

**Commissioner's Rule Review**

**Chapter 97, Subchapter AA, Accountability and Performance Monitoring**

<b>Chap.</b>	<b>Ext.</b>	<b>Issue</b>	<b>Desired Change</b>	<b>Rationale</b>	<b>Focus Group Comments</b>	<b>TEC</b>	<b>Agency Response</b>
97		Don't move targets continually. Too many indicators "gotcha system".			The focus group agreed that targets are consistent in state accountability, federal accountability, and monitoring and raised as appropriate to ensure high expectations continue to be set. "Too many" indicators needs to be considered in light of (a) state and federal requirements; and (b) the actual impact on districts.		Consistent with Focus Group recommendation, no change is recommended.

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97		<p>2 accountability systems cause problem.</p> <p>Prefer alignment between TAC97 and Chapter 39 of Ed. Code.</p> <p>Confusion about State/Federal Graduation &amp; completion rates.</p>	Align 2 systems - align state & federal dropout & completion standards.		Focus Group agreed that state and federal regulations defining dropout and completion standards are not aligned.		<p>Consistent with Focus Group recommendation, no change is recommended. State law required the use of the National Center for Education Statistics (NCES) dropout definition to be phased in and applied to the completion/graduation/dropout indicators in both state and federal systems beginning with the 2005-06 leavers that were reported in the 2006-07 school year and fully implemented by the 2009-10 school year.</p> <p>Under state accountability, the School Leaver Provision (SLP) was in place only for the 2007 and 2008 school years to give districts sufficient time to adjust to the more rigorous NCES definition.</p> <p>Under the SLP, the completion, annual dropout, and underreported students indicators could not be the sole cause for a lowered district or campus rating. HB 3 states that certain exclusions will be allowed beginning with the 2010-11 leavers that will be reported in the 2011-12 school year. At that time, the dropout definition will no longer be aligned between the state and federal accountability systems.</p>

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97	1071	97.1071 TPM is applied to reg. accountability but not PBMAS.	Should be considered in all systems.		The Focus Group agreed that there are already sufficient provisions in PBMAS that take into account growth and incremental progress. (See p. 4 of the 2009 PBMAS Manual for more information on this issue.)		Consistent with Focus Group recommendation, no change is recommended. The 2009-10 school year is the second year that Texas Projection Measure (TPM) projections were used in state and federal accountability. For 2011 state accountability, TEA will consider several options for changing the use of TPM so student performance is acknowledged and the state acct. system remains transparent. Options include:  1). suspension TPM for acct. ratings 2). use TPM but only for districts that elect to use it 3). modify TPM calculations, and/or 4). include additional safeguards such as performance floors, count the students projected to pass as a fraction of a passer, prohibit TPM to be used for same measure in subsequent year, limited number of measures for which TPM can be used in a given year, or limit which rating categories can make use of TPM.

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97	1001.Accountability Rating System. (a)(4) procedures for submitting a rating appeal.	Appeals process - districts should be able to appeal before results are made public to the media.	Privately release ratings to superintendents through TEASE before a public release.	<p>It corresponds to the FIRST rating system that already allows for a private release.</p> <p>Assure correct information is given to the public.</p> <p>Avoids unmerited negative public opinion.</p> <p>To the benefit of not only individual districts but Texas education as a whole.</p>			District superintendents receive ratings via the TEA Secure Environment (TEASE) after appeals are determined and prior to the public release of final ratings.
97		Benefit	Revise rule to allow time for districts to go through the appeals process before public release of information.	If districts could be notified of their rating privately and given time to go through the appeals process before the public announcement, it would be more expedient and motivating for the districts.			District superintendents receive ratings via the TEA Secure Environment (TEASE) after appeals are determined and prior to the public release of final ratings.

