2007
Student Assessment Data Validation Manual

Performance-Based Monitoring System

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Section III: Comments and Questions

Performance-Based Monitoring Data Validation

The Performance-Based Monitoring (PBM) system, which was developed in 2003 in response to state and federal statute, is a comprehensive system designed to improve student performance and program effectiveness. The PBM system is a data-driven system that uses performance and program effectiveness data submitted to the state by local education agencies (LEAs); therefore, the integrity of these data is critical. To ensure data integrity, the PBM system includes annual data validation analyses that use several different indicators to examine district leaver and dropout data, student assessment data, and discipline data. Additional data analyses are conducted as necessary to ensure the data submitted to the Texas Education Agency (TEA) are accurate and reliable.

Differences Between Student Assessment Data Validation Indicators and Other PBM Indicators

As shown in the table on page 2, there are key differences between the student assessment data validation indicators that are used as part of the PBM system and the performance indicators used in the Performance-Based Monitoring Analysis System (PBMAS). A PBMAS performance indicator yields a *__definitive__* result, e.g., 100% of an LEA's students in Grades 3-11 passed the Texas Assessment of Knowledge and Skills (TAKS) mathematics test. A student assessment data validation indicator typically *__suggests__* an anomaly that a local review may ultimately be able to validate. For example, an LEA may report an extraordinarily high number of students absent for a particular statewide assessment. This high number of absences within a given year suggests a data anomaly. However, the LEA may determine, after a local review and verification process, that the high number of absences can be validated.

Because a PBMAS performance indicator yields a definitive result, an LEA's performance on PBMAS indicators is made *__public__*. Because a student assessment data validation indicator typically yields a result that is not definitive, an LEA's initial results on these indicators are *__not made public__*. Results of the student assessment data validation indicators are only released on the Texas Education Agency Secure Environment (TEASE).

Another difference between PBMAS performance indicators and PBM student assessment data validation indicators is the use of standards. A PBMAS performance indicator is based on a *__standard__* that is made public with as much advance notice as possible and that all LEAs can achieve over time. The goal for LEAs on PBMAS performance indicators is progress toward the standard over time. A student assessment data validation indicator is typically based on an *__annual review of data trends__* in

an attempt to identify what data may be anomalous or what trends can be observed. Standards on individual student assessment data validation indicators generally are not, and generally cannot be, made public in advance. The goal for LEAs on PBM student assessment data validation indicators is to report accurate data each year.

The required response by the LEA is also different depending on whether the LEA is identified under a PBMAS performance indicator or a PBM student assessment data validation indicator. LEAs identified with a PBMAS performance indicator concern are generally expected to (a) improve performance; or (b) if the identification of a performance indicator concern occurred because of inaccurate data, improve data collection and submission procedures. LEAs identified as a result of a student assessment data validation indicator are generally expected to (a) validate that their data are, in fact, correct; and (b) if correct data reflect a program implementation concern, address that concern; or (c) if their identification occurred because of incorrect data, improve local data collection and submission procedures.

Differences between Student Assessment Data Validation Indicators and other PBM Indicators				
Indicator Type	**Result**	**Publicly Released**	**Standards**	**LEA Response**
Student Assessment Data Validation	Suggests an anomaly	No	Based on annual review of data trends	Validate accuracy of data locally and, as necessary, improve local data collection and submission procedures or address program implementation concerns
PBMAS	Yields a definitive result	Yes	Based on standards established in advance	Improve performance or program effectiveness or if identification occurred because of inaccurate data, improve data collection and submission procedures

By their very nature and purpose, student assessment data validation indicators may identify some LEAs that are collecting and reporting data that are entirely accurate. **Confirming the accuracy of data is a critical part of the process necessary to validate and safeguard the integrity of the overall PBM system.** As such, the process LEAs engage in to either validate the

accuracy of their data or determine that erroneous data were collected and/or submitted is fundamental to the integrity of the entire system.

