



October 16, 2019

Mike Morath, Commissioner  
Texas Education Agency  
1701 N. Congress Avenue  
Austin, TX 78701-1494

*Re: Proposed amendments to §97.1061, §97.1063, and §97.1064, concerning interventions and sanctions for campuses, campus intervention teams, and campus turnaround plans.*

Commissioner Morath,

The 40 member districts of the Texas School Alliance (TSA) appreciate the opportunity to comment on the proposed amendments that would modify three specific sections of current statute (§97.1061, §97.1063, and §97.1064) in order to 1) align the agency's current intervention framework and changes from the 85th Texas Legislature, 2017 and 2) clarify intervention activities required in TEC Chapter 39A.

With regards to the proposed changes to **§97.1061 Interventions and Sanctions for Campuses**:

1. TSA **agrees** with the proposed amendment to subsection (a) that would remove the requirement to engage in the Texas Accountability Intervention System (TAIS), as this framework is no longer used by the agency.
2. TSA **strongly disagrees** with the proposed replacement to subsection (h) and offers a possible solution.
  - a. While TEA correctly referenced HB 2263, 85<sup>th</sup> Texas Legislature, 2017, which removed the requirement for a CIT for campuses that receive an acceptable performance rating the year immediately after receiving an unacceptable performance rating, the proposed replacement to subsection (h) appears to re-instate prior statute that HB 2263 intended to remove. *(See Figures 1 and 2.)*
  - b. **Proposed replacement solution in red text:** (h) If a campus was assigned an unacceptable overall F rating in the prior year but met standard with an overall rating of A, B, C or D in the current year, the CIT will may, but is not required to, continue to work with the campus until the campus meets all the performance standards under TEC, §39.054(e), for a two-year period. (See Figure 3.)
3. TSA **recommends clarifying** 'unacceptable rating' in subsections (e), (f), and (g) and offers a possible solution.
  - a. **Proposed subsection solution in red text:** (e)(f)(g) If a campus is assigned an unacceptable overall F rating under Texas Education Code (TEC), §39.054(e), for...

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Mr. Steve Chapman

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Alief ISD  
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Dr. Curtis Culwell

**MEMBER DISTRICTS**

|                           |                          |
|---------------------------|--------------------------|
| Abilene ISD*              | Killeen ISD*             |
| Aldine ISD                | Lubbock ISD              |
| Alief ISD*                | McAllen ISD              |
| Amarillo ISD*             | Mesquite ISD*            |
| Arlington ISD             | Midland ISD              |
| Austin ISD                | North East ISD           |
| Corpus Christi ISD*       | Northside ISD*           |
| Cypress-Fairbanks ISD     | Pasadena ISD             |
| Dallas ISD*               | Pflugerville ISD         |
| Ector County ISD          | Pharr-San Juan-Alamo ISD |
| El Paso ISD               | Plano ISD                |
| Fort Bend ISD             | Richardson ISD           |
| Fort Worth ISD            | Round Rock ISD           |
| Garland ISD               | San Angelo ISD*          |
| Harlingen CISD            | San Antonio ISD          |
| Houston ISD               | Socorro ISD              |
| Humble ISD*               | Spring Branch ISD*       |
| Hurst-Euless-Bedford ISD* | Tyler ISD                |
| Irving ISD*               | United ISD               |
| Katy ISD                  | Waco ISD                 |

\*Board of Directors



With regards to the proposed changes to **§97.1063 Campus Intervention Teams:**

1. TSA **agrees** with the proposed amendment to remove a professional service provider professional service provider (PSP) because the new Effective Schools Framework does not utilize a PSP.
2. TSA **agrees** with the proposed new paragraph (b2) to include the campus principal's direct supervisor, if the DCSI is not the campus principal's direct supervisor.
3. TSA **agrees** with the proposed new subsection (c) that an approved education professional, who is not an employee of the campus or district, shall assist with the needs assessment as described in TEC §39A.053

With regards to the proposed changes to **§97.1064 Campus Turnaround Plan:**

1. TSA **recommends clarifying** 'unacceptable rating' in proposed amendment (a) and offers a possible solution.
  - a. **Proposed amendment solution in red text:** (a) If a campus is assigned an ~~unacceptable~~ overall F rating under Texas Education Code (TEC), §39.054(e), for two consecutive years, the campus must develop a campus turnaround plan to be approved by the commissioner of education in accordance with TEC, §§39A.103-39A.107 ~~§39.107~~.
2. TSA **recommends clarifying** 'unacceptable rating' in proposed amendment (d) and offers a possible solution.
  - a. **Proposed amendment solution in red text:** (d) Within 60 days of receiving a campus's preliminary accountability rating the district must notify parents, community members, and stakeholders that the campus received an ~~unacceptable~~ overall F rating for two consecutive years and request assistance in developing the campus turnaround plan. All input provided by family, community members, and stakeholders must be considered in the development of the final campus turnaround plan submitted to the Texas Education Agency (TEA).
3. TSA **disagrees** with the proposed new subsection (h) and offers a possible solution.
  - a. NOTE: Subsection (g) requires that *"the district must submit the campus turnaround plan electronically to the TEA by March 1 unless otherwise specified."*
  - b. TEA's proposed turnaround plan approval or rejection date of June 15 is too late for the budgeting and staffing processes to be implemented effectively for these critical needs campuses. And if the commissioner rejects a turnaround plan, the June 15<sup>th</sup> date does not provide adequate time before the start of the new school year to modify the plan, seek stakeholder comment prior to board approval, and be approved by the board prior to the 60-day resubmission to the TEA - as outlined in the proposed new subsection (i)(1-4) requires.
  - c. **Proposed new subsection solution in red text:** (h) Not later than ~~June~~ **April 15** of each year, the commissioner must either approve or reject any campus turnaround plan prepared and submitted by a district.
4. TSA **disagrees** with the proposed new subsection (i)(1) and offers a possible solution.
  - a. **Proposed new subsection solution in red text:** (i) (1) The modified plan ~~must~~ **may** be created with assistance from TEA staff, as requested by the district.



