



June 1, 2020

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

Re: Adoption of Proposed 2020 Accountability Manual into Rule

Dear Commissioner Morath,

The Texas School Alliance (TSA) appreciates the opportunity to comment on the state's plan to implement the 2020 Accountability Manual. Attached to this letter are the member districts' feedback and recommendations relative to the proposed manual.

We want to thank you, Jamie Crowe, and the Performance Reporting staff at TEA for your commitment to continuous improvement and feedback regarding the development of the 2020 accountability system.

Finally, because TSA member districts are committed to a strong, fair, statistically valid and reliable system of accountability to support continuous academic improvement, we welcome continued opportunities for dialogue and are happy to serve as a resource in the future development of the state and federal accountability systems.

As always, if you have any questions or want to discuss our recommendations in the attachment, please let me know.

Sincerely,

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

Attachment. TSA Recommended Revisions to the 2020 Accountability Manual

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*Board of Directors

Chapter 1 – 2020 Accountability Overview:

(page 3) TSA districts **strongly support** the decision to assign a label of *Not Rated: Declared State of Disaster* to all campuses and districts for 2020. ***TSA districts recommend including language from the Agency’s TAA letter dated April 2nd in the opening paragraphs of the 2020 accountability manual.***

Chapter 2 – Student Achievement Domain:

(page 18) In November 2019, TSA districts were generally pleased when TEA announced that “*Districts will no longer need to specifically report that a student is enrolled in a [CTE] coherent sequence. It will be auto-calculated based on course completion records.*”; because this provides consistency in awarding CTE credit within the CCMR indicator for high schools and districts. ***TSA districts strongly recommend the Agency continue to include the ½ point credit for graduates who meet no other CCMR indicator in the accountability ratings calculations for 2021 and Beyond (as shown in the table below).***

CTE Coherent Sequence Coursework Transition	Accountability Years	
CCMR Indicator	[-2019 and] 2020	2021 and Beyond
CTE coherent sequence graduates who complete and receive credit for at least one aligned CTE course	½ point	½ point
Earn an industry-based certification	1 point	1 point

Chapter 4 – Closing the Gaps Domain:

- (page 47) TSA districts **agree** with Texas’ request to amend the Four-Year Graduation Rate methodology as described in the Texas’ ESSA plan. ***If the amendment is approved, then TSA districts recommend the table on page 57 be updated to reflect the amendment waiver language shown on page 47.***
- (page 47) If the amendment is denied by USDE, ***then TSA districts offer the following recommendations: (a) Remove the condition to “exceed the previous year by at least a tenth of a percent” and award credit in this component based on the 90% target; or (b) Modify this condition to award credit when the student group increases by at least a tenth of a percent or reaches the long-term state target of 94%.***

Chapter 5 – Calculating 2020 Ratings:

- (pages 57, 63-65) As discussed during the February 4, 2020 ATAC meeting, AEA campuses are created to effectively provide different educational services and support. For example, some AEAs serve as dropout recovery schools, while others serve as magnet campuses and/or schools of choice. Regardless of the AEA’s purpose, the accountability system requires all AEA campuses to meet the same targets. ***TSA districts recommend setting alternate targets for AEAs that serve as dropout recovery schools.***
- (page 60) TEC 39.054(b), as per HB 22 (85th Texas Legislature), includes a provision that received much support from Representatives during the legislative process that “*the commissioner shall ensure that the method used to evaluate performance is implemented in a manner that provides the mathematical possibility that all districts and campuses receive an A rating.*” Step 10 in the overall rating calculation process, does not align with this stated legislative intent. It forces campuses and districts to “*automatically receive an overall rating of F, even if that is not the mathematical results of the adopted scoring system.*” Additionally, as noted on page 47 of the House Public Education Committee’s Interim Report to the 86th Texas Legislature, “*it could be characterized as going beyond the intent of the*

legislation and the rule-making process.”; and “While opinions differ regarding the merit of this rule, the inclusion of such a significant change without the opportunity for additional stakeholder input was ill-advised.” (See figure 2.)

TSA districts strongly recommend repealing the “Step 10” paragraph in its entirety to align the ratings calculations with legislative intent until such time as lawmakers decide to make changes.

3. (page 64) The charts on page 55 provide the scale score conversion for longitudinal graduation rates. Although created using a statistically valid method, the conversion model is biased against large TSA districts and campuses because the method does not take campus enrollment size into account. Thus, it is skewed by the large number of very small campuses with 100% graduation rates.
TSA districts recommend using a scaling model that takes school enrollment size into account.

Chapter 6 – Distinction Designations:

(page 83) While TSA districts were pleased to see the new AADD in mathematics, *Algebra I by Grade 8 Performance*, concerns were raised that using the ‘Meets Grade Level standard’ is not comparable to the other AADD in mathematics, which use the Masters Grade Level standard to award the distinction designations. ***TSA districts recommend aligning this new distinction designation with the previously established AADDs by using the Masters Grade Level standard for the numerator.***

Chapter 8 – Appealing the Ratings:

1. (page 97) This section describes principles that underly the appeals process. The first sentence of the second paragraph states, “... a single indicator or measure will result in an F rating.” However, later sections of the chapter state that any overall or domain rating may be appealed if the appeal would result in a higher rating. This sentence implies that appeals are intended to address F ratings only.
TSA districts recommend change the phrase “an F rating” to “a reduced rating”.
2. (pages 100-101) Clarification is requested regarding the “*Issues Unfavorable for Appeal*” list on page 100 (which cites requests to include or exclude unschooled asylees/refugees and students with interrupted formal education (SIFE) in accountability calculations) and the “*Special Circumstances Appeals*” section which lists a new ‘*Special Program Campuses*’ as a category of appeals for consideration and includes “a newcomer center designed specifically to serve unschooled asylees and refugees or students with interrupted formal education.” While TSA districts support the Agency’s proactive identification of campuses enrolling significant numbers of asylee/refugee/SIFE students as worthy of appeal consideration, we are concerned that specifying a ‘newcomer center’ may unintentionally omit many campuses that serve large numbers of asylee/refugee/SIFE students in a comprehensive setting.
TSA districts recommend expanding the phrase “newcomer center” to “newcomer center and/or campuses with 10% or more of their enrolled students identified as asylee/refugee/SIFE students.”

Chapter 10 – Identification of Schools for Improvement:

(page 114) TSA districts support the removal of the “all students” group from the groups used to identify campuses for targeted support and improvement and additional targeted support.

Chapter 11 – Local Accountability Systems (LAS):

(page 121) TEC. 39.0544 (b)(3) and (d), as per HB 22 (85th Texas Legislature), requires an independent review panel as part of the local accountability system implementation. TSA districts realize there are no LAS ratings in 2020, however, in future accountability years, this provision may be used.

TSA districts recommend retaining the phrase, “independent review panel consisting of representatives from current LAS districts” to align the accountability manual with statute until such time as lawmakers decide to make changes.

Proposed Changes to Ratings, Labels, Interventions, and Sanctions – Ds and Fs

- (page 12) TEC 39.054(a), as per HB 22 (85th Texas Legislature), specifically states that a letter grade of *D* represents *Needs Improvement*. It is **not** equivalent to or to be assigned an *Unacceptable* rating. Additionally, page 47 of the House Public Education Committee’s Interim Report to the 86th Texas Legislature states, “They [Lawmakers] also agreed there should be some difference between the interventions required for scores of *D* and *F*.” (See figures 1-3).

TSA districts recommend removing the proposed “D” from the ‘Campus Number Tracking’ section to align the accountability manual with statute until such time as lawmakers decide to make changes. (See screenshot below.)

- Campus Number Tracking:** Requests for campus number changes may be approved with consideration of prior state accountability ratings. A[~~A~~]-~~F~~ or *Improvement Required* rating for the same campus assigned two different campus numbers may be considered as consecutive years of unacceptable ratings for accountability interventions and sanctions, if the commissioner determines this is necessary to preserve the integrity of the accountability system.

- (page 109) TSA members **disagree** with this proposed sentence, “While no ratings were issued in 2020, an overall or domain rating of *D* or *F* in 2019 and an overall or domain rating of *D* or *F* in 2021 will be considered to be consecutive”; because 2019 and 2021 will NOT be consecutive years in terms of uninterrupted instruction, student learning opportunities, and data collection.
 - As currently defined, the STAAR academic growth components for reading and math, as well as the English Language Proficiency components will be missing for 2021;
 - the graduation rates and college, career, and military ready (CCMRs) components for the Class of 2020 have been impacted by school closures and test cancellations;
 - the ESSA student group targets and cut scores used to assign A-F letter grades across all domains will no longer be valid or comparable since those were previously established when students had the opportunity for 180+ days of face-to-face instruction with a qualified teacher; and
 - in the upcoming 2020-2021 school year, no one knows how much or how little remote, at-home learning will be required, and subsequently no one knows how it will impact student performance.

TSA districts recommend the Agency issue ‘hold-harmless’ or ‘not-rated’ or ‘report only’ accountability ratings for the 2020-2021 school year for the reasons listed above.

- (page 111) TEC 39.054(A), as per HB 22 (85th Texas Legislature), specifically states that a letter grade of *D* represents *Needs Improvement*. It is not equivalent to or to be assigned an *Unacceptable* rating. Additionally, page 47 of the House Public Education Committee’s Interim Report to the 86th Texas Legislature states, “They [Lawmakers] also agreed there should be some difference between the interventions required for scores of *D* and *F*.” (See figures 1-3). ***TSA districts recommend removing the proposed “D” from the ‘Actions Required Due to Low Ratings or Low Accreditation Status’ section, to***

***align the accountability manual with statute until such time as lawmakers decide to make changes.
(See screenshot below.)***

Actions Required Due to Low Ratings or Low Accreditation Status

Districts and charter schools that earn a ~~D or F~~ rating or *Accredited-Probation/Accredited-Warned* accreditation status and campuses with a ~~D or F~~ rating will be required to follow directives from the commissioner designed to remedy the identified concerns. Requirements will vary depending on the circumstances for each individual district or charter school. Commissioner of education rules that define

Unschoolled asylees, unschooled refugees, and students with interrupted formal education (SIFE)

(pages 16, 35, and 39) During the 2019-20 school year, there were discussions with ATAC members about USDE's ruling that all states include unschoolled asylees, unschooled refugees, and students with interrupted formal education in their federal accountability systems beginning with their second year of enrollment in U.S. schools. In Texas, this federal requirement appears to apply only to the Closing the Gaps / ESSA domain as shown on page 45. Therefore, ***TSA districts recommend returning to the state's long-time standard of including these groups of educationally disadvantaged students beginning in their sixth year of enrollment in U.S. schools for the Student Achievement, School Progress, Part A: Academic Growth and School Progress, Part B: Relative Performance domain calculations.***

Miscellaneous

TSA districts respectfully request the Agency include a historical timeline in the appendix that outlines the significant changes that have been made to the assessment and accountability system since 2011. Some examples to include are: 15 EOCs reduced to 5 EOCs, SSI waived due to online testing disruptions, 4 domains reduced to 3 domains, A-F letter grades, ESSA, Hurricane Harvey exclusions, and COVID-19 closures.