Student Assessment Data Validation Indicators: Background

The Texas Education Code (TEC) contains two statutory references that form the basis of the student assessment data validation component of the Performance-Based Monitoring System. TEC §39.075 calls for special accreditation investigations when anomalous data related to reported absences are observed in the administration of the state student assessment program:

> TEC §39.075. Special Accreditation Investigations. (a) The commissioner shall authorize special accreditation investigations to be conducted:
>
> > (1) when excessive numbers of absences of students eligible to be tested on state assessment instruments are determined;

In addition, Texas Education Code §7.028 provides specifically for data integrity monitoring for the purposes of the Public Education Information Management System (PEIMS) and accountability under Chapter 39:

> TEC §7.028. Limitation on Compliance Monitoring. (a) Except as provided by Section 29.001(5), 29.010(a), 39.074, or 39.075, the agency may monitor compliance with requirements applicable to a process or program provided by a school district, campus, program, or school granted charters under Chapter 12, including the process described by Subchapter F, Chapter 11, or a program described by Subchapter B, C, D, E, F, H, or I, Chapter 29, Subchapter A, Chapter 37, or Section 38.003, and the use of funds provided for such a program under Subchapter C, Chapter 42, only as necessary to ensure:
>
> > **. . .**
>
> > (3) data integrity for purposes of:
> > (A) the Public Education Information Management System (PEIMS); and
> > (B) accountability under Chapter 39.

List of 2007 Student Assessment Data Validation Indicators

The following indicators have been developed to meet the statutory requirements described above:

1(i-iv)   Excessive Coding of Absent (Mathematics)
   1(i) All Students
   1(ii) African American Students
   1(iii) Hispanic Students
   1(iv) White Students

2(i-iv)   Excessive Coding of Absent (Reading/ELA)
   2(i) All Students
   2(ii) African American Students
   2(iii) Hispanic Students
   2(iv) White Students

3(i-iv)   Excessive Coding of Absent (Science)
   3(i) All Students
   3(ii) African American Students
   3(iii) Hispanic Students
   3(iv) White Students

4(i-iv)   Excessive Coding of Absent (Social Studies)
   4(i) All Students
   4(ii) African American Students
   4(iii) Hispanic Students
   4(iv) White Students

5(i-iv)   Excessive Coding of Absent (Writing)
   5(i) All Students
   5(ii) African American Students
   5(iii) Hispanic Students
   5(iv) White Students

6(i-iv)   Excessive Coding of "Other" (Mathematics)
   6(i) All Students
   6(ii) African American Students
   6(iii) Hispanic Students
   6(iv) White Students

7(i-iv)   Excessive Coding of "Other" (Reading/ELA)
   7(i) All Students
   7(ii) African American Students
   7(iii) Hispanic Students
   7(iv) White Students

8(i-iv)   Excessive Coding of "Other" (Science)
   8(i) All Students
   8(ii) African American Students
   8(iii) Hispanic Students
   8(iv) White Students

9(i-iv)   Excessive Coding of "Other" (Social Studies)
   9(i) All Students
   9(ii) African American Students
   9(iii) Hispanic Students
   9(iv) White Students

10(i-iv)   Excessive Coding of "Other" (Writing)
   10(i) All Students
   10(ii) African American Students
   10(iii) Hispanic Students
   10(iv) White Students

11   Excessive Coding of Absent (RPTE)

12   Excessive Coding of "Other" (RPTE)

13(i-iv) Excessive Discrepancy between PEIMS Career and Technology Education Status and TAKS Answer Documents Submitted

        13(i) Mathematics

        13(ii) Reading/ELA

        13(iii) Science

        13(iv) Social Studies

Detailed information on all of these indicators is provided in the next section of this manual.

Data Validation Reports

The 2007 student assessment data validation analysis for the indicators listed above is based on the spring 2007 student assessment answer documents submitted by districts for the following assessments: the Texas Assessment of Knowledge and Skills (TAKS), the Texas Assessment of Knowledge and Skills-Inclusive (TAKS-I), the State-Developed Alternative Assessment (SDAA II), and the Texas English Language Proficiency Assessment System (TELPAS). District-level reports and student-level data will be produced for each district identified for further review as a result of this analysis. These reports and data will be available via the Accountability application on TEASE. Districts not identified for further review will receive the following message if they attempt to access the report on TEASE: *"Your district was not identified in the 2007 student assessment data validation analysis, and therefore no report will be generated."*

If a district has been identified for further review on an indicator, this is referred to as "triggering" an indicator. Only the indicators a district triggers will be listed on the report. For example, in the sample report below, only some of the indicators are listed because the district only triggered those specific indicators as shown.

