Texas School Alliance

January 17, 2020

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

Re: Proposed Amendment to State's Every Student Succeeds Act (ESSA) State Plan

Commissioner Morath,

The 40 member districts of the Texas School Alliance (TSA) appreciate the opportunity to comment on the proposed ESSA amendment to 1) adjust the Closing the Gaps domain graduation rate methodology used in the academic accountability system, and 2) change the methodology used to identify schools for support and improvement.

TSA **agrees** with the proposed Graduation Rate Methodology, as outlined in TEA's "To the Administrator Addressed letter" (TAA) dated December 19, 2019.

TSA also **agrees with and appreciates** the inclusion of a growth metric, and the use of a six-year federal graduation rate to identify campuses for comprehensive support and improvement (CS&I).

Additionally, with regards to the Graduation Rate Methodology, TSA **respectfully requests** the following:

a) Provide written clarification and guidance on how the Graduation Rate Methodology will be applied to any one of the current (or future) P-TECH and /or T-STEM high schools that may not have a four-year adjusted cohort graduation rate (ACGR) as required by ESSA because these specialized schools may *"Within six years, enable students to earn a high school diploma, an associate degree, a two-year post-secondary certificate or industry certification, and complete work-based training."* (Source TEA Pathways in Technology Early College High School (P-TECH) webpage.);

b) Use the "better of" the five-year or six-year graduation rate in the proposed Graduation Rate Methodology; and

c) Retroactively apply the six-year graduation rate. Please note that there are currently campuses that are identified as year two comprehensive support and improvement due to the *original* use of the four-year federal graduation rate. TSA members propose and support the agency submitting to USDE the amendment to **retroactively apply the six-year graduation rate** in order to achieve the goal of having all comprehensive support campuses identified using the same methodology.

TSA **disagrees** with the proposed amendment request to change the escalation of Title I additional targeted support campuses, rather than escalating Title I targeted support and improvement campuses for the reasons listed below:

1. <u>The proposed change does not align with ESSA's stated intent regarding identification of schools.</u> The description in the December 19, 2019 TAA letter states, *"the escalation of Title I additional targeted support campuses to comprehensive support and improvement after three consecutive years, rather than escalating Title I targeted support and improvement campuses."*
    a. ESSA requires that *"The category of targeted support and improvement includes **two types** of schools – those with a:*
        i. Consistently underperforming subgroup; and
        ii. Low-performing subgroup. These schools must also receive additional targeted support." (See Figure 1.)
    b. ESSA also requires that schools with <u>chronically</u> low-performing student groups be identified as comprehensive support and improvement (CS&I). *(See Figure 1.)*
    c. Currently, Texas' ESSA plan states (and TSA agrees with the current definition) that *"Any Title I campus identified for targeted support and improvement for three consecutive years will be identified for CS&I the following school year. (See Figure 2.)*

2. <u>There is a mismatch between Texas' ESSA plan (approved March 2018) and the 2019 Accountability Manual definition for schools identified for targeted support and improvement.</u>
    a. Texas' ESSA plan identifies a school for targeted support and improvement, i.e. any school with one or more "<u>consistently</u> underperforming" student groups, *"as a school having one or more student groups that do not meet the interim benchmark goals for three consecutive years." (See Figure 3.)*
    b. The 2019 Accountability Manual identifies a school for targeted support and improvement, i.e. "<u>consistently</u> underperforming" student groups, as *"A student group that misses the targets in at least the same **three** indicators, for three consecutive years, is considered "consistently underperforming." (See Figure 4.)*
        i. NOTE: If performance has not improved after three consecutive years of "consistently underperforming" targeted support and improvement status, then the campus is identified as "<u>chronically</u> low-performing" and escalates to CS&I the following year.

3. <u>ESSA allows for greater flexibility in evidence-based interventions than what Texas is currently implementing to improve student outcomes in a school identified for comprehensive or targeted support and improvement schools.</u>
    a. ESSA allows States to *"develop a list of State-approved evidence-based interventions, and may, if they choose, require schools identified for comprehensive or targeted support and improvement to use interventions from that list. In other words, the evidence-based interventions may be selected from a non-exhaustive list of evidence-based interventions if such a list is established by the State." (See Figure 5.)*

TSA strongly recommends the following solutions for the proposed ESSA amendment:

1. Align the definitions for targeted support and improvement identification between the State's plan and the 2019 Accountability Manual. This ensures that schools escalating to CS&I (and who are eligible for school improvement funding) are those identified by definition as "chronically low-performing" by missing at least the same **three** indicators, for three consecutive years.

2. Develop a list of *"State-approved evidence-based interventions"* as allowed by ESSA, and may, if the state chooses, require schools identified for targeted support and additional targeted support to use interventions from that list rather than escalate to CS&I. This solution gives back some local control to districts to implement evidence-based interventions in response to the specific educational needs of the campus. *(See the example shown below.)*

EXAMPLE INTERVENTION CONTINUUM		
CS&I	Effective Schools Framework (ESF) with TEA oversight	
Targeted Support & Improvement	Years 1, 2, and 3 select from State approved intervention list –which could include the ESF	After three consecutive years, escalates to CS&I identification and TEA oversight
Additional Targeted Support	Select from State approved intervention list – which could include creating a TIP (vs. including the components of a TIP in the CIP)	No escalation of interventions and remains with local district oversight

3. 'Reset' the federal identification label if one student group meets that target(s) and another student group misses the target(s).
4. Include a growth measure (i.e. similar to TEA's proposed Graduation Rate Methodology) so that if a campus does not meet the target but shows growth over a number of years, the campus is determined to be on track and no federal label is assigned (i.e. Safe Harbor).
5. Develop sliding scale targets based on the percentage of economically disadvantaged students enrolled at the campus. This methodology could be identical to the sliding cut scores used to determine A-F letter grades for Domain 2B: Relative Performance.
6. Amend targets so they vary by school type. ESSA statute does not prohibit setting targets by school type; and ATAC discussed this idea during the November 2019 meeting. TEA should model what the targets would look like for different school types (Elementary, Middle, HS, K-5, K-8, etc.) and discuss with ATAC during the February 2020 meeting.
7. Remove the "All Students" group when identifying campuses for targeted and additional targeted support, as per ATAC's discussion during their November 2019 meeting.

Finally, does TEA intend seek an ESSA waiver for the 2019-2020 school year that no more than 1% of the students be assessed using an alternate assessment aligned with alternate academic achievement standards (AA-AAAS)?

As you know, TEA requested a waiver in December of 2018 because, based on State data for the 2017-2018 school year, TEA concluded that it needed to assess more than 1.0 percent of students using an AA-AAAS in the 2018-2019 school year. The waiver for the 2018-2019 school year was granted on April 1, 2019. We are unaware as to whether TEA will seek another waiver for the 2019-2020 school year. We do know that many TSA district members remain concerned about this requirement within ESSA.