Figure 1. Source: TEA Overview of 2018 Accountability, TEA A-F Resources, as of 7-3-19



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

Figure 2. Source: Interim Report to the 86th Texas Legislature, House Committee on Public Education, December 2018

TEA is also required to study the feasibility of adding an indicator to the state system that accounts for extra and co-curricular student activity. These activities can provide students with an opportunity to build relationships, character, and leadership skills. Research has shown a positive correlation between participation in these activities and improvements in school attendance, test scores, and post-secondary aspirations, as well as decreases in dropouts and disciplinary referrals.¹⁹³ TEA plans to convene a task force to study this issue in early 2019.¹⁹⁴

Some provisions of the bill were included to encourage fairness within the accountability system. Lawmakers agreed that top performers should not be penalized for a lack of growth in performance and that an LEA that receives an F in either the Student Achievement or School Progress domain cannot receive an overall score higher than B. **They also agreed there should be some difference between the interventions required for scores of D and F.** Another provision that received much support from Representatives during the legislative process was the requirement that “the commissioner shall ensure that the method used to evaluate performance is implemented in a manner that provides the mathematical possibility that all districts and campuses receive an A rating.”¹⁹⁵

Many of the details that determine how scores are calculated under the House Bill 22 system were created through TEA rule-making and reflect the agency’s consideration of stakeholder input. One example is the weight given to each of the separate indicators used to calculate the Student Achievement score for high schools. TEA originally suggested a 45-45-10 split between STAAR, CCMR, and graduation rates, in that order; most stakeholders preferred a 33-33-33 split. The final rules for the system include a compromise split of 40-40-20.¹⁹⁶

In some cases, TEA’s actions could be characterized as going beyond the intent of the legislation and the rule-making process. After the draft 2018 Accountability Manual was published and stakeholder comments had been received, TEA incorporated a stakeholder recommendation regarding overall ratings into the final version of the manual. The recommendation was to require LEAs and campuses that receive an F for three of the four domains (including the two School Progress subdomains) automatically receive an overall rating of F, even if that is not the mathematical result of the adopted scoring system.¹⁹⁷ While opinions differ regarding the merit of this rule, the inclusion of such a significant change without the opportunity for additional stakeholder input was ill-advised. Likewise, many stakeholders were concerned to see the emphasis placed on numerical scores on the 2018 campus report cards when the legislation explicitly stated that campuses were to *only* receive either a Met Standard or Improvement Required rating in August 2018. It is difficult to conceive any rationale for this emphasis beyond the desire to circumvent the provisions of the bill regarding the delay of campus A-F ratings.¹⁹⁸

Two other examples involve industry certifications and dual credit as CCMR indicators, both of which are very important to small and rural LEAs. TEA chose to limit CCMR credit to industry certifications that can be obtained while in high school and that, according to TEA, lead to high wage jobs. However, this limited list prevents many of the coherent sequences of CTE courses that had been recently developed by LEAs in response to previous legislation from receiving credit.¹⁹⁹ The final compromise on this issue allows half credit for students who have taken courses in a coherent sequence that leads to one of the TEA approved certifications but have not yet obtained the certification.²⁰⁰ Stakeholders were also dissatisfied by TEA’s original proposal

Figure 3. Source: Texas School Law Bulletin, 2018 Edition, TEC §39.101 Needs Improvement Rating, page 518

