

Performance-Based Monitoring Analysis System (PBMAS) Interventions Guidance

Performance-Based Monitoring Analysis System

Introduction

The Performance-Based Monitoring Analysis System (PBMAS) is part of the Performance-Based Monitoring (PBM) system, which is a comprehensive evaluation system designed to improve student performance and program effectiveness at the local education agency (LEA) level. The PBM system is a data-driven system utilizing PBMAS performance indicators, data validation indicators, and other indicators of program compliance required by federal law. While subsequent guidance will be provided for LEAs participating in data validation interventions, this guidance document focuses on PBMAS interventions.

The PBMAS is focused on the effectiveness of federal and state program areas, specifically, bilingual education/English as a second language (BE/ESL), career and technical education, Every Student Succeeds Act (ESSA), and special education. LEAs are staged for interventions by the TEA Division of School Improvement (SI) based on a consideration of LEA student performance and program effectiveness results, as described in greater detail below. LEAs staged for interventions engage in activities that lead to the development and implementation of a PBMAS district targeted improvement plan.

The following LEAs will be required to engage in a district continuous improvement process:

- LEAs staged for interventions in either single or multiple PBMAS program areas, which includes the assignment of a determination level for one or more of the federally-required elements (FREs)¹ for the special education program.

Intervention Process Overview

LEAs are evaluated in each PBMAS program area and assigned a stage of intervention if they have:

- one or more PBMAS indicators with a performance level (PL) 3 or 4 and/or
- (for the special education program) a determination level for one or more of the FREs.

LEAs that are assigned a stage for intervention are assigned as a Stage 1, 2, 3, or 4. Intervention activities for all program areas at any stage of intervention will include engaging in a district continuous improvement process (i.e. data analysis, root cause analysis, strategy selection and planning, implementation fidelity and monitoring,).

District Leadership Team (DLT) and District Coordinator of School Improvement (DCSI)

LEAs required to engage in interventions must establish a broad-based district leadership team, composed of key LEA personnel and stakeholders, to conduct and monitor the activities of the process. The DLT must include a DCSI. The DCSI is a district-level employee who is in a leadership position in special programs, school improvement, curriculum and instruction, or another position with responsibility for student performance.

The LEA determines the other members of the DLT. However, membership of the DLT should include representatives from programs staged for interventions, LEA staff responsible for school improvement, curriculum and instruction, and other programs that may have an impact on student performance and

¹ The FREs are: State Performance Plan compliance indicators 9, 10, 11, 12 and 13; data integrity; uncorrected noncompliance; and audit findings.

program effectiveness. Based on the reasons the LEA is required to engage in intervention activities, it should consider selecting participants from:

- All levels represented (i.e., elementary, middle, and/or high school)
- LEA central office administrators
- BE/ESL, special education, CTE, and/or federal programs administrators/directors
- Campus administrators
- Guidance counselors
- General education teachers
- Teachers serving students in BE/ESL, special education, CTE, and/or ESSA programs
- Language Proficiency Assessment Committee (LPAC) members
- Students and parents of students served in the program areas under review
- Representatives of any private and/or private non-profit schools participating in the program areas being reviewed
- Community stakeholders
- Curriculum specialists
- Public Education Information Management System (PEIMS)/Texas Student Data System (TSDS) staff members
- Representatives of district alternative education programs (DAEP) or campuses, if applicable
- Related service providers
- Speech therapists
- Evaluation personnel
- Representatives of campuses within the feeder patterns
- Administrators of residential facilities (RFs), if the LEA serves students with disabilities who reside in RFs
- Other members as determined by data analysis and program areas

The LEA is not required to submit a list of DLT members, unless requested by TEA. The LEA is required to submit the name of the DCSI through the Intervention Stage and Activity Manager (ISAM) application.

Engaging in Continuous Improvement

As stated above, LEAs staged for interventions in either single or multiple PBMAS program areas must engage in a district continuous improvement process. The DCSI and DLT will collaboratively engage in this process and submit the resulting in a PBMAS district targeted improvement plan and an EOY progress submission to TEA, as discussed in more detail below.

Data Analysis

LEAs assigned an intervention stage must analyze data for each PBMAS indicator with a PL of 2 or higher and/or area of noncompliance of a FRE. It is important that LEAs identify specific campuses contributing to areas of low performance or noncompliance and target those campuses for interventions, as appropriate. LEAs will use multiple data sources to examine areas that may have an impact on the effectiveness of their programs.

Based on the data analysis, LEAs will determine what problems exist that are contributing to each ineffective program area. These problem statements synthesize the data analysis process into objective statements that clarify the areas that will be addressed in the PBMAS district targeted improvement plan.

Problem statements should be concise and objective statements that reflect the current status as reflected by the data analysis. These statements do not assign causation as to why a gap exists and do not identify solutions to address areas in need of improvement. Essentially, problem statements capture the “where the LEA or program is” compared to “where the LEA or program wants to be.”

