The objective for the third meeting of the 2018 Accountability Technical Advisory Committee (ATAC) was to review feedback from the U.S. Department of Education and make final recommendations for the commissioner on the A–F accountability system established by House Bill (HB) 22. TEA responses to questions and concerns given during the meeting are provided in red. Some questions will require staff research and are yet to be answered. The following is a summary of the discussion at the meeting.

- TEA welcomed the committee.
- Committee members reviewed the latest Student Achievement domain model beginning with the inclusion of substitute assessments and discussed options for the School Progress domain.
 - Questions
 - Where is the list of substitute assessments? [https://tea.texas.gov/About_TEA/Laws_and_Rules/Commissioner _Rules_(TAC)/Proposed/17_04_Proposed_Amendment_to_19_ TAC_%C2%A7101_4002/]
 - With enough substitute assessments, is it possible a very qualified student could enter high school needing only the U.S. History EOC to graduate? [Yes.]
 - The School Progress, Part A domain chart shows that if a student achieves the Masters Grade Level standard in the current year, regardless of prior year performance, a full point is awarded for growth. If substitute assessments are included at the Masters Grade Level standard, why not award a full point for growth? [The consolidated accountability file (CAF) that districts receive will not have a growth measure for these students; therefore, TEA would have to manipulate the data and districts would have to make the same adjustments locally to have an accurate picture of outcomes for the School Progress, Part A domain. For the sake of transparency, this method is unfavorable.]
 - For those districts that do not have the means to administer the PSAT to all their students, is the inclusion of substitute assessments fair?
 - Will the SAT scores included be the best or most recent? [We are working with the College Board and ACT to obtain multiple years of data to include the best result. This will likely go into effect next year.]
 - Concerns
 - The inclusion of substitute assessments in the Student Achievement domain affects outcomes for the School Progress, Part A and the Top 25% Student Progress distinction designation if these students are not given a progress measure. These are often high performing students. In some districts, 75 percent of students would be able to use a substitute assessment for English

I. Consequently, using substitute assessments could have an unintended negative impact on growth the following year.

- Districts may discourage students from participating in college pathway assessments because of possible negative accountability implications.
- Using substitute assessments in the Student Achievement domain while excluding these results from School Progress, Part A sends mixed signals about the value of substitute assessments.
- Earning a passing score on the PSAT is not comparable to earning Masters Grade Level on a STAAR EOC. [According to the College Board, "The grade level benchmarks associated with the PSAT/NMSQT, PSAT 10, and PSAT 8/9 are based on expected student growth toward the SAT benchmarks at each grade level. The SAT college and career readiness benchmarks now indicate a 75% likelihood of achieving at least a C in first-semester, creditbearing college courses in related subjects and course work." This is comparable to the correlation between achieving the Masters Grade Level standard on STAAR EOCs and college readiness.]
- Suggestions
 - In the future, each substitute assessment should have three performance level descriptors based on performance outcomes.
 - Substitute assessments should be included in all domains.
- Recommendations
 - A majority of the committee voted to maintain the inclusion of substitute assessments at the Masters Grade Level standard in the Student Achievement domain for this year but would like to explore options for creating multiple performance standards for each substitute assessment in the coming years.
 - A majority of the committee recommended to include high schools in Student Progress, Part A. Even though there are limited progress measures for high school students, this methodology maintains the intent that School Progress evaluate progress rather than solely relative performance.
 - Members recommended that the bottom threshold for Cs be lowered in the School Progress, Part B domain to increase the number of Cs and decrease the number of Ds and Fs.
 - The School Progress letter grade should be the better of part A or B.
- Committee members considered the transition from awarding credit for graduates enrolled in a CTE-coherent sequence to graduates who earned an industry-based certification.
 - Concerns
 - This is a substantial problem for districts that presently have students completing CTE-coherent sequences. Changing the methodology now wouldn't award credit for these students.

- The time and cost to implement a pathway toward the specified 74 industry certifications should be considered. As such, CTEcoherent sequence should be phased out rather than removed immediately.
- Suggestions
 - Consider phasing out the inclusion of CTE-coherent sequence for CCMR over several years.
 - Compile a list of courses that are on the path to the industry certifications.
- Recommendation
 - The committee voted unanimously to phase out the inclusion of CTE-coherent sequence as follows:
 - For 2018 and 2019 accountability, prior-year graduates who were reported as enrolled in a CTE-coherent sequence will credit CCMR with one point.
 - For 2020–22 accountability, prior-year graduates who were reported as enrolled in a CTE-coherent sequence will credit CCMR with half a point; prior-year graduates who were on a path to industry certification will credit CCMR with one point; prior-year graduates who earned an industry certification will credit CCMR with one point.
 - For 2023 accountability, prior-year graduates who earned an industry certification will credit CCMR with one point. Prior-year graduates who were reported as enrolled in a CTE-coherent sequence and did not earn an industry certification will no longer credit CCMR with any points.
- Committee members discussed the graduation rate component of the Student Achievement domain, the weight of each of the components in the domain, and cut points for the Student Achievement domain letter grades.
 - Questions
 - Will the Student Achievement domain only include STAAR for campuses that opened this year? [Yes, because data for CCMR lags by one year.]
 - Will IEP graduates appear in the six-year rate?
 - What is a "school of choice" for accountability purposes? [The agency is exploring options to better identify campuses with selective enrollment practices.]
 - Concerns
 - Schools of choice will likely figure in heavily at the top of the letter grade range.
 - It will be difficult to rebalance the distribution or otherwise correct course with the agency's goal to hold the system static for five years. [In hopes of allowing districts and campuses to evaluate longitudinal performance, the agency would like to maintain

targets but realizes that there may need to be minor adjustments made to the system.]

