



Accountability Update

HOUSE COMMITTEE ON PUBLIC EDUCATION

OCTOBER 28, 2019

Needs Improvement Rating

- Background
- Current Statute
- Improvement Planning Requirement Issue
- Interpretation Challenges
- Possible Recommendations
- Appendix

- House Bill 2804 passed by the 84th Legislature established A-F system.

- House Bill 22 passed by the 85th Legislature.
 - Took effect for the 2018-2019 school year.
 - Defines letter grade ratings (what is acceptable, needs improvement*, unacceptable).
 - *D rating* requirements in statute.

Always acceptable ratings:

- An overall or domain rating of **A** reflects exemplary performance.
- An overall or domain rating of **B** reflects recognized performance.
- An overall or domain rating of **C** reflects acceptable performance.

Acceptable, sometimes requires unacceptable interventions

- An overall or domain rating of **D** reflects performance that needs improvement.

Always unacceptable:

- An overall or domain rating of **F** reflects unacceptable performance.

Always acceptable ratings:

- An overall or domain rating of **A** reflects exemplary performance.
- An overall or domain rating of **B** reflects recognized performance.
- An overall or domain rating of **C** reflects acceptable performance.

Acceptable, sometimes requires unacceptable interventions

- An overall or domain rating of **D** reflects performance that needs improvement.

Always unacceptable:

- An overall or domain rating of **F** reflects unacceptable performance.

- (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
 - (2) an overall performance rating of D as provided by Subsection (c).
- (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.

- (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
 - (2) an overall performance rating of D as provided by Subsection (c).
- (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.

Statute: Quick Reference

Districts and campuses with **initial overall or domain D** rating must develop and implement a board-approved targeted improvement plan (TIP)

Interventions and sanctions continue to apply to districts and campuses who have been ordered to develop a TIP if they have **subsequent domain F or subsequent overall D or F.**

Districts and Campuses with **subsequent overall D** ratings are subject to the interventions and sanctions for an unacceptable (F) campus and continue for each consecutive year.

**What is unambiguously clear in
statute?**

Baseline Scenario

(A campus is subject to closure or a BOM after six years of an Overall D rating compared to five years of and Overall F rating.)

	2019	2020	2021	2022	2023	2024
Overall Rating	D	D	D	D	D	D
Lowest Domain Rating	N/A	N/A	N/A	N/A	N/A	N/A
Consecutive Failed Ratings	F-0	→ F-1	→ F-2	→ F-3	→ F-4	→ F-5
39A.0545 Intervention	TIP (D)					
Chapter 39A intervention		TIP	TAP			Closure - BOM

Challenges Created by Statutory Language

There are 5 key challenges created by the current statutory language.

- One is related to improvement planning requirements.
- Four have resulted in language interpretations made via a proposed rule.



2019-2020 State Accountability Improvement Planning Requirements

Requirement	Domain D	Domain F	1 st year Overall D	1 st year Overall F	2 nd year Overall F	3+ Overall F
DC SI Assignment	Yes	No	Yes	Yes	Yes	Yes
DC SI Attestation	Yes	No	Yes	Yes	Yes	Yes
Training	No	No	No	Yes	Yes	Implement Commissioner-Approved Turnaround Plan
Public Meeting for input ¹	Yes	No	Yes	Yes	Yes	
Self-Assessment (ESF-Aligned)	Yes	No	Yes	Yes	Yes	
Facilitated ESF Diagnostic	No	No	No	Yes	Yes	
TEA TIP Template Format	No, any format; ex: embed in CIP	No	Yes	Yes	Yes	
Board Hearing & Approval of TIP	Yes	No	Yes	Yes	Yes	
Submit Plan/Progress Report to TEA	No	No	No	Yes	Yes	Yes
Develop/submit Turnaround Plan	No	No	No	No	Yes	No



2019-2020 State Accountability Improvement Planning Requirements

Improvement planning requirements are not tied to Domain F in statute, only Domain D