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97	1001.Accountability Rating System. (a)(2) indicators, standards, and procedures used to determine campus ratings.	<p>Issue and Problem: School Districts that have Residential facilities such as North Texas Youth Connection (NTYC), formerly Juvenile Alternatives, can be negatively impacted in the area of Completion Rate I. This issue was resolved several years ago, in regards to the JJAEP and Juvenile Detention Center (JDC) that is within our district boundaries, but the issue of the NTYC was not addressed and should have been.</p> <p>I can best describe this situation with an example. September 28th, Johnny is enrolled at the local HS because CPS has moved him to the NTYC center that was built by the state in the school's attendance zone. Johnny runs away on September 30th. Johnny's leaver code will be a 98 and will count as a non-completer for the local HS, even though Johnny was only in attendance for 2 school days. Those schools who do not have a facility of this type within their attendance zone do not have this issue to deal with and one school's accountability rating is at risk simply because the state chose to build this facility in their attendance zone.</p>	<p>I am requesting that students housed in short term Residential Facilities, such as the NTYC, who are under the state's guardianship, not count against the school's accountability rating in terms of Completion Rate because it is unequitable.</p>	<p>My proposed change would solve the problem because my accountability rating would truly reflect the job that my HS is doing.</p> <p>The mobility issue addresses this in terms of TAKS data, but for Completion Rate, a student can be enrolled one day and then count against us. I'll accept the hit when it's a student still with parents/guardians who reside in my district, because that's an issue that all districts and campuses across the state have to deal with. It's not good, but at least there is equity.</p> <p>But when it's a child in state custody, and I'm taking the hit simply due to the physical location of the state facility, that's an accountability issue that not all districts must face, and therefore is unequitable.</p>			<p>Texas Youth Commission (TYC), Texas Juvenile Probation Commission (TJPC), and residential treatment facilities results are excluded from district results, as per the <i>2010AccountabilityManual</i>, Chapter 6, adopted as rule. Current statute (TEC 39.054(f)) states that a student who leaves a residential treatment center after receiving treatment for fewer than 85 days and fails to enroll in school may not be considered to have dropped out from the campus or school district serving the facility or center unless that campus or district is the one to which the student is regularly assigned. Beginning in the 2009-10 school year, additional student attribution codes were collected in PEIMS that would allow districts to identify students served in a residential facility located in the district.</p>

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97	<p>1001. Accountability Rating System. (d) specific criteria and calculations used in the accountability manual are established annually by the commissioner and communicated to all districts and charter schools.</p> <p>1004. Adequate Yearly Progress. (c) specific criteria and calculations used in AYP are established annually by the commissioner and communicated to all districts and charter schools.</p> <p>1005. Performance-Based Monitoring Analysis System. (b) assignment of performance levels or districts and charter schools in the 2010 PBMAS is based on specific criteria and calculations described in excerpted sections of the PBMAS 2010 manual.</p>	<p>Rules throughout accountability/monitoring systems are established with sole responsibility on commissioner. Accountability has no check/balance with commissioner as sole authority. Schools have no input. Recommend checks/balance relationship similar to school board/superintendent.</p>	<p>The specific criteria and calculations used in the accountability manual are established by the commissioner of education with input from school representatives and communicated to all school districts and charter schools.</p>	<p>Commissioner has support from another educational entity rather than bear sole responsibility of decisions.</p>		<p>39.051(c) (d), 39.072(c), 39.0721, 39.073, 29.081(e)/ 7.055(b) (32), 39.073, 39.075(a) (4)/ 97.1005(b)</p>	<p>While legal terminology refers to the commissioner, the process is a collaborative one with TEA, ESCs, school districts, business community, and others.</p>

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97	<p>1001. Accountability Rating System. (d) specific criteria and calculations used in the accountability manual are established annually by the commissioner and communicated to all districts and charter schools.</p> <p>1004. Adequate Yearly Progress. (c) specific criteria and calculations used in AYP are established annually by the commissioner and communicated to all districts and charter schools.</p> <p>1005. Performance-Based Monitoring Analysis System. (b) assignment of performance levels for districts and charter schools in the 2010 PBMAS is based on specific criteria and calculations described in excerpted sections of the PBMAS 2010 manual.</p>	<p>Rules established every year, throughout accountability/monitoring systems. Standards changing every year with results not available until late spring make it too late for planning; don't know the target.</p>	<p>The specific criteria and calculations used in the accountability manual are established bi-annually by the commissioner of education....</p>	<p>Provides some reliability in preparation for what will happen the coming year.</p>		<p>39.051(c) (d), 39.072 (c), 39.0721, 39.073, 29.081(e)/ 7.055(b) (32), 39.073, 39.075(a) (4)/ 97.1005(b)</p>	<p>While rules are adopted each year, they typically include preview information for at least one upcoming year whenever possible.</p> <p>Preview standards are published annually in the current year accountability manual.</p>

