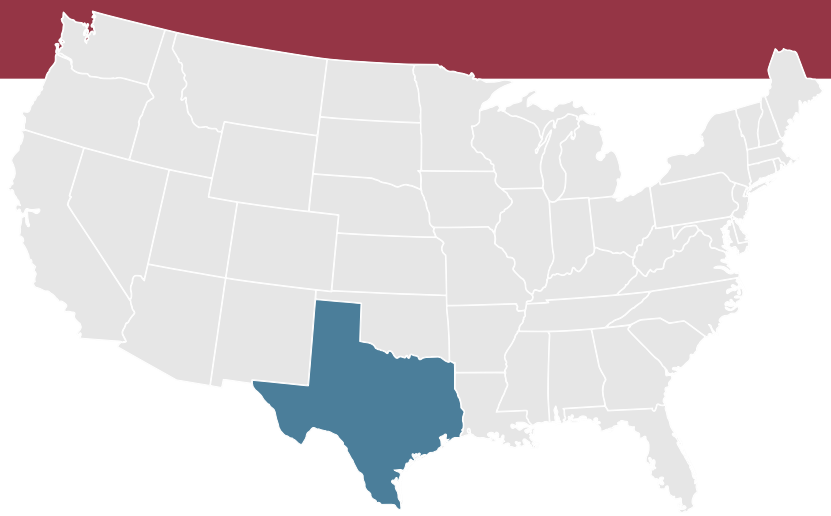


# An Independent Review of ESSA State Plans



## Texas

### *Project Overview*

**B**ellwether Education Partners, in partnership with the Collaborative for Student Success, convened an objective, independent panel of accountability experts to review ESSA state plans. We sought out a diverse group of peer reviewers with a range of political viewpoints and backgrounds, and we asked them to review each state's accountability plan with an eye toward capturing strengths and weaknesses.

We aimed to provide constructive feedback to the states, and to serve as a source of straightforward information to the public so that they are better able to engage policymakers if and how they see fit. Inherently, this independent process could not take into account the numerous political and situational challenges that occur in every state. We are in no way attempting to diminish those challenges, but the scope of this review was to compare the rigor and comprehensive nature of state accountability plans.

Peers worked in small teams to review the plans that states formally submitted to the U.S. Department of Education. After reviewing independently, the peers met for two days to discuss their individual reviews and work together on the collaborative draft you'll see below. The teams were asked to use their discretion and expertise to respond to and score each rubric item, and those scores were normed across states and peers.

Each state was given the opportunity to review the draft peer analysis and to provide substantive additions and corrections. Still, the reviews should be considered a snapshot of state plans as of September–November 2017, and we anticipate that states will continue to update their plans going forward.

To read more about the project, as well as a list of the expert peer reviewers, visit the Bellwether website [here](#).

## Overall Strengths and Weaknesses

**Strengths:** What are the most promising aspects of the state’s plan? What parts are worth emulating by other states?

Texas has taken steps to develop a new strategic plan, oriented toward college and career readiness, with a new A-F accountability system to match. While there are a number of remaining questions and decisions for Texas to make, there is potential for this system to form a clear foundation for the state’s work to improve student outcomes and close achievement gaps. Texas has adopted several indicators intended to focus on students’ readiness for college, career, and the military. By including science and social studies, the state is also signaling the importance of a well-rounded education for all students.

Texas’ plan for supporting its lowest-performing schools establishes a range of comprehensive and innovative interventions, including a recognition of the role for root cause analysis and stakeholder engagement prior to selection of strategies. The plan should be commended for its focus on both school boards and district leadership as critical factors in the success of school turnaround. Texas should also be recognized for planning to distribute at least a portion of its 7 percent set-aside of Title I funds for school improvement using a competitive process to help maximize school operational flexibility and prioritize significant changes in school governance and operations.

**Weaknesses:** What are the most pressing areas for the state to improve in its plan? What aspects should other states avoid?