In the letter to USDE seeking the extension for the waiver, the TEA set out its plan for monitoring and providing additional guidance to school districts to make substantial progress toward reducing the percentage of students taking alternative assessments to fewer than 1 percent. Additionally, the TEA letter contained assurances that if Texas was granted the waiver:

- It would continue to meet all other requirements of ESSA and take additional steps to support and provide oversight to each school district that the state anticipates will exceed the 1 percent threshold to ensure that only students with the most significant cognitive disabilities take an AA-AAAS.
- It would monitor and regularly evaluate each such school district to ensure the school district provides sufficient training such that school staff who participate as members of an individualized education program team implement the guidelines established by the state for participation in AA-AAAS so that all students are appropriately assessed.
- It would address any disproportionality in the percentage of students taking an AA-AAAS as identified through the data provided.
- It would verify that each school district that the state anticipates will assess more than 1 percent of its students in any subject using an AA-AAAS has followed the state's guidelines for participation in the AA-AAAS.
- While we know that Texas has made progress in this area, TSA's concern is that we did not see this area addressed in the proposed amendments and question at this time if it would be appropriately noted in the amended state plan. We point this out because simply did not want this important issue to be ignored at this point.

Thank you again for the opportunity to comment on the proposed ESSA amendment. TSA member districts would be happy to discuss the proposed solutions with you and to serve as a resource to Agency staff as you move through the rule adoption process.

Sincerely,

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: USDE Accountability Under Title I, Part A of the ESSA, Frequently Asked Questions, January 2017, pages 32-33, Identification of Schools.
https://www2.ed.gov/programs/titleiparta/eseatitleiaccountabilityfaqs.pdf

D. IDENTIFICATION OF SCHOOLS

D-1. What schools must be identified by the State for support and improvement?

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ACCOUNTABILITY – FAQS U.S. DEPARTMENT OF EDUCATION

States must identify two broad categories of schools for support and improvement: those that require comprehensive support and improvement, and those that require targeted support and improvement. The category of comprehensive support and improvement includes three types of schools:

(1) Lowest-performing;
(2) Low high school graduation rate; and
(3) Chronically low-performing subgroup.

The category of targeted support and improvement includes two types of schools — those with a:

(1) Consistently underperforming subgroup; and
(2) Low-performing subgroup. These schools must also receive additional targeted support.

(ESEA section 1111(c)(4)(C)(iii), 1111(c)(4)(D)(i), 1111(d)(2)(A)(i), 1111(d)(2)(D), and 1111(d)(3)(A)(i)(II); 34 C.F.R. § 200.19(a), (b))

Categories and Types of Schools Identified for Support and Improvement under the ESEA

Category: Comprehensive Support and Improvement

Types of School	*Must include only Title I schools?*	*Must be identified based on subgroups?*	*Must be identified with the State's methodology for producing a school's summative determination?*	*Must be identified annually?*	*First year of identification?*
Lowest-performing school (ESEA section 1111(c)(4)(D)(i)(I); 34 C.F.R. § 200.19(a)(1))	X		X		2018–2019
Low high school graduation rate (ESEA section 1111(c)(4)(D)(i)(II); 34 C.F.R. § 200.19(a)(2))					2018–2019
Chronically low-performing subgroup (ESEA sections 1111(c)(4)(D)(i)(III) and 1111(d)(3)(A)(i)(II); 34 C.F.R. § 200.19(a)(3))	X	X	X		State-determined

Category: Targeted Support and Improvement

Types of School	*Must include only Title I schools?*	*Must be identified based on subgroups?*	*Must be identified with the State's methodology for producing a school's summative determination?*	*Must be identified annually?*	*First year of identification?*
Consistently underperforming subgroup (ESEA section 1111(c)(4)(C)(iii) and 1111(d)(2)(A)(i); 34 C.F.R. § 200.19(b)(1), (e))		X		X	2019–2020
Low-performing subgroup (ESEA section 1111(d)(2)(D); 34. C.F.R. § 200.19(b)(2))		X	X		2018–2019

These categories and types of schools must be identified statewide, using a methodology and timeline that results in a group of identified schools that meets all statutory and regulatory requirements. The identification categories, including the types of schools that fall into each, and the frequency of identification are discussed

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Figure 2. Source: Texas' Final Submitted ESSA Plan – March 6, 2018, page 25

d. Comprehensive Support and Improvement Schools. Describe the State's methodology for identifying all public high schools in the State failing to graduate one third or more of their students for comprehensive support and improvement.

If a campus does not obtain a 67 percent four-year graduation rate for the All Students group, the campus will be automatically identified for comprehensive support and improvement.

e. Comprehensive Support and Improvement Schools. Describe the methodology by which the State identifies public schools in the State receiving Title I, Part A funds that have received additional targeted support under ESEA section 1111(d)(2)(C) (based on identification as a school in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D)) and that have not satisfied the statewide exit criteria for such schools within a State-determined number of years.

Any Title I campus identified for targeted support and improvement for three consecutive years will be identified for comprehensive support and improvement the following school year.

f. Year of Identification. Provide, for each type of schools identified for comprehensive support and improvement, the year in which the State will first identify such schools and the

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Figure 3. Source: Texas' Final Submitted ESSA Plan – March 6, 2018, page 26

TEA will annually identify campuses for comprehensive support and intervention beginning with the August 2018 accountability release, which is based on School Year 2017-2018 performance data.

g. Targeted Support and Improvement. Describe the State's methodology for annually identifying any school with one or more "consistently underperforming" subgroups of students, based on all indicators in the statewide system of annual meaningful differentiation, including the definition used by the State to determine consistent underperformance. *(ESEA section 1111(c)(4)(C)(iii))*

Student group achievement will be monitored annually through the Closing the Gaps domain (see Appendix F). Any campus that has one or more achievement gap(s) between individual student groups and the interim goals outlined in Appendix A will be identified for targeted support and improvement. TEA defines "consistently underperforming" as a school having one or more student groups that do not meet interim benchmark goals for three consecutive years.

h. Additional Targeted Support. Describe the State's methodology, for identifying schools in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D), including the year in which the State will first identify such schools and the frequency with which the State will, thereafter, identify such schools. *(ESEA section 1111(d)(2)(C)-(D))*

Any campus that is not identified for comprehensive support will be identified for additional targeted support if an individual student group's overall percentage, based on the weighting outlined on page 27, is at or below the percentage for comprehensive support campuses in that rating year. For example, if the cut point for a campus to be identified for comprehensive support is 25 percent, then any campus with a student group that has an overall percentage of 25 percent or less will be identified for additional targeted support. Identification will begin with the August 2018 school ratings and will occur on

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Figure 4. Source: TEA 2019 Accountability Manual, page 96

Targeted Support and Improvement Identification

TEA uses the Closing the Gaps domain to identify campuses that have consistently underperforming student groups. A student group that misses the targets in at least the same **three** indicators, for three consecutive years, is considered "consistently underperforming." Any campus not identified for comprehensive support and improvement that has at least one consistently underperforming student group is identified for targeted support and improvement. Campuses are evaluated annually for identification.