Requirement	Domain D	Domain F	1 st year Overall D	1 st year Overall F	2 nd year Overall F	3+ Overall F
DC SI Assignment	Yes		Yes	Yes	Yes	Yes
DC SI Attestation	Yes		Yes	Yes	Yes	Yes
Training				Yes	Yes	Implement Commissioner-Approved Turnaround Plan
Public Meeting for input ¹	Yes		Yes	Yes	Yes	
Self-Assessment (ESF-Aligned)	Yes		Yes	Yes	Yes	
Facilitated ESF Diagnostic				Yes	Yes	
TEA TIP Template Format	No, any format; ex: embed in CIP		Yes	Yes	Yes	
Board Hearing & Approval of TIP	Yes		Yes	Yes	Yes	
Submit Plan/Progress Report to TEA				Yes	Yes	Yes
Develop/submit Turnaround Plan					Yes	

Current Statute Interpretation Implications

- **Challenge 1-** Will campuses that decline from **overall** D to F cause the timeline to closure or BOM to reset?
- **Challenge 2-** Will campuses that move from **overall** F to D cause the timeline to closure or BOM to restart?
- **Challenge 3-** Will an initial **domain** rating of D (when the overall rating is C or higher) start the timeline to closure or BOM?
- **Challenge 4-** Will **domain** ratings of F (after a rating of D when overall ratings are C or higher) contribute to the timeline to closure or BOM?

Unpacking Challenge 1

Will campuses that decline from **overall** D to F cause the timeline to closure or BOM to reset?

Scenario A - Declining Performance

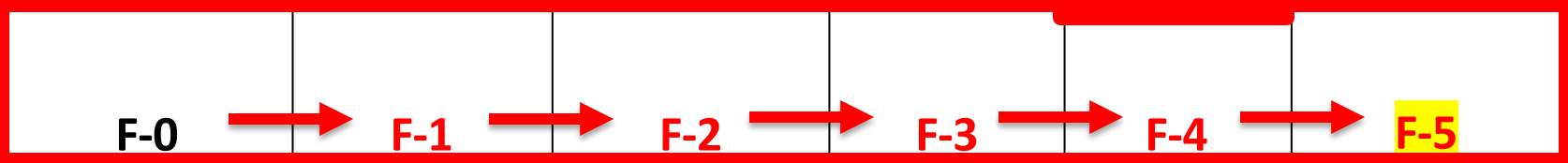
(Language in subsection (c) refers to consecutive “Ds” therefore it could be possible for a campus to have a D-Tip ordered in one year and then have an Overall F rating)

A campus would have a TIP ordered for overall D or overall F, yet interventions do not escalate

	2019	2020	2021	2022	2023	2024
Overall Rating	D	D	D	D	F	D
Lowest Domain Rating	N/A →	N/A →	N/A →	N/A →	N/A →	N/A
Consecutive Failed Ratings	F-0	F-1	F-2	F-3	F-4	F-0
39A.0545 Intervention	TIP (D)	TIP (D)				TIP (D)
Chapter 39A intervention		TIP	TAP			

Scenario A – Rule Resolution

(Language in subsection (c) refers to consecutive “Ds” therefore it could be possible for a campus to have a D-Tip ordered in one year and then have an Overall F rating)

	2019	2020	2021	2022	2023	2024
Overall Rating	D	D	D	D	F	D
Lowest Domain Rating	N/A	N/A	N/A	N/A	N/A	N/A
Consecutive Failed Ratings						
39A.0545 Intervention	TIP (D)	TIP (D)				TIP (D)
Chapter 39A intervention		TIP	TAP			Closure - BOM

Rule resolves this by defining subsequent assignments of D as unacceptable, without regard to it being from the prior year

Unpacking Challenge 2

Will campuses that move from **overall** F to D cause the timeline to closure or BOM to restart?



Scenario B – Restart?

(Campuses will be allowed to operate longer based on when an initial Overall D is received – 10 year timeline)

6 campuses currently have 4 years of consecutive unacceptable performance ratings

Campus could operate with low performance for 10 years before ordering closure/BOM

