

Congressman Proposes End To The Big Standardized Test

Peter Greene

Senior Contributor March 30, 2023

Before he was elected to represent New York's 16th congressional district, [Jamaal Bowman](#) was an educator. As a principal in the Bronx, [he gave strong support to New York's opt out movement](#)—a movement in which families and students chose to refuse to take the state's big standardized test.

Now [Bowman has proposed a big opt out](#) for every school in the nation.

An annual high stakes test used to evaluate school districts gained considerable steam under the Bush administration and No Child Left Behind. The Obama administration upped the testing ante with Race to the Top and an attempt to develop national testing that would be used not just to evaluate districts, but individual schools and teachers.

The notion that educational effectiveness could be measured by a single standardized test of math and reading was always suspect. But the big standardized test [didn't merely fail at its stated purpose](#) in areas [like teacher evaluation and improvement](#); it has been actively corrosive to education in the country, [narrowing the curriculum](#) ("Is it on the test," became the go to question of districts across the country) and taking up countless hours for test preparation.

Bowman has proposed [the More Teaching Less Testing Act](#). Using the flexibility available under the Every Student Succeeds Act (ESSA), Bowman's proposal seeks to improve assessment and accountability, increase student learning time, and help with the nationwide difficulty in filling teaching positions (very few young people think, "I want to become a teacher so I can teach students to pass a big standardized test"). High stakes testing at its worst turns schools upside down, pushing them to focus not on the education that students

need from schools and but to instead focus on the scores that the school needs the students to produce.

The act would eliminate the current federally mandated testing schedule and prohibit states from [using the federally mandated testing as the](#) “sole or dominant factor for large-scale retention policies, high school graduation decisions, teacher evaluations, or school rating systems.”

Introducing the act, Bowman said, “Our public schools have become test based factories where the curriculum has become a test preparation curriculum.”

He continued, “Learning is infinite. And the process of learning should open the infinite doors that are available in life to our children and their families. And instead, over the last 23 years, we have had a myopic, very narrow view of how to measure so-called learning in our schools.”

[Bowman noted in talking with the Washington Post](#) that the experience of testing is different for students in elite schools than in public schools that serve poorer communities, where students typically gain lower test scores and therefore suffer from more pressure to get those test scores up— pressure that eats into time that could be spent on other educational experiences.

“Annual testing doesn’t happen in our most celebrated private schools,” he said, “and I think we need to ask ourselves why that is. Kids in those elite private schools are exposed to a robust comprehensive curriculum. There is no annual testing there. Why are we doing it to our poorest, most vulnerable children? No one has given me a good answer to that question.”

There is [broad support](#) for Bowman’s bill, though its success in the House is difficult to predict. But [Bowman sees the bill](#) as necessary and important.

Peter Greene spent 39 years as a high school English teacher, looking at how hot new reform policies affect the classroom.



MORE TEACHING LESS TESTING ACT

SECTION-BY-SECTION

Sec 1. Short Title

Names the act the “*More Teaching Less Testing Act*”

Sec 2. Findings

This section outlines the body of research and sources that illustrate the harmful impact of the annual statewide summative assessments, in addition to research that debunks claims that standardized tests can measure student learning or growth or that test-based accountability can close achievement gaps. Our current practice of statewide summative assessments limits what is taught and how it is taught in the classroom in ways that prioritize rote memorization over critical thinking and problem solving skills. Teacher surveys also show that high-stakes standardized testing is a common reason cited for teachers leaving the classroom, which exacerbates the nationwide teacher shortage.

Sec. 3. Sense of Congress Relating to Appropriate Uses of Summative Assessment

This section conveys the sense of Congress that in order to support a love of learning that fosters joy, curiosity, creativity, rigor, collaborative problem solving, and 21st century skills, schools need more capacity and resources for meaningful educational experiences. State assessments and accountability systems should support critical thinking and student learning across a range of subjects and skills, but the current ESSA requirements limit classroom instruction, promote memorization, and are not conducive to balanced assessment systems using multiple measures. It further conveys that states should be supported in developing innovative assessment systems that meaningfully measure performance and do not rely on commercial assessment products. Areas for growth that are identified through balanced accountability systems should result in the allocation of both resources and capacity building opportunities, rather than punitive consequences.