Minimum Size

In order to be considered when evaluating campuses for targeted support and improvement identification, student groups must meet the following minimum size requirements. When a student group is not evaluated because it does not meet minimum size, the count of consecutive years resets for that student group.

The all students group must have 10 reading *and* 10 mathematics assessment results for evaluation in the Academic Achievement component. Each remaining student group must have 25 reading *and* 25 mathematics assessment results for evaluation in the Academic Achievement component. If a student group does not meet minimum size in Academic Achievement, it is not considered when evaluating the campus for identification. The following student groups are not evaluated to identify campuses for targeted support and improvement: former special education; continuously enrolled; and non-continuously enrolled.

Figure 5. Source: USDE Accountability Under Title I, Part A of the ESSA, Frequently Asked Questions, January 2017, page 50, Evidence-based Interventions.
https://www2.ed.gov/programs/titleiparta/eseatitleiaccountabilityfaqs.pdf

regard to the exit of students from EL status and services. Further, long-term goals and MIPs, including the student-level targets, established by each State do not change the State and LEA's obligation to assist individual ELs in overcoming language barriers within a reasonable period of time, consistent with requirements under Title VI and the EEOA. Further information on legal obligations under Title VI and the EEOA can be found in the Dear Colleague Letter jointly released by the Department of Education and the Department of Justice in January 2015. Further information on setting long-term goals and MIPs for ELP may be found in "*Resource Guide: Accountability for English Learners under the ESEA*."

(ESEA section 1111(c)(4)(A)(ii); 34 C.F.R. § 200.13(c)(4))

Evidence-based Interventions

E-22. What are the evidence requirements that apply to one or more of the interventions to be included in a comprehensive or targeted support and improvement plan and implemented in an identified school?

One or more of the interventions that are implemented to improve student outcomes in a school identified for comprehensive or targeted support and improvement must:

- Meet the definition of "evidence-based" under ESEA section 8101(21) (see the Department's non-regulatory guidance, "*Using Evidence to Strengthen Education Investments*," with suggested criteria for the four levels of evidence provided in the definition);
- Be supported, to the extent practicable, by evidence from a sample population or setting that overlaps with the population or setting of the school to be served; and
- Be supported, to the extent practicable, by the strongest level of evidence (*e.g.*, strong evidence, as opposed to moderate evidence or promising evidence) that is available and appropriate to meet the needs identified in the needs assessment for the school.

(ESEA section 1111(d)(1)(B), (2)(B); 34 C.F.R. §§ 200.21(d)(3)(i)-(iii), 200.22(c)(4)(i)-(iii))

In addition, States may develop a list of State-approved evidence-based interventions, and may, if they choose, require schools identified for comprehensive or targeted support and improvement to use interventions from that list. In other words, the evidence-based interventions may be selected from a non-exhaustive list of evidence-based interventions if such a list is established by the State. Or, if the State establishes an exhaustive list of evidence-based interventions from which LEAs and schools must choose, the evidence-based intervention would need to be selected from that list by each LEA or school (34 C.F.R. §§ 200.21(d)(3)(iv), 200.22(c)(4)(iv)). Similarly, an LEA could also choose to use an evidence-based intervention determined by the State in a school identified for comprehensive support and improvement, consistent with State law, as described in ESEA section 1111(d)(1)(3)(B)(ii) and 34 C.F.R. § 200.23(c)(3). See question E-25 for more information about these optional authorities for States to develop a list of evidence-based interventions or State-determined interventions.

Finally, in any high school identified as a low graduation rate high school that predominately serves students returning to education after having exited secondary school without a regular high school diploma or students who, based on their grade or age, are significantly off track to accumulate sufficient academic credits to meet high school graduation requirements, as established by the State, one or more of the interventions may include differentiated improvement activities that utilize evidence-based interventions (ESEA section 1111(d)(1)(C)(i); 34 C.F.R. § 200.21(d)(3)(vi)). It is important to note that, although the statute and regulations explicitly permit differentiated improvement activities for these specific high schools, an LEA may and, in fact, should, create differentiated improvement plans for each of its identified schools, which should be based on the school's needs assessment and designed to address the identified needs.

E-23. What does it mean for an intervention to be supported, to the extent practicable, by evidence

MEMBERSHIP
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- Chris Duke, Education Policy Assistant, *Office of the Lieutenant Governor*
- Ted Holladay, Public Education Budget Analyst, *Legislative Budget Board*
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- Laura Subrin Yeager, Parent, *TAMSA*
- Robert Sanborn, President & CEO, *Children At Risk*

Total = 24 members

Spanish to English Transition Proxy

Campus level*:

	With S-E Transition	Without S-E Transition	Difference
Number of Students	2,210,973	2,176,819	34,154

*Includes any campus with Spanish to English transition students in 2019 (current method)

Methodology

One point was given for each percentage of assessment results at Approaches Grade Level or above.

Change of campus raw scores:

Difference	Frequency	Percent	Cumulative Frequency
-27	1	0.03	1
-6	1	0.03	2
-5	5	0.15	7
-4	13	0.40	20
-3	25	0.77	45
-2	81	2.51	126
-1	561	17.38	687
0	2198	68.11	2885
1	277	8.58	3162
2	43	1.33	3205
3	8	0.25	3213
4	9	0.28	3222
6	3	0.09	3225
7	2	0.06	3227

*Difference = with transition - without transition

After adding in Spanish to English transition kids

- 687 campuses' raw score decreased;
- 2198 campuses' raw score remain un-changed; and
- 342 campuses' raw score increased.

Spanish to English Transition Proxy

Campus School Progress, Part A: Academic Growth Letter Grades

687 campuses' raw score decreased.

	With S-E Transition				
Without S-E Transition	**A**	**B**	**C**	**D**	**F**
A	15	12			
B		106	31		
C			186	49	1
D				116	47
F					124

342 campuses' raw score increased.

	With S-E Transition				
Without S-E Transition	**A**	**B**	**C**	**D**	**F**
A	12				
B	5	54			
C		11	100		
D			19	64	
F				12	65

Texas Education Agency

2020 & Beyond Accountability System Development

Texas Education Agency | Governance & Accountability | Performance Reporting

Meeting Goals

- Make the most efficient use of our time.
- Remain future focused.
- Develop recommendations for the 2020 accountability system.
- Discuss options for future accountability.