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97	1001.Accountability Rating System.	Accountability Guide year doesn't match fiscal year or testing year, causing confusion.	Use fiscal year or testing year for annual Accountability Guide, e.g. 2009-10 referring to evaluation year or FY 2010.	Minimize year confusion.		39.051(c) (d), 39.072(c), 39.0721, 39.073, 29.081 (e)	The year used for the state accountability manual is aligned with the school year that the ratings are applied.
	1001. Accountability Rating System (a)-(d) indicators, standards, and procedures to determine district and campus ratings, to determine additional acknowledgment, and procedures for submitting appeals.	Yes, it benefits districts	Schedule a publication of the accountability manual for late fall or early spring.  Formulas reconsidered in order not to be overly punitive toward districts/campuses. Consistency in rounding up of scores to the 10th, not the 100th.	Allows districts to familiarize themselves with expectations prior to receiving TAKS results.  Consistency, equity, fairness.		39.051(c) (d)	The accountability development calendar was reviewed at the meeting. While rules are adopted each year, they typically include preview information for at least one upcoming year whenever possible. In the current system, preview standards for the upcoming year are published annually in the current year accountability manual. In the accountability system beginning in 2013, HB 3 requires that standards are projected for the next two years.
97	1001.Accountability Rating System. (a)(1)-(2) indicators, standards, and procedures used to determine district and campus ratings	The way districts, campus and student assesments are reported and used to determine ratings and pass/fail.	The scores should be reported as percentage met grade level, percentage above grade level and did not meet grade level.	The present TAKS is not a grade level test even though it is based on TEKS. Some students may actually score high enough to meet grade level standards, but fail the test as reported now. So have two scores for students, campus and district - met grade level, exceeded grade level, did not meet grade level mastery.		39.051(c) (d)	The standard setting process for the new STAAR assessment program will assign a proficiency standard and a higher college/career readiness standard as mandated by HB 3.

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97	1001.Accountability Rating System.	Yes	Accountability should be based on improvement and used as a tool to improve instruction, not as a punitive measuring stick for campuses/districts.	More in line with what assessment is intended to be and a large minimum size for district will be more equitable for determining accountability ratings.		39.051(c)(d), 39.072(c), 39.0721, 39.073, 29.081(e)	Required Improvement (RI) feature has been a feature in the state accountability system since 1994.
97	1004.Adequate Yearly Progress.	Yes	The state and federal accountability systems should be aligned. The caps for special education should be reconsidered due to the fact that districts are required to teach all children, regardless of handicapping condition.	Helps schools focus on teaching and learning and not on keeping up with two accountability systems. Allows schools to provide the best assessment for students to determine improvement.		7.055(b)(32), 39.073, 39.075(a)(4)	Statutory change required. During the development of the new accountability system, the two systems will be aligned to the extent possible.
97	1005.Performance-Based Monitoring Analysis System	Yes	Should be based on improvement. Standards should not be changed yearly.	Schools will know the target standard during the school year instead of knowing the standard toward the end of the year as in the current situation.	Data indicate PBMAS standards are reasonable. They do not change yearly.	7.028, 29.001(5), 29.010(a). 39.051, 39.052, 39.054, 39.056- 39.058, 39.102- 39.104	The PBM Focus Group, ESCs, and districts all have opportunity annually to provide input to the Commissioner in the standard-setting process.

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97	1005.Performance-Based Monitoring System. (c)specific criteria and calculations used in PBMAS are established annually by the commissioner of education and communicated to all school districts and charter schools.	No opportunity for districts to have input into establishing standards annually.	Revise (c) to allow a committee to make recommendations to the Commissioner for the standards adopted annually, i.e. school size, in relation to demographics, needs to be considered; also consider 5-year averages/trends rather than 1 year spikes.	By providing opportunity of input for a reasonable standard in PBMAS.			The PBM Focus Group, ESCs, and districts all have opportunity annually to provide input to the Commissioner in the standard-setting process.

