

Comments Received Regarding Notice of Intent to Submit an Amendment Request to USDE  
During December 20, 2013 – January 10, 2014 Comment Period

**From:** Maria Whitsett [<mailto:mwhitsett@moakcasey.com>]  
**Sent:** Friday, December 20, 2013 8:34 AM  
**To:** Rules (Policy Planning); Zyskowski, Gloria  
**Cc:** Gottardy, Brian  
**Subject:** Comments from Texas School Alliance on 19 TAC Chapter 101, Assessment, Subchapter CC

Dear Dr. Zyskowski:

The following comments are submitted on behalf of the **Texas School Alliance** with regard to proposed 19 TAC Chapter 101, Assessment, Subchapter CC, Commissioner's Rules Concerning Implementation of the Academic Content Areas Testing Program, Division 1, Implementation of Assessment Instruments.

The following language is in the "background" section of the posting at <http://www.tea.state.tx.us/index4.aspx?id=25769808329>, and it seems to suggest that TEA is still contemplating the practice of "banking" test scores for future use at high school campuses for federal accountability purposes: "By administering the Algebra I and grade-level assessments to students taking Algebra I prior to high school, assessment results for the current grade level (e.g., STAAR® Grade 8 mathematics score) can be used for federal accountability purposes at the current campus, **while STAAR® Algebra I results can be applied in a subsequent year at the high school campus.**" (*emphasis added*) However, correspondence from Commissioner Williams to the USDE on November 6, 2013 (accessible from the link provided at <http://www.tea.state.tx.us/index2.aspx?id=25769803880>) stated the following: "{...} Texas does **not** wish to attribute the same Algebra I test score to these students' future high school campuses since the high school campus cannot be legitimately held accountable (favorable or not) for the performance of those students." (*emphasis added*)

We respectfully request that the state clarify its intent with regard to "banking" middle school students' EOC test scores for future use at high school campuses for any accountability-related purposes, and ensure that all districts have accurate information on this issue.

The Texas School Alliance appreciates the opportunity to comment on the proposed rule and welcomes further discussion with you and other Agency staff about this issue.

Kind regards,

Maria Whitsett  
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**From:** Stanton Marwitz <[stanton.marwitz@zephyrisd.net](mailto:stanton.marwitz@zephyrisd.net)>  
**Date:** Mon, 23 Dec 2013 16:53:25 +0000  
**To:** Performance Reporting <[performance.reporting@tea.state.tx.us](mailto:performance.reporting@tea.state.tx.us)>  
**Subject:** Algebra 1

As a district, I don't mind my smart students that are capable of passing both exams to take them. If we have placed the students correctly and they are smart enough to take Algebra 1 in 8th grade, then they should be smart enough to meet the standard in 8th grade. If my smartest students are not allowed to count on the 8th grade scores, then I have eliminated the top scores and lowered my percentage points in 8th grade for the passing rate. I think that there should be two options from TEA so that that the districts are not affected:

- A. Do not allow any of the districts the flexibility to allow 8th graders to take Algebra 1.
- B. Test them on both tests so that I don't lose a test for my credibility on my best students. IF we test them twice, I want their Algebra 1 test score to count the following year with their current grade level.

Thanks,  
Stanton Marwitz  
Zephyr ISD

Comments Received Regarding Notice of Intent to Submit an Amendment Request to USDE  
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**From:** Linda McAnelly [linda.mcanelly@devineisd.org]  
**Sent:** Tue 1/7/2014 4:06 PM  
**To:** Performance Reporting  
**Subject:** Comments on USDE Waiver on Algebra I

To Whom It May Concern:

I am writing to support Commissioner Williams' request for a USDE waiver to eliminate double math testing in Texas for our advanced 8<sup>th</sup> grade math students on both the Algebra I and 8<sup>th</sup> grade STAAR Math Tests. The brightest and best students often choose to take Algebra I in grade 8, but with the federal standards, these bright students will have to take two exams to meet federal standards. The 8<sup>th</sup> grade math exam will cover content learned a year before in 7<sup>th</sup> grade- not over the Algebra I curriculum which is the current content.

