

**House of Representatives
Response to Notice of Formal Request for Information
Public Education- Interim Charge 1(B)**

Chairman Huberty and Members of the House Committee on Public Education:

The Texas Association of School Administrators (TASA) appreciates the opportunity to provide comment on Interim Charge 1(B) related to recent legislation regarding the State's assessment and accountability systems. We offer the following input for your consideration:

- 1. We recommend removal of Texas Education Code, Section 39.101(c) that applies the same sanctions and interventions to certain D-rated campuses as those applied to F-rated campuses.** As discussed at the House Committee on Public Education hearing on October 28, 2019, TEA Commissioner of Education Mike Morath pushed "pause" on rule-making for this provision to allow the legislature time to clarify and tighten the language so that there would be no more ambiguity regarding a "D" rating. Texas Education Code (TEC), Section 39.054 states that an F is the only rating assigned the label of unacceptable, whereas a rating of A, B, C, or D are deemed acceptable. These definitions conflict with TEC, Section 39.101(c) that provides that a D rating is treated as an unacceptable rating after two consecutive years for purposes of accountability interventions and sanctions. A campus rated D for two consecutive years needs time to fully implement its targeted improvement plan, and should not be treated the same as an F-rated campus. Removal of TEC, Section 39.101(c) would rectify the conflicting provisions.
 - 2. We recommend removal of the provision in Texas Education Code, Section 39.054 that states, "A district may not receive an overall or domain performance rating of A if the district includes any campus with a corresponding overall or domain performance rating of D or F."** As heard through testimony at the House Committee on Public Education hearing on October 28, 2019, it is inherently wrong when a district has *earned* an overall A rating but has its rating lowered to a B because of one campus rating of D or F. This provision conflicts with the definition of the ratings in the same section of code, in which an A reflects exemplary performance. In addition, with no meaningful, valid, or reliable method to measure progress, the "best of" option (between Domains 1 and 2a/2b) is not a sound calculation. This inherently puts high-poverty districts at a disadvantage for any possibility of achieving an A, and goes against the legislative intent in which every district can earn an A rating. We recommend removing this provision and grading each domain separately without an overall rating.
 - 3. We recommend waiving the A-F rating system for the 2020-2021 school year.** It would not be equitable to rate school communities under the current landscape. In addition to
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the health, safety and trauma issues of the COVID-19 pandemic, students in many areas of the state have also been negatively impacted by tropical storms and hurricanes. While the intent of Operation Connectivity is much appreciated, additional equity issues include the digital divide in rural, remote, and poor areas. If the USDE is not offering waivers for the STAAR test administration for the 2020-2021 school year (per Secretary of Education correspondence to Chief State School Officers dated September 3, 2020) we recommend only using the STAAR test results locally to help inform instruction and in addition to local diagnostic assessments administered to determine students' academic strengths and weaknesses. We urge the Committee to keep the focus on helping students and school communities instead of labeling them for circumstances outside of their control. We ultimately advocate for the establishment of a comprehensive accountability system that looks beyond high-stakes, multiple-choice exams to meaningful assessments that have value for students, parents, and teachers, as well as flexible measures that local communities' value.

4. **We recommend that the Committee carefully review and consider the [concerns and recommendations of the State's APAC and ATAC members](#).** This includes their last committee meetings in July of 2020 in which they discussed:
- Concern about instructional loss from COVID-19 and academic growth for 2021;
 - Need to deemphasize high-stakes testing;
 - Need to focus on diagnostic testing and intervention;
 - Need to reset targets;
 - Concern that schools will be punished for lack of performance, and;
 - Four options for moving forward with the State's Accountability System in 2021.

We also recommend that the Committee monitor future APAC and ATAC discussions and recommendations while considering accountability and assessment provisions.

Thank you again for the opportunity to provide input on Interim Charge 1(B). I'm happy to answer any questions or provide further information on TASA's recommendations to the Committee.

Sincerely,



Dr. Casey McCreary
Associate Executive Director, Education Policy
Texas Association of School Administrators