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97	1001.Accountability Rating System.  1004.Adequate Yearly Progress.  1005.Performance-Based Monitoring System.	The timing of the rule adoption process relative to the development processes for each of the three accountability systems or mechanisms being administered by TEA is problematic. It is common professional practice for both individuals and organizations to be informed in advance of the criteria that will be used for their evaluations. The current development cycle yields decisions at a point in time when it is too late for practitioners to use the information to guide appropriate practice, including the ability to prepare data analyses that accurately conform to state definitions or requirements. In addition, rules typically are formally adopted after "final" decisions have been made and announced to districts, rendering the public comment period associated with the formal rules process somewhat moot. Finally, the rules do not address the development process, per se.	A new section of rule should be used to codify accountability system development processes, including sufficient specificity about means TEA will use to obtain public school educators' and other stakeholders' input into the decision making process. The new section also should establish a time frame that yields final decisions closer to the start of the school year than is now the case, so that system transparency and fairness are promoted.	The requested changes support mutual interests of the state and districts by promoting transparency, efficiency and effectiveness. Districts are forced into inefficiency when specific accountability decision details are not released until the end of the school year. District personnel must prepare various data displays (including intensive system programming) and analyses to inform planning and decision making, but when specific details about how the data will be treated are not released until very late in the school year, much of the work has to be done over again to accurately reflect those final decisions.	After review and discussion of the accountability development calendar for the current system, the focus group members acknowledged that the timelines for the rule adoption process were reasonable and did not offer any alternative recommendations.	39.051(c) (d)/7.055 (b)(32), 39.073, 39.075/ 7.028(a)	During the development of the new accountability system, input from public school educators and other stakeholders will be sought throughout the process.

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97	1005.Performance-Based Monitoring Analysis System.	This rule needs to be revised because PBMAS applies standard accountability requirements to standard and alternative education campuses.	Changes should be made to account for those schools that fall under AEA accountability.	When assessing AEA schools, the PBMAS system conflicts with the requirements in the AEA manual. The rule does not give consideration for schools that fall under AEA standards. It could be reconciled by drafting language that will assess AEA schools under PBMAS with AEA standards and not the standard accountability standards. Our members report that the system does not accurately account for the type of students they serve. Although dropout recovery charters in the alternative accountability system are most exposed to the PBMAS, college preparatory schools are also affected by PBMAS. PBMAS is a significant issue to our members because based on performance ratings in these areas, one of several remediation levels, called "intervention stages" may be triggered, requiring specified actions. Continued	The data indicate PBMAS is an appropriate monitoring system for all districts.	7.028, 29.001(5), 29.010(a), 39.051, 39.052, 39.054, 39.056-39.058, 39.102-39.104	Statutory change required. Federal law and federal program requirements do not permit a separate monitoring system or separate monitoring requirements for charters. (There is, likewise, no separate AYP system for charters.)

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[CONTINUED FROM RATIONALE] Such triggering may lead to sanctions and result in the denials of federal and state grants, denials of requests for expanded programs and campuses, and other adverse affects. In addition, the Agency already has precedence for reviewing performance as appropriate to the population being served. [END]							
97	1005.Performance-Based Monitoring Analysis System.	The current PBMAS indicators measure the percentage of students who are receiving Special Education services, regardless of which school identified those students as Special Education. This causes violations and appeals regarding a metric over which the school has no direct control.	Change the indicator to be the percentage of students IDENTIFIED as Special Education by the school in which the students are currently enrolled.	This focuses the attention on where it is needed - appropriately identifying Special Education students - and not punishing a school for serving a student who has already been so identified.	The focus group agreed that the indicator as currently calculated is appropriate.	7.028, 29.001(5), 29.010(a), 39.051, 39.052, 39.054, 39.056-39.058, 39.102-39.104	Consistent with Focus Group recommendation, no change is recommended.
97	1001.Accountability Rating System.	Three different manuals, three different releases, and three different reports.	Common release date for common reports (accountability rating/AYP/PBM), format acceptable to all three.	Reduce confusion, stress, and reduce unnecessary interference with district ability to improve student performance.		39.051(c)(d)	Common releases are not possible due to the different data collection cycles, reporting cycles, and policy development cycles for state and federal accountability as well as for PBM.
97	1001.Accountability Rating System.	Rule states "annually" but not the use date. Earlier release of manual. Manual released in May and used in August rating system.	Released in May but used in subsequent year or Released in August for use in the next year. Provides for better planning and implementation.	Reduce appeals based on changes in the test answer sheet coding. Schools know the changes prior to the PEIMS snapshot and answer sheet coding.		39.051(c)(d)	Data collection cycle, data reporting cycle, and policy development cycle prevent the Manual from being released earlier than May.

