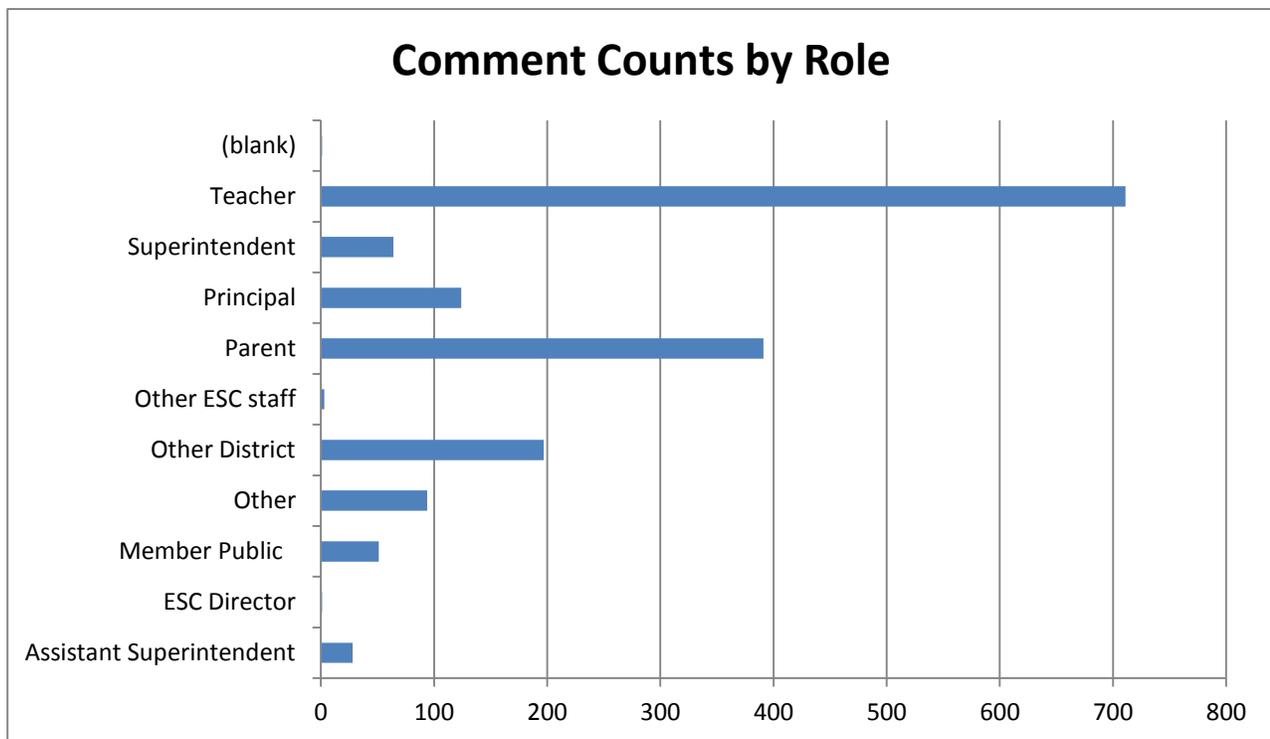


PUBLIC COMMENTS RECEIVED REGARDING DEVELOPMENT OF 2013 (AND BEYOND)
ACCOUNTABILITY SYSTEM

Role	Counts	Percent
Assistant Superintendent	28	1.7%
ESC Director	1	0.1%
Member Public	51	3.1%
Other	94	5.6%
Other District	197	11.8%
Other ESC staff	3	0.2%
Parent	391	23.5%
Principal	124	7.4%
Superintendent	64	3.8%
Teacher	711	42.7%
(blank)	1	0.1%
Grand Total	1665	100%



PUBLIC COMMENTS RECEIVED REGARDING DEVELOPMENT OF 2013 (AND BEYOND) ACCOUNTABILITY SYSTEM

STRENGTHS

New system is Equitable/Comprehensive

- *New system maintains a high expectation of academic success for all students, including English Language Learners.*
- *The proposal seems to effectively balance a variety of indicators in the indexing process.*
- *The introduction of index 2, 3 and 4 provides more of a complete picture of how a campus/district have performed.*
- *I appreciate the transition away from the separate indicator system, and toward a more balanced performance index framework*
- *The proposed 4-part approach offers a more comprehensive view of school and district performance than simple passing rates on state tests.*
- *It is a more comprehensive approach.*
- *I believe this is truly the first accountability framework in a long time that will be fair for all districts both rich and poor.*
- *I love the idea that student progress will be taken into account.*
- *When all the indexes are complete it will be a fair assessment.*
- *It seems more equitable for the variety of groups enrolled.*
- *Method of Closing Performance Gaps seems equitable.*
- *Very comprehensive and inclusive*
- *Excellent framework that provides a much more equitable and a more realistic measure of where a campus is truly at.*
- *The current proposal is a more equitable system...it allows for more equity within the system by focusing on positives rather than one or two negatives.*

No More 'Death by Single Cell'

- *Any single cell will not create a school to be academically unacceptable. It is encouraging for all stakeholders to receive credit for student progress.*
- *Accountability is now based on multiple indecies instead of a solo measure.*
- *School district ratings will no longer depend on a single area of weak performance and instead will depend on a comprehensive measurement of district performance.*
- *Comprehensive system with no death by a single cell.*
- *The best part of this proposed plan is that it takes away the stigma of being unacceptable if your campus has one low rating.*
- *No death by single cell*
- *The lowest performance indicator no longer sets the rating.*
- *The state is not relying on one measure to evaluate school districts. There are multiple measures.*

Growth Measure Inclusion

- *Index 2 (Growth Index) should help schools with big numbers of low socio-economic students.*
- *The growth index is a positive addition. Teachers and administrators must be given credit for students who make significant growth even if they do not meet the desired standard.*
- *Emphasis on performance improvement or progress is also a strength of the proposed approach.*
- *Campuses are given credit for growth.*
- *It is a positive attribute to acknowledge growth as well as achievement.*
- *The best strength for the new STAAR is that you measure growth.*

PUBLIC COMMENTS RECEIVED REGARDING DEVELOPMENT OF 2013 (AND BEYOND) ACCOUNTABILITY SYSTEM

- *It appears that Index 2 (Growth Index) should help schools with high numbers of low socio-economic students.*
- *Allows for student growth.*

Other Strengths Mentioned

- Increase in Rigor
- Accountability is important.
- AYP combined with State
- EOC better than exit tests
- EOC is course specific
- Flexibility for students new to US
- Highlights strength and weaknesses
- Index system is good
- kept same subset
- Like the 4 index groups.
- Like index 2, 3, 4/kept subset
- Promote accountability
- Snapshot
- Snapshot, index 1, 5-yr grads

