

## Texas' ESSA Plan: What's In, What's Out, and Why Change?

The State of Texas embarked on a major change to the state accountability system in 2017 as a result of HB 22, offering the perfect opportunity to satisfy a goal long held by both legislators and educators alike - to create a single system that would meet the state's educational standards as well as those required by the U.S. Department of Education outlined in the Every Student Succeeds Act.

However, the ESSA plan deadline of September 18, 2017 created both an opportunity, as well as a problem, in that it afforded Texas the opportunity to combine the two systems, but created a short timeline to develop an integrated system, given that the details of HB 22 were not signed into law until June of 2017. TEA submitted the State of Texas ESSA plan on September 25, 2017 and feedback from the USDE, as well as from peer reviewers (<https://bellwethereducation.org/independent-essa-state-plan-peer-reviewers>) was received on December 21, 2017; and a revised ESSA plan was due to USDE by January 8, 2018. Due to this short timeline, TEA was not able to gather a great deal of stakeholder input for the proposed revisions, but Commissioner Mike Morath stated in his January 9<sup>th</sup> "To The Administrator Addressed" letter that the Agency would continue to seek stakeholder input leading up to the release of the accountability rules in March.

The indicators in the ESSA plan are as follows:

- Academic Achievement in Reading and Mathematics
- Growth in Reading and Mathematics (Elementary and Middle Schools)
- Graduation Rates (High Schools, K-12)
- English Language Proficiency (ELP)
- School Quality or Student Success
  - Domain 1 Performance for Elementary and Middle Schools
  - College, Career, and Military Readiness Performance (High Schools, K-12)

The table on the following pages is a summary of the changes made to specific assessment and accountability indicators in the State of Texas ESSA plan that was submitted in September to address the feedback given by the USDE in December.

It's our understanding that USDE has until January 23, 2018 to respond to the revised plan.

**Please note:** The minimum number of students in each demographic and program group originally included in the ESSA plan was 25. However, the feedback states that *"TEA must clarify that it is using the same minimum n-size for all students [10 students] and all subgroups. TEA should clarify what the minimum n-size is for all students and all student subgroups"* and that *"TEA needs to provide evidence that a minimum n-size of 25 is statistically sound."* **Source:** USDE Peer Review Feedback, page 10. TEA did not specifically address this concern in the revised plan, so perhaps this will be a topic of discussion with stakeholder groups.

