11,641,292.69	\$	2,938,755.40	1,524.29
870	Union County	\$ 53,233,146.81	\$ 39,492,335.47	\$ 11,388,776.28	\$	2,352,035.06	\$ 50,129,542.85	\$	3,103,603.97	5,581.96
880	Van Buren County	\$ 7,241,514.21	\$ 5,000,419.74	\$ 1,724,157.46	\$	516,937.01	\$ 6,262,267.80	\$	979,246.41	706.77
890	Warren County	\$ 59,842,736.81	\$ 43,681,608.71	\$ 13,123,359.22	\$	3,037,768.88	\$ 50,116,302.50	\$	9,726,434.31	6,174.08
900	Washington County	\$ 72,500,104.06	\$ 56,183,134.28	\$ 12,678,046.16	\$	3,638,923.62	\$ 49,118,091.18	\$	23,382,012.88	7,941.08
910	Wayne County	\$ 19,167,992.36	\$ 14,071,174.06	\$ 3,811,505.09	\$	1,285,313.21	\$ 16,677,151.59	\$	2,490,840.77	1,988.86
920	Weakley County	\$ 36,980,298.96	\$ 27,084,996.71	\$ 7,444,549.72	\$	2,450,752.52	\$ 30,127,824.49	\$	6,852,474.46	3,828.27
97	West Carroll Sp Dist	\$ 7,274,513.83	\$ 5,121,553.19	\$ 1,705,361.39	\$	447,599.24	\$ 6,368,363.54	\$	906,150.29	723.89
930	White County	\$ 34,560,765.22	\$ 25,845,466.32	\$ 7,054,724.23	\$	1,660,574.67	\$ 29,079,060.16	\$	5,481,705.05	3,653.07
940	Williamson County	\$ 337,851,961.17	\$ 292,530,925.91	\$ 32,156,426.64	\$	13,164,608.62	\$ 177,557,606.46	\$	160,294,354.72	41,347.13
950	Wilson County	\$ 174,320,175.89	\$ 143,614,143.80	\$ 20,062,964.47	\$	10,643,067.62	\$ 122,770,206.51	\$	51,549,969.38	20,298.82
	Totals	\$ 9,147,699,541.55					\$ 6,548,245,611.15	\$ 2	2,599,453,930.40	968,390.13

^{*} Post Appeal

^{**} Hold Harmless Districts

^{***} Safety Net Districts