Texas’ plan is incomplete and lacks sufficient detail to review in key areas, such as the weighting of its indicators, the inclusion of subgroup performance, and methods for identifying schools in need of improvement. The plan also makes no reference to a provision in state law that will weaken Texas’ ability to develop a single statewide accountability system: State law permits districts and charter schools to add locally developed measures to school ratings, with state approval. Such local modifications will undermine comparability across the state’s accountability system, as well as its validity and reliability.

In addition, areas where the plan is more fully realized raise flags, especially in terms of equity and excellence. Notably, the state has created a goal for 60 percent of adult Texans to have a postsecondary credential by 2030, but it undercuts this goal by setting the bar for student proficiency below the standard required to be ready for college and career. With such a low bar, students may meet it and believe they’re on a path toward success, even though they won’t necessarily be prepared. Given the missing details about the state’s A-F grading system, it is impossible to know whether this issue will be offset by other decisions to emphasize student growth or performance at higher levels that are indicative of postsecondary readiness.

Subgroup accountability is another area to strengthen. For example, the plan proposes to use a higher minimum group size for individual subgroups than the all-students group. As Texas' own data demonstrate, this choice results in a significant proportion of schools that will not be held accountable for critical groups of students, such as English learners and students with disabilities. 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. The plan also does not appear to include a timeline to achieve language proficiency for English learners. If a timeline exists, it should be added to the plan; if it does not, it's important to establish one. Finally, some of Texas' interim targets for achievement and graduation rates lack ambition and are lower than the current performance of certain student groups. Texas should provide a stronger rationale for how these targets are equally rigorous and attainable for all students, especially for those already meeting the targets.

## Plan Components

Each state's plan has been rated on a scale of 1 ("This practice should be avoided by other states") to 5 ("This could be a potential model for other states").

**Goals:** Are the state's vision, goals, and interim targets aligned, ambitious, and attainable? Why or why not?



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. Texas' long-term ESSA goals expect 90 percent of all students and all subgroups to reach the “approaches” level in English language arts and math and 94 percent of students to graduate high school on time over the next 15 years.

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.

Texas' goals for progress toward English language proficiency are simple to understand, with the percentage of English learners making sufficient progress expected to increase 2 percentage points every five years. However, Texas' plan could be improved by demonstrating how a two-point increase over this timeframe is sufficiently rigorous—particularly when achieving the long-term goal still means that fewer than half of English learners in the state (46 percent) would be making sufficient progress toward English language proficiency after 15 years. Further, the plan does not appear to include a maximum timeline to attain proficiency for English learners. If a timeline exists, it should be added to the plan; if it does not exist, Texas should establish one to support continued academic progress for its significant English learner population.

**Standards and Assessments:** Is the state's accountability system built on high-quality standards and assessments aligned to college and career readiness? Why or why not?

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Texas uses standards and assessments unique to the state, and its plan provides some details regarding their alignment to students' readiness for college and career. The state's STAAR test was validated using student performance data so that achieving the "masters" grade level means that students have a 75 percent chance of passing entry-level college courses (the same standard used by SAT and ACT), while the next highest level, "meets" grade level, indicates students have a 60 percent chance of passing them. However, Texas primarily focuses on student performance at the lower "approaches" level, as previously discussed.

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.

Texas should be commended for developing STAAR tests in Spanish for grades 3-5, especially as Spanish is a language present to a significant extent among the state's English learners. That said, Texas does not plan to develop similar tests for higher grade levels and could strengthen its plan by including a rationale for why there is no need for additional Spanish-language tests.

Finally, Texas could also strengthen its plan by providing more information about its alternate achievement standards and aligned assessments for students with the most severe cognitive disabilities, including the steps it will take to ensure that the state does not exceed the 1 percent cap on participation in the alternate assessment for students with the most significant cognitive disabilities.

**Indicators:** Are the state’s chosen accountability indicators aligned to ensure targets and goals are met and likely to lead to improved educational outcomes for students? Why or why not?