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97	1001.Accountability Rating System.	Confusing with three accountability system---State-AYP-and PBMAS.	One manual for all three program issues, so we don't have to go from manual to manual to make sure that we're meeting all compliance issues. Create a side-by-side document like special ed does that has federal law, state law, and TEA rule.	Districts will more likely understand the impact of their decisions and provide for transparency and understanding.		39.051(c)(d)	All manuals are available electronically through the agency website, and anyone who would like to put them all together into one either hard or electronic copy can easily do so. Side-by-side comparisons of key indicators are also available.
97	1004.Adequate Yearly Progress.	Completion and Graduation Rate--- definitions are confusing and difficult to keep clear between AEIS, AYP, & PBM.	Completion data and definition and standards should be consistent between AEIS, AYP, PBM in order to communicate with staff and community	Eliminate unnecessary interference with district ability to improve student performance. Reduce stress and increase understanding and clarity.		7.055(b)(32), 39.073, 39.075	During the development of the new accountability system, the two systems will be aligned to the extent possible.
97	1005.Performance-Based Monitoring System.	District counts include pre-identified students who transfer into the district.	Accountability should take into consideration kids who transfer into district who are pre-identified for special pops	Fairness to district and students.	The Focus Group agreed that the indicators as currently calculated in the PBMAS are appropriate.	7.028, 29.001(5), 29.010(a). 39.051, 39.052, 39.054, 39.056-39.058, 39.102-39.104	The <i>Accountability Manual</i> specifies accountability subsets and minimum size requirements for districts and campuses that determine which students are included in the calculation of accountability ratings.

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97	1005.Performance-Based Monitoring System.	Evaluation Criteria is based on just one year state average	It would be better if they were based and set on three-year timeline (three-year average); standard should stay constant for three years (PBM).	Evaluation Criteria should not be based on just one year state average; it would be better if they were based and set on three-year timeline (three-year average); standard should stay constant for three years (PBM).		7.028, 29.001(5), 29.010(a). 39.051, 39.052, 39.054, 39.056-39.058, 39.102-39.104	Evaluation criteria are not based on one-year state averages but rather pre-determined standards. Aggregation across years is used when appropriate.
97	1005.Performance-Based Monitoring System.	Indicators currently use a ranking where there is always going to be a bottom quartile.	The state could set a standard and as long as everyone is moving towards it, they should not be cited	Improve district ability to operate efficiently and effectively while moving a instructional target that benefits all students.		7.028, 29.001(5), 29.010(a). 39.051, 39.052, 39.054, 39.056-39.058, 39.102-39.104	There is never a "forced" bottom quartile, and there are several indicators with no Performance Level 3s assigned.  Required Improvement (RI ) component has been a part of the PBMAS since 2005.
97	1005.Performance-Based Monitoring System.	PBM should be more closely related to federal law.	Only indicators that are required by federal law should be included or added to the system. It seems that the indicators are always increasing and few have been required by any federal law.	Reduce time away from instruction. Streamlines the accountability burden on districts. Reduces costs and expense to TEA and to the district.		7.028, 29.001(5), 29.010(a). 39.051, 39.052, 39.054, 39.056-39.058, 39.102-39.104	All indicators in the PBMAS system meet state or federal law. The indicators in the first PBMAS (2004) and the most recent PBMAS (2010) are generally the same, with a few indicators added or deleted as appropriate.

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97	1001.Accountability Rating System. (d) specific criteria and calculations used in accountability manual are established by the commissioner and communicated to districts and charter schools.	<p>1. While the TAC is not specific to the calculation of indicators, it is the TAC that gives the Commissioner the authority to determine the calculation of indicators for accountability, such as completion rate. Currently the HB3 completion rate exclusions are slated for the cohort of 2011. This is an issue for districts given that ratings based on this cohort will remain static for two years.</p> <p>2. Currently the exclusions only include students who are court ordered to a GED program, students who are incarcerated in an adult facility, students who are asylees or refugees, students who are "previous dropouts," and students who are ADA ineligible.</p> <p>3. Additionally, districts are not provided an opportunity to correct data errors for completion rate in the summer of accountability. TEA provides to districts, in June, a final cohort list but provides no final correction window.</p>	<p>1. Implement HB3 completion rate exclusions with the 2010 cohort (accountability 2011) instead of with 2011 cohort.</p> <p>2. Added Exclusion: Add students in Residential Facilities (rehabilitation centers, JJAEPs, etc.) to those excluded from completion rate.</p> <p>3. Following the release of the final cohort list in June, districts need an opportunity to correct any data errors related to completion rate before accountability ratings are released in late July.</p>	<p>1. The rationale is that there will be no rating issued in 2012 which is when the exclusions are currently slated to take effect. The feeling of participants is that the legislative intent was to give school districts relief as soon as possible.</p> <p>2. In the case of added exclusions, these are students for which the district has no substantive authority or in loco parentis control.</p> <p>3. The rationale concerning data error corrections relates to the complexity of computing completion rates, which is compounded by several factors. All preliminary cohort lists lag behind PEIMS data submissions, sometimes as long as five months. Because the data for completion rate come from many systems, the opportunity to review a final cohort list would be very beneficial.</p>		39.051(c) (d)	<p>1. Statutory change required. To the extent that the graduation indicators in PBM are tied to state and federal law, state law clearly states that the NCES definition is in effect until the exclusions apply in 2011-12; federal law allows no such exclusions.</p> <p>2. Districts have had the ability since 2003-04 to identify students in residential facilities. Students in JJAEPs are the responsibility of the serving district and should not be removed.</p> <p>3. Preliminary cohort data are released within 2 months of the data being made available to agency staff. At this time, the agency does not have the ability to accept updated information on data errors from previous years.</p>