Sec. 4. Decreasing Standardized Testing Frequency for Students in Grades 3 through 12

This section removes the federal mandate for annual summative assessments administered to every student every year in grades 3-8 under ESSA and instead empowers states to implement grade span testing (statewide summative assessment once in each grade span of 3-5, 6-9, or 10-12), representative sampling, or a combination of grade-span testing with either representative sampling or matrix sampling.

Sec. 5. Public Comment Period Regarding the Administration of Assessments

This section requires that States carry out a public comment period of at least 90 days to solicit input from a broad community of stakeholders on the annual cap for time allotted to preparing for and administering federally-mandated summative assessment in a school year.

Sec. 6. Establishing a Taskforce to Evaluation Practices and to Promote Quality Teaching

This section creates a Taskforce within the National Center for Education Research charged with identifying:

- the research-based impact of standardized testing on student wellness and learning,
- opportunities to better support states in developing and implementing performance-based assessment systems that center student learning over teaching to the test,
- potential metrics of educational quality and equity that do not rely on standardized assessments, including opportunity to learn data, and
- Barriers that prevent elementary and secondary schools for establishing innovative assessment systems

Sec. 7. Expansion of Innovative Assessment Demonstration Authority

This section amends and improves the Innovative Assessment Demonstration Authority. The section extends the demonstration period to give states more time to develop and implement innovative assessment systems and expands the number of states eligible to participate.

This section further amends comparability requirements, which have made it difficult for states to design and pilot new assessment systems that diverge from traditional multiple-choice end of year tests. This section replaces such comparability requirements with a requirement that the innovative assessment system is of equal or greater rigor than current assessment systems, thus maintaining equity guardrails while empowering states to design more meaningful and balanced assessment systems.

Authorizes \$500 million over 5 years to carry out the Innovative Assessment Demonstration Authority, which had previously been unfunded.

Sec. 8 Authorization of Appropriations

This section authorizes quadrupling Title I-Part A funding for ten years to \$66 billion annually

Sec. 9. Prohibition of funds

This section prohibits states receiving these federal funds from using state assessments as the sole or dominant factor for large-scale grade retention policies, teacher evaluations, or high school graduation decisions. States receiving funds from the ESEA are prohibited from establishing a rating system for K-8 schools and districts that are based on test scores exclusively. States receiving funds from the ESEA are prohibited from establishing a rating system for high schools and districts that are based on test scores and graduation rates exclusively.



More Teaching Less Testing Act

Bill Summary

Our public schools are the heartbeat of our communities and a pillar of our democracy. **They should be funded and supported as such to foster the joy, curiosity, rigor, creativity, collaboration, and problem solving skills of every child to reach their full potential.** Developing the value and ethic of lifelong learning is fundamental to our commitment to educational equity and racial and economic justice. This requires focusing on 21st Century learning skills, wraparound social and health services that center the whole child, and ensuring our educators are afforded the time, space, and resources to provide holistic, experiential, and culturally responsive learning opportunities. High quality assessments, when designed and implemented thoughtfully in service of high quality curriculum, can be an important part of a balanced system that supports continuous, deeper learning and positive outcomes for all students.

The Problem: Today, we spend less time teaching, and more time testing. States are required by the Every Student Succeeds Act to administer statewide summative assessments annually in grades 3-8. **The emphasis on annually testing every student using standardized summative assessments negatively impacts what gets taught in our schools and how it is taught, and is out of step with peer-reviewed research on K-12 assessment.** For too long, limited time and resources in our chronically underfunded public schools have been focused on standardized tests that don't adequately measure learning – or opportunities to learn – and are used inappropriately to make high-stakes decisions about grade retention, graduation, teacher evaluations and more. Furthermore, these high-stakes summative assessments rarely give us the kind of information necessary to fully understand the causes of inequities or to support educators, schools, and districts in providing high quality learning opportunities that meet the needs of every student.