Texas Education Agency
2007 Data Validation Report
Student Assessment Data

Example ISD   Region ZZ

INDICATOR	2007 RATE	2007 NUMERATOR	2007 DENOMINATOR
****

1. EXCESSIVE CODING OF ABSENT (MATHEMATICS)

1(i)	ALL STUDENTS	28.1	25	89
1(iv)	WHITE	20.6	13	63

7. EXCESSIVE CODING OF "OTHER" (READING/ELA)

7(ii)	AFRICAN AMERICAN	15.3	19	124
7(iii)	HISPANIC	18.2	6	33

For detailed information on each of the indicators above, see the 2007 Student Assessment Data Validation Manual available at http://www.tea.state.tx.us/pbm/DIManuals.html.

The data in the sample report above can be interpreted as follows:

EXCESSIVE CODING OF ABSENT (MATHEMATICS)

1(i)   ALL STUDENTS: The district's percent of TAKS, TAKS-I, and SDAA II answer documents coded absent for the All Students group on the 2007 mathematics test was 28.1 percent. (Of 89 total answer documents, 25 were coded absent for the mathematics test.)

1(iv)   WHITE: The district's percent of TAKS, TAKS-I, and SDAA II answer documents coded absent for White students on the 2007 mathematics test was 20.6 percent. (Of 63 total answer documents, 13 were coded absent for the mathematics test.)

EXCESSIVE CODING OF "OTHER" (READING/ELA)

7(ii)   AFRICAN AMERICAN: The district's percent of TAKS, TAKS-I, and SDAA II answer documents coded "other" for African American students on the 2007 reading/ELA test was 15.3 percent. (Of 124 total answer documents, 19 were coded "other" for the reading/ELA test.)

7(iii) HISPANIC: The district's percent of TAKS, TAKS-I, and SDAA II answer documents coded "other" for Hispanic students on the 2007 reading/ELA test was 18.2 percent. (Of 33 total answer documents, 6 were coded "other" for the reading/ELA test.)

Data Validation Requirements for Districts

Districts will be notified by the Program Monitoring and Interventions Division of any required data validation activities and the timelines for completing those activities. Guidance and resource documents that pertain specifically to the performance-based monitoring data validation indicators are available at: http://www.tea.state.tx.us/pmi/datamon/. These documents have been developed to support districts in reviewing their current data reporting and programmatic practices related to student assessment data.

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Student Assessment Data Validation Indicators

Student Assessment Data Validation Indicator #1(i-iv): Excessive Coding of Absent (Mathematics)

This indicator identifies districts with an excessive number of students coded absent (mathematics) on the TAKS, TAKS-I, or SDAA II answer documents.

INDICATOR CALCULATION

$$\text{District absence rate for mathematics} = \frac{\text{District number of students (Grades 3-11) with a TAKS, TAKS-I, or SDAA II answer document coded absent for the mathematics test in spring 2007}}{\text{District number of students (Grades 3-11) for whom a TAKS, TAKS-I, or SDAA II answer document was submitted in spring 2007}}$$

MINIMUM SIZE REQUIREMENTS	NOTES
• Minimum Size Criterion: At least 30 spring 2007 TAKS, TAKS-I, or SDAA II answer documents submitted and at least 5 spring 2007 TAKS, TAKS-I, or SDAA II answer documents coded absent for the mathematics test.	This indicator is calculated for the following groups: • Indicator #1(i): All Students • Indicator #1(ii): African American Students • Indicator #1(iii): Hispanic Students • Indicator #1(iv): White Students Both English and Spanish answer documents are included in the calculation of this indicator.

Student Assessment Data Validation Indicator #2(i-iv): Excessive Coding of Absent (Reading/ELA)

This indicator identifies districts with an excessive number of students coded absent (reading/ELA) on the TAKS, TAKS-I, or SDAA II answer documents.

INDICATOR CALCULATION

$$\text{District absence rate for reading/ELA} = \frac{\text{District number of students (Grades 3-11) with a TAKS, TAKS-I, or SDAA II answer document coded absent for the reading/ELA test in spring 2007}}{\text{District number of students (Grades 3-11) for whom a TAKS, TAKS-I, or SDAA II answer document was submitted in spring 2007}}$$

MINIMUM SIZE REQUIREMENTS	NOTES
• Minimum Size Criterion: At least 30 spring 2007 TAKS, TAKS-I, or SDAA II answer documents submitted and at least 5 spring 2007 TAKS, TAKS-I, or SDAA II answer documents coded absent for the reading/ELA test.	This indicator is calculated for the following groups: • Indicator #2(i): All Students • Indicator #2(ii): African American Students • Indicator #2(iii): Hispanic Students • Indicator #2(iv): White Students Both English and Spanish answer documents are included in the calculation of this indicator.