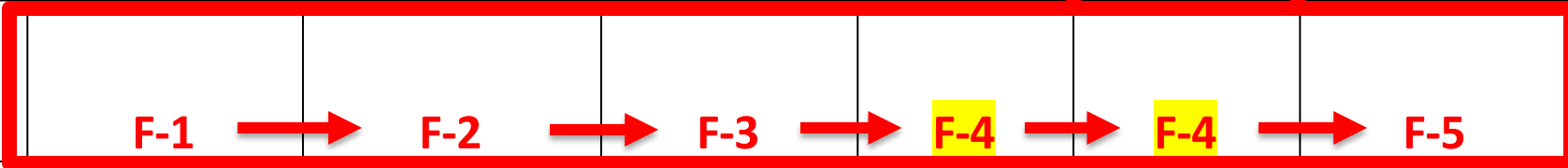
	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Overall Rating	F	F	F	F → D	D	D/F	D/F	D/F	D/F	D/F
Lowest Domain Rating	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Consecutive Failed Ratings	F-1 →	F-2 →	F-3 →	F-4 →	F-0 →	F-1 →	F-2 →	F-3 →	F-4 →	F-5
39A.0545 Intervention					TIP (D)					
Chapter 39A intervention	TIP	TAP				TIP	TAP			Closure - BOM

Campuses will be allowed to operate longer based on when an initial Overall D is received

Scenario B1 – Rule Resolution

71 campuses moved from IR to Overall D with a domain F in 2019.

At least one domain F with Overall D institutes a pause.
Interventions pick up with next Overall D.

	2019	2020	2021	2022	2023	2024
Overall Rating	F	F	F	F	D	D/F
Lowest Domain Rating	N/A	N/A	N/A	N/A	F	N/A
Consecutive Failed Ratings						
39A.0545 Intervention					TIP (D)	
Chapter 39A intervention	TIP	TAP				Closure - BOM

If there are "F" domain ratings, Overall "D" is a one year pause.

Scenario B2 – Rule Resolution

33 campuses moved from IR to Overall D with NO domain Fs in 2019.

Campus is reset with one Overall D as long as no F domain ratings

	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Overall Rating	F	F	F	F → D	D	F	F	F	F	F
Lowest Domain Rating	N/A	N/A	N/A	N/A	D	N/A	N/A	N/A	N/A	N/A
Consecutive Failed Ratings	F-1 → F-2 → F-3 → F-4 → F-0 → F-1 → F-2 → F-3 → F-4 → F-5									
39A.0545 Intervention					TIP (D)					
Chapter 39A intervention	TIP	TAP								Closure - BOM

"D" breaks the chain if there are no "F" domain ratings.

Unpacking Challenge 3

Will an initial **domain** rating of D (when the overall rating is C or higher) start the timeline to closure or BOM?

Scenario C- Only 5 Years of a D

(Campuses who receive their initial D rating in a *domain* followed by overall D ratings could receive a sanction after 5 overall Ds)

1149 campuses are overall C or higher with at least one domain D rating

Benefits of Initial D rating burned with domain rating instead of Overall rating.

	2019	2020	2021	2022	2023	2024
Overall Rating	A/B/C	D/F	D/F	D/F	D/F	D/F
Lowest Domain Rating	D	N/A	N/A	N/A	N/A	N/A
Consecutive Failed Ratings	F-0	F-1	F-2	F-3	F-4	F-5
39A.0545 Intervention	TIP (D)					
Chapter 39A intervention		TIP	TAP			Closure - BOM

Does an initial domain rating of D use a campuses intervention pause?

Scenario C – Doesn't Apply if Domain F

A campus with a D domain rating would face closure/BOM a year sooner than a campus that initially earned a F domain rating

	2019	2020	2021	2022	2023	2024	2025
Overall Rating	C+	D	D	D	D	D	D
Lowest Domain Rating	F	N/A	N/A	N/A	N/A	N/A	N/A
Consecutive Failed Ratings	F-0	F-0	F-1	F-2	F-3	F-4	F-5
Intervention	No TIP requirement for F domain rating.	D-Tip	TIP	TAP			Closure - BOM

	2019	2020	2021	2022	2023	2024
Overall Rating	C+	D	D	D	D	D
Lowest Domain Rating	D	N/A	N/A	N/A	N/A	N/A
Consecutive Failed Ratings	F-0	F-1	F-2	F-3	F-4	F-5
Intervention	D-Tip	TIP	TAP			Closure - BOM

Scenario C – Rule Resolution

1149 campuses are overall C or higher with at least one domain D rating

Domain ratings require TIPs but don't set a campus on the path of increased interventions

	2019	2020	2021	2022	2023	2024	2025
Overall Rating	A/B/C	D	D/F	D/F	D/F	D/F	D/F
Lowest Domain Rating	D	N/A	N/A	N/A	N/A	N/A	N/A
Consecutive Failed Ratings		F-0 → F-1 → F-2 → F-3 → F-4 → F-5					
39A.0545 Intervention	TIP (D)						
Chapter 39A intervention			TIP	TAP			Closure - BOM

Rule resolves this by interpreting domain level intervention requirements as applying only when overall ratings of a D occur.