There are a wide range of formative assessment practices that educators, schools and districts can and should be encouraged to develop and use to evaluate student learning, guide teaching, and inform families about their children's progress on a regular basis. Rather than empowering our teachers to use classroom time for experiential, project-based learning experiences, our schools today face tremendous pressure to test prep, or 'teach to the test,' in such a way that often harms our students.

The *More Teaching Less Testing Act* would address these issues by:

- Building on the flexibility of ESSA, promoting ways to improve assessment and accountability for the ultimate purpose of increasing student learning opportunities, and addressing one of the several interconnected factors exacerbating the nationwide teacher shortage.
- Allowing states more flexibility to administer summative assessments and design assessment systems that support high quality teaching and learning. The bill would eliminate the current federally mandated testing schedule for summative assessments in math, reading & language arts, and science, and instead establish the following menu of options for states to choose from:
 - Grade-span testing – states could test each of math, RLA, and science once in each grade span (3-5, 6-9, 10-12)
 - Representative sampling – states could administer assessments in math, RLA, and science to representative samples of students each year in grades 3-8 and once in 9-12
 - Combination testing – states could design a system that uses either of the following combinations:
 - Grade-span + representative sampling
 - Grade-span + matrix sampling
- Engaging educators, school leaders, families and advocates in determining an appropriate limitation on assessment and test preparation time.
- Establishing an Assessment Taskforce to Evaluate Testing Practices and Recommend Assessment Practices that Promote High Quality Teaching
- Authorizing \$66 billion annually for Title I – quadruple the current authorized funding level – to correct chronic underfunding of our public schools and prioritize public education in our federal budget.
- Scaling up and improving ESSA's Innovative Assessment Demonstration program. The bill would authorize \$100 million annually for the program, marking the first time the pilot program has gotten an authorization of dedicated funds.
- Prohibiting states from using federally mandated statewide assessments as the sole or dominant factor for large-scale retention policies, high school graduation decisions, teacher evaluations, or school rating systems.

This bill *does not* eliminate summative assessments, but rather makes space for a more balanced assessment system that allows for both formative and summative assessments in service of high quality teaching and learning that meets the needs of all students.



The *More Teaching Less Testing Act* is endorsed by the following organizations: American Federation of Teachers, NAACP, National Education Association, Network for Public Education, New York State Allies for Public Education (NYSAPE), FairTest, Long Island Opt Out, Advocates for Public Education Policy, NAACP New Rochelle, Education Law Center, Rethinking Schools, National Educators United, Arizona Educators United, National Association for Multicultural Education – GA Chapter, Public Advocacy for Kids, Opt Out Georgia, Support Our Students, Community Voices for Public Education, First Focus Campaign for Children, Texas Kids Can’t Wait, Citizens for Public Schools, Schools and Communities United, Illinois Families for Public Schools, Fairplay, Schools and Communities United, Educators for Democratic Schools, Illinois Federation of Teachers

An Educational Contrarian

Divergent thoughts about education and other pertinent matters

Wednesday, March 29, 2023

Why Commissioner Morath's idea of moving the accountability bar won't do what he claims

(Written in response to Children at Risk supporting Commissioner Morath's desire to move the bar on the state accountability ratings such that a school with a similar result two years running will receive significantly different ratings in those years.)

I would love to sit down with the Children at Risk Folks and show just how misguided their support of TEA's "higher standards" is. Let me first agree, however, that we should absolutely and constantly increase our educational capacity to effectively serve children and prepare them for life. Everything is right with that sentiment.

But states run their accountabilities based on compliance, and therein lies the truly catastrophic problem: no amount of compliance has ever made an organization more effective. But you already know that. Almost every driver on the street has complied with the requirements to obtain a driver's license, but that doesn't also mean we are a country of continuously improving drivers. Almost every school in America complies with FERPA requirements (the privacy rules regarding student data) but having complied they do not also declare their teaching as effective. Every practicing lawyer complied with the requirement to pass the bar, but that does not mean you can presume every law firm runs an ethical and effective practice.