Student Assessment Data Validation Indicator #3(i-iv): **Excessive Coding of Absent (Science)**

This indicator identifies districts with an excessive number of students coded absent (science) on the TAKS or TAKS-I answer documents.

INDICATOR CALCULATION

$$\text{District absence rate for science} = \frac{\text{District number of students (Grades 5, 8, 10, 11) with a TAKS or TAKS-I answer document coded absent for the science test in spring 2007}}{\text{District number of students (Grades 5, 8, 10, 11) for whom a TAKS or TAKS-I answer document was submitted in spring 2007}}$$

MINIMUM SIZE REQUIREMENTS	NOTES
• Minimum Size Criterion: At least 30 spring 2007 TAKS or TAKS-I answer documents submitted and at least 5 spring 2007 TAKS or TAKS-I answer documents coded absent for the science test.	This indicator is calculated for the following groups: • Indicator #3(i): All Students • Indicator #3(ii): African American Students • Indicator #3(iii): Hispanic Students • Indicator #3(iv): White Students Both English and Spanish answer documents are included in the calculation of this indicator.

Student Assessment Data Validation Indicator #4(i-iv): Excessive Coding of Absent (Social Studies)

This indicator identifies districts with an excessive number of students coded absent (social studies) on the TAKS or TAKS-I answer documents.

INDICATOR CALCULATION

$$\text{District absence rate for social studies} = \frac{\text{District number of students (Grades 8, 10, 11) with a TAKS or TAKS-I answer document coded absent for the social studies test in spring 2007}}{\text{District number of students (Grades 8, 10, 11) for whom a TAKS or TAKS-I answer document was submitted in spring 2007}}$$

MINIMUM SIZE REQUIREMENTS	NOTES
• Minimum Size Criterion: At least 30 spring 2007 TAKS or TAKS-I answer documents submitted and at least 5 spring 2007 TAKS or TAKS-I answer documents coded absent for the social studies test.	This indicator is calculated for the following groups: • Indicator #4(i): All Students • Indicator #4(ii): African American Students • Indicator #4(iii): Hispanic Students • Indicator #4(iv): White Students

Student Assessment Data Validation Indicator #5(i-iv): Excessive Coding of Absent (Writing)

This indicator identifies districts with an excessive number of students coded absent (writing) on the TAKS or SDAA II answer documents.

INDICATOR CALCULATION

$$\text{District absence rate for writing} = \frac{\text{District number of students (Grades 4, 7) with a TAKS or SDAA II answer document coded absent for the writing test in spring 2007}}{\text{District number of students (Grades 4, 7) for whom a TAKS or SDAA II answer document was submitted in spring 2007}}$$

MINIMUM SIZE REQUIREMENTS	NOTES
• Minimum Size Criterion: At least 30 spring 2007 TAKS or SDAA II answer documents submitted and at least 5 spring 2007 TAKS or SDAA II answer documents coded absent for the writing test.	This indicator is calculated for the following groups: • Indicator #5(i): All Students • Indicator #5(ii): African American Students • Indicator #5(iii): Hispanic Students • Indicator #5(iv): White Students Both English and Spanish answer documents are included in the calculation of this indicator.

Student Assessment Data Validation Indicator #6(i-iv): **Excessive Coding of "Other" (Mathematics)**

This indicator identifies districts with an excessive number of students coded "other" (mathematics) on the TAKS, TAKS-I, or SDAA II answer documents.

INDICATOR CALCULATION

$$\text{District "other" rate for mathematics} = \frac{\text{District number of students (Grades 3-11) with a TAKS, TAKS-I, or SDAA II answer document coded "other" for the mathematics test in spring 2007}}{\text{District number of students (Grades 3-11) for whom a TAKS, TAKS-I, or SDAA II answer document was submitted in spring 2007}}$$

MINIMUM SIZE REQUIREMENTS	NOTES
• Minimum Size Criterion: At least 30 spring 2007 TAKS, TAKS-I, or SDAA II answer documents submitted and at least 5 spring 2007 TAKS, TAKS-I, or SDAA II answer documents coded "other" for the mathematics test.	This indicator is calculated for the following groups: • Indicator #6(i): All Students • Indicator #6(ii): African American Students • Indicator #6(iii): Hispanic Students • Indicator #6(iv): White Students Both English and Spanish answer documents are included in the calculation of this indicator.