Unpacking Challenge 4

Will **domain** ratings of F (after a rating of D when overall ratings are C or higher) contribute to the timeline to closure or BOM?

Scenario D- A/B/C Interventions

(Campuses with ratings of C or higher would be subject to closure at 6 years)

187 campuses are overall C or higher with at least one domain F rating

Campuses ordered to develop and implement a TIP are subject to increased interventions due to **F domain** ratings regardless of acceptable overall ratings.

	2019	2020	2021	2022	2023	2024
Overall Rating	A/B/C	A/B/C	A/B/C	A/B/C	A/B/C	A/B/C
Lowest Domain Rating	D	F	F	F	F	F
Consecutive Failed Ratings	<div style="border: 2px solid red; padding: 5px; display: inline-block;"> F-0 → F-1 → F-2 → F-3 → F-4 → F-5 </div>					
39A.0545 Intervention	TIP (D)					
Chapter 39A intervention		TIP	TAP			Closure - BOM

Statute names increased interventions based on "F" domain ratings once a TIP had been ordered and implemented

Scenario D – Rule Resolution

Increased interventions driven by the overall rating, not domain ratings

	2019	2020	2021	2022	2023	2024
Overall Rating	A/B/C	A/B/C	A/B/C	A/B/C	A/B/C	A/B/C
Lowest Domain Rating	D	F	F	F	F	F
Consecutive Failed Ratings	F-0	F-0	F-0	F-0	F-0	F-0
39A.0545 Intervention	TIP (D)					
Chapter 39A intervention						

Rule resolves this problem by defining subsequent D ratings to only apply to *overall* ratings, not domains.

Statute Challenge	Rule Resolution
<p>Will campuses that decline from overall D to F cause the timeline to closure or BOM to reset?</p>	<p>Rule resolves this by defining subsequent assignments of D as unacceptable.</p>
<p>Will campuses that move from overall F to D cause the timeline to closure or BOM to restart?</p>	<p>Creates a pause for the first D. All campuses with overall D ratings are on a 6-year timeline. Further Differentiation for Final Rule: D breaks the chain if there are no F domain ratings. If there are F domain ratings, D is a pause.</p>
<p>Will an initial domain rating of D (when the overall rating is C or higher) start the timeline to closure or BOM?</p>	<p>Rule resolves this by interpreting domain level intervention requirements as applying only when overall ratings of a D occur.</p>
<p>Will domain ratings of F (after a rating of D when overall ratings are C or higher) contribute to the timeline to closure or BOM?</p>	<p>Rule resolves this problem by defining subsequent D ratings to only apply to overall ratings, not domains.</p>

Possible Recommendations

Consider statutory re-write to improve clarity and better differentiate intervention requirements. One possible approach:

- 1) Eliminate all required interventions / improvement planning based on Domain ratings
- 2) Change Needs Improvement (D) rating so that it continues to advance the intervention clock, but BOM/Closure isn't mandatory unless performance declines to Unacceptable (F) and no less than 6 total years have occurred.
- 3) Needs Improvement Overall (but not Domain) ratings would continue to trigger improvement planning requirements.

Code Sections Potentially Impacted by TEC § 39A.0545

TEC Sections Dependent on Definition of Unacceptable Performance

- **TEC §11.174:** Charters must be acceptable for certain years to participate in district charter partnerships. Intervention pause for district charter partnership campus applies to unacceptable performance.
- **TEC §12.115:** Three consecutive years of unacceptable performance require charter closure.
- **TEC §12.1141:** Expedited renewal and automatic nonrenewal of charters rely on unacceptable performance standards.
- **TEC §12.110:** Priority to charter applications that locate in attendance zone of unacceptable campus.
- **TEC § 12A.001:** Eligibility for district of innovation status requires prior year acceptable performance.
- **TEC §12A.008:** Commissioner termination of district of innovation status for consecutive years of unacceptable performance.
- **TEC §13.054:** Annexation of district with two consecutive years of unacceptable performance.
- **TEC §21.453:** Funding transfer authorized to service centers to provide staff development and resources due to unacceptable ratings.
- **TEC §21.4551:** Teachers must attend reading academy if teaching at a campus that does not meet accountability standards.
- **TEC §28.020:** Implementation of math innovation zone authorizes intervention pause when unacceptable performance occurs.
- **TEC §29.202:** Public Education Grant (PEG) applies to unacceptable performance in the student achievement and student progress domains.