What states have done at the behest of the Federal government is create complex compliance formulas into which they pour test and other data that spit out labels according to a school's level of compliance. It may not feel that way given that testing and graduation rates have long been seen as legitimate research sources for understanding schools, but it doesn't matter how relevant a research tool may be. When schools (or any organization) are asked to comply with a line drawn in the sand based on a piece of research the usefulness of the research as research goes out the window. You will be left with a judgment that may declare a school effective or ineffective, but that judgment will be as invalid as declaring that an organization filled with people who complied with a criminal background check are all great at their jobs. Thinking it won't make it so, and acting on it will make the organization less, not more effective.

Which explains why after thirty years of test-based accountability almost none of the far-reaching policy goals behind education have been met—policy makers selected an accountability methodology that isn't interested in schools becoming more effective. And so the harder schools try within that model, the less capacity they will have to focus on how to become more effective, which in turn puts them at risk for becoming less effective than they were. And now TEA wants to double down on what has not and cannot work.

Google Campbell's Law if you doubt me—he says it way better than I do.

So when Children at Risk or any other advocacy group stands up and supports TEAs desire for higher standards, all I ask is that they realize what they are asking for: the compliance line to be moved. And then I would remind them that no organization, ever, has made itself more effective through compliance. Which leaves a legitimate goal dangling in the air that will never be achieved through the selected means to get there.

So please don't anyone blindly support TEA's desire to move the bar and increase the public's perception of school failure that is the only guaranteed outcome from this nonsense. Rather, please oppose a methodology that will not aid the larger goals Children at Risk and so many other well-intentioned organizations have.

And realize that there are accountability models out there that are exclusively about an organization's effectiveness and that can be shown to be infinitely better at encouraging educational effectiveness. Which is truly what we should all be advocating for.

Advocacy for public schools...

...is critical. Education is a complex undertaking. Understanding it often requires new perspectives which can be placed next to the original and show us what we might otherwise have missed. Generating these perspectives is the purpose of this site.

See Tweets @testsensejt

About Me



John Tanner

San Antonio, Texas, United States

[View my complete profile](#)

John Tanner is a writer, educational thinker, and a passionate advocate for public schools. He is the founder and executive director of Test Sense which is now [bravEd](#), an organization committed to supporting educators in the conversion to a true educational accountability.

The Pitfalls of Reform

My book, *The Pitfalls of Reform*, is available through Amazon and the other online retailers or directly from the publisher, which you can access by clicking [here](#).

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March 6, 2023

Governor Greg Abbott
Office of the Governor
P.O. Box 12428
Austin, Texas 78711-2428

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

The Honorable Brandon Creighton
Chairman, Senate Education Committee
P.O. Box 12068
Austin, Texas 78711

The Honorable Brad Buckley
Chairman, House Public Education Committee
P.O. Box 2910
Austin, Texas 78768

Dear Governor Abbott, Commissioner Morath, Chairman Creighton, and Chairman Buckley,

Over the past several months, the Texas Education Agency has been working on an “A-F Accountability Refresh” to roll out with the 2023 Accountability Ratings. The TEA states that the purpose of the refresh is to “refocus on goals that directly address post-pandemic student needs” and to “allow Texas to leverage lessons learned over the last five years to improve the rigor, transparency, and fairness of the accountability system.”

These are certainly admirable goals. However, we write today with significant concerns regarding the proposed update to the College, Career, and Military Readiness (“CCMR”) cut scores as part of the refresh and the fact that the TEA has chosen to implement this refresh at the same time as another major change, the redesigned STAAR exam. The undersigned districts have enrollment ranging from less than 100 to over 100,000 students, and collectively we educate more than 2.7 million Texas students. We request that the TEA pause its planned refresh so that the legislature can re-evaluate the accountability system holistically.

The TEA proposes to raise the cut score necessary for a high school to receive an “A” in the CCMR domain from a 60 to an 88, a nearly 47% increase in one year and apply this increased cut score to students who graduated in 2022. Districts no longer have any influence over the performance of those students, and it is unreasonable to apply new standards retroactively, particularly because these students will not benefit from the “improve[d] rigor, transparency, and fairness [of] the accountability system.”