Texas’ indicators are promising, but the plan lacks clarity, coherence, and detail around the specific calculations and weighting for each measure, given the recent changes to its A-F grades. Texas should revise its plan to include historical data and additional descriptions and evidence of how its indicators support meaningful differentiation of schools. In addition, the plan should describe how Texas will implement a uniform statewide accountability system, given its state law permitting districts and charters to add locally developed indicators to school ratings with state approval. If local modifications are approved and could change a school’s overall grade, such an approach would undermine the validity, reliability, and comparability of the school grades across the state.

There also appear to be some measures used for school grades that are not described in the plan, such as those related to former students with disabilities. That said, it is clear the state will at least be measuring academic proficiency in reading, math, writing, science, and social studies and progress toward English language proficiency for English learners in all schools; both academic growth and academic achievement at the “meets” grade level standard in reading and math in elementary and middle schools; and graduation rates (four-, five-, and six-year rates) and college and career readiness in high schools.

Setting its “proficient” level on STAAR tests at a level that does not indicate a student is on track for college and careers works against the state’s long-term college attainment goal, and Texas appears to do very little to offset this choice with its other indicators. Texas includes a second achievement measure of student performance at the higher “meets” grade level standard as a school quality indicator, but the indicator may not receive a significant weight or offer much additional differentiation of schools. Texas would be better served by replacing its academic proficiency indicator entirely with this more rigorous measure. A robust growth measure could also offset Texas’ low academic proficiency bar, but the growth measure used in Texas fails to incentivize student progress to levels above the “approaches” level.

In high schools, the state’s college- and career-ready indicator is noteworthy, giving a menu of options for students to demonstrate postsecondary readiness—meeting standards on Advanced Placement exams, earning dual course credits or industry certifications, admission to postsecondary programs that require successful high school performance as a prerequisite, earning an associate’s degree in high school, and military enlistment, to

name a few. Texas should monitor its data to ensure that all of these options are equally predictive of success and that certain groups of students are not disproportionately likely to pursue more or less rigorous pathways. 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, Texas should place greater weight on its four-year rate relative to extended-year rates to emphasize on-time completion.

Texas deserves recognition in two other areas. The state notes that it will include all K-12 English learners in its indicator of progress in English language proficiency, which goes beyond ESSA's requirements and includes more students in this critical measure. In addition, the inclusion of science and social studies is positive and may help mitigate concerns of curriculum narrowing.

**Academic Progress:** Has the state created sufficient incentives for schools to care about both student proficiency and student growth over time? Why or why not?

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While Texas includes both student proficiency and progress in reading and math in its accountability system for elementary and middle schools, its method for weighting each measure could be improved. In particular, it is troubling that only one of these factors may ultimately matter in school grades. Texas is considering using only the better of the two domains, either Student Achievement or School Progress, in calculating each school's grade. Although this approach could enable growth to play a significant role in school grades, it could also have the opposite effect, which would be a real disservice to students.

Texas also fails to focus on achievement and growth for all students, at all levels of performance, toward college and career readiness. Texas measures proficiency as the percentage of students reaching the "approaches" standard, which sets a relatively low bar. Further, the plan appears to only incentivize growth for students at the lowest level. For students who are already proficient on the STAAR tests, the expectation is to just maintain an "approaches" score, and it is unclear how much growth is expected each year for students who are not yet at that level. Thus, Texas misses an opportunity to encourage and reward growth from the "approaches" to the "meets" or "masters" level in this indicator and could strengthen its plan by providing a demonstration that its growth measure expects sustained progress for all students, not just those scoring a level 1 on state tests.

**All Students:** Does the state system mask the performance of some subgroups of students, or does it have adequate checks in place to ensure all students (including all subgroups of students) receive a high-quality education? Why or why not?

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Between its high minimum group size for inclusion in accountability measures, lack of consequences for nonparticipation in state tests, and lack of clarity on how its “Closing the Gaps” domain is measured, Texas has significant work to do to ensure all students are included in the accountability system and that low subgroup performance is not masked. The state proposes to use a different minimum group size for the all-students group (10) than for individual subgroups (25). Texas explains that a group size of 10 will enable small schools to be included, as the state will combine three years of data in those cases to reach the group size, but does not offer a rationale for using a different policy for individual subgroups.