5. TSA **recommends clarifying** ‘academically acceptable rating’ in re-numbered amendment (j) and offers a possible solution.
  - a. **Proposed amendment solution in red text:** (j) ~~[(h)]~~ A campus may implement, modify, or withdraw its campus turnaround plan with board approval if the campus receives an ~~academically acceptable rating~~ overall rating of A, B, C or D for the school year following the development of the campus turnaround plan.
6. TSA **recommends clarifying** ‘academically acceptable rating’ and ‘acceptable performance rating’ in proposed new subsection (k) and offers a possible solution.
  - a. **Proposed amendment solution in red text:** (k) A campus that has not received an academically acceptable rating overall rating of A, B, C or D for the school year following the development of the campus turnaround plan must implement its commissioner-approved campus turnaround plan with fidelity until the campus receives an acceptable performance rating overall rating of A, B, C or D for two consecutive school years.

Thank you again for the opportunity to comment on the proposed changes concerning interventions and sanctions for campuses, campus intervention teams, and campus turnaround plans. TSA member districts would be happy to discuss the possible solutions with you and to serve as a resource to Agency staff as you move through the rule adoption process.

Sincerely,

A handwritten signature in cursive script that reads 'Steven A. Chapman'.

Steve Chapman, President, Texas School Alliance  
Superintendent, Hurst-Euless-Bedford Independent School District

The Texas School Alliance (TSA) comprises 40 of Texas’ largest school districts, serving over 2 million students or nearly 40 percent of the state’s total pupil enrollment. Our students represent 44 percent of the state’s economically disadvantaged student population, 52 percent of its English Language Learners, and 45 percent of all at-risk students in the state. The organization works on issues that will improve educational quality for Texas students, particularly those in large and urban districts.

Figure 1. Source: HB 2263 Enrolled Version, 85<sup>th</sup> Texas Legislature, 2017, retrieved 10-15-19.

|    |                                                                               |
|----|-------------------------------------------------------------------------------|
|    | H.B. No. 2263                                                                 |
| 1  | AN ACT                                                                        |
| 2  | relating to continued monitoring of certain public school campuses            |
| 3  | that have been assigned a campus intervention team and the approval           |
| 4  | and modification of a campus turnaround plan submitted by a school            |
| 5  | district.                                                                     |
| 6  | BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF TEXAS:                       |
| 7  | SECTION 1. Section 39.106(e), Education Code, is amended to                   |
| 8  | read as follows:                                                              |
| 9  | (e) For each year a campus is assigned an unacceptable                        |
| 10 | performance rating, a campus intervention team shall:                         |
| 11 | (1) <del>continue to work with a campus until:</del>                          |
| 12 | <del>[(A) the campus satisfies all performance</del>                          |
| 13 | <del>standards under Section 39.054(e) for a two-year period; or</del>        |
| 14 | <del>[(B) the campus satisfies all performance</del>                          |
| 15 | <del>standards under Section 39.054(e) for a one-year period and the</del>    |
| 16 | <del>commissioner determines that the campus is operating and will</del>      |
| 17 | <del>continue to operate in a manner that improves student achievement;</del> |
| 18 | <del>[(2)]</del> assist in updating the targeted improvement plan             |
| 19 | to identify and analyze areas of growth and areas that require                |
| 20 | improvement; and                                                              |
| 21 | (2) <del>[(3)]</del> submit each updated plan described by                    |
| 22 | Subdivision (1) <del>[(2)]</del> to the board of trustees of the school       |
| 23 | district.                                                                     |
| 24 | SECTION 2. Section 39.107, Education Code, is amended by                      |

Figure 2. Source: LBB Fiscal Note HB 2263 Enrolled Version, 85<sup>th</sup> Texas Legislature, 2017, retrieved 10-15-19.

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| <p style="text-align: center;"><b>LEGISLATIVE BUDGET BOARD</b><br/><b>Austin, Texas</b></p> <p style="text-align: center;"><b>FISCAL NOTE, 85TH LEGISLATIVE REGULAR SESSION</b></p> <p style="text-align: center;"><b>May 25, 2017</b></p> <p><b>TO:</b> Honorable Joe Straus, Speaker of the House, House of Representatives</p> <p><b>FROM:</b> Ursula Parks, Director, Legislative Budget Board</p> <p><b>IN RE:</b> HB2263 by Gooden (Relating to the public school accountability system.), As Passed 2nd House</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"><p><b>No significant fiscal implication to the State is anticipated.</b></p></div> <p>The bill would remove the requirement that a campus that had previously been assigned an unacceptable performance rating would continue to work with a campus intervention team (CIT). Under current statute, a campus previously assigned "Improvement Required" (IR) continued to work with a CIT to prepare and submit a targeted improvement plan for one or two years.</p> <p>TEA estimates a reduction in the number of improvement plans submitted annually, and expects a cost savings to result from the bill. However, because these plans are from previously IR campuses, and the agency does not support them as extensively as it does multi-year IR campuses, the cost savings associated with the bill are not expected to be significant.</p> <p>The commissioner would also be required to either approve or reject any campus turnaround plan in writing no later than June 15th of each year. If the plan is rejected, the commissioner must also send the district an outline of the specific concerns regarding the turnaround plan that resulted in the rejection. A district receiving a rejected plan must create a modified plan with assistance from TEA staff.</p> <p>The bill would take effect September 1, 2017.</p> <p><b>Local Government Impact</b></p> <p>The bill would reduce costs to districts with a campus that would no longer be required to contract with a Professional Service Provider in the year after the campus meets standard.</p> <p>TEA estimates a minimal local impact for districts currently required to take action to address campus improvement plans. This bill would limit or eliminate interventions at some districts.</p> <p><b>Source Agencies:</b> 701 Texas Education Agency<br/><b>LBB Staff:</b> UP, SL, THo, AM</p> |
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Figure 3. Source: TEA Overview of 2018 Accountability, TEA A-F Resources, as of 7-3-19



The slide features the TEA logo in the top left corner. The title "A-F Accountability: New Labels/Grades" is positioned at the top center. On the right side, there is a blue silhouette of the Texas State Capitol building against a light blue sky with white clouds. The performance labels are listed on the left: A (green) for Exemplary Performance, B (blue) for Recognized Performance, C (purple) for Acceptable Performance, D (orange) for In Need of Improvement, and F (red) for Unacceptable Performance. A small number "9" is in a circle at the bottom right.