According to materials published by the TEA, the newly proposed cut score was set for two primary reasons: 1) too many schools are performing above the 60 point threshold; and 2) 68% of students who are deemed college, career, or military ready, sustain postsecondary success one year after graduation.

The TEA states that one of the goals of the A-F Accountability System as a whole is to ensure that no forced distribution exists and that all schools have the opportunity to achieve an A rating. As a result, it is perplexing that the TEA would use the justification that too many schools are receiving an A for CCMR to raise the cut score.

Additionally, the fact that only 68% of students who are deemed college, career, or military ready are sustaining postsecondary success one year after graduation suggests that either the components used by the TEA to measure such readiness are inadequate, or that issues in higher education may be hindering otherwise prepared students from succeeding. Both of these likely play a role in this issue. For example, the TEA emphasizes a certain list of “industry-based certifications,” however, many of those certifications are not truly of value in the workforce. But because the TEA emphasizes those certifications, many schools feel compelled to spend resources promoting them instead of focusing on other potential opportunities for students to become prepared for postsecondary success.

These significant changes to the cut score for CCMR will have drastic impacts to school ratings across Texas. The A-F system was designed to make it easier for the public to understand how schools are truly performing. But increasing the cut score for an A for CCMR by almost 47% in a single year will create the misconception that high performing schools are drastically declining, even if their CCMR performance actually improved. In the midst of a teacher shortage, the last thing school districts need is another false narrative that drives a wedge between schools and the families they serve. No public relations campaign from the TEA will be adequate to combat the misperception that our schools are suddenly worse than they were last year.

House Bill 977 would create an Assessment and Accountability Commission to fully review the current system and make recommendations regarding improvements to how we measure success and communicate school performance to parents. The legislature has used the commission model with great success to address other complex issues over the past few sessions and should apply this same model to the A-F Accountability System.

Moving forward with the planned refresh is irresponsible as it will cause significant confusion among the community, put increased pressure on teachers and other staff who are already at their breaking point, and wrest the policy decisions of how we should hold our schools accountable away from the elected representatives of the people leaving them in the hands of unelected bureaucrats. We urge the TEA to pause its accountability refresh and allow the legislature to examine the system and make the policy determinations of what Texans expect from their schools, as they were elected to do.

Sincerely,

A+ Unlimited Potential	Atlanta ISD	Brock ISD	Cedar Hill ISD
Charter School	Austin ISD	Brownfield ISD	Celeste ISD
Abernathy ISD	Azle ISD	Brownsboro ISD	Channing ISD
Alamo Heights ISD	Bandera ISD	Buena Vista ISD	Chapel Hill ISD
Albany ISD	Bells ISD	Buffalo ISD	Chico ISD
Aldine ISD	Benjamin ISD	Burkburnett ISD	Chilton ISD
Aledo ISD	Beta Academy	Burkeville ISD	Claude ISD
Alief ISD	Birdville ISD	Burleson ISD	Clear Creek ISD
Allen ISD	Bland ISD	Caddo Mills ISD	Comal ISD
Alvin ISD	Blue Ridge ISD	Callisburg ISD	Coppell ISD
Alvord ISD	Bonham ISD	Campbell ISD	Corpus Christi ISD
Anahuac ISD	Bosqueville ISD	Canadian ISD	Corsicana ISD
Angleton ISD	Boyd ISD	Canyon ISD	Crawford ISD
Aransas County ISD	Brazosport ISD	Carrollton-Farmers	Cross Roads ISD
Argyle ISD	Bridgeport ISD	Branch ISD	Crowell ISD