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<p><b>Grade Level Proficiency</b> defined as Approaches Grade Level</p>	<p><b>Grade Level Proficiency</b> defined as Meets Grade Level.</p> <p><b>Source:</b> TEA Revised ESSA Plan, page 22</p>	<p><i>"In its State plan, TEA provides long-term goals and measurements of interim progress for academic achievement for all students and student groups based on a student achieving a level on the statewide assessment that is below proficient ("Approaches Grade Level," which is described as one standard deviation below Meets Grade Level). The ESEA requires a State to identify and describe ambitious long-term goals and measurements of interim progress for improved academic achievement, <b>as measured by grade-level proficiency</b>, on the annual statewide reading/language arts and mathematics assessments, for all students and for each subgroup of students."</i></p> <p><b>Source:</b> USDE Review letter, page 3 (emphasis added)</p> <p><i>"Texas' overarching strategic goal expects that by 2030, 60 percent of Texans aged 25-34 will possess some kind of postsecondary credential. Yet the plan undercuts this goal by setting the bar for student proficiency below the standard required to be ready for college and career—at the "approaches" grade level standard, not "meets" or "masters" grade level standard—which could leave a significant portion of the state's students unprepared for the future. It does a disservice to students and teachers to label a student as "proficient" when the student is not achieving at grade level."</i></p> <p><b>Source:</b> Bellwether Peer Review, page 3</p>
<p><b>Academic Achievement Indicator:</b> Includes STAAR Reading, Math, Writing, Science and Social Studies</p>	<p><b>Academic Achievement Indicator:</b> Includes STAAR Reading and Math Only.</p> <p><b>Source:</b> TEA Revised ESSA Plan, page 22</p>	<p><i>TEA proposes including science, social studies, and writing in the Academic Achievement indicator. ESEA section 1111(c)(4)(B)(i)(I) requires that the Academic Achievement indicator only include measures of proficiency on the annual assessments required under ESEA {...} (i.e. reading/language arts and mathematics).</i></p> <p><b>Source:</b> USDE Review letter, page 4</p>
<p><b>School Quality / Student Success Indicator:</b> Includes STAAR Reading and Math only at Meets Grade Level</p>	<p><b>School Quality / Student Success Indicator:</b> Student Achievement Domain STAAR component (averages R, M, Wr, Sci, SS at Approaches, Meets, and Masters Grade Level).</p> <p><b>Source:</b> TEA Revised ESSA Plan, page 23</p>	<p><i>... a State may include performance on assessments other than those required under ESEA section 1111(b)(2)(B)(v)(I) (e.g., science) in the indicator for public elementary and secondary schools that are not high schools required under ESEA section 111(c)(4)(B)(ii) (i.e. the Other Academic indicator) or in the School Quality or Student Success indicator for any schools, including high schools.</i></p> <p><b>Source:</b> USDE Review letter, page 4</p>
<p>Identical <b>interim and long term goals</b> for all student groups</p>	<p><b>Long term goals</b> for each student group that represent a 30 percent increase in the Meets performance level over</p>	<p><i>"The ESEA also requires that the State-designed long-term goals show improved academic achievement for all students and separately for each subgroup of students. Because its long term goals and measurements of interim progress for academic achievement are not measured by proficiency and do not show improved academic</i></p>

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	<p>baseline scores from the 2016-17 school year (see Appendix A for specific student group targets), to be reached by 2032.</p> <p><b>Source:</b> TEA Revised ESSA Plan, page 17.</p>	<p><i>achievement for each subgroup of students (i.e., Asian, White, and Two or More Races), the long-term goals are not consistent with the statutory requirements.”</i></p> <p><b>Source:</b> USDE Review letter, pages 3-4</p> <p><i>“Texas’ method for setting targets toward these long-term goals also misses disparities in baseline data, expecting complete gap closure between subgroups over the first five years of implementation, rather than over the entire 15-year goal-setting period. For example, students with disabilities (baseline 34.9 percent) and all students (baseline 71.9 percent) have the same interim target in reading for the year 2021-22. Another issue is that some of the interim targets are lacking in ambition and are lower than current performance; for instance, white students currently have a graduation rate of 93.4 percent, but Texas sets their 2021-22 interim target at just 90 percent. Texas should provide a stronger rationale for how these targets are equally rigorous and attainable for all groups, given the dramatically different starting points.”</i></p> <p><b>Source:</b> Bellwether Peer Review, pages 3-4</p>
<p><b>Graduation Rate:</b> State law requires use of an NCES-compliant dropout definition</p>	<p><b>Graduation Rate Clarification:</b> TEA explicitly commits to using the definition for graduation that is specified in ESSA, and embeds in the text the long-term statewide goal of 94 percent for the 4-year graduation rate. TEA also clarified that graduation rates will be evaluated for each subgroup of students, relative to long-term goals for all students and each student group. (Thus, it seems that TEA will not apply the records exclusions provided for in state law.)</p> <p><b>Source:</b> TEA Revised ESSA Plan, pages 22-23, and Appendix A displays targets</p>	<p><i>In its State plan, TEA indicates that it will determine which graduation rate to use for this indicator based on certain school characteristics. {...} It is unclear whether TEA is calculating the four-year adjusted cohort graduation rate for all high schools consistent with the statutory requirements. In addition, {...} it is unclear how TEA is using this {NCES} definition consistent with the ESEA requirements to calculate the four-year adjusted cohort graduation rate. {...} Because TEA does not describe how the extended-year adjusted cohort graduation rates will be combined with the four-year adjusted cohort graduation rate within the indicator, TEA has not fully described its Graduation Rate indicator.</i></p> <p><b>Source:</b> USDE Review letter, pages 5-6</p> <p><i>The state also includes four-, five-, and six-year graduation rates, recognizing that some students may need additional time, but it is unclear how each is weighted, In finalizing its A-F methodology, TEA should place greater weight on its four-year rate relative to extended year rates to emphasize on-time completion.</i></p> <p><b>Source:</b> Bellwether Peer Review, page 6</p>