**TEA** Texas Education Agency® **A-F Accountability: New Labels/Grades**

**A** = Exemplary Performance

**B** = Recognized Performance

**C** = Acceptable Performance

**D** = In Need of Improvement

**F** = Unacceptable Performance

TEA Overview of 2018 Accountability, <https://tea.texas.gov/A-F/>, retrieved 7-3-19

Source: <https://tea.texas.gov/a-f/>, retrieved 7-3-19



## Priority Recommendations from TSA Accountability Experts (Based on Regional Fall Accountability Workshops and October Strategic Staff Meeting)

**Issue #1:** TEA is eliminating two CCMR indicators: CTE coherent sequence of courses and locally developed Military Ready criteria (beginning in Spring 2020, TEA will use the CCMR bonus definition for accountability purposes → ASVAB cut scores + DoD enlistment records).

The concerns include the following:

- It appears the agency is changing legislative intent from Career 'Ready' to Career 'Proven' and Military 'Ready' to Military 'Proven'
- Unless TEA changes the cut scores...these calculation changes will lower domain scores (and in some cases) ratings for ALL districts and ALL high schools because the CCMRs are used in all three domain calculations. See TEA's data table below.
- The lower domain scores will NOT be due to any change in student performance; instead it will be due to these 2 rule changes.
- Eliminating CTE coherent sequence has been vigorously debated with TEA by both ATAC and APAC.
- Eliminating the locally developed Military Ready criteria was announced in August via a HB 3 in 30 video. It has NOT been discussed with ATAC or APAC or with legislators. It has not been proposed via rulemaking.

| Texas Education Agency<br>2019 College, Career, and Military Readiness<br>State                                                                                                                                                                 |                  |         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|---------|
| Data Table                                                                                                                                                                                                                                      |                  |         |
|                                                                                                                                                                                                                                                 | Annual Graduates |         |
|                                                                                                                                                                                                                                                 | Count/Credit     | Percent |
| <b>Graduate with Completed IEP and Workforce Readiness</b><br>Received graduation type code of 04, 05, 54, or 55                                                                                                                                | 5953             | 2%      |
| <b>Special Ed with Advanced Degree Plan</b><br>Identified as receiving special education services and earned an advanced degree plan                                                                                                            | 8882             | 3%      |
| <b>U.S. Armed Forces</b><br>Enlisted in the U.S. Armed Forces                                                                                                                                                                                   | 14823            | 4%      |
| <b>Met Non-CTE Criteria</b><br>Met at least one criteria above                                                                                                                                                                                  | 202427           | 58%     |
| <b>CTE Coherent Sequence Coursework Aligned with Industry-Based Certifications</b><br>CTE coherent sequence graduate with at least one CTE course aligned with an industry-based certification and did not meet any other criteria (1/2 credit) | 25,296.0         | 7%      |

**NOTE:** 50,592 students were awarded ½ point for completing CTE Coherent Sequence Coursework (50,592 x ½ = 25,296 pts.)

### Recommendations:

- Keep CTE coherent sequence of courses as a CCMR indicator for campus and district accountability purposes.
- Define 3 or 4 specific 'Military-Ready' criteria such as completing JROTC courses, meeting the ASVAB cut score (but not enlisting in the military), etc.

## Issue #2: ESSA Federal Accountability → Closing the Gaps Domain

1. **Graduation Rate Methodology:** High performing high schools with graduation rates already above the state's final goal of 94%, who do not show at least a one-tenth percentage point increase from the prior year, earn 0 points in the Closing the Gaps Domain for the graduation rate category, and can penalize a campus by lowering their numeric score.
  - a. 2019 Accountability Manual, Chapter 4, page 36, states, *"For the Class of 2018, the four-year graduation target is 90 percent of students graduate with regular high school diploma in four years. Student groups that are at or above 90 percent are required to exceed that rate by at least a tenth of a percent in the following year(s)."*
  - b. The state's **final** graduation rate goal (as Texas ESSA Plan Appendix A) is 94%.

**Recommendation:** TEA and the USDE adjust the requirement for the Four-Year Graduation Rate Target for Closing the Gaps to read: "...Student groups that are at or above 90 percent are required to exceed that rate by at least a tenth of a percent in the following year(s), until they surpass the final graduation rate of 94% for any student group included in the accountability system. Districts and campuses that surpass the final graduation rate of 94% for any student group must maintain a rate equal to or higher than 94% to received credit for the student group in the accountability system for the Closing the Gaps Domain."

2. **Alternative Education Accountability:** ATAC has offered a variety of solutions. To date, the agency has not agreed to implement any of ATAC's proposed solutions.

**Recommendation:** Redefine AEA campus performance targets in the Closing the Gaps Domain and include the use of extended graduation rates.

### 3. Recommended Amendments / Waivers to Texas' ESSA Plan:

- a. **"ALL" student group.** Use as a report only indicator. The "All" student group reflects state demographics and performance targets. A campus can meet other student group targets and miss "All" target.
- b. **EL exemption.** ELs who are year one in U.S. schools are excluded from accountability performance calculations. ELs who are in their second year in U.S. schools are included in accountability. TSA wants the EL exemption extended for 3 years. i.e. If the state wants a lower IGC rate for ELs, then extend the EL exemption for high school students and allow them time to learn English.
- c. **SIFE/Asylees / Refugees.** Unschooled asylees, unschooled refugees, and students with interrupted formal education (SIFEs) are not included in **state accountability** until their sixth year of enrollment in U.S. schools. TSA wants this provision extended to federal accountability / ESSA / Closing the Gaps Domain.
- d. **No Double Testing for accelerated students in grades 5 – 7.** USDE /TEA memo propose that hyper-accelerated middle school students be double-tested. Take grade-level STAAR for accountability and EOCs for graduation.
- e. **Expand grades 3 – 8 indicators beyond STAAR.** See next section.
- f. **TSIA.** Designate the TSIA as an approved state test (like EOCs are an approved state test).