Sec. 39.101	EDUCATION CODE	518 19
Section.	39.1071. Transitional Interventions and Sanctions. [Repealed]	(2) an overall performance rating of D as provided by Subsection (c).
39.108.	Annual Review. [Repealed]	(c) If a school district or campus is assigned an overall performance rating of D for a school year after the district or campus is ordered to develop and implement a targeted improvement plan under Subsection (a), the commissioner shall implement interventions and sanctions that apply to an unacceptable campus and those interventions and sanctions shall continue for each consecutive school year thereafter in which the campus is assigned an overall performance rating of D.
39.109.	Acquisition of Professional Services. [Repealed]	(d) The commissioner shall adopt rules as necessary to implement this section.
39.110.	Costs Paid by District. [Repealed]	HISTORY. Enacted by Acts 2017, 85th Leg., ch. 807 (H.B. 22), § 11, effective June 15, 2017.
39.111.	Conservator or Management Team. [Repealed]	STATUTORY NOTES
39.112.	Board of Managers. [Repealed]	Applicability. Acts 2017, 85th Leg., ch. 807 (H.B. 22), § 22 provides: "This section applies beginning with the 2017-2018 school year."
39.1121.	Appointment of Board of Managers for Open-Enrollment Charter School; Superintendent. [Repealed]	Sec. 39.102. Interventions and Sanctions for Districts.
39.1122.	Compensation of Board of Managers for Open-Enrollment Charter School and Superintendent. [Repealed]	(a) [2 Versions: As amended by Acts 2017, 85th Leg., ch. 823] If a school district does not satisfy the accreditation criteria under Section 39.052, the academic performance standards under Section 39.053 or 39.054, or any financial accountability standard as determined by commissioner rule, or if considered appropriate by the commissioner on the basis of a special accreditation investigation under Section 39.057, the commissioner shall take any of the following actions to the extent the commissioner determines necessary:
39.113.	Campus Intervention Team Members. [Repealed]	(1) issue public notice of the deficiency to the board of trustees;
39.114.	Immunity From Civil Liability. [Repealed]	(2) order a hearing conducted by the board of trustees of the district for the purpose of notifying the public of the insufficient performance, the improvements in performance expected by the agency, and the interventions and sanctions that may be imposed under this section if the performance does not improve;
39.115.	Campus Name Change Prohibited. [Repealed]	(3) order the preparation of a student achievement improvement plan that addresses each academic achievement indicator under Section 39.053(c) for which the district's performance is insufficient, the submission of the plan to the commissioner for approval, and implementation of the plan;
39.116.	Transitional Interventions and Sanctions. [Repealed]	(4) order a hearing to be held before the commissioner or the commissioner's designees at which the president of the board of trustees of the district and the superintendent shall appear and explain the district's low performance, lack of improvement, and plans for improvement;
39.117.	Special Student Recovery Program. [Repealed]	(5) arrange a monitoring review of the district;
39.131.	Sanctions for Districts [Renumbered].	
39.132.	Sanctions for Academically Unacceptable Campuses [Renumbered].	
39.1321.	Sanctions for Charter Schools [Renumbered].	
39.1322.	Technical Assistance and Campus Intervention Teams [Renumbered].	
39.1323.	Campus Intervention Team Procedures [Renumbered].	
39.1324.	Mandatory Sanctions [Renumbered].	
39.1326.	Transitional Sanctions Provisions [Expired].	
39.1327.	Management of Certain Academically Unacceptable Campuses [Renumbered].	
39.133.	Annual Review [Renumbered].	
39.1331.	Acquisition of Professional Services [Renumbered].	
39.134.	Costs Paid by District [Renumbered].	
39.135.	Conservator or Management Team [Renumbered].	
39.136.	Board of Managers [Renumbered].	
39.137.	Special Campus Intervention Team [Renumbered].	
39.138.	Immunity from Civil Liability [Renumbered].	
Sec. 39.101. Needs Improvement Rating.	(a) Notwithstanding any other law, if a school district or campus is assigned an overall or domain performance rating of D:	
	(1) the commissioner shall order the district or campus to develop and implement a targeted improvement plan approved by the board of trustees of the district; and	
	(2) the interventions and sanctions provided by this subchapter based on failure to satisfy performance standards under Section 39.054(e) apply to the district or campus only as provided by this section.	
	(b) The interventions and sanctions provided by this subchapter based on failure to satisfy performance standards under Section 39.054(e) apply to a district or campus ordered to develop and implement a targeted improvement plan under Subsection (a) only if the district or campus is assigned:	
	(1) an overall or domain performance rating of F; or	

Kindergarten

TEC, §28.006(b) requires the commissioner to adopt a multidimensional assessment tool that includes a reading instrument and tests at least three developmental skills, including literacy, for use in diagnosing the reading development and comprehension of kindergarten students.

The commissioner has adopted **TX-KEA** (CLI).

TEC, §28.006(b-1) permits the commissioner to approve an alternative reading instrument for use in diagnosing the reading development and comprehension of kindergarten students.

The commissioner has approved **mCLASS Texas Edition** (Amplify) as the alternative reading instrument.

Information regarding training opportunities for these instruments will be made available soon.

LEAs are required to use one of these two reading diagnostic instruments for the beginning-of-year screener, starting in the 2020-2021 school year. However, because of disruptions to the 2019-2020 school year and possible disruptions to the 2020-2021 school year resulting from COVID-19, districts may request a waiver in order to continue to use the instrument they used in the 2019-2020 school year or another instrument approved by a local district board of trustees in order to best meet student needs in the 2020-2021 school year only.

A waiver of the requirement to use one of the two specified instruments will only be approved for one year and will not be waived in the 2021-2022 school year and beyond.

Even with potential disruptions screening to monitor reading development and comprehension of students is critical in supporting their growth and academic success.

Grades 1 and 2

TEC, §28.006(b-1) requires each school district to administer, at the first and second grade levels, a reading instrument on the list adopted by the commissioner or by a district-level committee.

Free options that are available for the 2020-2021 school year include:

- **mCLASS Texas Edition** (Amplify)
- **Fastbridge earlyReading** (Illuminate Education)
- **CBMreading** (Illuminate Education)
- **TPRI/Tejas Lee**

Grade 7

TEC, §28.006(c-1) requires each school district to administer at the beginning of the seventh grade a reading instrument adopted by the commissioner to each student whose performance on the grade 6 STAAR reading assessment did not demonstrate reading proficiency.