Selected Excerpts on Strengths

I think a strength of the proposed accountability framework is that it uses multiple measures for grading schools. I think its critical when evaluating teachers or schools that we use multiple measures and not just test scores. Another strength of the proposed accountability framework is that there is attention to growth. I think this much more important than the raw test scores. [Parent]

The Texas Association of School Boards believes an index system resolves many of the problems that the separate indicator model presented. School district ratings will no longer depend on a single area of weak performance and instead will depend on a comprehensive measurement of district performance. Emphasis on performance improvement or progress is also a strength of the proposed approach. [Other]

Student Achievement a. First Year ELL students not being _included in calculations_ is an appropriate decision. b. Using the Spring Administrations for the calculations is appropriate. c. TAKS for Grade 11 during 2013 is appropriate. 2) Student Progress a. Process seems appropriate, but group size and how data on individual students are used is not proportionate. b. Reading and Math would have more of a tendency to be consistently measured, since all students have reading and math each year. 3) Closing Achievement Gaps a. It is a strength that it focuses on something other than LEP and Special Education, but is disproportionately a weakness for districts having a high percentage of Low SES students. b. I am struggling with how this impacts districts with virtually no Low SES students and very few Racial/Ethnic groups. 4) Postsecondary Readiness a. High School graduation rates are already being considered, but not within as many subpopulations, so this will assist us wi [Superintendent]

The current proposal calls for a single comprehensive academic accountability system to satisfy both state and federal requirements. There are obvious merits to such an approach, such as clarity of focus, elimination of conflicting results across the two systems. The proposed index model resolves many of these long-standing issues, because of the following features: _ an index-based model is, by design, compensatory in nature: high performance in one area can compensate for weaker performance in another area _ the proposed 4-part approach offers a more comprehensive view of school and district performance than simple passing rates on state tests _ the proposed model includes use of actual individual-level progress over prior year, and should give credit for maintained performance or improved performance even if the improvements fail to reach satisfactory or better levels. [ESC Director]

The current accountability framework ensures educators are spiraling content vertically and horizontally. It helps teachers see areas of concern to focus on in lessons. Special needs students are not ignored. [Teacher]

PUBLIC COMMENTS RECEIVED REGARDING DEVELOPMENT OF 2013 (AND BEYOND) ACCOUNTABILITY SYSTEM

Comprehensive system with no _death by a single cell._ Growth model looks at progress and not just one point in time and should give credit for maintained performance. ELL Proposal (Indic. 1): Keep this model throughout the entire length of the system to facilitate growth in language acquisition. Grades 5 and 8, best results from primary administration and first retest: we are glad this is still included. As currently written, no cap on modified or alternate assessments: do not cap these assessments. Indicator one gives a clean, global view of student performance because all students are only counted once. Consider modifying the proposal to include the following: testing in only reading/LA and math in grades 3-8 and English I, II, and III, algebra I, geometry, and algebra II for EOC include college and career readiness components into the system earlier and a combination of state and locally developed accountability indicators. [Other District Staff]

I believe the strengths of the proposed system allow for a school district to show the strengths of the student achievement through the four index measures. There are multiple scenarios for the index and as presented a district cannot miss meeting expectations for missing one indicator. I appreciate all the work that the committees have done in preparing and evaluating an accountability system that will work for Texas. [Principal]

I believe this is truly the first accountability framework in a long time that will be fair for all districts both rich and poor. I love the idea that student progress will be taken into account. Some of our students begin at the bottom of the scale and make great gains, but are still not passing. To me, that is growth and should be given recognition. [Teacher]

The current proposal is excellent in that it disallows a school or district from being severely downgraded because of just a single subgroup. If one piece of the accountability involves student academic improvement, gifted students would receive a much better education. As it is, low achievers receive all of a campus extra staff and money because that is where the accountability lies. If we were to reward schools for ALL students making gains, not just the students who are below grade level, truly no student would be left behind. [Teacher]

A campus or district's accountability is no longer based on _single-cell_ performance, or the performance of the lowest performing subgroup _ Attempts to incorporate student improvement from year to year _ Attempts to reward districts for closing the performing gap _ Attempts to reward districts for helping students to become ready for post-secondary options _ Campuses Districts will not be rewarded or penalized for the performance of individual subgroups in Index 1. This new framework attempts to hold schools and districts accountable for student achievement as an overall educational organization without diminishing accountability when an accountability rating is missed by the performance of one student, in one single ethnic group, on one assessment. { Other District Staff]

It seems more equitable for the variety of groups enrolled. Recognizing Student Progress is a great addition. Method of Closing Performance Gaps seems equitable. [Other District Staff]

I believe the strengths of the system allow for a school district to show the strengths of student achievement through the 4 index measures. There are multiple scenarios for the index and as presented a district cannot miss meeting expectations for missing one indicator as they can under the old accountability system. [Other District Staff]

Like the emphasis upon refugee students results being excluded for five years. [Other District Staff]

The fact that the student achievement index is based on an overall group and not specific subgroups is a plus of this system. [Principal]

The discussed policy that would include 5th-year and 6th-year graduation statistics will significantly help schools like that enroll over 50 of students that are 2 or more years behind their cohort. [Other]

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Numerical Score in addition to a Categorical Rating: The proposed system is based on the accumulation of points from 4 indices that results in a numerical score upon which a rating is determined. While a campus or district may keep the same rating from one year to the next, the numerical score helps to determine if progress is being made on each of the four indices. [Assistant Superintendent]

Strengths of the system include practices carried over from the previous system. For example, allowing the best result of the 5th 8th grade Reading and Math score to counts towards campus accountability. [Assistant Superintendent]

It will be important to push acknowledgement of CATE involvement through courses and clubs and activities into the system. [Other District Staff]