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97	1005.Performance-Based Monitoring Analysis System. (c) specific criteria and calculations used in the PBMAS are established by the commissioner	The Texas Education Code (7.028 (a)) directs the Agency to monitor compliance “only as necessary to ensure...compliance with federal law and regulation...financial accountability...data integrity.” The TAC gives the commissioner the authority to establish the criteria and calculations used in PBM. The current PBM system has more than 225 indicators across three systems: PBMAS, data validation, and Initial Compliance Review.	Reconsider the “only as necessary” criteria. Participant group believed that at least 50% of current indicators have relatively little to do with the education of children and are burdensome to the instructional mission of schools. Some of the indicators are not responsive to nor controlled by district action. Review the data sources used in the system and consider the use of longitudinal trend data rather than a single year to identify a district for intervention.	The large number of indicators is excessive in meeting the “only as necessary” insurance. In addition, the data sources lag at least one year behind the PBM ratings.		7.028, 29.001(5), 29.010(a), 39.051, 39.052, 39.054, 39.056-39.058, 39.102-39.104	All indicators in PBM have specifically to do with the education of children. All indicators use the most current data available.
97	1001.Accountability Rating System.	Participant group would like to commend the Commissioner on the decision to evaluate only two student groups for the commended performance indicator in 2011. The group felt that this was a positive move toward a less complex system.	None	None		39.051(c) (d)	No change requested.

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97	1001.Accountability Rating System.	A3 Accountability Rating System. Acknowledges those districts that utilize a dual language model.	A3 Accountability Rating System. Provide a Gold Performance Acknowledgement for those districts/campuses that have students who passed TAKS in two different languages.	A3 Accountability Rating System. Provide a Gold Performance Acknowledgement for those districts/campuses that have students who passed TAKS in two different languages. It promotes dual language. Acknowledges those districts that utilize a dual language model.			House Bill (HB) 3 provides for the measure of progress towards dual language proficiency for additional performance indicators [GPA] under section 39.034(b) [Assessment of Academic Skills] for students of limited English proficiency, as defined by section 29.052.
97	1004.Adequate Yearly Progress.	Problem of when the guide is published	The guide should be published no later than May of the previous year	Lets districts know ahead of time what it needs to do to be successful for the upcoming year		7.055(b)(32), 39.073, 39.075	Date collection cycle, date reporting cycle and policy development cycle prevent manual from being released any earlier.
97	1001.Accountability Rating System.	Yes	Publish an accountability manual by December of that school year.	The manual does not come out until after TAKS testing takes place.			Data collection cycle, data reporting cycle, and policy development cycle prevent the Manual from being released earlier than May.

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Chap.	Ext.	Issue	Desired Change	Rationale	Focus Group Comments	TEC	Agency Response
97	1001.Accountability Rating System.	Accountability rating system Section (b). Commended Performance level holds Recognized and Exemplary campuses are held to a standard of 15% and 25%.	Accountability rating system Section (b). Commended Performance level holds Recognized and Exemplary campuses are held to a standard of 15% and 25%. Remove Economically Disadvantaged student group from this indicator.	Accountability rating system Section (b). Commended Performance level holds Recognized and Exemplary campuses are held to a standard of 15% and 25%. Remove Economically Disadvantaged student group from this indicator. All school districts should be held to the same standard and should not be penalized for having a greater population of economically disadvantaged.			Commended performance will not be evaluated until 2011. Economically Disadvantaged is evaluated only if minimum size requirement is met.
97	1001.Accountability Rating System.	Need clarification of if C is a group of people or an individual 97.1001 Accountability rating system 1001(b) d - could a timeline be specified, we are told we will get the information but we always get it too late	if it's just one person I'd rather see a group of people making decisions - a committee Accountability rating system 1001(b) d - timeline should be included	two heads are better than one, hard to have a discussion with just one person, discussions come to clarification and a better decision Accountability rating system 1001(b) d - sooner we know the information, the sooner we can begin to emulate /replicate their data mining procedures			Data collection cycle, data reporting cycle, and policy development cycle determine the timeline for when then accountability system's manual and associated timelines can be made available to districts. ESCs, school districts, the business community and the public all have opportunities to provide input into the development and implementation of the accountability system.