The commissioner has adopted the following:

- Istation's Indicators of Progress, Advanced Reading (ISIP-AR)
- Reading Analysis and Prescription System (RAPS 360)
- Texas Middle School Fluency Assessment (TMFSA)
- Woodcock Johnson III Diagnostic Reading Battery (WJ III DRB)

LEAs are required to use one of these reading diagnostic instruments. However, because of disruptions to the 2019-2020 school year and possible disruptions to the 2020-2021 school year resulting from COVID-19, districts may request a waiver in order to use another instrument approved by a local district board of trustees in order to best meet student needs in the 2020-2021 school year only.

A waiver of the requirement to use an adopted instrument will only be approved for one year and will not be waived in the 2021-2022 school year and beyond.

Waiver Guidance

A district may choose one of the following three options:

- (A) Request a waiver to use an alternate district-selected kindergarten reading instrument and an alternate district-selected seventh grade reading instrument
- (B) Request a waiver to use an alternate district-selected kindergarten reading instrument only
- (C) Request a waiver to use an alternate district-selected seventh grade reading instrument only

Follow the instructions below to complete a reading diagnostic instrument waiver request:

1. Please visit TEA's State Waivers webpage to access general information about the waiver process: <https://tea.texas.gov/texas-schools/waivers/state-waivers>
2. Please also review Waiver Process FAQ for information on how to access TEAL for the purposes of submitting a waiver request: <https://tea.texas.gov/sites/default/files/Waiver%20Process%20FAQ.pdf>
3. Once in the TEAL waiver application, under the "Create New Waiver" tab, select the waiver type **"Other Waiver"** to create and submit a request for waiver to use an **alternate kindergarten or 7th grade reading instrument due to circumstances related to COVID-19**.
4. Please complete the LEA contact information, including filling in the date the board approved the waiver request.
5. For the section titled "Waiver Description" please use this language:
 - A. **"Waiver to use alternate K and 7th grade reading instruments due to COVID-19"** if requesting a waiver of both requirements
 - B. **"Waiver to use alternate kindergarten reading instrument due to COVID-19"** if requesting a waiver of the kindergarten requirement only
 - C. **"Waiver to use alternate 7th grade reading instrument due to COVID-19"** if requesting a waiver of the seventh-grade requirement only
6. For "General Questions #1," please use this language:
 - A. **"Waiver to use alternate K and 7th grade reading instruments due to COVID-19"** to request a waiver of both requirements
 - B. **"Waiver to use alternate kindergarten reading instrument due to COVID-19"** to request a waiver of the kindergarten requirement only
 - C. **"Waiver to use alternate 7th grade reading instrument due to COVID-19"** to request a waiver of the seventh-grade requirement only
7. For "General Questions #2," please enter **N/A**
8. For "General Question #3," please use this language:
 - A. **"TEC 28.006(c-1) and 28.006(c-2)"** if requesting a waiver of both requirements
 - B. **"TEC 28.006(c-2)"** if requesting a waiver of kindergarten requirement only
 - C. **"TEC 28.006(c-1)"** if requesting a waiver of seventh-grade requirement only
9. For "General Question #4," please enter **N/A**
10. For "General Question #5," please enter **N/A**
11. For "General Question #6," please enter **N/A**
12. For "Requested Years," please select only **"2020-2021"**
13. For "LEA Attachments," please include the board agenda from meeting in which the waiver application request was approved.
14. Please submit your completed waiver. For a *District Editor*, at the end of the waiver application you will find a **Complete & Route** button. This will route the application to your Superintendent for review and approval. For a *District Superintendent*, at the end of the waiver application you will find a **Review and Submit** button. This will take you to a review and submit details page. If the application is complete and ready for submission, select the **Submit to TEA** button.



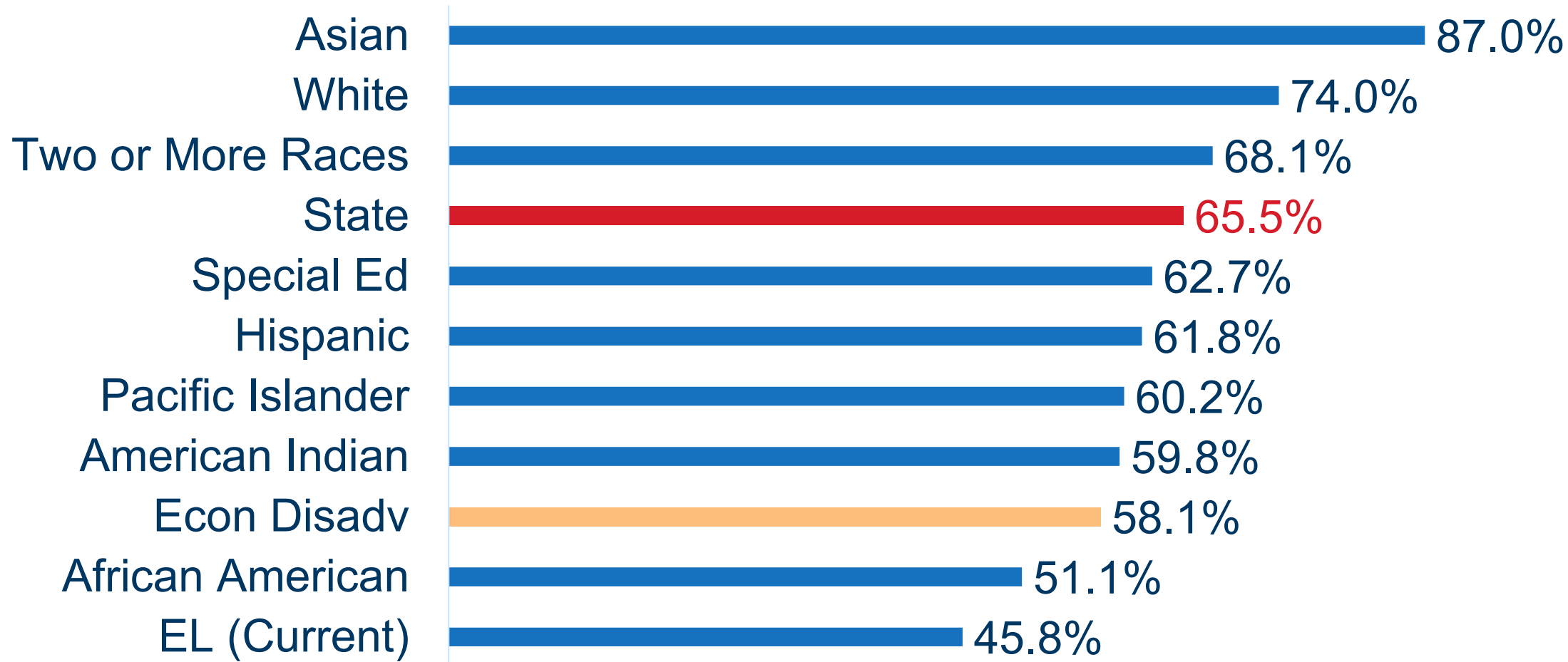
Preparing Texas High School Students For College Success