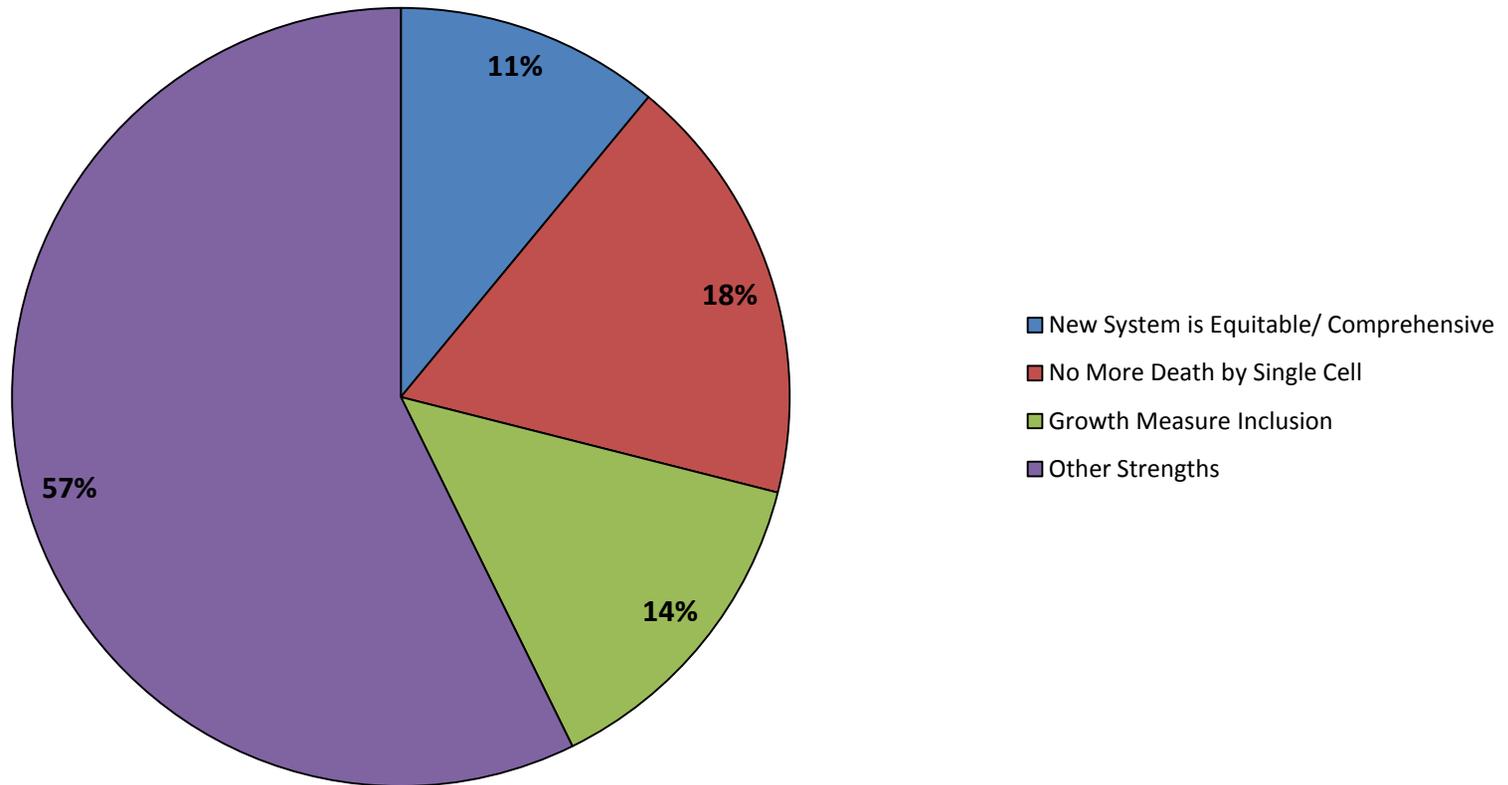
Regarding the AADC, it is mentioned that consideration was given for distinction either being for the top 10% of schools, or 25%, or 50%. I would recommend that a gold medal be given for the top 10%, a silver for the top 25%, and a bronze for the top 50%. [Superintendent]

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ACCOUNTABILITY SYSTEM

New System is Equitable/ Comprehensive	No More Death by Single Cell	Growth Measure Inclusion	Other Strengths
71	116	89	370

(counts are not mutually exclusive)

STRENGTHS
(All Comments Received)

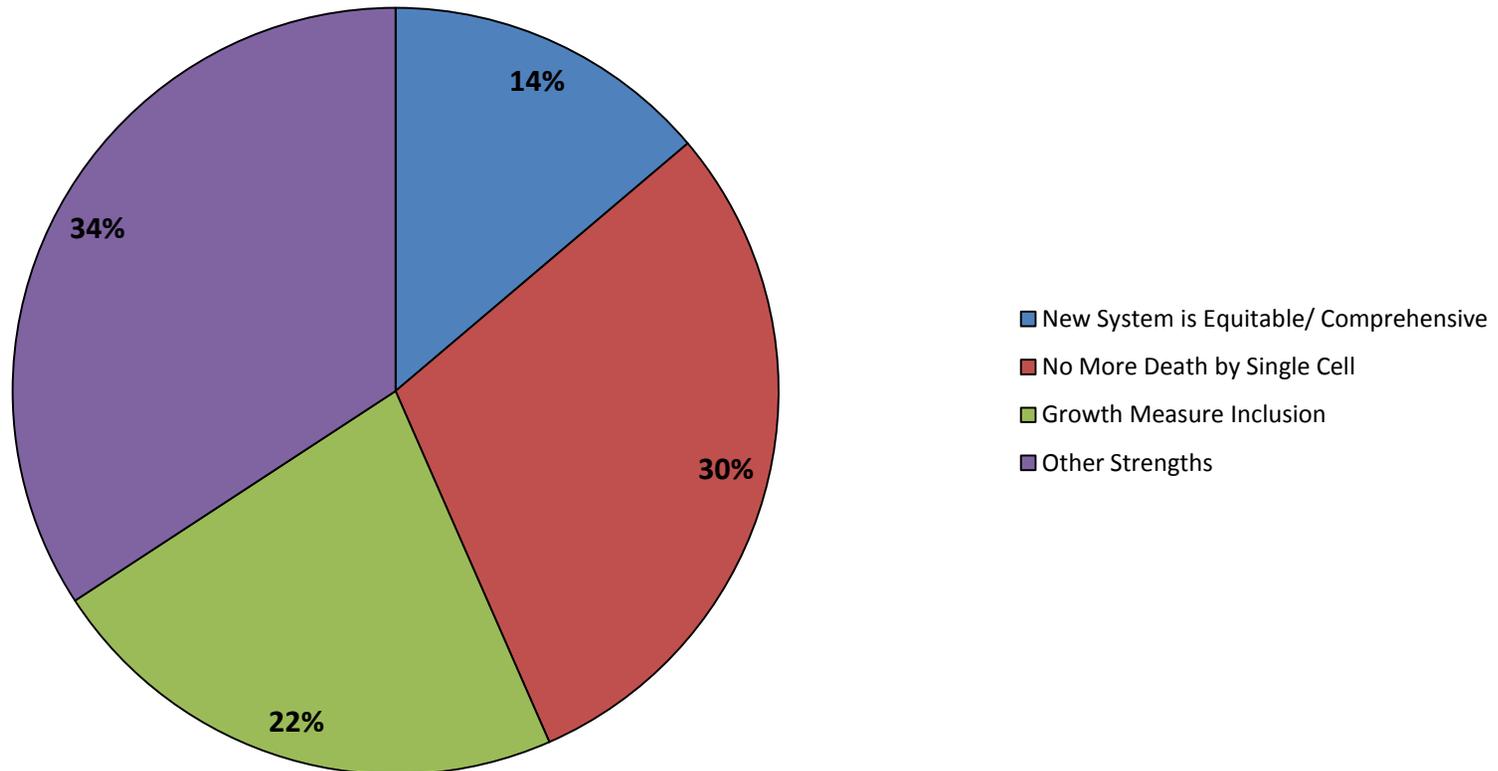


PUBLIC COMMENTS RECEIVED REGARDING DEVELOPMENT OF 2013 (AND BEYOND)
ACCOUNTABILITY SYSTEM

New System is Equitable/ Comprehensive	No More Death by Single Cell	Growth Measure Inclusion	Other Strengths
21	45	34	52