Double-testing middle school students enrolled in Algebra I is basically unfair to students and schools for a number of reasons. The Algebra I scores will be attributed to our high school which did not teach those grade 8 students, and to teachers who had no control over student instruction. In addition, our middle school prepares our grade 8 students to perform well on the STAAR Algebra I assessment. However, our middle school is penalized for advancing our 8<sup>th</sup> graders into a high school math course and the middle school has to exclude their best students from their campus performance scores. This is clearly not fair to our middle school teachers who work so hard to advance these bright students! The high school gets the advantage of these scores not the middle school.

Grade 8 students enrolled in Algebra I are learning the Algebra I curriculum standards, and they should test over the STAAR Algebra I assessment which measures their knowledge of Algebra I content standards not over two tests. Requiring these students to double test in grade 8 is unfair, and it sends the wrong message to bright students: bright students are punished for advancing in their curriculum. This is a disincentive to take the more challenging curricular path available in middle school, and may lead to more students dropping from the advanced courses in middle and high school.

Finally, requiring students to double-test for purposes of federal accountability has caused many districts to stop providing high school classes for middle schoolers who are accelerated students. Parents do not want their children tested twice, and some are pulling their children from the advanced math class because of the double testing. This would seriously disadvantage students who move quickly through the mathematics curriculum in grades K–8 and would benefit from taking advanced coursework in middle school. Not offering Algebra I in grade 8 reduces the opportunity to take an advanced mathematics course or another relevant upper-level courses in high school.

I strongly urge USDE to grant Commissioner Williams' waiver request.

Sincerely,

*Linda McAnelly*  
*Devine ISD*  
*Superintendent*

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**From:** ROEL PENA [mailto:r.pena13@ljsd.com]  
**Sent:** Friday, January 10, 2014 4:04 PM  
**To:** Performance Reporting  
**Cc:** Brenda Garcia  
**Subject:** Re: 8th Grade STAAR and Algebra One EOC

My name is Roel Pena and I am an 8th grade math teacher with the La Joya School District. I am also the math department head at my campus. I was told to share my thoughts with you concerning the 8th grade STAAR and Algebra test and taking both tests. I feel that our 8th graders taking Algebra this year should take the Algebra test only. They took the 8th grade test last year (while they were 7th graders) and mastered it. I feel... just my opinion... if they mastered the 8th grade test last year... why should they take it again this year? I hope this email is helpful in TEA making the decision of testing them or not. I hope they only take the Algebra test. These students showed last year they are advanced students and earned their spot in the algebra class this year.

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----- Forwarded message -----

**From:** Brenda Garcia <[b.garcia5@lajoyaisd.net](mailto:b.garcia5@lajoyaisd.net)>  
**Sent:** Fri Jan 10 10:50:03 CST 2014  
**To:** Roberto C Martinez <[r.martinez11@lajoyaisd.net](mailto:r.martinez11@lajoyaisd.net)>, "r.pena13@ljsd.com" <[r.pena13@ljsd.com](mailto:r.pena13@ljsd.com)>, "j.espinoza@ljsd.com" <[j.espinoza@ljsd.com](mailto:j.espinoza@ljsd.com)>, "n.ramirez7@ljsd.com" <[n.ramirez7@ljsd.com](mailto:n.ramirez7@ljsd.com)>, Jose L Perez <[j.perez4@ljsd.com](mailto:j.perez4@ljsd.com)>, "a.montalvo@ljsd.com" <[a.montalvo@ljsd.com](mailto:a.montalvo@ljsd.com)>, Viviana D Cabrera <[v.cabrera@ljsd.com](mailto:v.cabrera@ljsd.com)>  
**CC:** Albert Sandoval , Aissa de la Garza , Belen Martinez , Cesar Limas , Cynthia Ponce , Gloria Ramos , Santana Galvan , Thomas Ocana  
**Subject:** 8th Grade STAAR and Algebra One EOC

Good Morning,

Please email TEA to share your comments about students taking both 8th grade and Algebra One or just the Algebra One test. Do submit your comments by 5 p.m. today if possible.  
[performance.reporting@tea.state.tx.us](mailto:performance.reporting@tea.state.tx.us)

**Brenda Gonzalez-Garcia**  
**MS Math Coordinator**

Sent from my iPad

\*\*\* This Email was sent by an educator at Domingo Trevino Middle School in La Joya Independent School District.