Cushing ISD	Hays CISD	New Waverly ISD	Springtown ISD
Cypress-Fairbanks ISD	Honey Grove ISD	Newton ISD	Sudan ISD
Daingerfield-Lone Star ISD	Houston ISD	Northside ISD	Sundown ISD
Dallas ISD	Huffman ISD	Northwest ISD	Sunnyvale ISD
Damon ISD	Hull-Daisetta ISD	Oakwood ISD	Taylor ISD
Danbury ISD	Humble ISD	Odem-Edroy ISD	Tenaha ISD
Dayton ISD	Hutto ISD	Orange Grove ISD	Terrell ISD
Decatur ISD	Ingleside ISD	Palmer ISD	Texas School of the Arts
Del Valle ISD	Ingram ISD	Pampa ISD	Tornillo ISD
Denison ISD	Iowa Park CISD	Panhandle ISD	Treetops School
Denton ISD	Irving ISD	Paradise ISD	International
Detroit ISD	Italy ISD	Paris ISD	Trinity ISD
Dickinson ISD	Jacksboro ISD	Patton Springs ISD	Utopia ISD
Dodd City ISD	Jasper ISD	Pearland ISD	Van Alstyne ISD
Dr. M.L. Garza-Gonzalez	Jim Ned CISD	Pecos-Barstow-Toyah ISD	Van ISD
Charter School	Katherine Anne Porter	Pettus ISD	Vega ISD
Duncanville ISD	School	Pewitt CISD	Victoria ISD
Eagle Mountain-	Katy ISD	Pittsburg ISD	Waller ISD
Saginaw ISD	Kaufman ISD	Plains ISD	Warren ISD
East Chambers ISD	Keller ISD	Plano ISD	Water Valley ISD
Edgewood ISD	Kelton ISD	Poolville ISD	Waxahachie ISD
El Paso ISD	Kennedale ISD	Port Aransas ISD	Weatherford ISD
Era ISD	Kerens ISD	Pottsboro ISD	West ISD
Farmersville ISD	Ki Charter Academy	Pralrie Valley ISD	West Orange-Cove CISD
Fayetteville ISD	Kingsville ISD	Prairiland ISD	Westlake Academy
Flour Bluff ISD	Klein ISD	Prosper ISD	Charter School
Follett ISD	Knox City-O'Brien CISD	Queen City ISD	Wheeler ISD
Forestburg ISD	Krum ISD	Red Lick ISD	White Deer ISD
Forney ISD	La Vega ISD	Red Oak ISD	Whitewright ISD
Forsan ISD	Lago Vista ISD	Rice ISD	Whitney ISD
Fort Bend ISD	Lancaster ISD	Richardson ISD	Willis ISD
Fort Davis ISD	Leander ISD	Rio Hondo ISD	Wylie ISD
Fort Stockton ISD	Lewisville ISD	Riviera ISD	Zapata County ISD
Fort Worth Academy of	Liberty Hill ISD	Rockwall ISD	
Fine Arts	Liberty ISD	Rogers ISD	North Texas Commission
Fort Worth ISD	Liberty-Eylau ISD	Round Rock ISD	Texas ASCD
Freer ISD	Lipan ISD	Royse City ISD	Career and Technical
Frisco ISD	Little Elm ISD	S&S CISD	Association of Texas
Frost ISD	London ISD	Sands CISD	Raise Your Hand Texas
Fruitvale ISD	Lubbock ISD	Savoy ISD	
Gainesville ISD	Lubbock-Cooper ISD	Schertz-Cibolo-Universal	
Galena Park ISD	Lufkin ISD	City ISD	
Garland ISD	Mabank ISD	Sealy ISD	
Gatesville ISD	Mansfield ISD	Seguin ISD	
Graford ISD	McKinney ISD	Seminole ISD	
Grand Prairie ISD	Melissa ISD	Shallowater ISD	
Grandview ISD	Mesquite ISD	Slaton ISD	
Grapevine-Colleyville ISD	Miami ISD	Slidell ISD	
Gregory-Portland ISD	Miles ISD	South San Antonio ISD	
Groesbeck ISD	Montgomery ISD	Spearman ISD	
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March 23, 2023

Dr. Mike Waldrip and Co-signed Superintendents,

Thank you for your letter. I appreciate the feedback and certainly welcome your insights. The process of setting goals for how well schools are supporting students and the process of communicating how well schools are meeting those goals to parents, educators, and our communities are both critical duties of local school boards and of the state, and those processes require careful consideration to ensure we are best supporting students. I understand your concerns about the update to the College, Career, Military Readiness (CCMR) cut scores, and we have made significant adjustments to our plans based on feedback received in the past few months as cut points have been available, and since we began discussions on these possible changes over a year ago. As noted below, we are exploring additional adjustments based on your feedback.