Other TEC Statutes Dependent on Definition of Unacceptable Performance

- **TEC §39.051:** Assignment of accreditation ratings based on unacceptable performance.
- **TEC §39.306:** Boards of trustees required to annually report unacceptable campuses.
- **TEC §39.333:** TEA reports unacceptable campuses that received teacher student ratio exception.
- **TEC §39.361:** Districts must report on first student report card whether campus is unacceptable.

Local Accountability Update

House Bill 22 (85R) included the ability for districts to voluntarily create a local accountability system that can be applied to state accountability campus ratings. Districts will be able to apply up to 50% of their local accountability plan to combine with their state accountability ratings.

2017–18 (Pilot Year)

- 19 participating districts in five meetings and discussed guidelines for plan creation.

2018–19 (Initial Year)

- Two approved district plans – Dallas and Snyder
- Local accountability system ratings submitted for 228 campuses

2019–20 (Current Year)

- Twenty-one districts submitted a *Notice of Interest* - Dallas, Snyder, Palacios and Van ISDs indicated intent to submit a local accountability system plan for 2019–20

2017-2018 Pilot Year Data

- 19 districts participated in five meetings to discuss guidelines for plan creation.
- Of these 19 districts, 12 districts submitted a local accountability plan to TEA that outlined indicators of student outcomes across domains and components for review.
- Of the 437 campuses participating in the pilot, 385 received a state accountability rating of C or above and were therefore eligible for the combined local and state accountability rating.

State Accountability System Campus Grade	Combined State and Local Campus Grade				Total
	A	B	C	D	
A	69	31	1		101
B	29	105	34		168
C		55	57	4	116
Total	98	191	92	4	385

Reliability

- A measure is considered reliable if it delivers consistent results across administrations.
 - Forms of assessments that have been created and tested to be equivalent to each other
 - Observational ratings conducted by trained and assessed raters who have reached a level of consistency with each other

Validity

- A measure is considered valid if the resulting outcome represents what the test is designed to measure.
 - Content-specific tests focused on the related content topic
 - Surveys designed to capture beliefs and attitudes about certain topics
 - Rating protocols with clearly defined observational evidence

Calibration

- What level of performance constitutes (A) Exemplary, (B) Recognized, (C) Acceptable, (D) Needs Improvement, and (F) Unacceptable?

2018-2019 Initial Year Data

- Local accountability plans from two districts were approved.
- Of the 228 campuses participating in the local accountability system, 204 received a state accountability rating of C or higher and were therefore eligible for the combined local and state accountability rating.
- Of the 204 campuses that received official combined accountability ratings.

State Accountability System Campus Rating	Combined State and Local Campus Grade			Number of Campuses
	A	B	C	
A	27	23		50
B	1	72	20	93
C		3	58	61
Total	28	98	78	204

Extra and Co-curricular Indicator Study Update

Taskforce Milestones

Summer 2019:

Review previous ECC work done through HB 2804

33 committee members invited to participate -19 members accepted

September 19, 2019:

First meeting of ECC workgroup

September 27, 2019:

Second meeting of ECC workgroup

October 18, 2019:

Third meeting of the ECC workgroup

The commissioner must report to the legislature on the feasibility of including ECC indicators no later than December 1, 2022.

Taskforce Next Steps

- The taskforce will conduct a data collection outside of the TSDS PEIMS environment and establish a pilot group of districts to explore the viability of adding elements into TSDS PEIMS for the future.
- TEA staff will create a data collection outside of TSDS PEIMS and establish ECC indicators that will be collected for elementary, middle and high schools to explore the feasibility of incorporating the ECC indicator for use in accountability.
 - The taskforce suggested five categories: athletics, academics, visual and performing arts, avocation, and service and leadership.
- TEA will work to establish a pilot group of districts to collect ECC data beginning in January 2020 for the 2020–2021 school year.
- Additional meeting dates and taskforce milestones will be developed through 2022.