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97	1001.Accountability Rating System.  1004.Adequate Yearly Progress.  1005.Performance-Based Monitoring Analysis System.	It would be nice if the final rules would come out early (AYP, etc). The scores come out prior to manuals being available.	Manuals need to be out early or mid May; before results are provided to districts	Gives us targets that we are shooting for. These are the rules that will not change so districts do not have to make predictions. The official scores do not come out until July. This would make it easier to communicate with all stakeholders and the public. Curriculum planning, staffing, and financial decisions, are all affected by this data.			Data collection cycle, data reporting cycle, and policy development cycle prevent the Manual from being released earlier than May.
97	1001.Accountability Rating System.  1005.Performance-Based Monitoring Analysis System.	97.1001 (e) issue related to the timing of the annual accountability manual. Criteria need to be set well in advance of the year that they impact.  97.1005(d) year citation issue.  Information is not published in a timely manner. Acct manual 2010-changes was posted after TAKS.  Rules are changed mid-stream without "grandfathering" 2005 (i.e. GED's not counting for acct when students earned the GED when it did count).	Proposed changes should be made prior to TAKS administration.	Confusion – scheduling ARDS – all affect what students take then we make decision and the rule then changes and our students are affected as well as our acct.			State policies and procedures related to assessment decision-making for students with disabilities are detailed in the TEA publication titled <i>Admission, Review, and Dismissal (ARD) Committee Decision-Making Process for the Texas Assessment Program</i> . Explanations on how GED recipients are excluded or included in the calculation of standard and AEA accountability ratings are located in <i>Part 1</i> and <i>Part 2</i> of the current year <i>Accountability Manual</i> .

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97		The accountability and accreditation systems have become incredibly complex, openly redundant, and so filled with deficiency measures that it has become virtually impossible to explain the system and its implications to the various audiences that need the information, i.e., parents, staff, media, community and general populations.	Although this statement would, at its best, lead to a totally new system, some improvements can be made to what is currently in place. The reviewers felt that these improvements should not be specified by this group although several sample ideas are shown, as follows: <ul style="list-style-type: none"> <li>• Reduce the number of subgroup measures.</li> <li>• Focus on socio-economic status as the primary subgroup measure.</li> <li>• Decide in which system (accountability or compliance) a measure should be placed for school and district ratings. No measure should penalize a district or campus in two or more systems.</li> <li>• Consider an averaging system for indicators: a district that is Exemplary on 90% of measures gets an Exemplary rating.</li> </ul>	Overall, all district personnel present at this review session on accountability and accreditation agreed to three salient principles: <ul style="list-style-type: none"> <li>• We believe that any state accountability system that emphasizes single and/or very minute deficiency measures is ineffective, punitive, and counter-productive to student performance. Examples:</li> <li>• Midlothian ISD was Academically Unacceptable in 2009-2010. All scores at the district level were in the Recognized range. However, the Economically Disadvantaged subgroup had a completion rate of 73.7%. For that reason, and that reason alone, the entire district was rated Academically Unacceptable. That rating had a detrimental effect on the morale of the staff and the faith of the community in the school system.</li> </ul> [CONTINUED]			The state accountability system, federal accountability system, and monitoring system all have unique statutory requirements. At the same time, since the data processing and reporting responsibilities for these three systems reside within the same department at TEA it has been possible to achieve a certain degree of standardization and alignment across the systems. Those efforts will continue and will be informed by external input.  The agency relies a great deal on the network of regional education service centers to provide technical assistance and training to school districts and will continue to work collaboratively with the ESCs to help ensure that information, materials, and resources are provided that can facilitate an understanding of the different systems. It is anticipated that in a data-driven environment it will continue to be important for districts and ESCs to ensure sufficient local capacity to understand and work with a variety of student, staff, and financial data. [CONTINUED]