Texas Education Agency

February 2020 ESSA Amendment

Proposed Closing the Gaps Graduation Rate Methodology

1. Did the student group meet the four-year long-term graduation rate target of 94.0%?

2. If #1 is no, did the student group meet the four-year interim graduation rate target of 90.0% **and** demonstrate improvement of at least 0.1% over the prior year rate?

Proposed Closing the Gaps Graduation Rate Methodology (cont.)

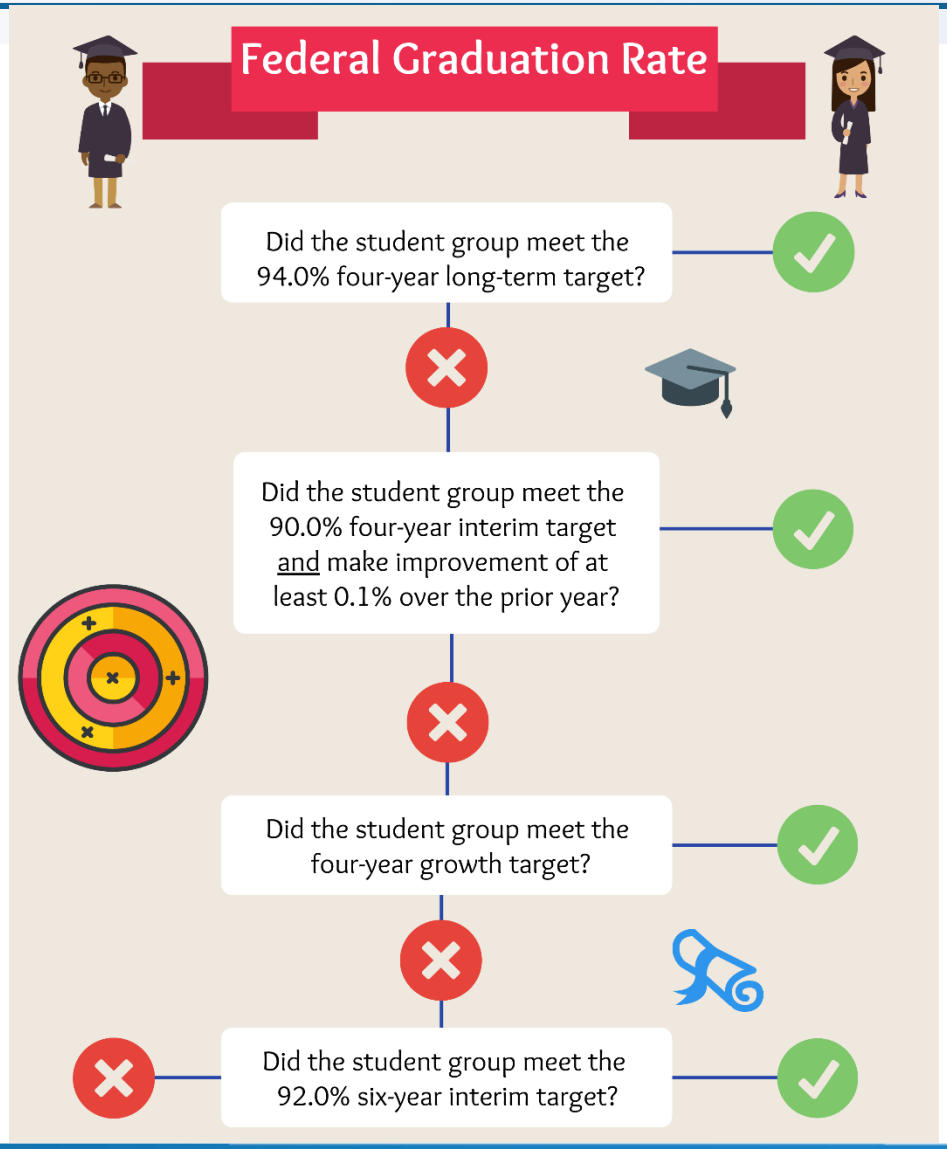
3. If #1 and #2 are no, did the student group meet its four-year graduation rate growth target?

$$\text{current year four-year graduation rate} - \text{prior year four-year graduation rate} \geq \frac{\text{94.0 (long-term target)} - \text{prior year four-year graduation rate}}{\text{10}}$$

Proposed Closing the Gaps Graduation Rate Methodology (cont.)

4. If #1, #2, and #3 are no, did the student group meet the six-year interim graduation rate target? (Appendix A of the ESSA State Plan would be amended to add an interim target of 92.0% and a long-term target of 96.0%.)

Proposed Closing the Gaps Graduation Rate Methodology (cont.)



Proposed Closing the Gaps Graduation Rate Methodology (cont.)

Proposed Graduation Rate Methodology Example

2018 Special Education Graduation Rate	2019 Special Education Graduation Rate
66.7%	70.0%

1. Did not meet 94.0% 4-year long-term graduation target
2. Did not meet 90.0% 4-year interim graduation target and improve by 0.1%
3. Did meet 4-year growth target (i.e. a 10% decrease in difference between the prior year rate and the long-term target):

$$70.0 - 66.7 = 3.3 > 2.73 = \frac{94.0 - 66.7}{10}$$

Proposed Closing the Gaps Graduation Rate Methodology (cont.)

The proposed methodology has a positive impact on Closing the Gaps domain letter grades for campuses.

2019 Campus Closing the Gaps Domain Grade	Model Campus Closing the Gaps Domain Grade				
	A	B	C	D	F
A	1246	0	0	0	0
B	94	1589	0	0	0
C	0	77	2952	0	0
D	0	0	25	1069	0
F	0	0	20	28	668

Proposed Closing the Gaps Graduation Rate Methodology (cont.)

The proposed methodology has a positive impact on Closing the Gaps domain letter grades for AEAs.

2019 Campus Closing the Gaps Domain Grade	Model Campus Closing the Gaps Domain Grade				
	A	B	C	D	F
A	7	0	0	0	0
B	3	15	0	0	0
C	0	5	14	0	0
D	0	0	8	12	0
F	0	0	20	22	36

P-TECH/T-STEM Clarification

- P-TECHs and T-STEMS will not require special processing for graduation rates.
- T-STEM campuses are on a four-year graduation track.
- P-TECH campuses will complete state graduation requirements and report students as graduates in four years.

Proposed School Improvement Identification Methodology

- Comprehensive support and improvement identification for graduation rates less than 67% will be based on the 6-year graduation rate rather than the 4-year rate.