**Issue #3: The A-F accountability system is a work in progress.** It's not yet recognizing effective schools as much as it is recognizing where wealthy students or poor students are located. Here's what we know now:

- a) Commissioner Morath provided SBOE members with the following correlations between the %EcD students and campus ratings:
  - i. Overall A-F ratings = 0.4 (moderate)
  - ii. Student Achievement Domain = 0.6 (strong)
  - iii. School Progress Domain = 0.1 (weak)
  - iv. Closing the Gaps Domain = 0.4 (moderate)

- b) When the 2019 A-F ratings are disaggregated by %EcD students enrolled it looks like this:

|                                                                 |                |                                |
|-----------------------------------------------------------------|----------------|--------------------------------|
| 0-20% <u>EcD</u>                                                | 636 campuses   | 98.6% A or B<br>1 D<br>0 F     |
| 20.1-40% <u>EcD</u>                                             | 979 campuses   | 86.1% A or B<br>15 D<br>3 F    |
| 40.1-60% <u>EcD</u>                                             | 1,631 campuses | 64.4% A or B<br>93 D<br>31 F   |
| 60.1-80% <u>EcD</u>                                             | 2,235 campuses | 50.6% A or B<br>273 D<br>145 F |
| 80.1%-100%                                                      | 2,821 campuses | 48.7% A or B<br>321 D<br>223 F |
| NOTE: 87% of D or F campuses enroll 60-100% <u>EcD</u> students |                |                                |

- c) Legislators created an equitable school finance system that recognizes the differences in educating students of poverty by targeting funding to the most educationally disadvantaged students (with weights attached to Tiers 1 – 5.) The current A-F accountability system does not recognize those same challenges.
- d) HS and Districts have “multi-dimensional” accountability indicators because the system includes CCMR and Graduation rates. Elementary and Middle Schools do not have “multi-dimensional” accountability indicators. A-F accountability letter grades for grades 3-8 are based solely on STAAR.

**What are some realistic recommendations to increase equity in the academic accountability system?**

**1. Limit STAAR to no more than 50% of any domain calculation (the minimum required by ESSA) and expand non-test based indicators.**

- a. Possible indicators include:
  - i. ES Growth – Full day Pre-K participation rates → aligns with HB 3 PreK funding
  - ii. ES and MS Growth:
    - 1. Spanish to English Transition proxy for STAAR → aligns with HB 3 Dual Language Program enrollment
    - 2. “Enrichment” course completion or access to the arts /wellness indicators – fine arts, P.E. and second language acquisition (6 states + DC are using this indicator in their ESSA plans.)
  - iii. MS Growth / CCMR:
    - 1. Advanced course completion
    - 2. CTE course completion
    - 3. On-track for high school graduation

iv. HS Growth / CCMR:

1. 9<sup>th</sup> graders credit accumulation on-track to graduate with cohort
  2. Postsecondary readiness course completions for EcD students (i.e. AVID)
  3. Diplomas with endorsements → aligns with 85<sup>th</sup> & 86<sup>th</sup> session discussions regarding Endorsements and Distinguished Level of Achievement by students successfully completing Algebra 2.
  4. Fine Arts course completion
- v. All Levels - Chronic absenteeism (Barbara Bush Literacy Foundation / Attendance Works Definition: a student who misses 18 or more days of school for ANY reason) – 35 states are using this as an ESSA school quality indicator.
- vi. All Levels - School and Student Safety Survey → aligns with 86<sup>th</sup> session allocation of resources focus on school safety and mental health.
- vii. All Levels – EL reclassification rates (this should align with the EL progress measure plans that are a part of the academic accountability system and NOT promote early exit policies) → aligns with HB 3 Dual Language Program Allotment.

**2. Use Spectrum Weights (SES Tiers 1-5 / Weighted average SES Tier) in the A-F accountability system similar to how they are used in the school finance system.**

**a. Rationale:**

- i. Weights would function similar to SES Tiers 1-5 functions in the school finance system.
- ii. This would NOT change any cut score or standard.
- iii. It would provide context to the domain A-F letter grades.

**b. Ideas from TSA strategic staff meeting include:**

- i. Apply to each domain raw score before scaling
- ii. Apply to the overall raw score before scaling
- iii. Replace % Eco Dis in Domain 2B Relative Performance

**3. Eliminate the Overall Letter Grade Rating.**

**a. Rationale:**

- i. Publicly reporting all 3 letter grades increases transparency – which Legislators and the Commissioner has said is one purpose of the A-F accountability system.
- ii. **NOTE:** A 200+ accountability manual filled with rules and raw scores converted to scale scores is not transparent at all.
- iii. Eliminates the 70/30 weight calculations for an overall rating.

4. Align State and Federal accountability systems by only using the Closing the Gaps Domain to determine overall A-F accountability letter grades.

a. Rationale:

- i. Almost all of the metrics used in the Student Achievement Domain (D1) and the School Progress Domain (D2) are also used in the Closing the Gaps Domain (D3). NOTE: Relative Performance (D2b) is currently not included in the Closing the Gaps Domain.

### Calculating a Closing the Gaps Domain Score

To calculate the Closing the Gaps domain score, weight each component for which the district or campus has at least the minimum number of evaluated indicators based on the following table.