(counts are not mutually exclusive)

STRENGTHS
(Superintendent, Ass't Superintendent, Principal Comments Only)



PUBLIC COMMENTS RECEIVED REGARDING DEVELOPMENT OF 2013 (AND BEYOND) ACCOUNTABILITY SYSTEM

WEAKNESSES

(not categorized)

Too Complicated/Too Difficult to Understand or Explain

Waste of Money

Too Much Testing/Inappropriate Testing/Tests too Hard

15% EOC Rule (Graduation)

College Readiness is Overly Stressed

- *There should be a provision for CTE courses that would count for graduation plans and attaining Level III*
- *Not all students are college bound.*
- *It is totally unrealistic to believe every student will be college ready by simply upping the testing.*
- *The STARR format seems to be geared to judge college readiness and to punish or hold-back students not exhibiting the skills deemed to show readiness for the path to a rigorous 4-year college curriculum.*
- *The 4 X 4 plan should be reduced and Career and Technology pathways should be one option for students to choose for graduation without penalizing districts for students personal preference.*
- *We are having all students ready themselves for a college they may never attend. It seems unreasonable to hold every student to a standard that is intended for those preparing for college.*
- *The students that will not go to a traditional four year collage. If they could prepare for a technical education it would be more beneficial than stressing four years of core subjects.*

Inclusion of English Language Learners and/or Special Education Students

- *Not allowing enough time for English Language Learners to learn the language before being tested.*
- *Immigrant student group of grade 9 and above could exempted longer because the students are coming in with the same linguistic and academic challenges as their elementary and middle school counterparts.*
- *The new accountability system currently lacks a realistic and attainable ELL progress measure that recognizes that a minimum of five to seven years of targeted English-language instruction is required in order to achieve second language fluency.*
- *Eliminate Cap on Modified (M) and Alternative (ALT) assessments, honor the ARD process for assessment decision.*
- *Extend years for ELL learners to 3 in 2014 and beyond.*
- *The number of students tested with alternative versions of the test should be subject to IEP requirements, not a fixed percentage of students or some other arbitrary control.*
- *Extend years for the ELL learner to 3 in 2014 and beyond to allow our ELL students to learn the language to prepare for the high stakes accountability system.*
- *It is unfair to test ELL students after only one year in the US(or one day which counts as one year).*
- *My plea is to allow an ELL have the opportunity of completing a three years in a Texas public school, before taking a rigorous accountability test.*
- *If the state provides alternate and modified forms of assessment for students whose Admissions, Review and Dismissal (ARD) Committees determine should be assessed with such instruments, then it is inappropriate at best to impose any predetermined limit on the number of satisfactory results that are allowed to be counted as satisfactory.*
- *Asylees and refugees do not count in accountability, but ELLs who are not asylees or refugees who have limited or interrupted educational background do count for accountability.*
- *The current determination of Years in US schools (1 day = 1 year) is a false record and penalizes ESL students who enter in the spring semester of the school year.*

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Growth/Progress Measure

- *The growth measure is a good idea and in most cases helpful unless you have students on the high level and then they regress. This could be extremely hurtful to districts especially high schools.*
- *In index 2, student progress means just that, student progress. If there is significant growth or decline in a score, that should be included as part of accountability, not just whether or not there is a jump between Levels.*
- *I believe that once students reach and maintain level 3 performance, their campus should be given credit year to year. Once a student reaches that level, they will have less growth especially when you consider the these ceiling effects of a grade level test.*
- *Once students reach and maintain level 3 performance, students and campuses should not be penalized due to smaller increments of growth.*
- *Index 2 does not seem very straight forward nor balanced for each group measured. Also, once at the top there is no room for growth and therefore no points to be earned.*
- *Growth measure would be better measured by an average increase as students raise their scores vs categories. Growth based on average vertical scale score growth should be used. This would allow students that receive level III to continue to show growth.*
- *The index II average growth rating based on Low Level I to High Level I, Low Level II to High Level II, and Low Level II to High level III is not optimal. It would be far better to base it on a vertical scale score average to indicate growth.*

Minimum Size Requirements

- *Need to make student group sizes 50 as they are in No Child Left Behind!*
- *The minimum number of students set at 20 allows about half of the school districts in the state (small schools) to not educate certain sub-groups. The minimum number should be set at 20 or at least have some average over two years so small schools will also be accountable.*
- *Minimum group size should remain at 30.*
- *Start with a minimum group size of 30 (as was used in the old state accountability system) and phase in the size requirement over several years in light of increments in STAAR passing standards.*
- *The minimum number of students to make a subgroup should be 10% of the total number of students or at least averaged over a two or three year period. 20 students is too small, the percentages do not work out for that small a number.*
- *Minimum group size decrease to 20.....why?*
- *I do not think that a student group should be lowered to 20 from the current 30 students. This lower number will have a major impact on the entire schools performance index.*
- *I believe that using 20 instead of 30 for a subgroup will lessen the accuracy of the data.*
- *When considering accountability I think that a percentage of the campus should be considered, not a set number. If 20 students are the amount considered enough to hold a campus accountable that is quite different on a 300 person campus and a 1200 person campus.*
- *My greatest concern at this time is the number of students determining a subgroup. It should remain at 50.*
- *Lowering the student groups from 30 to 20 will make it almost impossible to meet the highest levels. It is very difficult even at 30. Please keep the student groups at 30 or even raise it to 50 so it is like AYP.*
- *The sub pop number needs to stay at 30 and not changed to 20.*
- *Please consider moving the 20 baseline for student groups to 30. This is too narrow for smaller districts.*
- *Don't lower the class size to 20 keep at 50.*

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Need More Focus on Indicators other than (STAAR) Testing