- Using this methodology, 32 fewer campuses would be identified for comprehensive support and improvement, although some would still be identified as “comprehensive progress” because of prior year status.

Proposed School Improvement Identification Methodology

- Additional targeted support campuses identified for three years will escalate to comprehensive support and improvement.

- Implementation will be delayed until the 2021–22 school year.

Campuses Identified as Additional Targeted Support for Two Consecutive Years	
AEA	13
Non-AEA	446
Total	459

SAT/ACT Inclusion for Accelerated Testers

- SAT/ACT results will be included in accountability calculations for accelerated testers beginning with August 2021 accountability ratings.
- Prior to inclusion, performance levels that equate to the STAAR Approaches Grade Level, Meets Grade Level, and Masters Grade Level standards will be set.
- These assessment results will also be included in participation calculations.

Texas Education Agency

Other 2020 Topics for Consideration

School Progress, Part A: Academic Growth

What can we do for 109 campuses that only serve up to grade 3?

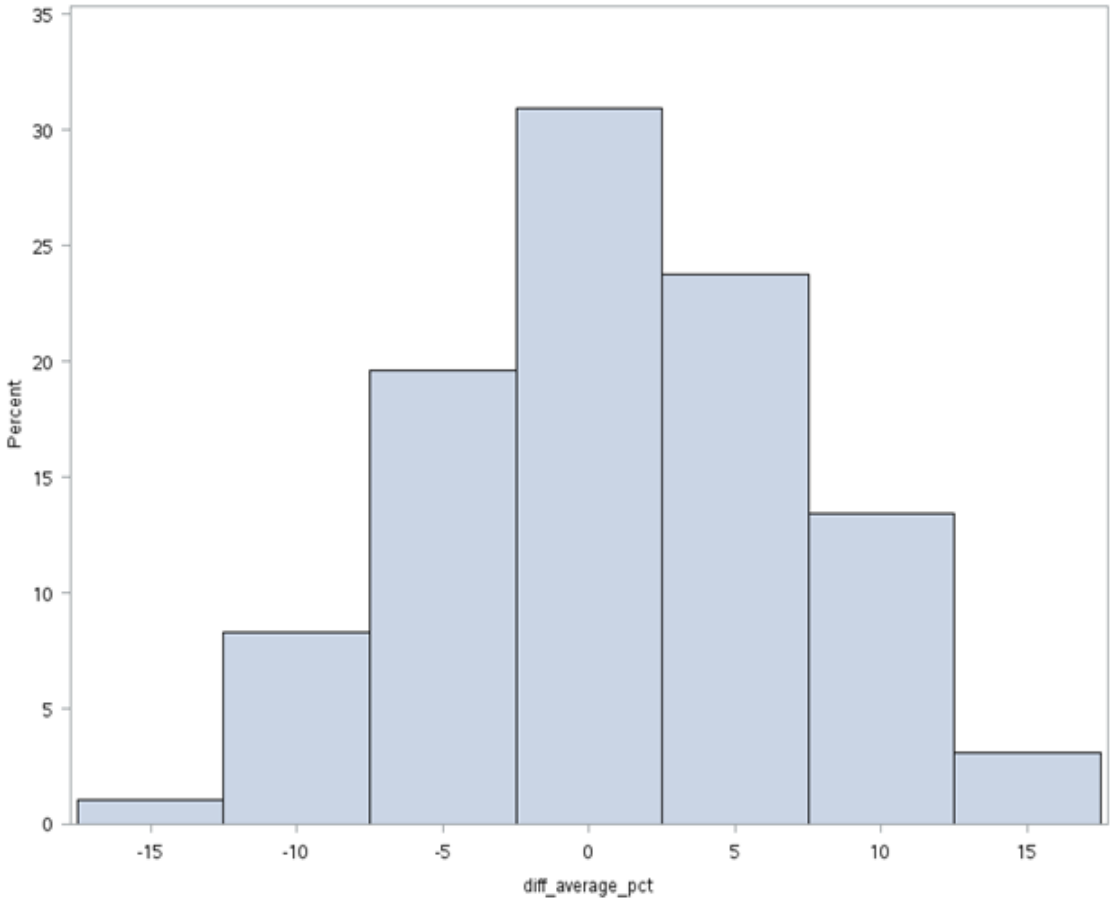
School Progress, Part A: Academic Growth Modeling

Modeling Methodology

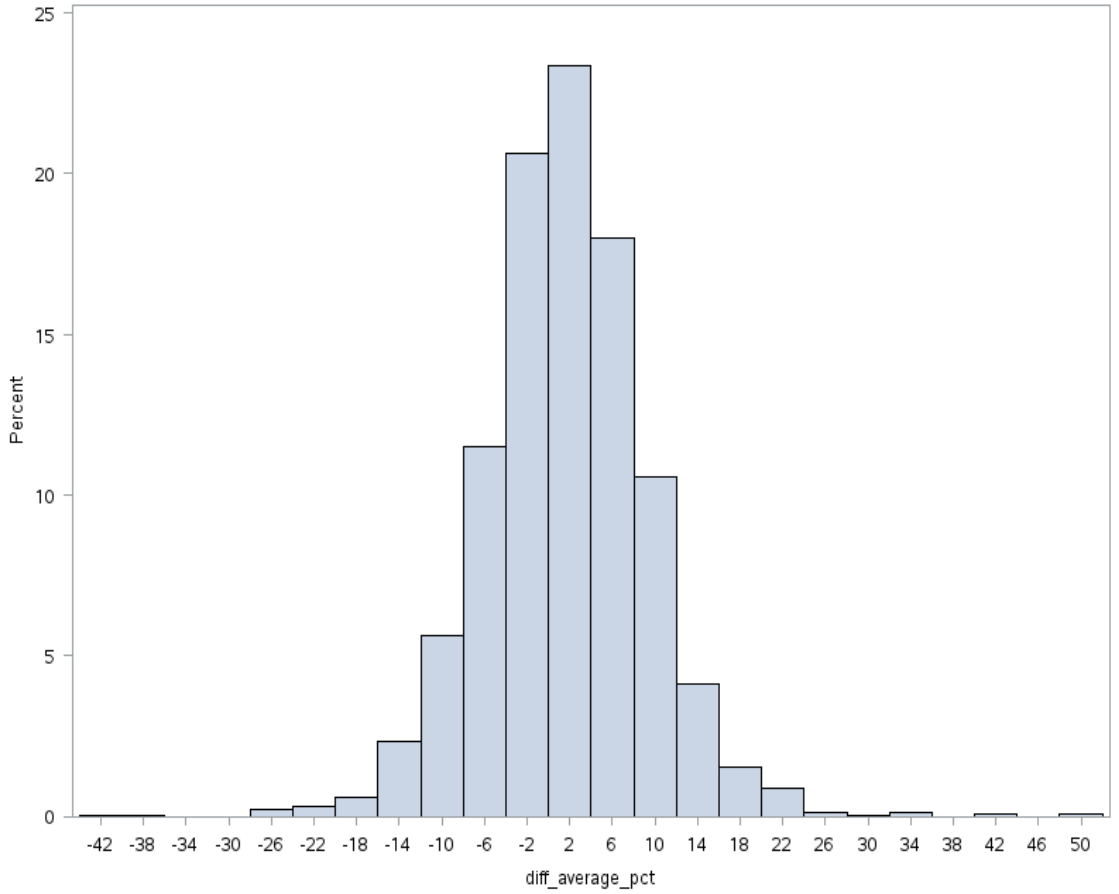
Using 2018 and 2019 performance level data, calculate the following:

- Percentage change in Approaches Grade Level or above, Meets Grade Level or above, and Masters Grade Level
- Calculate the average percentage change for the three performance levels.
- Calculate the difference in average percentage change (2019 result – 2018 result), and check the percentile.
- Calculate the difference in average percentage change for all elementary schools with at least 10 grade 3 tests, check the percentile, and use it as reference to decide the cut off points for letter grade.
- For the newly rated grade 3 campuses, compare School Progress, Part A results with Part B results.

School Progress, Part A: Academic Growth Modeling



Total number of campuses serving up to grade 3=109
12 of them are new in 2019, so 97 are used in the model.



Total number of elementary campuses with at least 10 grade 3 tests=4220

School Progress, Part A: Academic Growth Modeling

Scaling Excerpt

	Average Percent Change	Frequency	Percent
A	11	81	1.92
	10	110	2.61
	9	113	2.68
	8	141	3.34
	7	163	3.86
	6	178	4.22
B	5	197	4.67
	4	220	5.21
	3	236	5.59
	2	233	5.52
	1	271	6.42
	0	243	5.76
	-1	263	6.23
C	-2	218	5.17
	-3	211	5.00
	-4	177	4.19
	-5	145	3.44
	-6	112	2.65
D	-7	119	2.82
	-8	109	2.58
	-9	76	1.80
	-10	63	1.49

School Progress, Part A: Academic Growth Modeling

Academic Growth Modeling Example

- Elm Elementary School had a 2018 STAAR component score of 37% and a 2019 STAAR component score of 43%.
- The percent change is 6%.
- Using the scaling chart, this campus would earn an *A* for Academic Growth.

School Progress, Part A versus Part B Modeling

Outcomes for Campuses using Part A Modeling Methodology

	2019 Part B: Relative Performance				
Modeled Part A: Academic Growth	A	B	C	D	F
A	2	3	.	.	.
B	3	14	7	1	.
C	1	18	12	5	3
D	2	8	5	3	1
F	.	3	3	3	.

School Progress, Part A: Academic Growth Modeling

ATAC expressed the following:

- The proposed methodology does not evaluate the same group of students.
- A cumulative effect could occur, and the expectations could continue to increase from year to year.
- ATAC asked to see the same models for 4th grade as well in order to see whether the distributions and cut scores are the same.
- ATAC indicated that there needs to be an aspect that gives campuses full credit for growth if the student is already very high performing (e.g., Masters Grade Level assessment results receive 1 point, regardless of growth).
- ATAC does not want campuses changing grade spans based on potential accountability incentives.

School Progress, Part A: Academic Growth

Would a hold harmless provision be appropriate?

Partial Points for English Language Proficiency (ELP) Component

- Currently, districts and campuses either earn 10 points or 0 points for the ELP component in the Closing the Gaps domain.

- Should partial points be awarded depending on achievement toward the 36% target?

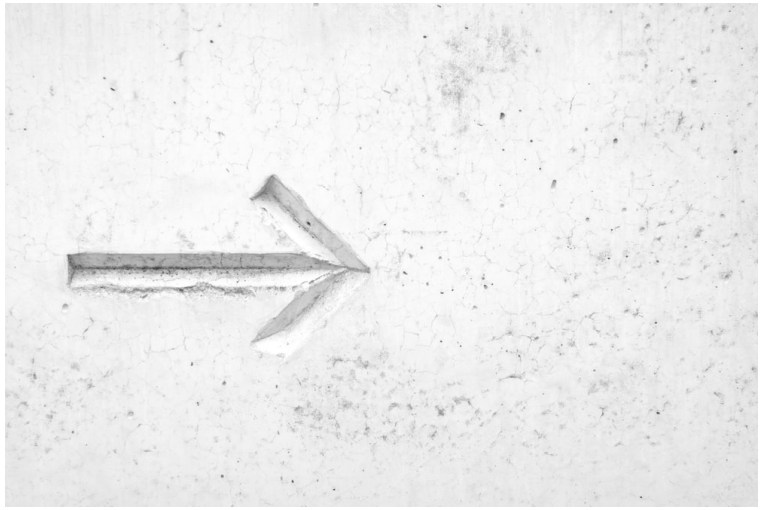
ELP Rate	Points
36	10
35	9
34	8
33	7
32	6
31	5
30	4
29	3
28	2
27	1

Relative Performance for Alternative Education Accountability (AEA)

- ATAC requested modeling to show the feasibility of using Relative Performance for AEAs.
- See the online binder for modeling.

Spanish to English Transition Proxy

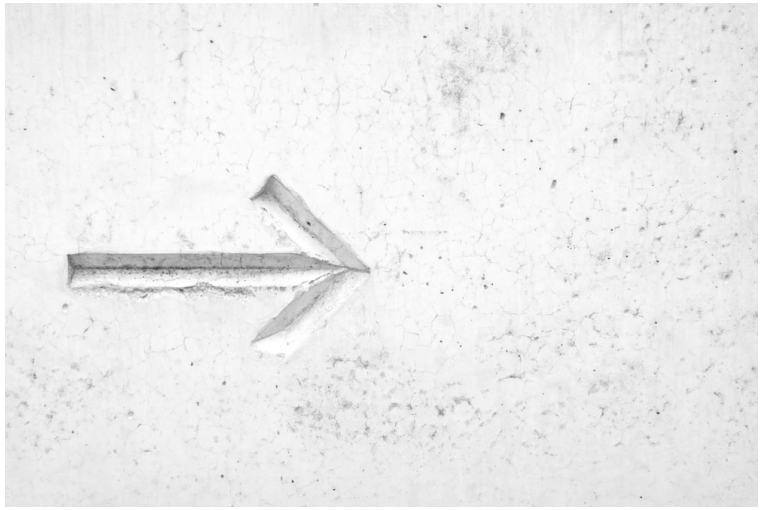
- Students who transition from the Spanish STAAR reading assessment to the English STAAR reading assessment currently do not receive a STAAR progress measure for use in Academic Growth.
- A proxy was calculated for these students in the previous accountability system.
- Overall, ATAC members were in favor of the idea of adding the transition proxy for 2020 accountability, noting that it would acknowledge the work of the schools and set the expectation that the language switch be made when kids are ready.



