

## 2020 Accountability Policy Advisory Committee Summary of Meeting on October 16, 2019

The objective for the first 2020 Accountability Policy Advisory Committee (APAC) meeting was to review 2019 accountability results and recommend improvements for the 2020 accountability system and beyond. 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 and introduced new members.
- Committee members reviewed the impact of removing the requirement for student groups to improve their four-year graduation rate after reaching the 90% target. This would require an Every Student Succeeds Act (ESSA) plan amendment.
  - Questions
    - How many campuses would this affect? **We don't have a count at this time, but we can generate data in time for the next ATAC meeting.**
- Committee members discussed the graduation rate methodology for P-TECH/T-STEM campuses
  - Questions
    - Can six-year students at these campuses be given a new designation, such as “enrolled in an advanced certificate program” in a similar fashion to IEP continuers? **Performance Reporting has conducted follow up with the Division of College, Career, and Military Preparation (CCMP). T-STEM campuses are on a four-year graduation track. P-TECH campuses will complete state graduation requirements and report students as graduates in four years.**
    - Are they already on the clock for higher education once they get into the college? **Per CCMP, under the P-TECH model, this is a non-issue.**
    - For specialty campuses, or at-risk populations, are we tied to federal requirements for calculations, or is there leeway for Texas? **We must use the federal dropout definition without exclusions. We can ask for the six-year rate to be used.**
    - What are the timelines? Can the new rules be applied to 2019 ratings? **We would like to submit an amendment for 2020 without redoing targets by the end of the year. Then the Department has 120 days to respond, which would mean a decision in time for the manual. The agency will also get a sense from USDE staff as to whether our request would be approved. The earlier an amendment is submitted, the better for 2020. We cannot retroactively apply it to 2019 outcomes. Once the manual has been adopted, then those rules bear statutory weight and are applicable for that year.**

## 2020 Accountability Policy Advisory Committee Summary of Meeting on October 16, 2019

- Do we have alternative education accountability (AEA) campuses that are P-TECH? **No.**
- Concerns
  - For T-STEM emphasis, we're just worried about the students who make the graduation rates look lower. Can we just correct the issue with a PEIMS code? **Based on follow-up, T-STEM campuses complete state graduation requirements and report students as graduates in four years.**
- Committee members considered replacing the four-year graduation rate with a six-year graduation rate.
  - Can we move to the six-year federal graduation rate for comprehensive support identification, or will we get push back? **The USDE is flexible on which rate we use, but we will need to use the same one across the board. Based on modeling, 28 fewer campuses would be identified based solely on a graduation rate below 67%.**
- Committee members considered developments for the 2020 alternative education accountability system and beyond.
  - Questions
    - Members were curious if and how AEAs were identifying special education students? **Yes. AEAs are held to the same state and federal special education requirements.**
    - What is the number of dropout recovery schools (DRS) statewide? **217**
    - Any discussions about not allowing an alternative education campus (AEC) *D* or *F* rating to limit the district rating? **Statute doesn't specify which campus types are included in the cap. Legislatively we can propose the change for the next session. We can also consult our legal team to see if the change can be made under a commissioner's rule. For the five-year reset, we would like to explore having districts rated proportionally so that the impact of a small, specialized campus fits naturally into the system. That may resolve the issue. How should a district rating be calculated? Using proportionality, imagine 600 students are at the elementary, 100 students are at the middle school, 290 students are at the high school, and 10 students are at the AEC. If district ratings were proportional, the 10 AEC students would count 1 percent toward the district rating.**
    - Is there anything else we can do for bonus points for AECs? **TBD**
    - How do we identify students that are dropouts and have returned? **The agency identifies students who previously dropped out and later returned using PEIMS records. Specifically, these students would have previously been**

