IMRA Response to Public Comments on the Draft Supplemental Mathematics K–12 Quality Rubrics (Memo of Changes Updated 11/15/2024)

This memo of changes provides a summary of specific public comment stakeholder feedback for sections, indicators, and/or reviewer guidance on the first draft of the Instructional Materials Review and Approval (IMRA) supplemental mathematics K–12 quality rubric and TEA's response, as well as changes made in response to that feedback.

Indicator Guidance	Summarized Stakeholder Feedback	TEA Response to Feedback and Rationale
General	The Texas Math TEKS should be revised to eliminate "process math," which aligns with Common Core standards. Parents find it difficult to help their children, who often become discouraged and develop a dislike for math. Please revise the TEKS to traditional math for children K–5, as the math scores for Texas children have plummeted.	Thank you for the feedback. The TEKS are adopted by the SBOE, and TEA is required to review materials using the currently adopted TEKS.
General	The rubric for Supplemental Math should be a simplified version of the tier-one math rubric. If it is identical, it functions more like a core curriculum rubric rather than for supplemental submissions. Supplemental materials should serve multiple purposes for students: 1. Help those who are behind catch up. 2. Enable advanced students to extend their learning. 3. Provide opportunities for those in the middle to move up to the next level. It's important to focus on a few key standards that will have the greatest impact on student learning, rather than the 73 expectations currently in the draft rubric. Even if a submission meets all rubric standards, it won't be effective unless it genuinely engages students. This rubric, as it stands, helps ensure high-quality materials and prevents low-quality programs from being used in our districts.	Thank you for your feedback. TEA reduced the total number of indicator guidance in the rubric from 73 to 60. The supplemental math rubric differs from the tier-one math rubric in key areas.
1.1a	The rubric is broad and overarching with need for stakeholder guidance. This indicator guidance states that the TEKS and ELPS need to be outlined, which some supplemental materials may not cover all of those standards.	TEA revised 1.1a as follows: Materials include an alignment guide outlining the TEKS, ELPS, and concepts covered, with a rationale for learning paths across grade levels (vertical alignment) and within the same grade level (horizontal alignment) as designed in the materials. The SBOE is considering rules related to the minimum TEKS and ELPS coverage requirement in item 6 in the Committee of the Full Board on

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		Monday, 11/18/2024, and will take the final vote during item 6 on Friday, 11/22/2024.
1.1c	Rubric language reads as the teacher is teaching a lesson (background content knowledge and academic vocabulary necessary to effectively teach the concepts in each lesson). The expectation for digital materials of how this background content knowledge and academic knowledge would be provided within the digital interface.	TEA removed 1.1c from the rubric.
1.1c	Strong emphasis on vocabulary, sometimes paired with discourse or a broader definition of math language. Suggested explicit inclusion of language expectations. Suggested revision to add, "and other language structures" after "Materials include comprehensive reporting category overviews that provide the background content knowledge and academic vocabulary."	TEA removed 1.1c from the rubric.
1.1e	The word "explain" can be tricky with semantic nuances. Many times, a table is included to show vertical and horizontal alignment but does not include an explanation.	TEA deleted 1.1e from the rubric and revised 1.1a to address vertical and horizontal alignment. TEA revised 1.1a as follows: Materials include an alignment guide outlining the TEKS, ELPS, and concepts covered, with a rationale for learning paths across grade levels (vertical alignment) and within the same grade level (horizontal alignment) as designed in the materials.
1.1f	The reading of this indicator implies support for a print program (guidance, protocols, or templates). Is there an exemplar or example of what would be expected for an adaptive digital program (e.g. is a protocol the amount of time required to use the program each week to see growth, etc.)	TEA revised 1.1f as follows: Materials include protocols with corresponding guidance for unit and lesson internalization. This indicator guidance applies to print and digital materials.
1.2a, 1.2ai	These two indicator guidances read differently. 1.2a treats "tasks or activities" as the same concept and 1.2ai separates "tasks, or activities" with a comma disrupting the coherent meaning between the two guidance.	TEA revised 1.2a as follows: If designed to be static, materials include detailed lesson plans with learning objectives, teacher and student materials, lesson components with suggested timeframes, and assessment resources aligned with the TEKS and ELPS. TEA relabeled 1.2ai as 1.2b and revised it as follows: If designed to be adaptive, materials include responsive learning objectives, lesson components with suggested timeframes, and assessment resources aligned with the TEKS and ELPS.