June 4, 2020

Many Texas students graduate not ready for college

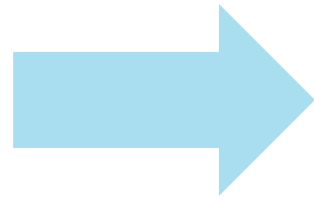
In 2018, **121,000** students graduated **without** demonstrating college, career, or military readiness.

College, Career, and Military Ready Graduates, 2017-18



COVID-19 has negatively impacted graduating and rising seniors

Factors
affecting
college
readiness in
2020



- ACT, SAT, and TSIA were not available for students to test
- Students may not have finished college prep courses given limited ability to deliver remote instruction
- Changing college requirements

College ready testing alone will not produce the results the students need to demonstrate readiness post-COVID-19

- The alternative must embed personalized math and English learning to help students quickly close learning gaps to demonstrate college readiness.
- Students need the opportunity to complete an **online** course to support college readiness in English and Mathematics, either alongside concurrent college enrollment or resulting in seamless enrollment in college.

The College Prep Math/English Course

- Supported by HB5 and HB22 , the College Prep English and Math course is a full credit course designed for students in Grade 12 whose performance on an end-of course assessment instrument or coursework, a college entrance examination, or a Texas Success Initiative assessment instrument, indicate the student is not ready to perform entry-level college coursework.
- **The course is not widely available at present.**
- **And during COVID, the lack of distance learning has prevented this course completion for many.**

Districts currently offer HB5 College Prep courses in a number of ways

- LEA-IHE locally developed courses
- LEA-IHE locally approved pre-existing curriculum offered:
 - on high school campus
 - online
 - via distance learning



Texas College Bridge offers an alternative to support students and achieve district CCMR

Students

- Self-paced, competency-based, on-line course, with evidence of validity
- Provides personalized math and/or English learning
- Free for students
- Applicable beyond 2020

Districts

- Demonstrates college readiness **if ISDs and IHEs sign MOUs** approve the vetted HB5 course
- **Free** for districts (TEA has procured license to cover entire state)
- **Improves district A-F accountability ratings for 2020-2021 (and beyond)**
 - TEA is working to allow data reporting for this year's graduates who demonstrate college readiness through this college prep class through 8/31

Direct enrollment and corequisite opportunity

- It is possible to improve direct college enrollment & increase credit-bearing course attainment as IHE-LEA partnerships are expanded with College Bridge.
- Co-requisite course completion: students complete college prep course AND complete credit bearing 1st level college math & English courses
 - Either this year's students who have already graduated
 - Next year (and beyond) seniors start accessing dual credit



Texas Success Initiative (TSI) Assessment and 2020-21 enrollment

What options can we provide to non-exempt students who are enrolling at higher education institutions?

- For non-exempt students enrolling at higher education institutions in summer 2020, institutions may use either of the following options, depending on other indicators of students' level of preparation, such as HS GPA, HS course-taking, and non-cognitive factors:
 - Enroll the student in the college-level course as part of a corequisite model,
 - Utilize the “exceptional circumstances” provision, to permit a student to enroll in freshman-level academic coursework without assessment but shall require the student to be assessed not later than the end of the first semester of enrollment in entry-level freshman coursework.

Districts and colleges who want to participate in the Texas College Bridge are responsible for the following:

TEA is covering the costs of the online college prep courses and teacher training.