Component points are rounded to one decimal place. Total points for each component are determined by multiplying the percentage of evaluated indicators met by the corresponding weight and rounding to one decimal place. The Closing the Gaps domain score is the sum of the total points rounded to the nearest whole number.

| Closing the Gaps Component Weights       |                                                                                                                |        |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------|--------|
| Campus Types                             | Closing the Gaps Domain Component                                                                              | Weight |
| Elementary and Middle Schools            | Academic Achievement <b>STAAR Meets Grade Level on R &amp; M</b>                                               | 30%    |
|                                          | Academic Growth Status <b>STAAR R and M</b>                                                                    | 50%    |
|                                          | English Language Proficiency                                                                                   | 10%    |
|                                          | Student Achievement Domain Score: STAAR Component Only                                                         | 10%    |
| High Schools, K-12s, AEAs, and Districts | Academic Achievement <b>STAAR Meets Grade Level on R &amp; M</b>                                               | 50%    |
|                                          | Federal Graduation Status or Academic Growth Status <sup>1</sup>                                               | 10%    |
|                                          | English Language Proficiency                                                                                   | 10%    |
|                                          | College, Career, and Military Readiness or Student Achievement Domain Score: STAAR Component Only <sup>2</sup> | 30%    |

<sup>1</sup> If Federal Graduation Status is not available, Academic Growth Status is used.

<sup>2</sup> If College, Career, and Military Readiness is not available, Student Achievement Domain Score: STAAR Component Only is used.

Source: TEA 2019 Accountability Manual. Red text added.

b. Eliminate the Student Achievement Domain (D1) and the School Progress Domain (D2).

- i. If no changes are made to the currently D3 calculations and metrics, the table below shows that if D3 was used to assign 2019 Overall A-F letter grades then 55% of campus overall ratings would remain the same, 43% would be lower, and 2% would be higher.

**Research Question: What would happen to campus letter grades if only the D3 Closing the Gaps Domain was used for both state and federal accountability systems?**

**Answer: 55% would remain the same / 43% would be lower than the overall grade / 2% would be higher than the overall grade**

#### Overall Rating vs. Domain 3 Rating: All

Of the 7,768 included campuses, 4,238 (55%) had the same Overall and Domain 3 rating. Where there was a difference 3,347 (43%) had a higher Overall rating, and 183 (2%) had a higher Domain 3 rating. No campus got an A in one and an F in the other.

| Overall Rating | Domain 3 Rating |       |       |     |     |
|----------------|-----------------|-------|-------|-----|-----|
|                | A               | B     | C     | D   | F   |
| A              | 1,120           | 503   | 9     | 2   |     |
| B              | 126             | 1,165 | 1,739 | 44  | 2   |
| C              |                 | 15    | 1,265 | 679 | 74  |
| D              |                 |       | 16    | 343 | 295 |
| F              |                 |       |       | 26  | 345 |

Overall vs Domain 3 Rating  
 ■ Domain 3 Higher  
 ■ Overall Higher  
 ■ Same

Source: TSA Accountability by HillCo Partners

- c. Based on the results shown in the table above, the following changes to the Closing the Gaps Domain are suggested:
- Include Relative Performance calculation before assigning overall letter grade.
  - Include SES Tiers in the calculations.
  - Reduce assessments to only what is required by ESSA (i.e. eliminate 8<sup>th</sup> gr. SS and U.S. History EOC).
  - For Elementary and Middle Schools:
    - Expand achievement and growth indicators beyond STAAR (see previous section)
    - Replace the school quality / student success indicator
      - Texas' ESSA Plan uses Meets GL on STAAR as the school quality / student success indicator for gr. 3-8. High Schools and Districts use CCMRs for school quality / student success indicator.
      - USDE has approved the following options for other states:
        - 35 states are using **chronic absenteeism/attendance measure** as a school quality indicator in their ESSA plans.
        - Nine states plan to use a **school climate/culture measure**.
        - Nine states plan to use a **social studies proficiency/progress measure**.
        - Six states, plus the District of Columbia, plan to use an **art access/participation or well-rounded education measure**.
        - Source: Education Commission of the States.  
<https://www.ecs.org/50-state-comparison-states-school-accountability-systems/>

## 2019 Closing the Gaps Performance Targets

| Academic Achievement (Percentage at Meets Grade Level or above) |              |                  |          |       |                 |       |                  |                   |               |               |                            |                     |                |                    |
|-----------------------------------------------------------------|--------------|------------------|----------|-------|-----------------|-------|------------------|-------------------|---------------|---------------|----------------------------|---------------------|----------------|--------------------|
| Subject                                                         | All Students | African American | Hispanic | White | American Indian | Asian | Pacific Islander | Two or More Races | Special Educ. | Econ. Disadv. | EL (Current and Monitored) | Special Ed (Former) | Cont. Enrolled | Non-Cont. Enrolled |
| ELA/Reading                                                     | 44%          | 32%              | 37%      | 60%   | 43%             | 74%   | 45%              | 56%               | 19%           | 33%           | 29%                        | 36%                 | 46%            | 42%                |
| Mathematics                                                     | 46%          | 31%              | 40%      | 59%   | 45%             | 82%   | 50%              | 54%               | 23%           | 36%           | 40%                        | 44%                 | 47%            | 45%                |

| Subject     | Academic Growth Status (Elementary and Middle Schools) |     |     |     |     |     |     |     |     |     |     |     |     |     |
|-------------|--------------------------------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| ELA/Reading | 66%                                                    | 62% | 65% | 69% | 67% | 77% | 67% | 68% | 59% | 64% | 64% | 65% | 66% | 67% |
| Mathematics | 71%                                                    | 67% | 69% | 74% | 71% | 86% | 74% | 73% | 61% | 68% | 68% | 70% | 71% | 70% |

| Federal Graduation Status (High Schools, K-12s, and Districts) <sup>1</sup> |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
|-----------------------------------------------------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| 90%                                                                         | 90% | 90% | 90% | 90% | 90% | 90% | 90% | 90% | 90% | 90% | 90% | n/a | n/a | n/a |