Spanish to English Transition Proxy

ATAC expressed concerns with the following:

- Students will be instructed in the language in which they are tested. That could have a long-term negative impact.
- The proxy may negatively impact some districts and campuses.



Texas Education Agency

Accountability Reset

Graduation Rate Methodology

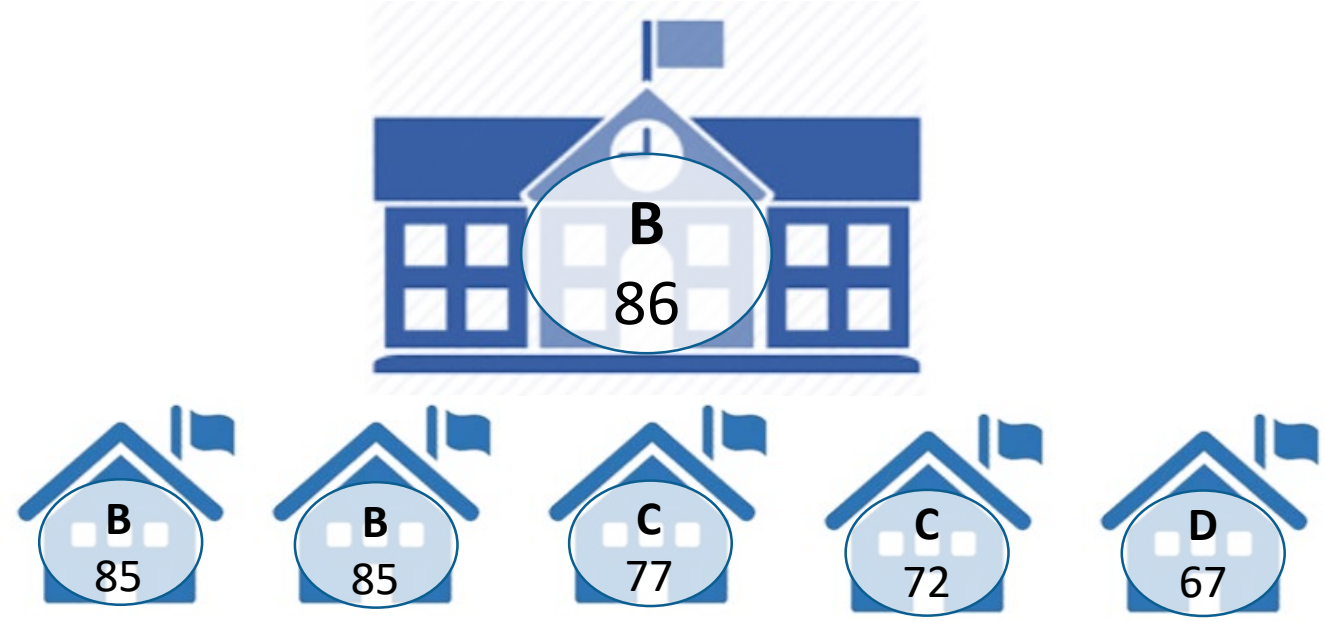
- The current long-term four-year graduation rate is 94%, and the long-term six-year graduation rate is 96% for all student groups.
- Should we consider establishing unique targets for certain student groups using baseline data?

District Rating Methodology

- District ratings are not always representative of campus ratings.
- How can we revise the district rating methodology so that district ratings accurately reflect outcomes for ALL students in the district?
- Should campus outcomes contribute proportionately to district ratings?

District Rating Methodology

Example using Current Methodology



District Rating Modeling Methodology

Methodology using Proportional Weighting

1. Determine the number of students enrolled in grades 3–12 at each campus.
2. Sum the number of students enrolled in grades 3–12 at the district.
3. Divide the number of grades 3–12 students at the campus by the district total.
4. The resulting percentage is the weight that each campus will contribute to the district rating.
5. Multiply the campus scaled score by its weight to determine the points.
6. Sum the points for all campuses to determine the overall district score.

District Rating Modeling Methodology

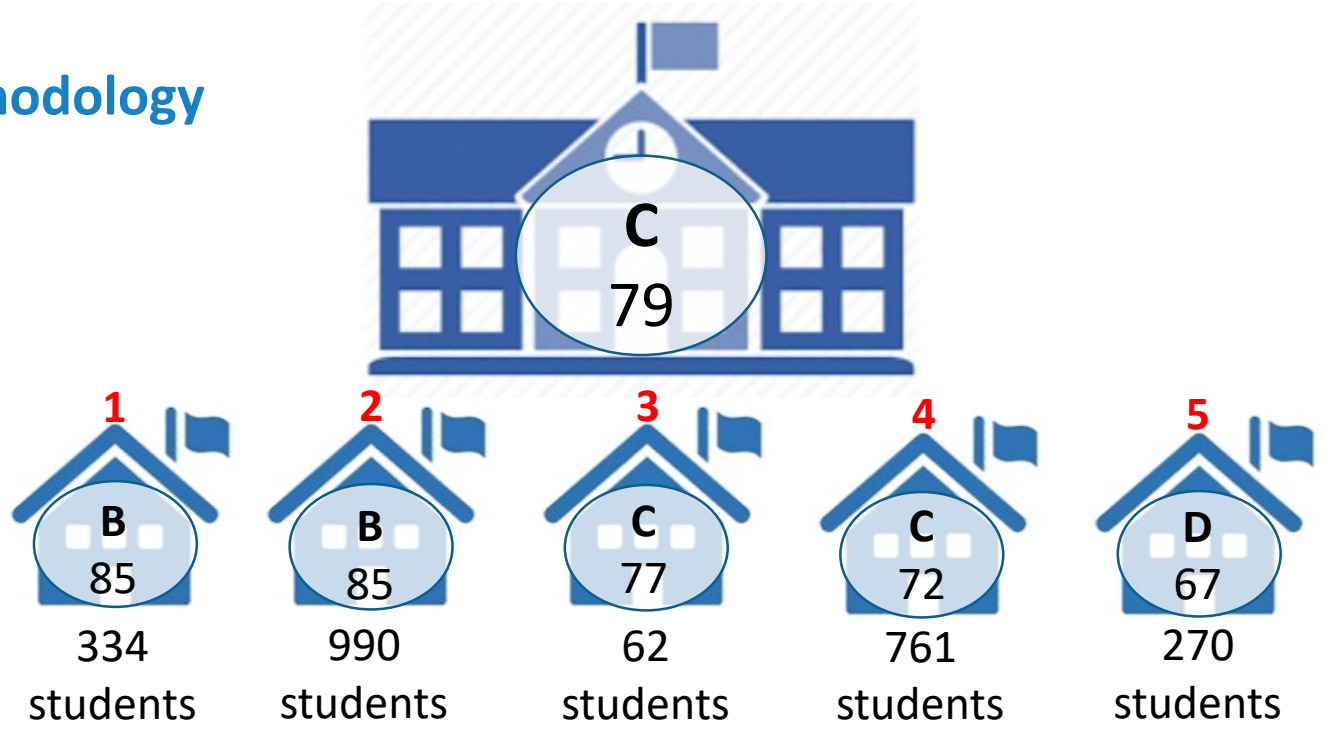
Methodology using Proportional Weighting Presumptions