Review the state-wide MOU and establish a partnership between local college and district(s)



Identify and recruit senior graduates who are not college ready



Create student rosters mapped to assigned instructors



Assign a point person



Abide by established timeline



Create a technology plan

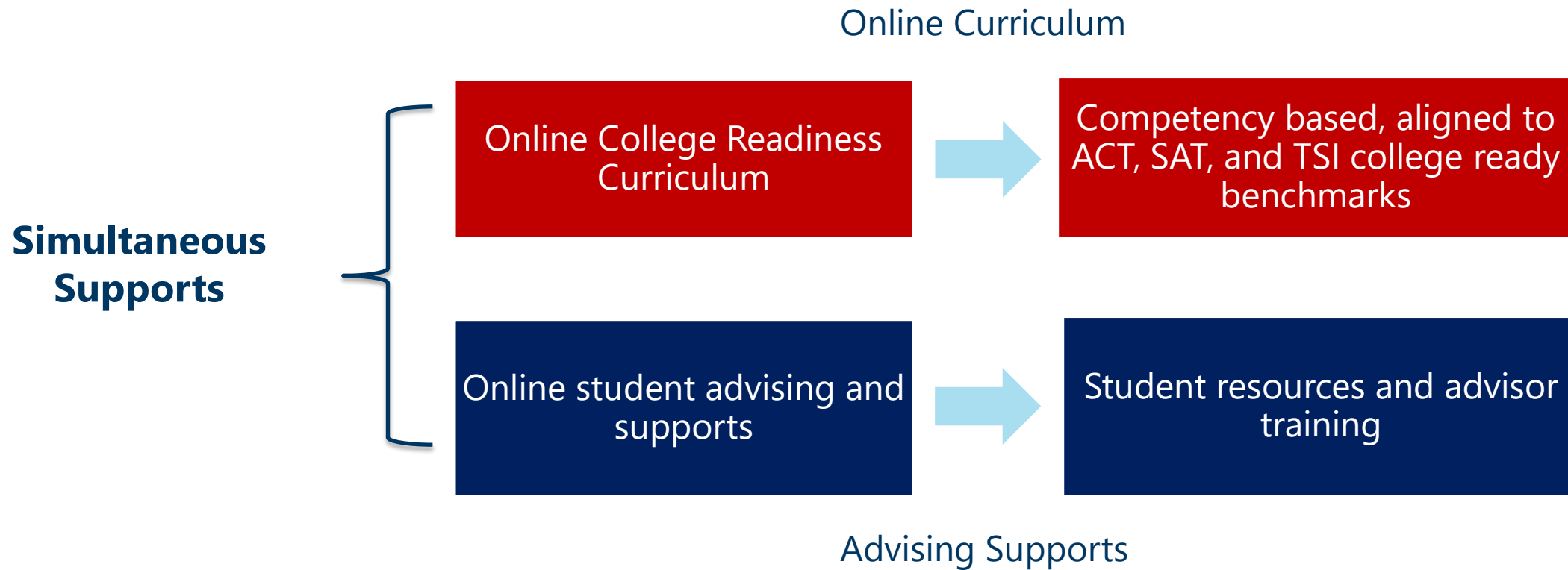


Create a district implementation plan



Monitor student progress

Texas College Bridge provides simultaneous supports



Texas College Bridge – Summer 2020 to Summer 2021



Summer 2020
Phase 1

Graduating/rising
seniors who
have not
demonstrated a
CCMR measure
(ACT, SAT, TSIA,
College Prep
course etc.)

Fall and Spring 2020-2021
Phase 2

Seniors who are
taking HB 5
College Prep
Courses

Summer 2021
Phase 3

Graduating/rising
seniors who
have not
demonstrated a
CCMR measure
(ACT, SAT, TSIA,
College Prep
course etc.)

Texas College Bridge - Online personalized English and math course



<https://nroc.org/what-we-offer/edready/>

Network, Resources, Open, College & Career Partnership (NROC)

- NROC's has been producing results for over a decade and is particularly effective with low-income students
- Courses in both English and math (math in Spanish)
- Offers the ability to demonstrate empirical equivalencies to Texas TSI benchmarks (SAT/ACT/TSIA)

There are other options LEA-IHE's can use besides NROC. But given time constraints of the COVID crisis, this is the only option TEA was able setup for statewide support at this time.

Texas College Bridge - Online personalized English and math course

EdReady
ENGLISH

EdReady
MATH

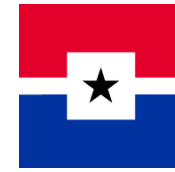
<https://edready.org/home>

- Includes customized teacher training for Texas
- Mapping of math performance to high-demand industry certificates
- Personalized plans for students that focus their efforts on the skills they need to develop
- Students demonstrate mastery of identified content skills before earning a TSI exemption
- Dashboards track student progress and can be monitored by instructors, administrators, and district leaders

Higher Education partners as of June 1, 2020

- Dallas County Community College District
- University of North Texas
- University of North Texas at Dallas
- Texas A&M University at Commerce
- Texas Woman's University

Other higher ed partners are welcome to participate in the statewide MOU or have their faculty review the NROC / EdReady courses. Contact **TexasCollegeBridge@tea.texas.gov**



Dallas County
Community College District



TEXAS WOMAN'S
UNIVERSITY™

MOU available at: www.texascollegebridge.org

Higher Education MOU options

Encourage your IHE partner to consider amending your current shared MOU to incorporate the requirements of the Texas College Bridge program.



Higher ed partners are welcome to participate in the statewide MOU or have their faculty review the NROC / EdReady courses.