- *Other measures should be considered as well (ie: attendance, UIL participation, fine arts, AP classes, vocational classes and certifications, etc.)*
- *Why not use SAT/ACT tests or another standardized test?*
- *Why not just use the ACT/SAT and PSAT scores as a measure to how students/schools are doing?*
- *There are other more valid, reliable, and inexpensive measures, such as national tests, that are better accountability indicators for achievement and college/career readiness. These tests are already developed, transferable to other states, and occur in gateway years instead of using the same measure for testing every year. We should be focused on high quality learning standards that are aligned to existing national measures of college/career readiness (AP, EXPLORE/PLAN/ACT, SAT, etc.). For younger grade levels, there are other existing national tests we can use, as well as fluency checks, MAP testing, etc. to measure achievement and progress.*
- *A school may decide to place someone in remediation that did not meet standard on the test. This takes them out of Art, Athletics, Child Development, Nursing Programs, Choir, Business, and many more courses that could spark their interest and help them to choose a path for their future.*
- *Texas Performance Standards Projects, UIL academic competitions, Texas Future Problem Solving, Mathcounts, Destination Imagination, Odyssey of the Mind, Science and History Fairs, Academic Decathlon. Other quantifiable indicators include: student acceleration by exam, accelerated coursework, participation in / completion of AP and Pre- AP classes, and IB classes*
- *Some suggestions on items to include in new accountability measures: Variety of electives offered, Education level of teachers (bachelors, masters, etc.), Service to the community by students individually and by school or district sponsored programs, UIL participation, Dual-credit, AP, and other advanced class enrollment, Career-specific class enrollment, College acceptance numbers and Scholarships awarded.*

Rating Labels

- *I do not believe ranking schools A-F using the index system is helpful to schools and therefore the option that is preferred is outlined below: (Accountability Met Standard which would have 3 levels and would be broken down as follows: 1.)Exemplary 2.)Recognized 3.)Acceptable. The last level would be called Improvement Needed).*
- *Performance level indicators for rating provide a much clearer and accurate system for rating, instead of A-F grading.*
- *The accountability labels should be: Exemplary Recognized Acceptable Improvement Needed*
- *The proposal to provide schools and districts with a letter grade (_A_ through _F_) is an anachronism.*
- *Labels should be Exemplary, Recognized, Acceptable, and Improvement Needed.*
- *The letter grading system of schools is outdated, and does not suggest best practices.*
- *I want to advocate against the use of Commended and Distinguished or Gold and Silver.*
- *Gold and Silver imply that there is a competition that has been won, or in which a district or campus has performed at runner-up status.*
- *Changing the ratings to an A-F system will cast a negative image on many schools. We should instead stay with terms that allow the public some understanding of the rating. The ratings of Exemplary, Recognized, Acceptable, and Improvement Needed.*
- *The A-F school labeling is an extension of the current stigmatizing and ranking of schools. School performance labels should be very few (maximum of four, preferably three) and should be extremely simple in nature. Community members should be able to discern from the generalized label that their school is either doing well, or not.*
- *I believe the accountability labels should follow a similar pattern to what is in place: Exemplary, Recognized, Acceptable, Improvement Needed (with specifics as to why/what areas missed) People need to easily understand what the system is, means, and how it was earned.*

PUBLIC COMMENTS RECEIVED REGARDING DEVELOPMENT OF 2013 (AND BEYOND) ACCOUNTABILITY SYSTEM

- *I would like to see us stay away from the A,B,C,D,F rating system and stay with what we have as far as Exemp, Recogn, Accept, and Un.*
- *The commissioners proposal to grade schools A, B, C, D, or F, is degrading, and puts a lot unnecessary stress on educators.*
- *Do not grade schools on a A, B, C, D, F system. This is setting up our schools for inaccurate public perceptions and does not tell the entire story of how a campus or district is performing.*
- *A rating system of A, B, C, D, and F for campuses would have a very detrimental impact on students and communities. A meeting expectations or not meeting expectations is a much more reasonable rating system.*
- *I believe a performance level indicator would be a better rating system than an A-F grading system. Letter grades have stigma attached to them from an out dated grading system.*

Use of Phase In Standards/Level II/Level III

- *A concern is using the phase-in standard for student accountability and the final level two standard for campus and district accountability. The passing rate at the phase-in standard should be the measure by which student, campus, and district accountability is determined.*
- *I do not recommend Level II - This proposal does not provide a suitable and realistic time line for adequate professional development.*
- *The system holds the students to one standard and the district to another.*
- *Level III should NOT be the standard for college readiness. Level II should be the standard. Does the state say only Level III students should be going to college??? That is what is communicated if Level III is the standard.*
- *The Final Recommended Level II makes the students be ready for these kinds of tests much faster. The struggling students will be overwhelmed.*
- *I have significant concerns about Level 1 on STAAR Alt not being considered passing for students with significant disabilities who will never be able to perform higher than Level 1.*
- *One weakness of the current proposal is that everything related to STAAR/EOC performance is based on the final Level II and final Level III cutoff scores.*
- *Campuses should be allowed the same phase in standard offered to students: grades 3-8*
- *Using the final level two phase in the first year is not appropriate. The system should use the phase in scores and increase each year.*
- *Level II weighted too heavily on the final score for EOC.*
- *By not using the current passing standard in the measures on the accountability rating, the state would be further overloading school districts that are already struggling with the increased rigor of the EOC tests.*
- *Using only the final phase-in Level II standard instead of the interim phase-in standards in the accountability system does not provide districts (using TEAs words) with an appropriate amount of time to adjust instruction, provide additional professional development, increase teacher effectiveness, and close knowledge gaps before recommended standards take effect. Districts need that time!*

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Other Weaknesses

- Complicated: will cause problems for developing improvement plans
- Need credit for continuers
- CTE in Index 4
- Distinctions not equal at HS vs JH
- Do not weight Index 3 more than others
- Don't know STAAR standards
- Eliminate cap
- Eliminate safeguards
- ELL exempt to 3 years, no cap, min size = 30, keep snapshot date
- Extend ELL exemption
- Growth Index should start this year
- Handicaps high performing schools
- How to compare growth from biology to chemistry?
- Hurts AP kids
- Hurts high achievers
- Include continuers
- Include critical thinking skills
- Include CTE
- Include GED
- Index 4 needs CTE
- Inequality in accountability for high schools vs elementary
- LEP students need 5 years to acquire language.
- Level 3 growth
- Need CTE provision.
- Need grad plan that emphasizes CTE
- Need one year delay
- Need phase-in for schools
- Need safeguards
- Need special exemptions
- No comparison to other states
- No consideration of diversity between districts
- Overlapping student groups, remove GED; use Continuous Improvement model
- Phase in for schools
- Rigor of tests
- Mirror the federal standards
- Snapshot, include results if stud is there 160 or more days
- Suggests using Vertical Scale score to measure growth.
- Take out use of 7-8 dropouts
- Take out writing from index 2
- Tests exceed developmental level
- Too hard to understand
- Too much change, too quickly
- Too much importance on test outcomes
- Too much time spent on preparation for test
- Too rigorous
- Use 2nd admin results
- Use numbered rating system
- Use rubric scoring
- Use SAT and ACT
- Use SAT instead of STAAR
- Use SAT, ACT, PLAN, Explore
- Weigh indexes equally