While the higher group size for subgroups should be reduced, Texas should be recognized for including data demonstrating the effects of this choice. Unfortunately, the data show that, at a group size of 25, fewer than half of schools will be held accountable for English learners and students with disabilities, fewer than 35 percent will be held accountable for black students, and only 56 percent will be held accountable for white students. The state also has a different set of criteria to include English learners who are recent refugees and may exclude their results for five years; it is not clear why this is the case, what the state’s plan is for addressing these students’ learning needs, and how these criteria are determined to apply to individual students.

Texas has not finalized its new methodology for awarding school grades—and thus identifying schools for support—making it difficult to determine how much subgroup performance matters. The state indicates its Closing the Gaps domain will be at least 30 percent of the grading formula, which could be a positive step to emphasize subgroup results, but includes no explanation of what measures are part of Closing the Gaps, how individual subgroups are considered, and whether the English language proficiency indicator is included. Texas’ criteria for identifying schools with consistently underperforming groups for targeted support are clear, as they are based on missing the state’s interim targets or goals for a number of years. However, the criteria to identify additional targeted support schools are not, because they are based on earning an F grade in the Closing the Gaps domain. 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.

Finally, it is unclear how, and for how long, Texas is including former English learners and other unique populations, including former students with disabilities, who are part of Closing the Gaps. While tracking the performance of students formerly identified in these subgroups is a promising practice, there are also pitfalls if they’re included in the same subgroup with students currently receiving language or disability services. In addition, unlike former English learners, former students with disabilities may not be included in the overall subgroup for accountability purposes. Since exiting students tend to have higher performance, the state should clarify the length of time they will be incorporated in the overall subgroup, if at all, and monitor its data to ensure their inclusion is not masking the performance of students who are still receiving services.

**Identifying Schools:** Is the state’s plan to identify schools for comprehensive and targeted support likely to identify the schools and student groups most in need?

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Texas will be using its A-F grading system to hold schools accountable for overall performance based on three domains: Student Achievement, School Progress, and Closing the Gaps. An A-F system can be user-friendly, helping ensure that stakeholders and schools have a clear understanding of how schools are serving all children. However, because the system is so new, many decisions to implement it have yet to be made. Given these uncertainties, it is difficult to know how many schools Texas will identify and which measures will be used and emphasized. For instance, Texas has no data showing how an F grade relates to identification of schools among the bottom 5 percent.

It is also unclear how each of the described indicators fits into the domains, and it appears Texas may be including other measures that are not fully explained. For example, the Student Progress domain includes student growth, but also an unspecified metric comparing student achievement relative to schools with similar demographics. And the Closing the Gaps domain includes subgroup performance data, but Texas doesn’t provide any detail about how it will be measured. It is similarly unclear where indicators measuring progress in English language proficiency and the percentage of students achieving at the “meets” grade-level standard fit in, and how all of the measures count, if at all, toward school grades.

This raises another concern: Texas does not fully describe how multiple measures in a domain are aggregated, how it weights each domain to determine final grades, or the cut points that distinguish an overall A grade from a B or C. The plan indicates the Closing the Gaps domain will be worth at least 30 percent, and that final grades may include the better of Student Achievement or Student Progress. But because of the uncertainties and the lack of clear data on the number of schools that would be captured, it is hard to tell at this point if the system will identify the neediest schools.

Texas will identify three groups of schools each year for comprehensive support: the lowest 5 percent of Title I schools based on the overall A-F grades, any high school with a four-year graduation rate below 67 percent, and any school that remains in targeted support for three years in a row.

To identify targeted support schools, the fact that any one group falling behind on its interim targets for three years will lead to identification could go a long way to support schools with struggling subgroups. But the plan is ambiguous regarding which targets will be considered, and does not provide estimates for how many schools it might identify. 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.