Student Assessment Data Validation Indicator #7(i-iv): Excessive Coding of "Other" (Reading/ELA)

This indicator identifies districts with an excessive number of students coded "other" (reading/ELA) on the TAKS, TAKS-I, or SDAA II answer documents.

INDICATOR CALCULATION

$$\text{District "other" rate for reading/ELA} = \frac{\text{District number of students (Grades 3-11) with a TAKS, TAKS-I, or SDAA II answer document coded "other" for the reading/ELA test in spring 2007}}{\text{District number of students (Grades 3-11) for whom a TAKS, TAKS-I, or SDAA II answer document was submitted in spring 2007}}$$

MINIMUM SIZE REQUIREMENTS	NOTES
• Minimum Size Criterion: At least 30 spring 2007 TAKS, TAKS-I, or SDAA II answer documents submitted and at least 5 spring 2007 TAKS, TAKS-I, or SDAA II answer documents coded "other" for the reading/ELA test.	This indicator is calculated for the following groups: • Indicator #7(i): All Students • Indicator #7(ii): African American Students • Indicator #7(iii): Hispanic Students • Indicator #7(iv): White Students Both English and Spanish answer documents are included in the calculation of this indicator.

Student Assessment Data Validation Indicator #8(i-iv): Excessive Coding of "Other" (Science)

This indicator identifies districts with an excessive number of students coded "other" (science) on the TAKS or TAKS-I answer documents.

INDICATOR CALCULATION

$$\text{District "other" rate for science} = \frac{\text{District number of students (Grades 5, 8, 10, 11) with a TAKS or TAKS-I answer document coded "other" for the science test in spring 2007}}{\text{District number of students (Grades 5, 8, 10, 11) for whom a TAKS or TAKS-I answer document was submitted in spring 2007}}$$

MINIMUM SIZE REQUIREMENTS	NOTES
• Minimum Size Criterion: At least 30 spring 2007 TAKS or TAKS-I answer documents submitted and at least 5 spring 2007 TAKS or TAKS-I answer documents coded "other" for the science test.	This indicator is calculated for the following groups: • Indicator #8(i): All Students • Indicator #8(ii): African American Students • Indicator #8(iii): Hispanic Students • Indicator #8(iv): White Students Both English and Spanish answer documents are included in the calculation of this indicator.

Student Assessment Data Validation Indicator #9(i-iv): Excessive Coding of "Other" (Social Studies)

This indicator identifies districts with an excessive number of students coded "other" (social studies) on the TAKS or TAKS-I answer documents.

INDICATOR CALCULATION

$$\text{District "other" rate for social studies} = \frac{\text{District number of students (Grades 8, 10, 11) with a TAKS or TAKS-I answer document coded "other" for the social studies test in spring 2007}}{\text{District number of students (Grades 8, 10, 11) for whom a TAKS or TAKS-I answer document was submitted in spring 2007}}$$

MINIMUM SIZE REQUIREMENTS	NOTES
• Minimum Size Criterion: At least 30 spring 2007 TAKS or TAKS-I answer documents submitted and at least 5 spring 2007 TAKS or TAKS-I answer documents coded "other" for the social studies test.	This indicator is calculated for the following groups: • Indicator #9(i): All Students • Indicator #9(ii): African American Students • Indicator #9(iii): Hispanic Students • Indicator #9(iv): White Students

Student Assessment Data Validation Indicator #10(i-iv): Excessive Coding of "Other" (Writing)

This indicator identifies districts with an excessive number of students coded "other" (writing) on the TAKS or SDAA II answer documents.

INDICATOR CALCULATION

$$\text{District "other" rate for writing} = \frac{\text{District number of students (Grades 4, 7) with a TAKS or SDAA II answer document coded "other" for the writing test in spring 2007}}{\text{District number of students (Grades 4, 7) for whom a TAKS or SDAA II answer document was submitted in spring 2007}}$$

MINIMUM SIZE REQUIREMENTS	NOTES
• Minimum Size Criterion: At least 30 spring 2007 TAKS or SDAA II answer documents submitted and at least 5 spring 2007 TAKS or SDAA II answer documents coded "other" for the writing test.	This indicator is calculated for the following groups: • Indicator #10(i): All Students • Indicator #10(ii): African American Students • Indicator #10(iii): Hispanic Students • Indicator #10(iv): White Students Both English and Spanish answer documents are included in the calculation of this indicator.