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<p><b>School Quality / Student Success Indicator for High Schools:</b> Annual graduates can meet the standard through achievement of at least one of the indicators listed.</p>	<p><b>School Quality / Student Success Indicator for High Schools Clarification:</b> Indicator is based on annual graduates, to include all students as well as each student group; Appendix D has details.</p> <p><b>Source:</b> TEA Revised ESSA Plan, page 25</p>	<p><i>"ESEA requires that each School Quality of Student Success Indicator measure performance for all students. It is unclear whether all students are captured in the annual graduates proposed by TEA. Additionally, because TEA does not provide detail regarding the measures within the college, career, and military readiness component or how the indicator is calculated, it is unclear whether use of these measures allows TEA to meet the statutory requirements..."</i></p> <p><b>Source:</b> USDE Review letter, page 4</p>
<p><b>Test participation rates</b> included on the Closing the Gaps Domain report. Campuses that do not meet the 95 percent rate will address participation rates in the Campus needs assessment.</p>	<p>If <b>test participation rates</b> for the all students group or any student group fall below 95 percent, the denominator used for calculating academic achievement will be adjusted to include the necessary students to meet the 95 percent threshold (i.e., artificial failers if test participation rates drop below 95%).</p> <p><b>Source:</b> TEA Revised ESSA Plan, page 22</p>	<p><i>In its State plan, TEA proposes to include failure to meet the 95 percent participations rate requirement in its accountability system (which is permissible) but not necessarily to calculate the Academic Achievement indicator. Section 1111(c)(4)(E)(ii) of the ESEA requires a State to use the greater of 95 percent of all students (or 95 percent of all students in a given subgroup) or the number of the number of students participating in the assessments as the denominator for measuring, calculating, and reporting on the Academic Achievement indicator. Because TEA is including failure to meet the participating rate requirement in its accountability system separately, it is not clear whether TEA is meeting the statutory requirement for calculating the Academic Achievement indicator.</i></p> <p><b>Source:</b> USDE Review letter, page 5</p> <p><i>"The plan includes no consequences for schools missing the 95 percent participation requirement, a critical requirement to preserve the accountability system's integrity and to ensure all students are represented equitably."</i></p> <p><b>Source:</b> Bellwether Peer Review, page 3</p> <p><i>"Further, Texas' lack of consequences for schools that do not meet the 95 percent participation rate in annual testing is highly problematic and could undermine the school rating system."</i></p> <p><b>Source:</b> Bellwether Peer Review, page 7</p>
<p><b>8th grade Math Exception:</b> The student takes a State-administered end-of-course</p>	<p><b>8th grade Math Exception Clarified:</b> the State will require students who take Algebra I in</p>	<p><i>"If a State takes advantage of this exception, the State must administer in high school a State-administered EOC or nationally recognized high school mathematics assessment that is more advanced."</i></p> <p><b>Source:</b> USDE Review letter, page 3</p>