**Supporting Schools:** Are the state’s planned interventions in comprehensive and targeted support schools evidence-based and sufficiently rigorous to match the challenges those schools face? Why or why not?

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Texas has a robust plan in place to support schools, particularly those that fail to improve over time. The plan could be strengthened, however, by describing how the state will determine that initial interventions are evidence-based and address the challenges faced by schools. Each comprehensive support school that hasn’t improved after two years will be required to develop a Campus Turnaround Plan and submit it to the state for approval. The plan must include data and root cause analysis, a whole-school reform model, and stakeholder engagement—all helpful steps that could be taken immediately, rather than after two years. It will also be important to ensure that stakeholder engagement on these plans is robust and allows an opportunity for meaningful participation. If these schools have not improved after five years, schools face more rigorous, state-directed action, such as closure; restarting the school in partnership with a charter; conversion to a charter with an independent governing board, new leadership, and redesigned model; appointment of a conservator for the school or district; or appointment of a board of managers to oversee the district instead of the local board.

Texas should be commended for planning to distribute at least a portion of its 7 percent set-aside for school improvement using a competitive process. The state will award funds to districts committed to interventions with strong evidence and that feature school-level operational flexibility, although its prioritized strategies focus more on the process for how change will happen than the specific interventions employed once that process is in motion. Texas could strengthen its plan by describing how it will ensure there is an evidence base for all school interventions, including any existing evidence backing the strategies it plans to prioritize. In addition, Texas is also the first state to propose using these funds to open new charter schools to serve students attending identified schools. That said, Texas should clarify its plan to ensure that this would be coupled with actions to improve conditions within the school that has been identified—in case some, or most, students from the identified school do not enroll in the newly created one. Texas could also indicate if and how it intends to provide direct student services using the optional 3 percent Title I set-aside, which could further support these efforts to improve identified schools.

Other areas of Texas’ strategy are less defined, such as the continuum of technical assistance it will provide to districts to support improvement, as most of its efforts to build district capacity have not yet been determined. Still, many of Texas’ ideas are promising, including developing a resource library for improvement activities and vetting professional service providers and school improvement partners for effectiveness. Delivering on all of these promises will go a long way toward providing the assistance schools and districts need to improve outcomes for students. Finally, Texas’ Lone Star Governance training program for local school boards, an oft-overlooked area in school improvement activities, is a novel approach other states may want to consider.

**Exiting Improvement Status:** Are the state’s criteria for schools to exit comprehensive and targeted support status sufficient to demonstrate sustained improvements? Why or why not?

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Texas’ exit criteria for identified schools are essentially the reverse of its identification criteria. It is proposing to exit schools from comprehensive support status if the school improves its relative ranking and is no longer in the bottom 5 percent of Title I schools for two years consecutively. 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.

For targeted support, schools may exit when they no longer meet the criteria in Closing the Gaps that caused them to be identified. 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..

**Continuous Improvement:** Has the state outlined a clear plan to learn from its implementation efforts and modify its actions accordingly, including through continued consultation and engagement of key stakeholders? If not, what steps could the state take to do so?

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Texas’ plan lacks a clear and explicit way to learn from implementation and make modifications as needed. While there are a few references to stakeholder engagement, such as getting input on school turnaround plans, there are many other ways stakeholder input could be included. That said, Texas plans to conduct additional engagement in the coming months around key decision points in its A-F accountability system, and plans to submit a revised plan after final decisions have been made. The state could more clearly describe the “multiple forums” it has used, and how it will ensure input from key, diverse constituencies as part of this process and on an ongoing basis, as it is not evident that consultation and engagement will continue once it resubmits its plan.

Similarly, Texas appears to still be working to develop a set of supports for district capacity-building around school improvement, including community partnerships, improvement and turnaround strategies, and instructional programs, to create conditions for continuous improvement of all schools. While many of its ideas are promising, at this stage they are only promises, with no firm decisions made on the direction of the work, key deliverables, or a multistep timeline for developing supports, receiving feedback, and improving them over time.