The A–F accountability system was established by House Bill 22 in 2017 in order to “continuously improve student performance to achieve the goals of eliminating achievement gaps based on race, ethnicity, and socioeconomic status and to ensure the state is a national leader in preparing students for postsecondary success.” In 2017, cut points for CCMR were set for the first time under the new A–F system. We conducted extensive outreach at that time, soliciting feedback from district leaders, educators, parents, and the general public to inform criteria that should be used in setting cut points that are consistent with excellence, the conceptual standard associated with receiving an “A”. There was remarkable consensus then, and now. Most district leaders, educators, and parents recommended we use a cut point of 90 percent or above as the percentage of CCMR graduates that represented excellence and should generate an “A”. Though we appreciated this feedback, setting a cut score that high then would have been inconsistent with the statutory goals of the system. While a 90 percent cut score is a level consistent with Texas being a national leader in preparing students, it would have been a largely unattainable goal since very few campuses had recently performed at that level (average performance was 47 percent based on prior baseline data), and therefore failed to work as a mechanism to meet the statute’s requirement of supporting continuous improvement. So, the cut point was set at 60 percent in 2017, which was at least consistent with the state’s 60x30 goals, even though those goals applied to individuals aged 25 and higher and were based on post-secondary attainment, not readiness.

In your letter, you assert that this change is being made because “too many schools are performing above the 60-point threshold.” That assertion is not correct. Since 2017, CCMR performance in Texas has improved significantly, with 65 percent of students in the class of 2021 graduating college, career, or military ready. This tremendous progress is a result of your hard work and that of our teachers and school leaders and should be celebrated. However, the statutory requirements related to establishing accountability standards continue to apply. Specifically, the agency is required to set cut points that continuously improve student performance toward the goal of ensuring the state is a national leader in preparing students for postsecondary success. It is no longer necessary to adopt a significantly lower standard than the broadly agreed upon 90 percent cut point for the purposes of setting reasonably achievable goals to drive continuous improvement of student performance. But we have still recommended a slightly lower standard of 88. That is reasonable given statutory requirements, as it is

consistent with at least 60 percent of graduates continuing on to a preliminary post-secondary attainment milestone one year after high school. Ultimately, we will need to set the cut point for CCMR at 90 percent, hopefully with the next periodic update to A-F standards as student performance continues to improve in the coming years.

One concern you express about the proposal has to do with the size of the cut point increase in one year. Before A–F became law with HB 22 in 2017, Texas accountability rules were changed every year, with goals for students constantly increasing each year. After hearing testimony that the state was *continuously moving the goal posts*, the Legislature determined that it was important to keep the cut scores static for a period of time and only periodically update the cut scores. With A–F, that commitment was made to maintain the same calculations and cut points “periodically”, for up to five consecutive years without annual changes, to provide certainty for districts and to allow for better year-over-year data comparisons. Had the prior law requirements remained in force, there would have been cut score increases for CCMR each year for the last five, so that this year’s change would be only a few percentage points to reach 88. Instead, the HB 22 statutory framework has enabled apples-to-apples comparisons in ratings for the last five years, as no cut points have been changed during that time. But statute still requires an increase in cut points, and so the changes made this year reconcile the improvements over the last five years to bring us closer to the ultimate 90 percent standard.

It is also important to note the holistic nature of the accountability system when analyzing any individual component. A–F ratings reflect the better of achievement or progress, combined with closing the gaps. For a high school or K-12 campus, the impact of the updated CCMR cut points may range from 0% to 35% of the campus’ overall rating. At a typical district with roughly 40% of students in HS, the impact of updated CCMR cut points would range from 0% to 14%. This would mean that if all HS campuses decrease their CCMR score by 10 points, the districts’ overall rating would decrease by 1 point. The true impact of the A–F refresh changes will become clear in the next two months, as the agency will release *What If* calculations applied to the most recent school year, so that school leaders around the state can know with certainty how the A–F methodology changes impact each of their campuses.