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<p>[CONTINUED FROM RATIONALE]:</p> <ul style="list-style-type: none"> <li>For 2010-2011, the preliminary performance scores at Bonham High School are in the Exemplary range. The one exception is the Economically Disadvantaged student group in Mathematics. That group's absolute passing rate is 83%. With TPM that group's passing rate is 88%. Even with scores this high, this campus will not be Exemplary because of one single deficiency. If the absolute passing rate had been 84.5%, this campus would have qualified for an exception and been Exemplary. This is impossible to explain to anyone.</li> <li>The complexity of the current state accountability system is disproportionate to the value gained in student performance. All districts have to now consume a large amount of the personnel time of administrators on understanding the implications of keeping up with very detailed calculations that come from diverse state sources. Specifically, inherent in research is the understanding that the key factor in addressing student performance is low socio-economic status of the household rather than the myriad other factors. Any system that fills up six manuals with measures and indicators and processes is too complex a system. Currently for an administrator to fully understand the implications of state accountability, he or she must have intensive knowledge of six manuals (six inches) and all of PEIMS. Certainly this type of system is too difficult to present to parents, community, staff, media, and the general public in cogent manner.</li> </ul> <p>The Accreditation and Accountability Systems contain much redundancy. In fact districts can be penalized within the accreditation and accountability system as well as compliance system. If an economically disadvantaged LEP student drops out of school as a 10th grader, the district is held accountable for that student under:</p> <ul style="list-style-type: none"> <li>PBMAS BE/ESL Indicator #8</li> <li>PBMAS BE/ESL Indicator #9</li> <li>PBMAS NCLB Indicator #2</li> <li>Federal Accountability (AYP) Graduation Rate</li> <li>State Accountability Completion Rate</li> </ul> <p>The district also has the potential of being held accountable for that student under:</p> <ul style="list-style-type: none"> <li>Leaver Data Validation Indicator #1</li> <li>Federal Accountability (AYP) Performance Required Improvement [END]</li> </ul>							
<p>[CONTINUED FROM AGENCY RESPONSE]:</p> <p>While manuals are developed annually to serve as detailed technical resources, there are many other options for presenting information about the three system to different audiences. TEA presentations as well as ESC-developed resources may be particularly helpful.</p> <p>While the same student(s) may be represented in more than one indicator across the three systems, the indicators themselves are measuring different things or serving different purposes. Should that no longer be the case, an indicator may be considered for deletion. In addition, all indicators include a minimum size requirement which ensures that no individual student is solely determining a district's performance result. [END]</p>							

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97	1001.Accountability Rating System.  1004.Adequate Yearly Progress.  1005.Performance-Based Monitoring Analysis System.	Problem Having 3 accountability systems with different terminology and check areas are complicated, confusing, and time consuming	Desired to have a more uniformed accountability system that is less complicated and uses consistent terminology.	A uniform accountability system would take less time to implement, less audits, easier to understand and comply with, and give more time and attention to student matters that the system is designed to help.			Systems are aligned where appropriate based on advisory committee recommendations.
97	1001. Accountability Rating System.	One size does not fit all We never focus on POSITIVE results more on NEGATIVE Accountability ratings	System that focuses on improvement Accountability should be based on individual progress of each child not on the percentage of class as a whole Don't legislate the percentages of students who can be identified as special education. Districts cannot cont	Need individualized accountability for each student		39.051(c) (d)	Under House Bill (HB) 3, section §39.023, if a student is in a special education program under Subchapter A, Chapter 29, the student's ARD committee shall determine whether any allowable modification is necessary in administering to the student an assessm
97		We never focus on POSITIVE results more on NEGATIVE	PBMAS Looking at LEP populations. To align with Federal standards in factoring current LEP to include first and second year monitored students.	PBMAS Looking at LEP populations. To align with Federal standards in factoring current LEP to include first and second year monitored students. This would create a more transparent accounting and alignment with Federal standards.			PBMAS provides a comprehensive evaluation of LEP students: current LEP students, former LEP students, LEP students who are served in BE, ESL, or not served at all. Each indicator serves a specific purpose.

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97	1005.Performance-Based Monitoring Analysis System.	Accountability ratings	AEIS/PBMAS should include M1 and M2 students	AEIS/PMAS only evaluates current LEP students and does not evaluate the effectiveness of the program if we do not include M1 and M2			PBM does evaluate former LEP students and will continue to do so.