- Perhaps awarding As to the top 10 percent of campuses is too few. Some other reports produced outside of the agency award As to the top 25 percent.
- Current modeling shows 23 percent of elementary campuses will receive a D or F in Student Achievement. Elementary campuses are most challenged with improving outcomes of English learners.
- Suggestions
 - Consider weighting STAAR, CCMR, and graduation rates at 40-40-20 respectively for Student Achievement.
 - Use equal weights for Student Achievement to better emphasize the value of graduating from high school.
- Committee members reviewed the Closing the Gaps domain considering the U.S. Department of Education response to the ESSA state plan.
 - Questions
 - To meet the participation rate requirements of ESSA, is the intent to add "artificial failers" up to 95 percent and *then* apply the accountability subset rules or apply the accountability subset first? [The intent is to add enough results back into the participation denominator to get to 95 percent. This will only apply to the Academic Achievement indicator in the Closing the Gaps domain.]
 - What will be the overall effect of adding "artificial failers" based on 2017 accountability results?
 - Concerns
 - For small campuses with few mobile students, these "artificial failers" could be a big issue as they are less likely to drop out of the accountability subset.
 - It is distinctly possible that many of the best results will be excluded from the Closing the Gaps domain growth calculations through substitute assessments.
 - The Academic Achievement indicator targets will be hard to maintain.
 - With different growth targets for different groups leading to different final outcomes, campuses will never actually "close the gaps."
 - K–3 campuses won't receive a growth measure.
 - There is still the continuing issue of one student counting for several different indicators.

Suggestions

Adjust the targets for the Academic Achievement indicator for 2017–18 through 2021–22 to the baseline targets. Weight the Academic Achievement indicator at 40 percent, the federal graduation rate at 10 percent, the EL proficiency status at 10 percent (once available), and CCMR at 40 percent.

- Committee members expressed frustration at the lack of impact ATAC is having on the development of the new accountability system.
 - Concerns
 - Members are feeling like a box to be checked.
 - The voice of ATAC is heard then discarded.
 - This is a wasted opportunity to receive and incorporate ATAC feedback.
 - This system strains credibility with so many failures based on one test on one day.
- TEA staff recounted major points raised during day one.
 - Concerns
 - The agency has been unresponsive to ATAC concerns in general.
 - The inclusion of substitute assessments will affect growth measures throughout the accountability system.
 - The exclusion of CTE-coherent sequence will unfairly affect the CCMR component for many campuses and districts. These changes are happening well after the fact and counter to district plans.
 - Closing the Gaps Academic Achievement indicator targets are too high. The committee recommends adjusting the targets for 2017– 18 through 2021–22 to the baseline targets.
 - Schools of choice will unfairly occupy the higher letter grades in this new system.
 - The ATAC notes are not accurately reflecting the atmosphere of the discussion and conviction of the participants.
- Committee members reviewed scaling and methodology for overall grades.
 - Questions
 - Will the raw scores change every year? [The goal is to hold the scaled scores constant for five years.]
 - How is an outlier defined for the School Progress, Part B domain?
 - Could an overall C campus be designated for comprehensive support based on the Closing the Gaps domain?

- Concerns
 - It seems surprising that 56 percent of high schools would have a better outcome in the Student Achievement domain rather than the School Progress domain.
 - Many more campuses will be identified as Ds and Fs than in the former accountability system.
- Suggestions
 - There must be tangible descriptions of these grades. The agency should be able to qualitatively describe each letter grade.
- Committee members reviewed distinction designations methodology.
 - Questions

How will the agency identify and incorporate campus enrollment types to mitigate the advantage of schools of choice because of their selective enrollment practices? [The agency is exploring options.]

- How will the system account for students on different EOC scale score standards?
- For the postsecondary readiness distinction, will dual credit count regardless of when it is completed? [Advanced/dual-credit course completion in grades 9–12 will be considered.]
- Will the postsecondary readiness distinction incorporate substitute assessments as well?
- Will it matter how many indicators a campus is graded on? Will campuses with many indicators be compared to campuses with few indicators?
- Is it possible a school in the top quartile could not be eligible for a distinction because their overall grade is too low? [Yes.]
- What is the argument for eliminating graduation rates but keeping attendance rates which are uniformly high and not distinguishing?
- How will CCMR rate and OnRamps be included in the postsecondary readiness distinction calculations?
- Concerns
 - Establishing the rule that D campuses are ineligible for distinctions means this system is tripling the number of campuses that cannot earn distinctions. [TEC, §39.201(b) establishes that a campus or district must have acceptable performance to be eligible for a distinction designation. TEC, §39.054(a) establishes that a grade of D is not acceptable performance, labeling the grade as "performance that needs improvement."]

- Recommendations
 - The committee voted to use the scaled score for the Closing the Gaps domain to determine the closing the gaps distinction designation.
 - Members recommended that the following indicators be used for the campus postsecondary readiness distinction designation:
 - Percentage of STAAR Results at Meets Grade Level or Above
 - Four-Year Longitudinal Graduation Rate
 - Four-Year Longitudinal Graduation Plan Rate
 - College, Career, and Military Ready Graduates
 - SAT/ACT/TSIA Participation (4 years)
 - AP/IB Examination Participation: Any Subject (4 years)
 - CTE-Coherent Sequence Graduates
 - Percentage of Grade 3–8 Results at Meets Grade Level or Above in Both Reading and Mathematics
- Committee members discussed the first meeting of the Local Accountability System pilot group.
 - Questions

Will LAS be implemented one year at a time or for longer periods once approved? [Districts are held to using their local accountability plan for the campus for one school year.]