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1.2a, 1.2ai	Clarification is needed on the requirements of these indicators. Would a publisher need to meet one or both requirements, including ancillary print materials?	TEA revised 1.2a as follows: If designed to be static, materials include detailed lesson plans with learning objectives, teacher and student materials, lesson components with suggested timeframes, and assessment resources aligned with the TEKS and ELPS. TEA revised 1.2ai to 1.2b as follows: If designed to be adaptive, materials include responsive learning objectives, lesson components with suggested timeframes, and assessment resources aligned with the TEKS and ELPS.
1.2b, 1.2c	It states that the lesson overview including timing and materials. Sometimes materials are listed within the section where they are applicable. Timings can be included within the lesson as time stamps, or a description of timing is included within the implementation guide.	TEA removed 1.2b and 1.2c from the rubric and incorporated language from both in 1.2a.
1.2b, 1.2c	Clarity on whether both indicator guidance are required for static and adaptive materials.	TEA removed 1.2b and 1.2c from the rubric and incorporated language from both in 1.2a.
1.2c	Suggested revision to add, "develop disciplinary language" before the phrase, "and address student misconceptions."	TEA removed 1.2c from the rubric.
2.1	A program that is designed to provide stealth formative assessment through adaptivity does not offer printable assessments due to the nature of the program.	TEA did not make a change. Printable versions of digital assessments are expected for 2.1c.
2.1	Assessments should address the language demands of math content, offering tools to track students' content-specific language growth. Materials should help educators monitor and support language development, providing feedback tailored to students' language stages. This approach leverages students' linguistic resources to deepen understanding, perseverance, and meaningful learning in math. Suggested revision: Create a new indicator 2.1h Formative assessments are aligned to the TEKS, and lesson or activity objectives and include assessment items	TEA did not make a change. Supports for emergent bilingual students are included in indicator 3.3. Development of academic mathematical language is included in indicator 5.4.

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	(such as look-fors or listen-fors) that address language development needs.	
2.1	Assessments should address the language demands of math content, offering tools to track students' content-specific language growth. Materials should help educators monitor and support language development, providing feedback tailored to students' language stages. This approach leverages students' linguistic resources to deepen understanding, perseverance, and meaningful learning in math. Suggestion revision Create a new indicator 2.1i Assessment materials guide educators to provide feedback that is responsive to student understanding, including their current language development stage.	TEA did not make a change. Data analysis and progress monitoring, including interpreting and responding student performance is included in indicator 2.2, and explanatory feedback is included in 6.2b.
2.2a, 2.2di	The wording mentions adaptive. This rubric implies that the program must be adaptive to pass indicators 2.2a and 2.2di	TEA did not make a change to 2.2a. TEA revised 2.2di as follows: If designed to be adaptive, materials provide frequent checks for understanding at key points throughout each lesson or activity.
2.2b	2.2b shows lack of consistency and coherence within the rubric. The rubric uses the phrase "tasks and activities" instead of combining the terms with or within this guidance.	TEA revised 2.2b as follows: Materials provide guidance for the use of included tasks and activities to respond to student trends in performance on assessments.
2.2c	Suggested revision is to include the phrase, "in content and language use" at the end of the guidance.	TEA revised 2.2c as follows: Materials include tools for teachers to track student progress and growth, and tools for students to track their own progress and growth.
2.2d, 2.2di	If a publisher submits an adaptive digital program, are both 2.2d and 2.2di required, or just 2.2di? If the program includes static ancillary print resources, must those also meet 2.2d?	TEA revised 2.2d as follows: If designed to be static, materials provide prompts and guidance to support educators conduct frequent checks for understanding at key points throughout each lesson of activity.