- Higher education institutions can access the Texas College Bridge college prep course MOU and faculty curriculum review process on the Texas College Bridge website at <https://texascollegebridge.org>.
- Students who complete the Texas College Bridge course will also demonstrate a multiple measure for immediate college entrance.
- *Note: IHE's may prefer other curricula or technologies. Ultimately, IHEs decide who is college-ready.*

Advising resources are forthcoming

The program will provide advising resources to students and staff to help them navigate the path to enrollment while students complete their College Prep coursework.

For Students*

- Clear, engaging communications that educate students about the following:
 - Career Exploration
 - Aligned Programs of Study
 - Steps to enrollment and financing
 - Connecting to campus resources
- Milestone tracking

For Advisors*

- Advisor-facing learning experience
 - Texas OnCourse Counselor Academy modules
 - Freely available to any district staff engaged in supporting students through transition
- Access to student-facing transition support content
- Ability to track student progress through course

*2020-2021 school year

District registrations steps



Visit www.texascollegebridge.org for detailed information & **Complete the Texas College Bridge participant application.**



Identify and reach out to your students to participate



Submit rosters for NROC course enrollment



Review information on NROC with your IHE to determine if you will use MOU provided through the grant or amend your current MOU for HB 5 college prep courses



Students begin NROC courses



Sign up [for Texas College Bridge Webinar](#) on June 8th 2-3:30pm

2020 Summer Texas College Bridge timeline

Timeline	Required Action
June 4	Districts can access the Texas College Bridge tool kit at www.texascollegebridge.org
June 10	Districts complete the participant application on the website, Districts assign a district point person. Districts approve the Texas College Bridge data sharing agreement
June 23	Deadline to recruit teachers and eligible students
June 24	Submit student rosters
June 26	Deadline for teachers to register for NROC/EdReady training sessions posted on website
July 1 or 2	Teachers attend NROC/EdReady training session
July 6	Students start the Texas College Bridge College Prep courses
July 8 or 9	Teachers, district and campus leaders attend dashboard and student data training
July 31 – Aug 14	Recommended program end data (focus on student enrollment in college)

For additional information,
visit www.texascollegebridge.org

or email
TexasCollegeBridge@tea.texas.gov

DATE:	June 4, 2020
SUBJECT:	House Bill (HB 3) Implementation: Texas Success Initiative Assessment (TSIA) Reimbursement Request
CATEGORY:	Funding Implications
NEXT STEPS:	Share with appropriate staff

This letter details processes and procedures for districts regarding the request for TSIA reimbursement as authorized by House Bill 3 (HB 3) of the 86th Legislative Session, 2019. Included below are the processes and procedures for the submission of the TSIA reimbursement request.

Background

Texas Education Code §48.155 states that a school district is entitled to a reimbursement to help defray the cost of the administration of college preparation assessments (SAT, ACT, or TSIA) to students in the spring of their junior year or during their senior year, beginning in the 2019-2020 school year.

This is a **one-time** reimbursement to districts for the cost of administering **one** college preparation assessment (SAT, ACT or TSIA) **per eligible student**. For the 2019-2020 school year, districts received estimated Foundation School Program allocations. The amount of estimated funding may be found on line 39 of the [Summary of Finance report](#).

Districts will receive estimated funding annually for assessment reimbursement. The Texas Education Agency (TEA) will settle up with districts in the spring of the following year, once all student assessment data is received. If multiple records of a student are reported, **TEA will reimburse the highest cost exam**. If multiple records of a student are reported from several districts, the **first district will be considered**.

TEA released a [To The Administrator Addressed](#) (TAA) letter on February 6, 2020 providing a high-level overview of the entire reimbursement process. In that letter, TEA specified that there would be a separate process for submitting a request for reimbursement of the TSIA.

If the TSIA is the highest cost exam for a student for which the district paid and would like reimbursement, the district must request a reimbursement to TEA that follows the process outlined in this document.

Timeline for Submission of TSIA Requests

On **June 1, 2020**, TEA will open the window for districts to submit a **Qualtrics form** with the required data to request their TSIA reimbursement. This window will close **September 18, 2020**. **TEA will not accept late requests.**

Process for Completion of the Form

Districts must provide required data elements detailed in the spreadsheet to the agency. TEA has provided a template for districts to utilize and/or replicate, along with the instructions on the data needed and the submission process, all of which can be found on our [website](#). Districts will then submit the spreadsheet to TEA through the Qualtrics form.

TEA and College Board Support

TEA will post a recorded webinar on **June 5** to answer questions and walk through the completion of the template and form. Additionally, TEA has collaborated with the College Board to provide instructions on how TSIA administrators can create a custom report and query on the ACCUPLACER platform with the necessary TSIA data requested on the template. This allows those districts who are TSIA administrators or who have a data sharing agreement with an institute of higher education (IHE) an easier ability to find accurate data.

College Board's instructions can be found to TSIA administrators when they log in to the ACCUPLACER platform.

SAT and ACT Submission of Requests

The TAA also outlined a process for submission of requests for SAT and ACT national day reimbursement. Districts **do not** need to submit documentation for SAT and ACT at this time. The SAT and ACT process is different than the TSIA reimbursement request and will be released in **fall 2020**. TEA does plan to utilize TEAL for this process and encourages districts to ensure they have adequate access to the platform.

For Further Information

The template, instructions, and webinar link are located on the College Preparation Assessment [website](#). Additionally, TEA has [FAQs](#) regarding the college preparation assessment reimbursement.

If you have additional questions regarding this correspondence, please contact Advanced Academics at advancedacademics@tea.texas.gov.