Selected Excerpts on Weaknesses

Group size of 20 with no considerations for percentage of enrollment is not appropriate. It makes disproportionate comparisons when gaps are being analyzed on an equal basis while populations are not equal. CAP info needs to take into consideration districts and campuses which draw students to special education programs. The campuses and/or districts may be penalized, because of successful programs that cause an increase in special education enrollees. Reporting and Evaluation based on final level 2 causes districts to appear to be manipulating data or falsely reporting data. The media should not receive reports based on final standards, when we are functioning in the transitional situation based on phase-in standards. The media and parents should receive reports based on the phase-in standard with the information regarding final standards being given as additional information to be used for transitioning. [Superintendent]

English Language Learner- extend years for the ELL learner to 3 in 2014 and beyond to allow our ELL students to learn the language to prepare for the high stakes accountability system. EOC takers should be allowed 2nd

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administration to be included in final results- Index 1 summarizing is good- the index points and totally across is good need further explanation on how the index points translate to achievement- Minimum Group Size is 20 instead of historical 30. Students taking STAAR Alt and M are included in the student count. Extend years for the ELL learner to 3 in 2014 and beyond to allow our ELL students to learn the language to prepare for the high stakes accountability system- [Other District Staff]

Ideally, we would like to see the following labels placed on schools and districts: Exemplary Recognized Acceptable Improvement Needed It is vital that parents and community members be able to easily understand the new accountability system. The minimum number of students in subgroups should be changed from 20 to 30 to allow for fair computation of percentages. 4. In Index 4, there should be a provision in the new accountability system to allow for new CTE courses and/or new graduation plans. [Superintendent]

The system penalizes districts with a diverse, limited English, and low SES population. The new system uses a large number of measures. However, the measures are still mostly STAAR. [Superintendent]

A rating system of A, B, C, D, and F for campuses would have a very detrimental impact on students and communities. A meeting expectations or not meeting expectations is a much more reasonable rating system. The subgroup passing rates should be weighted by their population sizes. In addition, the system is too complex and needs to be simplified. [Other District Staff]

An index system is a good idea, but a system with four different indices is very complicated and likely to generate mistrust and misunderstanding among stakeholders. The number of students tested with alternative versions of the test should be subject to IEP requirements, not a fixed percentage of students or some other arbitrary control. Minimum group size should remain at 30. The proposal to provide schools and districts with a letter grade (_A_ through _F_) is an anachronism. [Other]

Remove GED from the graduation rate calculation entirely. The entire system is overly complicated and difficult to comprehend and explain. The letter grading system of schools is outdated, and does not suggest best practices. A system more aligned to the Continuous Improvement models would be more current and allow for more expansion by school districts. [Teacher]

Difficult to explain this system to stakeholders. Minimum Size Criteria: consider setting this at 50/10/200 to match the federal accountability. Student Groups: consider use of All, African American, Hispanic, White, and Economically Disadvantaged. Final Level II Performance Standard Target: consider matching the accountability standards to the EOC and STAAR 3-8 scoring phase in model. Accountability Cycle Timeline: consider counting summer administration of EOC for the previous school year (Fall 2013, Spring 2014, and Summer 2014 would be on the same cycle). This would enable first time EOC testers to _re-test_ in the summer and have that data count for the current year accountability. Indicator III Weighted Performance: Adding greater weight to Level III performance could potentially add more value to one student over another. Lowest Performing Race/Ethnicity (Indicator 3): Potential for different groups to count campus by campus and from year to year. [Other District Staff]

Counting each EOC student assessment that meets the minimum level passing, at the minimum phase in standard. The district/campus should also receive credit for every assessment that meets the minimum standard just as the student does. The phase in standard should be used instead of the final level 2 student performance for the 2013-2014 accountability system. In the Index 2, consideration should be given to districts receiving credit for any student maintaining or making growth versus increments of growth. There should not be a cap for the modified or alternate special education assessments given. [Superintendent]

How can Texas compare its students to those in other states if we do not use the same instrument? [Parent]

I am concerned that the Commissioner may place too much weight on Index 3. The same students are very likely to fit into both categories - economically disadvantaged and at least one of the lowest performing ethnic groups. That means that their scores are already being counted twice. To give this index more weight is unfair. We definitely want

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ALL of our students to reach Advanced performance, but if the same student is in both of the lowest performing groups and is economically disadvantaged then they are already fighting an uphill battle. [Other District Staff]

I would like to see us stay away from the A,B,C,D,F rating system and stay with what we have as far as Exemp, Recogn, Accept, and Un. I would like for us to consider the category size of students, 30 would be a fair number. [Superintendent]

In its current form the system is sometimes confusing and hard to get a good handle on. I dont think we will be able to adequately explain it to our parents and community. If at all possible, please delay implementation of the proposed accountability system for another year. [Superintendent]

It appears to me that the ATAC has yet to conceive of a simple and concise method of presenting the 4 indexes to the public. I would like to see something graphical and colorful something easy-to-understand. If you want less pushback, you will have to make this system fair on the face of it, and simple to explain and comprehend. [Superintendent]

Evaluate accountability based on the standards at the time the test was administered, not the final phase in standards. [Principal]

Please consider moving the 20 baseline for student groups to 30. This is too narrow for smaller districts. Consider keeping the rating naming system similar, Exemplary, Recognized, Acceptable, Needs Improvement. I know part of the motivation for the changes in the accountability system is provide a clearer understanding of ratings and scores. In its current state, this new proposal is more confusing than the previous model. We also needs some flexibility to incorporate CTE classes in this system. [Superintendent]

Research shows that children acquire the language in about 5 years. Many of the refugees and assylees also have (very) limited schooling. Based on research the students should be exempt 5 years before they take the test to have a fair and reasonable assessment. [Teacher]

Student results are measured against the final Level II performance standard as opposed to the phase in standard. This will cause confusion with students passing the test for graduation but counted as a failure for accountability. Delay any changes to the state accountability system until the 2013-2014 legislature takes action on the education bills that are being filed and will be considered. TEA is considering implementing a CAP on the modified and alternate assessment results. [Superintendent]