Appendix

2018–19 Dallas Local Accountability System Plan: All School Types

Domain	Component
Academics	Value-Added, measured by Dallas ISD School Effectiveness Index (SEI), which provides a measure of value-add, relative to other district campuses, aggregated across local, state, and national assessments. For LAS, the district will use the prior-year SEI, because current year SEI is not complete until late summer.
Culture and Climate	Campus Staff Engagement and Support, measured by the percentage of positive responses ("agree" or "strongly agree") from spring administration of a teacher/staff climate survey. The survey comprises over 30 questions inquiring about staff members' agreement with the school leadership's climate and direction in four areas: beliefs and priorities, positive culture and environment, culture of feedback and support, college-going culture, teacher-teacher trust, and teacher-principal trust.
Culture and Climate	Parent/Guardian Satisfaction, measured by the percentage of positive responses ("agree" or "strongly agree") from respondents to a 10-question annual survey designed to gauge parent/guardian satisfaction with their schools' academic orientation, communication with parents/guardians, and physical and learning environment.
Locally-Determined: Student Engagement	Student Classroom Experience, measured by the percentage of favorable responses (responses above the median, or "neutral," response) from all students surveyed at the campus using an instrument that examines teachers' strengths in five areas: Expectations and Rigor, Student Engagement, Classroom Environment, Supportive Relationships, and Pedagogical Effectiveness.
Locally-Determined: Student Engagement	Co- or Extra-curricular Activity, measured by percentage of a school's students who have participated in at least one co- or extra-curricular activity, where participation is defined by the district based on the type of campus (elementary, middle, high) and requires a minimum number of participation hours in pre-determined activities.

2018–2019 Snyder Local Accountability System Plan: Excerpt

Domain	Component	School Type
Academics	Percent of students identified as economically disadvantaged reading on grade level as determined by running records	Elementary-Primary
Academics	Effectiveness of the Dual Language program as measured by the DLE Campus Summary Rating conducted by Richard Gomez annually	Elementary-Primary
Culture and Climate	Percent of students in Tier 1 behavior PBIS system on campus	Elementary-Intermediate
Culture and Climate	Staff response to Culture and Climate Survey	Elementary-Primary, Elementary-Intermediate, High School
Culture and Climate	Parent response to Culture and Climate Survey	Elementary-Primary, Elementary-Intermediate, High School
Future-Ready Learning	Percent of students using Achieve3000 in a blended learning format with usage resulting in improvement of literacy skills as measured by gains in Lexile scores.	High School

- The objective of the first meeting was to review work previously conducted on ECC and solicit input on the types of reliable and valid ECC indicators that could be evaluated in the academic accountability system.
- Taskforce members raised concerns regarding possible inequities in the system and concerns around funding for ECC activities.
- The taskforce suggested five categories for ECC: athletics, academics, visual and performing arts, avocation, and service and leadership.
- It was recommended that the taskforce focus on the feasibility of data collection for ECC.

- The objective of the second meeting was to review the notes from the meeting on September 18 and continue discussions regarding data collection options in order to determine the feasibility of the ECC indicator.
- Taskforce members raised concerns regarding the timeline of a data collection through TSDS PEIMS and the burden placed on coding for a new indicator.
- The taskforce decided to move forward with a data collection to measure student success through ECC.

- The objective of the third meeting was to discuss four possible options for data collections for ECC:
 - Option 1 - use currently existing TSDS PEIMS data to correlate course completion data to student activities, such as UIL competitions. This would be collected through the 2020-21 TSDS PEIMS submissions.
 - Option 2 - go outside of the TSDS PEIMS environment and collect data through an external data collection, such as Qualtrics. This would allow for an extensive data collection and would establish a pilot group of districts to explore the viability of adding elements into TSDS PEIMS for the future.
 - Option 3 – allow districts to use ECC as part of their Local Accountability System (LAS) plans. This would be voluntary for those districts that opt-in to participating in LAS.
 - Option 4 - report to the commissioner stating the ECC indicator is not currently feasible and/or the ECC indicator should be limited to school profile reporting (ECC data collected through a content management system for an information only report on TXSchools.gov).