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		TEA revised 2.2di as follows: If designed to be adaptive, materials provide frequent checks for understanding at key points throughout each lesson or activity.
3.1b	This reads as providing support for a teacher delivering direct instruction.	TEA revised 3.1b as follows: Materials include explicit educator guidance for language supports, including pre-teaching and embedded supports for developing academic vocabulary and unfamiliar references in text.
3.1b	The inclusion of explicit educator guidance on language supports is a strength. However, research suggests that pre-teaching of vocabulary without activities or ways for learners to attach the vocabulary to existing schema may be less effective than introducing vocabulary after an exploratory conceptual development activity.	TEA revised 3.1b as follows: Materials include explicit educator guidance for language supports, including pre-teaching and embedded supports for developing academic vocabulary and unfamiliar references in text.
3.1e	Suggested revision to add and/or languages, aligned with students' stage of language development.	TEA revised 3.1e as follows: Materials include educator guidance on offering options and supports for students to demonstrate understanding of mathematical concepts in various ways, such as perform, express, and represent.
3.2c, 3.2d	This indicator guidance have certain types of structures that may not be provided by a supplemental adaptive digital program, for example the parenthetical information.	TEA revised 3.2c as follows: Materials include multi-tiered intervention methods for various types of practice and structures and educator guidance to support effective implementation.

TEA revised 3.2d as follows: Materials include enrichment and extension methods that support various forms of engagement, and guidance to support educators in effective implementation. |
| 3.2e | The adaptive digital program provides immediate corrective feedback to students at all times, but this is not educator-directed. Suggested to revise rubric verbiage to allow for an adaptive program to provide this feedback. | TEA did not make a change to 3.2e. Adaptive programs can provide prompts and guidance that support both the educator and the student. |
| 3.3a | If a publisher's adaptive system includes embedded ELD support but does not include explicit educator guidance because the adaptive system provides this support to students, how would a publisher be advised to demonstrate alignment to this requirement? | TEA split 3.3a into separate guidance as follows:

3.3a: If designed to be static, materials include educator guidance on providing and incorporating linguistic accommodations for all levels of language proficiency [as defined by the English Language Proficiency Standards (ELPS)], which are designed to engage students in using increasingly more academic language. |

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		3.3b: If designed to be adaptive, materials include embedded linguistic accommodations for all levels of language proficiency [as defined by the English Language Proficiency Standards (ELPS)], which are designed to engage students in using increasingly more academic language.
3.3c	A supplemental adaptive digital program does not typically provide oral and written discourse.	TEA did not make a change. Supplemental programs, including those that are adaptive and digital, can provide opportunities for oral and written discourse.
3.3c	This guidance seems to focus on helping students rather than utilizing their linguistic resources. While cross-linguistic connections are mentioned in 3.3c, connections to a student's home or native language seem limited to Dual Immersion program (3.3d). Expanding these supports would acknowledge and utilize the full linguistic strengths of multilingual students in all education settings.

Suggested revision: Materials include embedded guidance to support emergent bilingual students in developing academic vocabulary [add] "and disciplinary communication structures, drawing on linguistic assets," increasing comprehension, [add] "leveraging or" building background knowledge, and making cross-linguistic connections through oral and written discourse. | TEA did not make a change. The indicator guidance focuses on teacher guidance for supporting emergent bilingual students in developing mathematical knowledge and skills through oral and written discourse, and students' linguistic assets are leveraged in practice.

Reviewers will receive training on all aspects of the review. TEA will ensure that the training for this indicator includes specific examples and strategies, such as drawing upon linguistic assets. |
4.3a	Are there specific ways this requirement should be "shown" for a student performing below grade level?	TEA revised 4.3a as follows: Materials provide spaced retrieval opportunities with previously learned skills and concepts across learning pathways.
5.3c	Suggested revision: Materials include supports for students in creating, analyzing, and explaining the connection between concrete and representational models and abstract (symbolic/numeric/algorithmic) mathematical concepts where academically appropriate, [add] "including linguistically accommodated supports."	TEA revised 5.3c changed as follows: Materials include supports for students in connecting, creating, defining, and explaining concrete and representational models to abstract (symbolic/numeric/algorithmic) concepts, as required by the TEKS.
5.4a	Suggested revision: Materials provide opportunities for students to develop their academic mathematical language using [add] "a variety	TEA did not make a change. Language development is included in indicator 3.3.