Texas AFT calls on the commissioner to defer further implementation of the new STAAR accountability system pending the outcome of legislative action likely to result in major course corrections during the 2013 session. By deferring further implementation, the commissioner would be responsive to concerns raised by both parents and educators_ as well as legislators--regarding the wisdom and viability of the STAAR system.[Other]

The proposed system is too complicated for most of our parents to understand which makes it hard to gain community support for the increased rigor STAAR demands. [Other District Staff]

Unfortunately, the documentation provided (especially PPT presentations) is difficult to decipher to figure out exactly what the framework really is. Please include some sort of measure for individual academic gains for ALL students, not just those who fail to make the lowest passing grade. Gifted students are valuable too, and under the current system their education is severely lacking. [Teacher]

Way too complex. Districts need to have a model that they can explain to parents and students. [Other District Staff]

Technical information is too complicated, too difficult to comprehend, too slow to come out to districts to adequately train staff and inform public post-poned ratings and no standards/results have provided limited, meaningful information. Duplication of students in the most neediest of areas...example, one student can count in the areas of all students, race, economically disadvantaged, and ELL/LEP. [Other District Staff]

PUBLIC COMMENTS RECEIVED REGARDING DEVELOPMENT OF 2013 (AND BEYOND) ACCOUNTABILITY SYSTEM

The four indexes are based on the same information. Perhaps a better accountability system is to allow the community to propose a portion of the criteria used to evaluate LEAs and document the requirements in the improvement plans. [Assistant Superintendent]

The proposed accountability system with the 4 index scores and each index is compiled from various different frameworks is extremely difficult to understand and explain as an educator who thoroughly understands the accountability system. I also believe that the elementary and middle schools are at a disadvantage if they are scored on index 4 or postsecondary success. [Principal]

Special provisions for Residential Treatment Facilities are not outlined in the proposed documents. Given the challenges these schools face, the accountability system should be adjusted to accurately measure their performance given the unique circumstances of their student population. [Other]

We do not support system safeguards that result in lower ratings as these safeguards would mitigate the intent of a compensatory index-based accountability system. [Other District Staff]

Evaluation of the LEP and Special Education student groups is not required by House Bill 3 and inclusion of these groups on the College Readiness Index would unfairly penalize schools that have enough students in these groups to meet the minimum size requirement, as the graduation rates for these groups are far below state graduation rates other student groups. [Other District Staff]

Minimum size requirements: Technical documents and presentations by TEA staff define the minimum size requirement (MSR) inconsistently on Index 1 and Index 3. The MSR is based on the number of tests in Index 1, and the number of students in Index 3. As a result, in many cases the low performing groups identified by performance on Index 1 do not meet the minimum size requirements on Index 3 when the results are broken down by subject area. We suggest that the minimum size requirement be consistent for all indices and that the MSR start at 30 students (as was used in the old state accountability system) and possibly phase in a lower MSR over time. [Other District Staff]

The proposed system favors high performing schools with homogenous populations and to penalize diverse schools with challenging populations. Under the old system, safeguards such as the exceptions provision and required improvement allowed diverse schools and districts to compensate for the challenges associated with highly mobile and largely economically disadvantaged populations. The new system penalizes diverse schools, especially on Indices 3 and 4, by allowing very small student groups with relatively low performance to impact the overall rating of a school by counting the results multiple times in the various indicators. While Index 2 (Student Progress) may allow schools with challenging student populations to compensate for other indices by showing strong growth, Index 2 will not be available in 2013. Our concern is that the 2013 system will create a wide performance gap between historically high performing schools and those that serve more challenging student populations. . [Other District Staff]

Level III performance scores within our lowest performing subgroups were non-existent at our school. This Index will be a great challenge for us. [Principal]

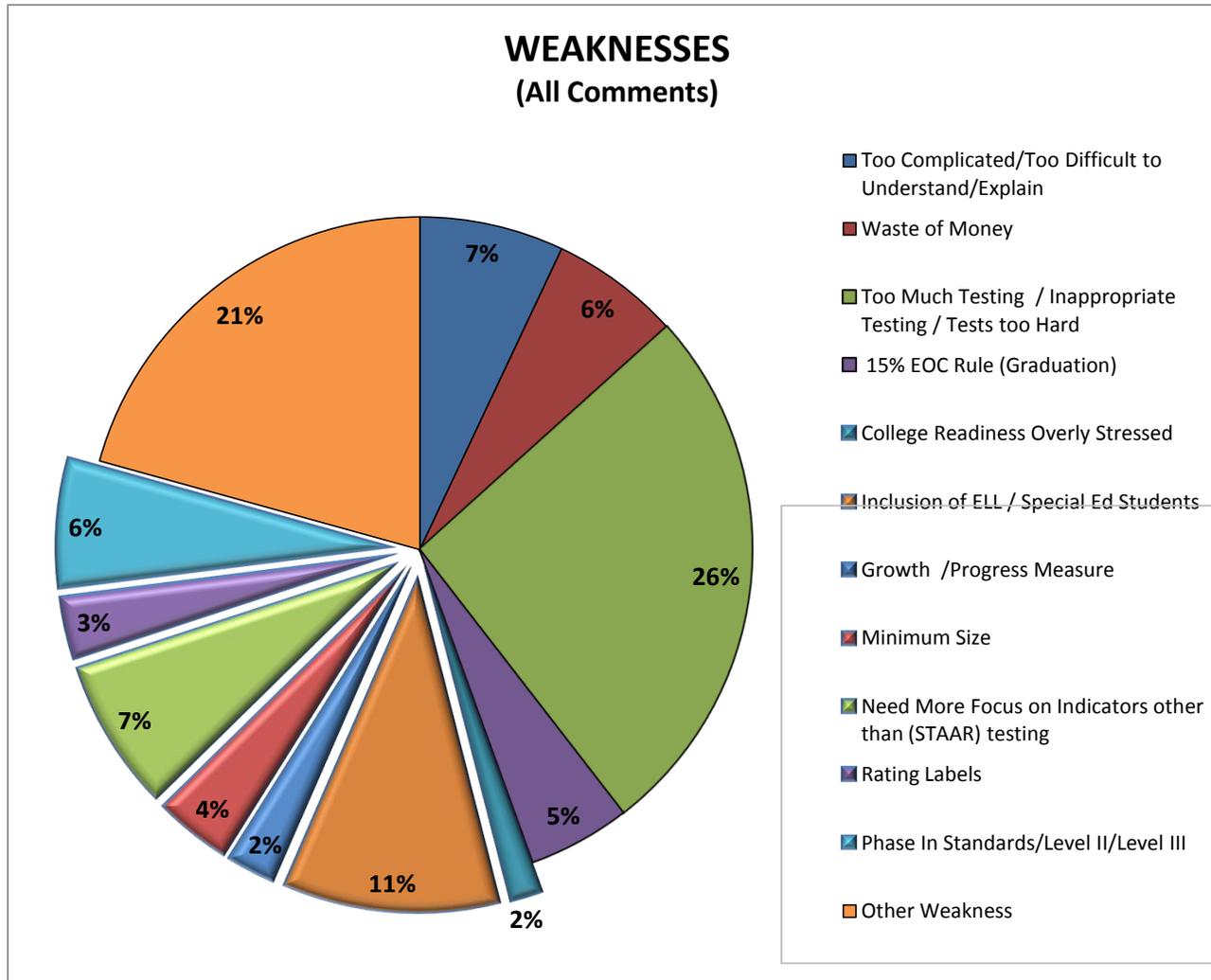
I am concerned about the complexity of the student progress index (index 2). I would like an average vertical scale score to measure growth be considered. The system seems to be very difficult to understand as currently written. [Assistant Superintendent]