| Student Achievement Domain Score: STAAR Component Only (Elementary and Middle Schools) |     |     |     |     |     |     |     |     |     |     |     |     |     |  |
|----------------------------------------------------------------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|--|
| 47%                                                                                    | 36% | 41% | 58% | 46% | 73% | 48% | 55% | 23% | 38% | 37% | 43% | 48% | 45% |  |

| College, Career, and Military Readiness Performance Status (High Schools, K-12s, and Districts) |     |     |     |     |     |     |     |     |     |     |     |     |     |  |
|-------------------------------------------------------------------------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|--|
| 47%                                                                                             | 31% | 41% | 58% | 42% | 76% | 39% | 53% | 27% | 39% | 30% | 43% | 50% | 31% |  |

| English Language Proficiency Status <sup>2</sup> |  |  |  |  |  |  |  |  |  |  |  |     |  |  |
|--------------------------------------------------|--|--|--|--|--|--|--|--|--|--|--|-----|--|--|
|                                                  |  |  |  |  |  |  |  |  |  |  |  | 36% |  |  |

<sup>1</sup> Ever ELs (EL [Ever HS]) are evaluated in the federal graduation rates. Ever ELs (EL [Ever HS]) are students reported in TSDS PEIMS as ELs at any time while attending grades 9-12 in a Texas public school.

<sup>2</sup> English Language Proficiency Status evaluates current ELs only.

# Texas Ranks High on Nations' 2019 Report Card When Scores are Adjusted for Demographics



According to the Urban Institute, a Washington D.C. think tank, Texas outperforms most other states when NAEP (National Assessment of Educational Progress) results are adjusted for student demographics. The Urban Institute recognizes that comparing absolute rankings assume that all states serve the same students – and we know they don't. The organization believes that a better way to compare and talk about NAEP performance is to use adjusted NAEP scores that account for demographic differences across students in each state.

In fact, the Urban Institute's apples-to-apples analysis show that Texas students perform very well in math and above-average in reading when accounting for each state's student demographics. The attached charts show the significant difference between adjusted and unadjusted (or absolute) rankings. When 2019 NAEP scores are adjusted for demographics, Texas students rank 4<sup>th</sup> in fourth-grade reading; 22<sup>nd</sup> in eighth-grade reading; 2<sup>nd</sup> in fourth-grade math; and 4<sup>th</sup> in eighth-grade math. *(See attached charts from the Urban Institute.)*

Additionally, Texas 4<sup>th</sup> grade mathematics performance for African American students rank first among all states, while Hispanic and Anglo students' performance rank in the top 10 states.

## What Most People Don't Know About NAEP

Student performance on NAEP does not correlate to student performance on STAAR (State of Texas Assessments of Academic Readiness). The tests serve different purposes, the tests are administered to different groups of students, and as noted above, the results can be reported in different ways.

**NAEP serves a different role than STAAR.** STAAR measures student performance on Texas' curriculum standards (known as TEKS). Curriculum standards are what policymakers and citizens consider important for students to know and be able to do. STAAR allows comparison of results over time within the state and gives individual student scores to allow parents to track their child's progress. NAEP is not aligned to the TEKS (or any state's content standards for that matter). The same NAEP assessment is administered in every state, and that allows comparisons of results from one state with another, or with results nationwide. *Source: NAEP 2019 Facts for Districts.*

**NAEP tests are given to randomly selected students within randomly selected schools in grades 4 and 8 for Reading and Mathematics.** The 2019 4th grade NAEP Reading test was administered to a representative sample of 7,100 students in 360 Texas schools. Within a school, not all of the students take the NAEP test, and student responses are combined with those from other participating students to produce the state's results. In contrast, the 2019 4th grade STAAR Reading test was administered to approximately 380,000 students enrolled in 4,100 Texas public schools because STAAR tests every student, every year, in every school in grades 3-8. *Source: NAEP 2019 technical appendix and TEA 2019 STAAR statewide summary.*

Want to read more interpretations of the 2019 NAEP scores? [Click here.](#)

### Breaking the Curve report

Updated October 30, 2019, to include data from the 2019 NAEP.