## 2020 Accountability Policy Advisory Committee Summary of Meeting on October 16, 2019

- reported by a district with a leaver reason code of 88, 89, or 98 during an earlier PEIMS submission (PEIMS submission 1, specifically) and would have been identified as a dropout through additional agency processing (e.g., agency processing confirms that the student is a dropout). The agency then uses PEIMS enrollment (Submission 1) and attendance (Submission 3) data to identify the students as returning to school.
- The A–F system was built to be easy to understand, but the public does not understand that there’s a subset of schools that have a different system. We need to communicate the issue of rating these schools differently because they have special provisions. **These campuses exist for special purposes, so how do we establish a set of criteria that measure them against the purpose for which they exist? The current accountability system does not meet all the needs of AECs. It’s difficult to distinguish a high-performing AEC versus a low-performing AEC. We do have a public flag on reports that indicates they’re rated under AEA standards, but we can provide additional clarity on the AEA rating. Also, this is a national issue. Texas has a long, well-established AEA history and has many more AECs than other states.**
  - Are charter school AEAs evaluated using the same standards as school district AEAs? **Yes.**
  - Concerns
    - The agency is receiving an increase in requests to consolidate campuses to alleviate the negative impact of *D* and *F* ratings, so it speaks to the larger issue of looking at the five-year reset. We must put in safeguards to prevent districts from placing students at an AEA to prevent low ratings.
    - For adult education, how do we incentivize recovering and reeducating adults? That is part of our mandate as a district and what we do for the community. We try to enroll adults in DRS and retrain the workforce.
  - Committee members discussed substitute assessment and accelerated tester requirements.
    - Questions
      - Will substitute assessments be permitted under Local Accountability Systems (LAS)? **We cannot use substitute assessments in state accountability. The issue with ESSA is the requirement for all students to take the same state administered test. The USDE has specific rules that students test in their enrolled grade. ESSA permits locally-selected assessments, but they must be aligned to the state’s assessed curriculum and used districtwide. SAT/ACT are not aligned with the STAAR assessments or TEKS. There is nothing that**

## 2020 Accountability Policy Advisory Committee Summary of Meeting on October 16, 2019

- prohibits a district from using SAT/ACT/PSAT/AB/IP outcomes as part of LAS.
- How likely is it that we'll be able to use TSIA for the high school math and reading? First, TSIA is not a "nationally-recognized high-school assessment" as allowable under ESSA. If Texas proposed using TSIA, we must demonstrate curriculum alignment. TSIA would have to be peer reviewed and used in additional states. We're not far along in that process yet. Also, THECB is very reluctant to have TSIA mandated into accountability. This would require a legislative change.
- Is there an off the shelf test that USDE accepts? AP tests by subject area, possibly.
- The parents are going to go nuts over this. We have not had pushback from parents so far. This will impact high performing students who are advancing faster than others, so it's a small subset.
- Is this a rule that Texas must follow? If we stop accepting Title I funds as a state, no. If we continue accepting Title I funds, yes.
- Why does the USDE keep mandating this? We have a complex accountability system. Like California, we're very large and unique. We give local control to districts. We have been a hold-out on this issue for a number of years.
- Can students opt out of their grade level assessment? No.
- Committee members reviewed rating release and accountability data timeline.
  - Questions
    - What does the agency prefer? We would like it to be current year but don't want districts to have to wait later in the year. We can run a pilot and get feedback if this change is considered.
    - What would be changed in the timeline? Preliminary ratings would be released in November and be finalized in February.
    - What's the benefit of the new timeline? Districts would be gaining current year graduation and CCMR rates.
  - Concerns
    - I use my local data from the last school year before the start of the new school year to align for with the school calendar. This change would disrupt the timeline for professional development and interventions.
    - Ratings would be final right before the start of new STAAR tests, so that's not the best timeline to hear about ratings or to try to make instructional adjustments.
    - This would only affect high schools and districts since they have a graduation rate. This would unnecessarily impact elementary schools.

## 2020 Accountability Policy Advisory Committee Summary of Meeting on October 16, 2019

- Concerns were raised over providing parents performance results to make school choice decisions so far into the school year.
- When does Texas get National School Clearinghouse data? **We have one data pull now, and we are working on a contract to get that data yearly.**
- Committee members reviewed the CTE coherent sequence auto calculation plan.
  - Questions
    - Are there House Bill 3 alternative career readiness measures? **We're unsure, but that could affect CCMR outcomes bonuses.**
- Committee members participated in an open forum.
  - Questions
    - My understanding is that there are three areas in ESSA that we report on for highly qualified teachers (out of field, uncertified, and certified). Is that something we report on through the state ESSA plan? **We do report that on the federal accountability report card. Other groups, such as Tim Regal's team, work with that data.**  
[https://tea.texas.gov/Texas\\_Educators/Educator\\_Initiatives/Texas\\_Educator\\_Equity](https://tea.texas.gov/Texas_Educators/Educator_Initiatives/Texas_Educator_Equity)
    - Should we treat multi-year *D* campuses the same as *F* campuses? **The way the law was written, it's unclear. In the next 4–6 weeks there will be a legislative hearing, and we will get some direction on that issue. School Improvement has a proposed rule which is a relaxation of the law.**  
[https://tlchouse.granicus.com/MediaPlayer.php?view\\_id=44&clip\\_id=18247](https://tlchouse.granicus.com/MediaPlayer.php?view_id=44&clip_id=18247)  
[https://tea.texas.gov/About\\_TEA/Government\\_Relations\\_and\\_Legal/Government\\_Relations/House\\_Public\\_Education\\_Committee](https://tea.texas.gov/About_TEA/Government_Relations_and_Legal/Government_Relations/House_Public_Education_Committee)
    - Could the ELP component have a scaled rating (1–10) instead of being pass/fail like it currently is? **We will explore this suggestion.**