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assessment or nationally recognized high school academic assessment	<p>middle school to also take SAT, ACT or TSIA in high school so that their results can be used in the accountability system.</p> <p><b>Source:</b> TEA Revised ESSA Plan, page 8</p>	<p><i>"Because Texas administers end-of-course assessments in high schools, the state has also proposed to permit 8th graders taking those courses early to avoid double-testing in 8th grade. This can be a promising practice. However, the state does not describe what state assessments are available beyond Algebra I, leaving out how those students would continue to demonstrate progress over time. It is important for these details to be added to ensure Texas will provide for more rigorous instruction and assessments for these students in math and be able to document their progress in high school (e.g., an Algebra II assessment). This will enable students and families to know if they are prepared for postsecondary work and is a core requirement in the law."</i></p> <p><b>Source:</b> Bellwether Peer Review, page 4</p>
<p><b>English Language Proficiency (ELP):</b> EL Performance Measure</p>	<p><b>English Language Proficiency (ELP):</b> ELL Progress Measure. TEA Revised ESSA Plan, page 11 ("an increase of at least one proficiency level on the TELPAS composite rating from most recent prior year to current year," etc.)</p> <p><b>Source:</b> TEA Revised ESSA Plan, page 23 and Appendix C</p>	<p><i>"While TEA provides a general description of how it will measure progress in achieving English language proficiency at the student level, it does not provide information regarding how the indicator is calculated. The ESEA requires a State to establish and describe in its State plan a Progress in Achieving English Language Proficiency indicator that is the same indicator across all LEAs in the State, is based on the State's definition of English language proficiency, is measured by the State's English language proficiency assessment, and includes the State-determined timeline for students to achieve English language proficiency."</i></p> <p><b>Source:</b> USDE Review letter, page 6</p>
<p><b>Exclusion of Identified Asylees/Refugees</b> in first through fifth years of enrollment in U.S. schools</p>	<p><b>N/A</b> (See deleted text in TEA Revised ESSA Plan, page 11)</p>	<p><i>Results of some asylee/refugee students in their first through fifth years in the U.S. will not be included in the accountability system, which is also not permissible under ESEA section 1111(b)(3)(A).</i></p> <p><b>Source:</b> USDE Review letter, page 3</p>
<p><b>Required Improvement Measure:</b> Safe Harbor - All students or any student group that fails to meet the ESSA indicator target for a specific measure will be afforded Safe Harbor via a required improvement measure.</p>	<p><b>Required Improvement Measure:</b> N/A (See deleted text in TEA Revised ESSA Plan, pages 17-18, and page 19 as relates to 4-year graduation rates)</p>	<p><i>"Finally, TEA proposes to use a second criterion of 'safe harbor' that seems to measure a school's performance based on the comparison of prior year and current year academic achievement. Since the ESEA requires that the academic achievement long-term goals be measured by proficiency, not improvement, on the annual statewide assessment, it appears that TEA does not meet the statutory requirement."</i></p> <p><b>Source:</b> USDE Review letter, page 4</p>



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<p><b>Overall A-F Grade Calculation for Campuses and Districts:</b> Not specified</p>	<p><b>Overall A-F Grade Calculation for Campuses and Districts Clarified:</b> The overall campus/district A-F grade is weighted by taking the better score of the Student Achievement domain or School Progress domain, which will account for 70 percent of the overall rating. The Closing the Gaps Domain comprises the additional 30 percent of the overall rating.</p> <p><b>Source:</b> TEA Revised ESSA Plan, page 26 and Appendix D</p>	<p><i>"The ESEA requires a State to describe its system of meaningfully differentiating, on an annual basis, all public schools in the State based on all indicators in the State's accountability system. • TEA proposes to assign each school an A-F grade determined by taking the better of what it calls "the Student Achievement" or "School Progress domain." It is unclear from TEA's description, however, how a school's grade would be based on all indicators. In particular, it does not use both the Student Achievement domain and the School Progress domain when differentiating schools. It also appears that TEA does not include the Progress in Achieving English Language Proficiency indicator in the determination of a school's grade.</i></p> <ul style="list-style-type: none"> <li>• <i>Additionally, the State proposes grouping its indicators into three domains but does not describe how those domains are calculated.</i></li> <li>• <i>In its State plan, TEA also includes a Closing the Gaps domain which does not appear to be based on any of the indicators in its accountability system. Since TEA does not describe how this domain is calculated or the indicators related to this domain, it does not appear that TEA meets the requirements for its system of annual meaningful differentiation to be based on all indicators in its accountability system.</i></li> <li>• <i>Finally, TEA indicates that it will assign each school a grade but does not describe how school grades are calculated. Accordingly, it is unclear whether the statutory requirements are met."</i></li> </ul> <p><b>Source:</b> USDE Review letter, page 7</p>
<p><b>Additional Targeted Support and Improvement Schools:</b> Any campus that is not identified for comprehensive or targeted support, and receives an "F" rating in the Closing the Gaps domain will be identified for additional targeted support</p>	<p><b>Additional Targeted Support and Improvement Schools:</b> Any campus that is not identified for comprehensive or targeted support will be identified for additional targeted support if any individual student group misses all indicators in the Closing the Gaps Domain.</p> <p><b>Source:</b> TEA Revised ESSA Plan, page 28</p>	<p><i>"TEA does not describe a methodology to identify each school in which any subgroup of students, on its own, is performing as poorly as the lowest- performing five percent of schools receiving Title I, Part A funds."</i></p> <p><b>Source:</b> USDE Review letter, page 8</p> <p><i>Finally, schools will be identified for additional targeted support on an annual basis if they receive an F in Closing the Gaps, but it's unclear what level of performance would warrant an F rating and how this will identify schools where subgroups are performing similarly to those in the bottom 5 percent of schools.</i></p> <p><b>Source:</b> Bellwether Peer Review, page 8</p>