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	of inputs including language-rich mathematical tasks," visuals, manipulatives, or other language development strategies.	
5.4a	Suggested addition: Materials provide guidance for educators to provide linguistically accommodated material that is decreased as more English is learned.	TEA did not make a change. Supports for emergent bilingual students are included in indicator 3.3.
5.4b	Suggested revision: Materials include embedded guidance for the educator [add] "to assess, scaffold, support, and extend student development [add] of listening and speaking skills, including language structures, expressions, and basic and" academic mathematical vocabulary in context when communicating with both educators and peers.	TEA did not make a change. Language development is included in indicator 3.3.
5.4c, 5.4d, 5.4e	The materials clearly state how the TEKS' conceptual and procedural focused is addressed, but it unclear if this guidance applies to teacher or student materials. Indicator guidance 5.4c, d, and e suggest teacher-led direct instruction. A supplemental adaptive digital instructional tool would provide embedded vocabulary support within the platform, but not embedded guidance for teachers. The other requirements of these indicator guidance refer to hearing and using math language with peers, which is different from the instructional model of an asynchronous supplemental digital program. It's unclear if ancillary materials need to meet these standards.	The term "embedded guidance" applies to both teacher- and student-facing components in both static and adaptive materials.

TEA revised 5.4c as follows: Materials include embedded guidance to support student application of appropriate mathematical language and academic vocabulary in discourse.

TEA revised 5.4d as follows: Materials include embedded guidance to facilitate mathematical conversations allowing students to hear, refine, and use math language with peers.

TEA revised 5.4e as follows: Materials include embedded guidance to anticipate a variety of student answers including exemplar responses to questions and tasks, including guidance to support and/or redirect inaccurate student responses. |
| 5.4e | Suggested revision: Materials include embedded guidance for the educator to support students in using existing language repertoire and language learning strategies to support their mathematical language development. | TEA did not make a change. Language development is included in indicator 3.3. |
| 5.5 | The TEKS Process Standards' language demands are not explicitly outlined in the rubric, risking superficial treatment. Adding an item detailing language expectations within the Process Standards and | TEA revised indicator 5.5 guidance to include "TEKS" before "process standards." |

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	how they are addressed in instructional materials would help ensure comprehensive attention to these critical language skills.	TEA revised 5.5a as follows: TEKS process standards are integrated appropriately into the materials. TEA revised 5.5b as follows: Materials include a description of how process standards are incorporated and connected throughout the learning pathways. TEA removed 5.5c from the rubric. TEA revised 5.5d as follows: Materials include an overview of the TEKS process standards incorporated into each lesson.
5.5a, 5.5b, 5.5c, 5.5d	The materials clearly state how the TEKS' conceptual and procedural focused is addressed, but it unclear if this guidance applies to teacher or student materials, and would the expectation be for every exercise/problem. Indicator guidance 5.5a, b, c, and d seem to apply to a print program, where teacher materials would be able to show a connection to process standards. Are these required to be shown in teacher materials, student materials, or both? Is the expectation of an adaptive digital program that this [process standard] connection would be explicitly shown for every exercise or problem in the program? Suggests refining the rubric language to specify if the guidance apply to teacher-facing materials, student-facing materials, or both?	The indicator guidance 5.5a, 5.5b, and 5.5d apply to both teacher- and student-facing materials. TEA removed 5.5c from the rubric.
6.1c	This section could emphasize that students can "make sense of mathematics through doing, writing about, and discussing math with peers and/or educators" (6.1c) in English, their native language, and/or using various representations–again, calling upon the receptive and expressive language skills used in learning new content. Suggested revision: Materials provide various opportunities for students to make sense of mathematics through doing, writing about, and discussing math [add] "in English, their native language, and/or using various representations" with peers and/or educators.	TEA revised 6.1c as follows: Materials are designed to require students to make sense of mathematics through multiple opportunities for students to do, write about, and discuss math with peers and/or educators. Supports for emergent bilingual students are addressed in implementation quality indicator 3.3. The supports required in indicator 3.3 ensure that educators have guidance to support all learners in making sense of mathematics. This indicator requires materials to accommodate students at all levels of English proficiency

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		and provide embedded guidance for supporting their academic development through discourse.
6.2a, 6.2b	A digital adaptive program can facilitate productive struggle, but not in the exact way as referenced in 6.2.a and 6.2.b. These two indicator guidances seem to assume a teacher is facilitating the math instruction. Is there any opportunity to address how an adaptive digital program might facilitate productive struggle? This section would benefit from clarity in what is required in teacher vs. student materials.	TEA did not make a change to 6.2a. Adaptive programs can provide prompts and guidance that support both educators and students.

TEA revised 6.2b as follows: Materials include prompts and guidance to support educators in providing explanatory feedback based on student responses and anticipated misconceptions. |