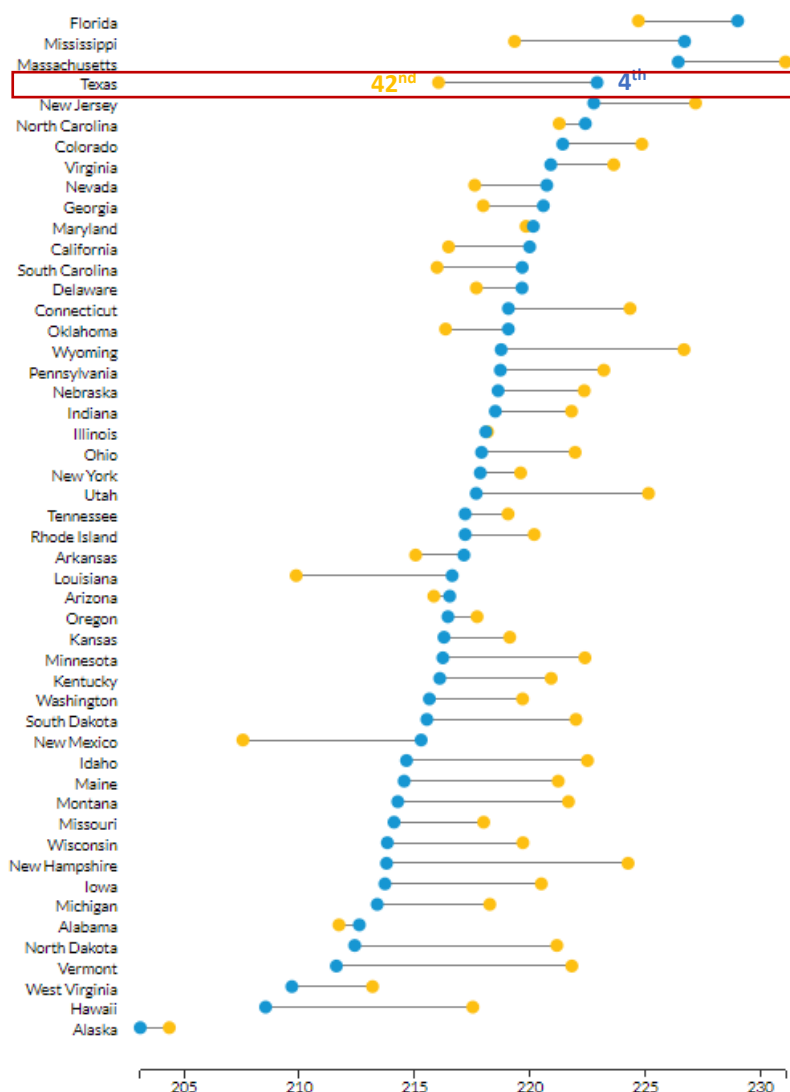
2  
14

\*Students were not asked about how frequently they spoke English at home in the 2017 NAEP.

### Unadjusted versus adjusted scores

● Unadjusted ● Adjusted

2019 4th-grade reading with controls for age, race or ethnicity, special education status, free and reduced-price lunch eligibility (imputed), and English language learner status



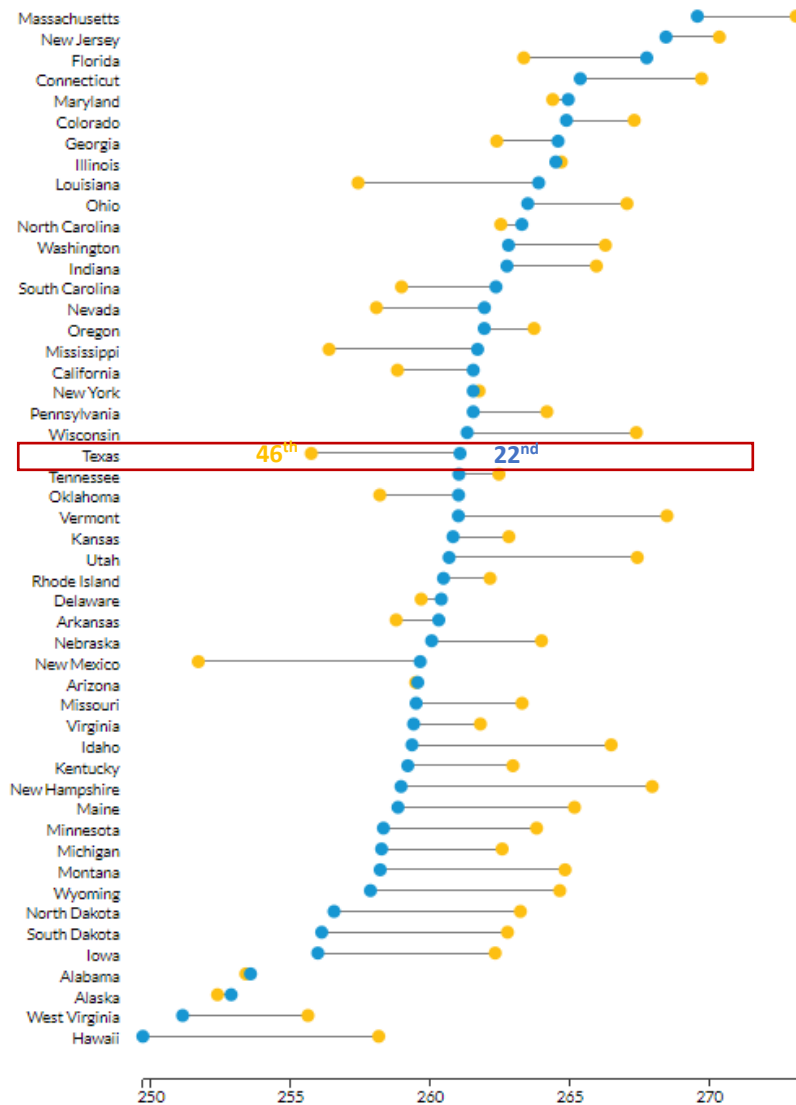
Source: <https://apps.urban.org/features/naep/>

\*Students were not asked about how frequently they spoke English at home in the 2017 NAEP.

### Unadjusted versus adjusted scores

● Unadjusted ● Adjusted

2019 8th-grade reading with controls for age, race or ethnicity, special education status, free and reduced-price lunch eligibility (imputed), and English language learner status