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<p><b>Exit Criteria for Comprehensive Support and Improvement Schools:</b> Campuses that do not rank in the bottom five percent for two consecutive years but are receiving comprehensive support will exit that status</p>	<p><b>Exit Criteria for Comprehensive Support and Improvement Schools:</b> In addition to not ranking in the bottom five percent for two consecutive years, the campuses also must have a "C" letter grade or better in the Closing the Gaps domain to successfully exit comprehensive support status.</p> <p><b>Source:</b> TEA Revised ESSA Plan, page 29</p>	<p><i>"...TEA describes exit criteria that require a school to no longer be in the bottom five percent for two consecutive years, which may not require schools to demonstrate continued progress to improve student academic achievement and school success {...} ESEA requires a State to establish and describe exit criteria for comprehensive support and improvement schools that ensure continued progress to improve student academic achievement and school success in the State."</i></p> <p><b>Source:</b> USDE Review Letter, page 8</p> <p><i>While looking for sustained gains is a strong approach, it is possible that a school could exit improvement simply by other schools getting worse and not the school itself improving. In addition, Texas does not provide exit criteria for other comprehensive support schools that are identified for different reasons, like low graduation rates or chronically low-performing subgroups.</i></p> <p><b>Source:</b> Bellwether Peer Review, page 10</p>
<p><b>Exit Criteria for Additional Targeted Support Schools:</b> Campuses exit this status when they no longer meet identification criteria in the Closing the Gaps domain, expected within three years</p>	<p><b>Exit Criteria for Additional Targeted Support Schools:</b> Campuses exit this status when the identified student group meets at least 50 percent of the indicators in the Closing the Gaps domain within three years.</p> <p><b>Source:</b> TEA Revised ESSA Plan, page 29</p>	<p><i>"...TEA indicates that a school will exit additional targeted support status when it no longer meets identification criteria, which may not ensure continued progress in improved student academic achievement and school success. The ESEA requires a State to establish and describe statewide exit criteria for schools receiving additional targeted support that ensure continued progress to improve student academic achievement and school success in the State."</i></p> <p><b>Source:</b> USDE Review Letter, page 8</p> <p><i>While schools are expected to exit within three years, because the identification criteria for these schools are unclear, more detail is needed to fully evaluate the sufficiency of Texas' approach and to determine if the criteria expect sustained improvement from schools with low-performing subgroups.</i></p> <p><b>Source:</b> Bellwether Peer Review, page 10</p>

Readers are also encouraged to review TEA's redline document for additional ESSA plan revisions regarding Resource Allocation Reviews and Disproportionate Rates of Access to Educators.