Identifying Root Causes

Through the root cause analysis process, LEAs identify root causes, or why the problem statements identified through data analysis exist. Knowing the “why” for problem statements helps ensure LEAs make evidence-based decisions to address or resolve the problem statements. Using multiple data sources throughout this process is important to ensure that several factors are considered in the development of root causes.

Developing a PBMAS District Targeted Improvement Plan

The PBMAS district targeted improvement plan addresses areas of low performance and program ineffectiveness identified through established annual goals. Prioritizing and determining the annual goals to address in the district targeted improvement plan is a local decision. The plan will also include strategies and interventions to help ensure LEAs can effectively meet their annual improvement goals. The targeted improvement plan also includes the data findings, problem statements, and root causes discussed above.

Special Education Compliance Review

Only LEAs assigned a Stage 3 or 4 for their special education program will conduct a compliance review for each PBMAS special education indicator assigned a PL 2 or higher. Resources are available in ISAM and on the Division of School Improvement webpage to assist LEAs with completing the compliance review. LEAs retain the compliance review itself and only submit to TEA if requested. However, LEAs at a stages 3 and 4 are required to submit a completed [Special Education Compliance Review Summary](#) to the TEA by February 15. *See Appendix A.

For LEAs at any level of staging, if noncompliance is identified during the review process, LEAs will develop a Corrective Action Plan ([CAP](#)) which outlines the activities/steps the LEA will take to correct all substantiated findings of noncompliance, to include that:

- policies and procedures, including operating guidelines and practices are reviewed and revised, as necessary;
- professional development is provided to identified staff;
- admission, review, and dismissal (ARD) committee meetings are convened to address the noncompliance, and, when required, determine if the noncompliance denied students a free appropriate public education (FAPE), and consider compensatory services, as appropriate; and
- develop and engage in monitoring activities to ensure ongoing compliance.

The LEA is required to correct any finding of noncompliance as soon as possible, but in no case, may the correction take longer than one calendar year from the date of notification of noncompliance.

LEAs That Serve Students with Disabilities Who Reside in RFs

Serving students with disabilities who reside in RFs is a function of a LEA’s overall special education program. LEAs have a legal obligation to ensure that all students with disabilities, including students residing in RFs, have access to a free appropriate public education. To assist LEAs in their efforts to

improve student performance and program effectiveness, LEAs assigned an intervention stage for their special education program must analyze data for each PBMAS indicator with a PL of 2, 3, or 4, and/or area of noncompliance of a FRE proportionally inclusive of RF student data.

The [special education compliance review protocols/templates](#) that have been made available to assist LEAs in the analysis of student-level data, are inclusive of the 13 investigatory elements outlined in the [RF Manual](#) and may be used, regardless of the assigned program stage:

- Behavior / Discipline
- Certified / Qualified Staff
- Commensurate School Day
- Current Evaluation
- Individualized Education Program Development and Implementation (+ Related Services, Educational Benefit, & Extended School Year)
- Participation in State Assessments
- Least Restrictive Environment
- Properly Constituted ARD Committee Meetings (+ Surrogate/Foster Parents)
- Transition Services.

LEAs assigned a Stage 3 or 4 for their special education program will ensure that RF students are included in the review.

Submissions to TEA

The PBMAS district targeted improvement plan incorporates data findings, problem statements and root causes that address areas of low performance and program ineffectiveness identified in PBMAS. LEAs retain information used during the data analysis and needs assessment and only submit to TEA if requested.

LEAs staged for interventions in any program area at Stage 3 or 4, submit their targeted improvement plan to TEA via the *Intervention, Stage, and Activity Manager* (ISAM) application in the Texas Education Agency Login ([TEAL](#)). LEAs retain information used during the data analysis and needs assessment and only submit to TEA if requested.

LEAs staged for interventions in any program area at Stage 1 or 2, develop their targeted improvement plan and retain it and supporting documentation locally.

Appendix A

Intervention Requirements for LEAs Staged in PBMAS

	Identify DCSI and Establish DLT	Engage in continuous improvement for all PBMAS Indicators assigned a PL 2 or higher	Submit PBMAS District Targeted Improvement Plan to TEA	Conduct Special Education Compliance Review
STAGE 1 For LEAs that have no program areas assigned a stage higher than a 1	Yes	Yes	No	**No
STAGE 2 For LEAs that have no program areas assigned a stage higher than a 2	Yes	Yes	No	**No
STAGE 3 For LEAs that have no program areas assigned a stage higher than a 3	Yes	Yes	Yes	**Yes Submit Summary of Compliance Review Findings
STAGE 4 For LEAs that have one or more program areas assigned a Stage 4	Yes	Yes	Yes	**Yes Submit Summary of Compliance Review Findings

** Notwithstanding of intervention stages, any LEA that identifies special education noncompliance during a review of data will submit a CAP to TEA.