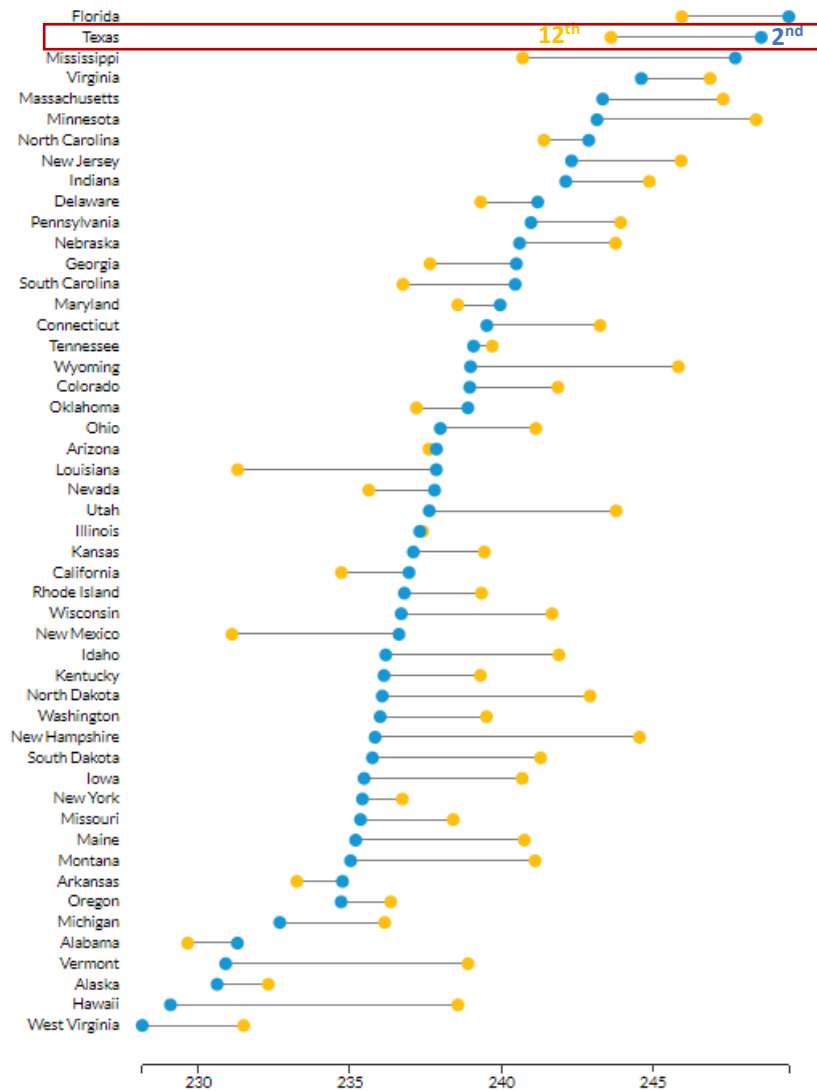
Source: <https://apps.urban.org/features/naep/>

\*Students were not asked about how frequently they spoke English at home in the 2017 NAEP.

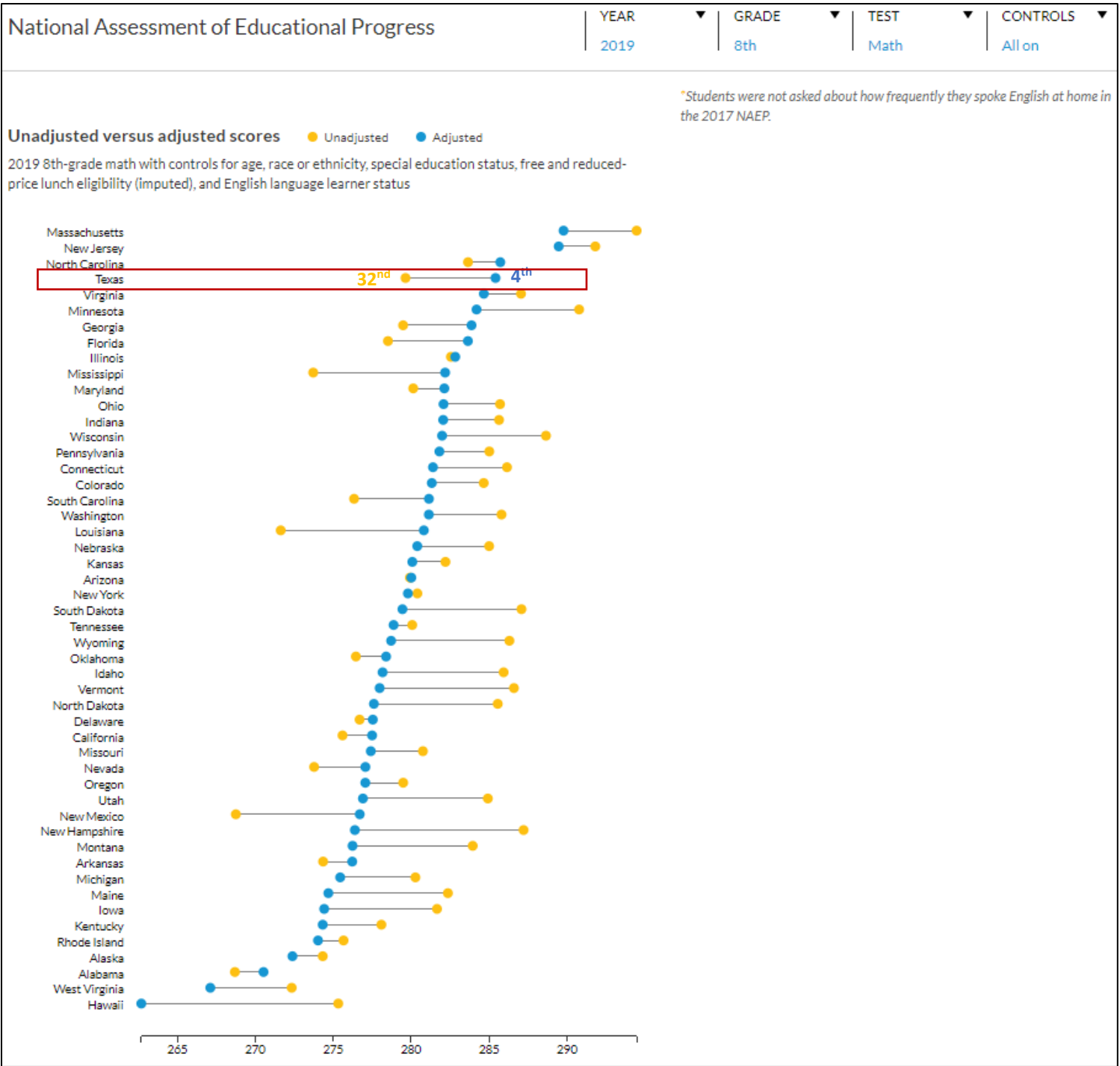
### Unadjusted versus adjusted scores

● Unadjusted ● Adjusted

2019 4th-grade math with controls for age, race or ethnicity, special education status, free and reduced-price lunch eligibility (imputed), and English language learner status



Source: <https://apps.urban.org/features/naep/>



Source: <https://apps.urban.org/features/naep/>