Another concern is that once students achieve level iii, they lose the prospect of being identified as Making Progress. Once they top out, the only place they can go is DOWN. [Principal]

PUBLIC COMMENTS RECEIVED REGARDING DEVELOPMENT OF 2013 (AND BEYOND)
ACCOUNTABILITY SYSTEM

Too Complicated/Too Difficult to Understand/Explain	Waste of Money	Too Much Testing / Inappropriate Testing / Tests too Hard	15% EOC Rule (Graduation)	College Readiness Overly Stressed	Inclusion of ELL / Special Ed Students	Growth /Progress Measure	Minimum Size	Need More Focus on Indicators other than (STAAR) testing	Rating Labels	Phase In Standards/Level II/Level III	Other Weakness
180	162	672	127	40	269	61	96	188	78	161	531

(counts are not mutually exclusive)

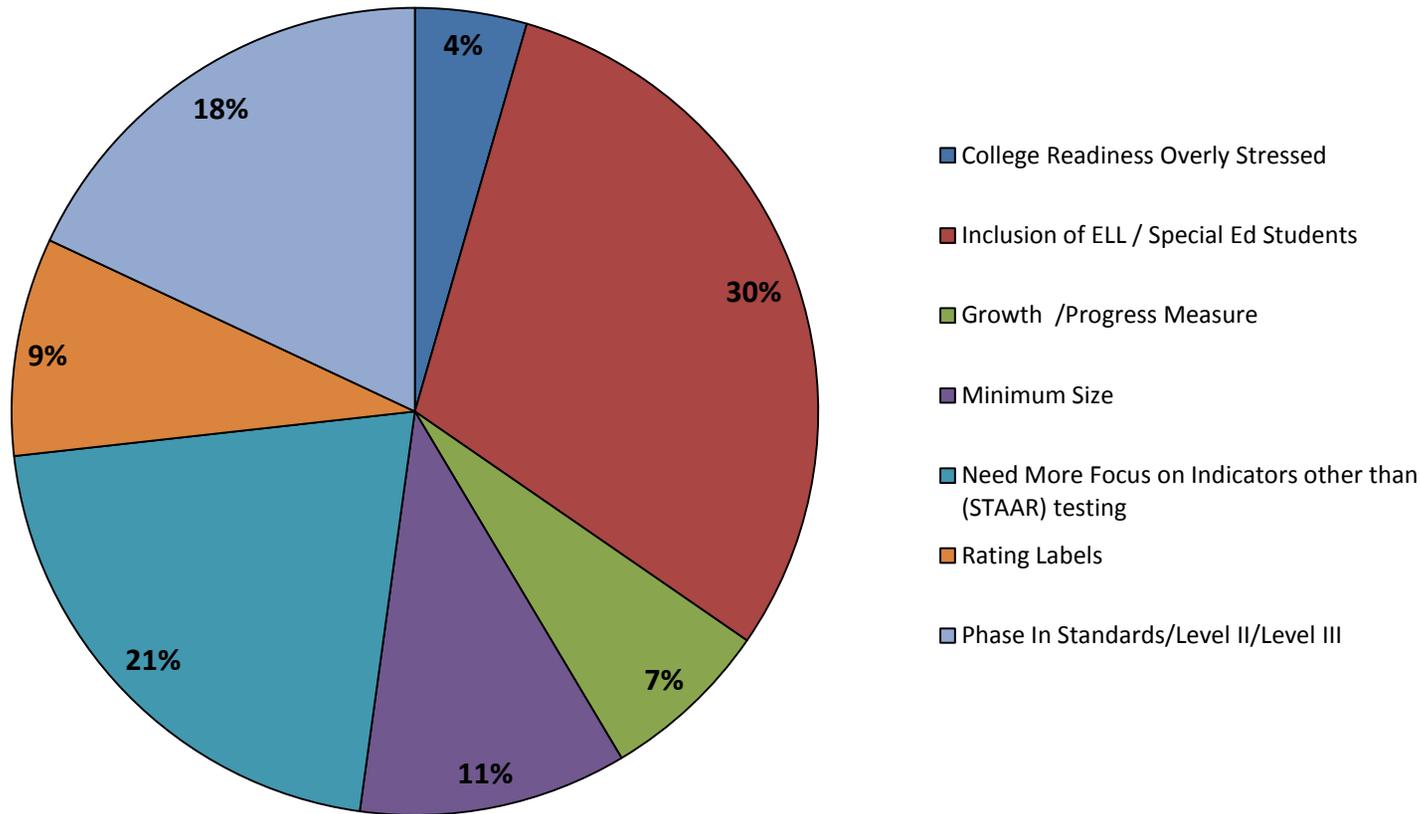


PUBLIC COMMENTS RECEIVED REGARDING DEVELOPMENT OF 2013 (AND BEYOND)
ACCOUNTABILITY SYSTEM

College Readiness Overly Stressed	Inclusion of ELL / Special Ed Students	Growth /Progress Measure	Minimum Size	Need More Focus on Indicators other than (STAAR) testing	Rating Labels	Phase In Standards/Level II/Level III
40	269	61	96	188	78	161

(counts are not mutually exclusive)

WEAKNESSES
(Comments Related to 2013 Development Only)



PUBLIC COMMENTS RECEIVED REGARDING DEVELOPMENT OF 2013 (AND BEYOND)
ACCOUNTABILITY SYSTEM

College Readiness Overly Stressed	ELL / Special Ed	Growth / Progress Measure Problem	Min Size = 30	Need More Focus on Indicators other than testing	Rating Labels	Use of Level II
4	20	22	30	18	36	32

(counts are not mutually exclusive)