- Enrollment counts would only include grades 3–12.
- *Not Rated* and paired campuses would be excluded from calculations.
- AEAs would be included in calculations.
- To align with statutory requirements, the methodology would be applied to each domain and overall.

District Rating Modeling Methodology

Example using Proportional Weighting Methodology

Campus	3 –12 Enrollment	Score	Weight	Points
Campus 1	334	85	13.8%	11.7
Campus 2	990	85	41.0%	34.9
Campus 3	62	77	2.6%	2.0
Campus 4	761	72	31.5%	22.7
Campus 5	270	67	11.2%	7.5
			District Rating	79



Alternatives for STAAR Component in Closing the Gaps

- The majority of states include chronic absenteeism in their federal accountability system.
- Most states define chronically absent as missing 10% or more of the school year.

Alternative Education Accountability

- Should AECs be their own campus type with different components, weights, and targets in the Closing the Gaps domain?
- If so, what would that look like?

School Improvement Identification

- Should comprehensive support and improvement campuses be determined by campus type (i.e., bottom 5% of elementary, bottom 5% of middle, etc.)?

Campus Type	Current (5% overall)	Modeling (5% for each campus type)	Difference
Elementary	138	197	59
Middle	96	58	-38
High Schools/K-12s	7	49	42
AEA	50	50	0
Total	291	354	63

- Should comprehensive support and improvement campuses be identified every three years, rather than yearly?

School Improvement Identification

- Should the targeted support and improvement identification methodology be revised to evaluate achievement gaps among student groups?

- Idaho identifies targeted support and improvement campuses using the following methodology:
  - The percent proficient/advanced for each student group is compared to the percent proficient/advanced for all students not in that group for each indicator.
  - A consistently underperforming student group is any student group that has an achievement gap, relative to its non-group peers, of 35 percentage points or more in any indicator for three consecutive years.

School Improvement Identification

- Should the additional targeted support identification methodology be revised to better align with comprehensive support and improvement?

- Idaho identifies comprehensive support and improvement campuses every three years based on the all students group. They use the same methodology annually for each student group for the purpose of identifying schools for additional targeted support.

Closing the Gaps Domain Weighting

- Stakeholders have communicated concerns regarding state accountability rating and school improvement identification alignment.

- Should the Closing the Gaps domain weight increase for campuses identified for school improvement?

Accountability Open Forum

What concerns or suggestions do you have that were not discussed today?

Texas Education Agency

To the Administrator Addressed

Commissioner Mike Morath

1701 North Congress Avenue • Austin, Texas 78701-1494 • 512 463-9734 • 512 463-9838 FAX • tea.texas.gov

DATE:	**December 18, 2019**
SUBJECT:	**House Bill 3 K-2 Diagnostics Update: Alternative Kindergarten Diagnostic Tool**
CATEGORY:	**Early Childhood Education**
NEXT STEPS:	**Vendor Call: Application for the Identified Commissioner-Approved Alternative Free Kindergarten Diagnostic Tool**

TEA seeks to identify a free alternative kindergarten diagnostic tool. This correspondence serves as a notice of the launch of a competitive application process through which eligible entities can apply.

Background

House Bill (HB) 3 was passed by the 86th Texas Legislature, 2019, and signed into law by Governor Abbott on June 11, 2019. Several provisions in HB 3 impact school districts and open-enrollment charter schools (districts and charter schools) serving prekindergarten through third grade students, including provisions related to kindergarten through grade 2 diagnostics. On November 21, 2019, the Texas Education Agency (TEA or agency) released an HB 3 in 30 K-2 Diagnostics video, along with a PowerPoint document and related materials.

HB 3 K-2 Diagnostics Updates

Today, the agency announces that a competitive application process is now available to determine the commissioner-approved alternative kindergarten diagnostic tool. Eligible entities may visit the Early Childhood Education web page to access the application and submit a Notice of Intent to Apply.

Overview of Changes

HB 3 requires the commissioner to adopt a kindergarten instrument that addresses the three developmental domains, including reading. That instrument is TX-KEA. LEAs must implement the TX-KEA screener or the identified alternate to determine kindergarten readiness. Students that are kindergarten ready will not need any further beginning-of-year diagnostics in Emergent Literacy-Reading, Emergent Literacy-Writing, and Language. If students are not kindergarten ready, further diagnostics may be administered in these areas with TX-KEA or other LEA-chosen diagnostic tools to inform instruction. For further information, please see the K-2 Diagnostics presentation.

Commissioner-approved Alternative Diagnostic Tools

Kindergarten

LEAs must use TX-KEA or the commissioner-approved alternative diagnostic tool. The tool must have the following characteristics: 1) Offered at no cost to LEAs; 2) Multidimensional and includes Emergent Literacy-Reading, Emergent Literacy-Writing, and Language; 3) Available online; 4) Available in English and Spanish; 5) Provides reports to teachers and administrators; 6) Meets the criteria in the Rubric for Kindergarten Diagnostic, including diagnostic components, results and reports, administration, scope and training of the diagnostic; and, 7) meet the TEA-compliant data reporting requirements listed in the TEDS Data Standards.

Grades 1 and 2
TEA also seeks to solicit proposals for a diagnostic tool offered at no cost. More information will be released on this in January 2020.

Questions
If you have any questions related to this letter regarding K-2 diagnostics under HB 3, please contact the Division of Early Childhood by email at earlychildhoodeducation@tea.texas.gov or email HB3info@tea.texas.gov. We will be compiling answers to frequently asked questions (FAQs) on the https://tea.texas.gov/hb3 webpage as well as TEA's Early Childhood Education webpage.

Sincerely,

Jacquie Porter,
State Director of Early Childhood Education