Student Assessment Data Validation Indicator #11: Excessive Coding of Absent (RPTE)

This indicator identifies districts with an excessive number of students coded absent on the TELPAS answer documents.

INDICATOR CALCULATION

$$\text{District absence rate for the RPTE} = \frac{\text{District number of students (Grades 3-12) with a TELPAS answer document coded absent for the RPTE test in spring 2007}}{\text{District number of students (Grades 3-12) for whom a TELPAS answer document was submitted in spring 2007}}$$

MINIMUM SIZE REQUIREMENTS	NOTES
• Minimum Size Criterion: At least 30 spring 2007 TELPAS answer documents submitted and at least 5 spring 2007 TELPAS answer documents coded absent for the RPTE test.	

Student Assessment Data Validation Indicator #12: **Excessive Coding of "Other" (RPTE)**

This indicator identifies districts with an excessive number of students coded "other" on the TELPAS answer documents.

INDICATOR CALCULATION

$$\frac{\text{District "other"}}{\text{rate for the RPTE}} = \frac{\text{District number of students (Grades 3-12) with a TELPAS answer document coded "other" for the RPTE test in spring 2007}}{\text{District number of students (Grades 3-12) for whom a TELPAS answer document was submitted in spring 2007}}$$

MINIMUM SIZE REQUIREMENTS	NOTES
• Minimum Size Criterion: At least 30 spring 2007 TELPAS answer documents submitted and at least 5 spring 2007 TELPAS answer documents coded "other" for the RPTE test.	

Student Assessment Data Validation Indicator #13(i-iv): **Excessive Discrepancy between PEIMS Career and Technical Education (CTE) Status and TAKS Answer Documents Submitted**

This indicator identifies districts with an excessive discrepancy between the number of students coded with CTE Indicator Code "2" or "3" in PEIMS but not coded with CTE Indicator Code "2" or "3" on the TAKS or TAKS-I answer documents.

INDICATOR CALCULATION

$$\text{District discrepancy rate for CTE coding} = \frac{\begin{array}{c}\text{District number of students (Grades 9-11) coded with CTE Indicator Code "2" or "3" in}\\\text{PEIMS in fall 2006 but not coded with CTE Indicator Code "2" or "3" on the spring 2007}\\\text{TAKS or TAKS-I answer documents}\end{array}}{\begin{array}{c}\text{District number of students (Grades 9-11) coded with CTE Indicator Code "2" or "3" in}\\\text{PEIMS in fall 2006 and tested on TAKS or TAKS-I in spring 2007}\end{array}}$$

MINIMUM SIZE REQUIREMENTS	NOTES
• Minimum Size Criterion: At least 30 students in Grades 9-11 coded with CTE Indicator Code "2" or "3" in PEIMS in fall 2006 and tested on TAKS or TAKS-I in spring 2007.	This indicator is calculated for the following subject areas: • Indicator #13(i): Mathematics • Indicator #13(ii): Reading/ELA • Indicator #13(iii): Science • Indicator #13(iv): Social Studies

COMMENTS AND QUESTIONS:

Questions about the *2007 Student Assessment Data Validation Manual* should be addressed to:

Address: **Division of Performance-Based Monitoring**
     Texas Education Agency
     1701 North Congress Avenue
     Austin, Texas 78701-1494
Phone: **(512) 936-6426**
Fax: **(512) 475-3880**
Email: pbm@tea.state.tx.us

Comments on the Student Assessment Data Validation Indicators:

Comments on the 2007 Student Assessment Data Validation Indicators are welcome and will assist the agency in its evaluation and future development efforts. Comments may be submitted to **Rachel Harrington, Division Director, Division of Performance-Based Monitoring, Texas Education Agency, 1701 North Congress Avenue, Austin, Texas 78701-1494 or sent via e-mail to pbm@tea.state.tx.us.** Comments should be provided no later than May 16, 2008 in order to allow sufficient time for consideration during the 2008 data validation development cycle.

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Division of Performance-Based Monitoring
Texas Education Agency
1701 North Congress Avenue
Austin, Texas 78701-1494