Another concern you raise is related to the timeline of data used for accountability. For as long as there has been an accountability system for public schools in the state of Texas, schools have been rated on a combination of current year and prior year data. Data from some portions of the A–F system are available in the current year, notably STAAR. But data used to issue accountability ratings related to high school graduating classes has always lagged one year. This includes graduation rate data. Prior to HB 22, it also included college readiness indicators like SAT or ACT. Since A–F, it has also included the CCMR indicators. The reason for this is the delay in data availability – students typically graduate around June, but there are summer graduates through August. The agency has not been able to discover a functional way for districts to submit all the required data to the agency in time for it to be accurately processed for fall ratings. Given this, when rating methodologies are changed, the methodology applies to all data currently available for the effective year of the rating. Prior to HB 22, as cut points were changed every year, this was also the case. As a result, cut point changes – both those made annually prior to HB 22 and those made periodically now – apply an effective rating for a school for a single year but using data from two years. I have been keenly interested in addressing this more-than-40-year dilemma, but it would involve a series of significant IT changes at TEA and within every school district, would require counting summer graduates in a different

accountability year than on-time graduates, and would also require that ratings be issued each winter, not each fall. All of this would require statutory changes, appropriations, and several years of implementation.

As a reminder, *A–F* uses multiple measures to evaluate campus performance. There are multiple ways that students can demonstrate college, career, or military readiness, and it is important that the state continues to evaluate and update CCMR indicators based on the latest data and research to ensure CCMR indicators are aligned with postsecondary success. The approach to calculating CCMR will remain unchanged through the *A–F* refresh – a student who demonstrates readiness in any area will count toward CCMR, equally.

However, you raise concern about whether all the components of CCMR are proper indicators of post-secondary readiness, noting in particular industry-based certifications (IBCs). The list of IBCs for Public School Accountability is revised bi-annually to ensure relevance and responsiveness to changes in the labor market, based on criteria established in rule, and involves extensive feedback from employers. This bi-annual process causes new IBCs to be added to the list, and some to be removed. A 2-year sunset period for IBCs that come off the list provides districts the opportunity to shift their offerings, even though the industry review process indicates those IBCs are not valuable for students. While it is certainly not advisable to offer students IBCs that do not actually indicate value in a career, it is important to provide some degree of transition time for school leaders.

That being said, TEA analysis has shown that not all CCMR indicators are equally predictive of post-secondary success, and therefore not equal indicators of post-secondary readiness. Given the feedback in your letter, we are exploring whether an alternative approach to CCMR is feasible, which would in some way limit the indicators within CCMR to only those for which there is a stronger evidence base of the indicator's utility in establishing post-secondary readiness. The use of that more limited set of indicators would also require retabulating baseline data, which would end up lower than the current methodology, and would in turn require us to determine a new, lower level for cut scores. This will take some time to perform, but we hope to be able to share information about how it could function with you and other stakeholders in the coming month.

You have also asked that we delay adoption of any rules on this topic to ensure the legislature has a chance to weigh in with possible statutory changes. I agree with your suggestion, and as a result, we will not adopt any final rule until the conclusion of the regular business of the legislature this session.

Once again, I appreciate your feedback. The design of the *A–F* system must balance needs between fairness to schools, rigor for students, and transparency for the public. TEA has engaged a broad array of groups for feedback and as we proceed with rulemaking, we are continuing efforts to reconcile the sometimes conflicting requests from stakeholders while meeting statutory requirements for the public school accountability.

Yours in Service,

A handwritten signature in black ink, appearing to read 'Mike Morath', with a stylized, flowing script.

Mike Morath
Commissioner of Education

Cc: The Honorable Greg Abbott
The Honorable Brandon Creighton
The Honorable Brad Buckley