Summary of February 2023 ESSA Amendment Comments

Summary of Comments Received and Agency Responses

English Language Proficiency (ELP)

1. As 2023–24 will be the first year that TELPAS writing online is part of the composite score, the Texas Education Agency (TEA) should use 2022–23 as a baseline and not use the proposed evaluation of two of three domains.

   The U.S. Department of Education (USDE) denied a waiver in 2018 requesting a one year pause on ELP evaluation due to TELPAS that year

to see the schools within a certain range of the targets get points. Perhaps 2 points – Did not meet interim target but showed expected growth toward interim target *OR* achieved a score within three points of the interim target.

As the focus of ESSA is on ambitious State-designed long-term goals, with interim measures toward the goals, TEA is in alignment with USDE guidance that growth toward targets is a requirement. Meeting the target or showing growth is a requirement under ESSA. If a group remains stagnant below the interim target, or their performance slides backwards to the point they are below the interim target, they are flagged as not meeting expectations as they are not progressing toward the long-term goal.

6.

0–4 points, and reported publicly. Campuses with student groups who are consistently underperforming are identified for school improvement.

With the reduced minimum size of ten and use of super groups, disparities in student group outcomes will be amplified, not obscured. The focus shifts to these groups without the previous 14 groups distracting from gaps. Larger student groups are reflected proportionally in and have a direct impact on the Student Achievement and School Progress domains; the goal of Closing the Gaps is to focus on the lowest performing groups in order to drive improvements to close gaps.

Disaggregated data for each of the following student groups will be reported and evaluated within Closing the Gaps. Additionally, district Closing the Gaps reports will include all district students, including those that move between campuses during the year.

> *All students*
> *Seven racial/ethnic groups: African American, American Indian, Asian, Hispanic, Pacific Islander, white, and two or more races*
> *Economically disadvantaged*
> *EB students/English learners (EL) (current and monitored through year 4)*
> *Special education*
> *Foster*
> *Homeless*
> *Migrant*
> *Continuously enrolled*
> *Former special education*

10. Rethink the methodology for identifying the two-lowest performing racial/ethnic groups by focusing on a racial/ethnic group's distance from target versus performance.

    As a key element of ESSA is to measure progress toward making significant progress in closing statewide proficiency gaps, TEA stands by the proposal to focus on the performance of the lowest-performing student groups in Academic Achievement in order to close these gaps.

Questions and Answers

1. Previously, the ELP methodology evaluated several years of prior scores. Why is this changing and evaluating only 2023 compared to 2022?

    Since 2020, the availability of TELPAS composite scores for EB students varied due to the interruptions caused by COVID on instruction and TELPAS administrations. In order to capture data for EB students, a multi-year methodology was used to include as many EB students in the state's evaluation as possible. As we move away from the impacted numbers, the multi-year evaluation is no longer necessary.

2. If two-point growth measures the necessary improvement to the next interim target, shouldn't the denominator be six as the next target will be evaluated at the end of the 2027–28 school year?

    Yes. TEA updated the two-point growth calculation to a six to reflect the growth necessary between the 2022–23 and 2027–28 school years.

3. Is ATS identification reverting to the prior methodology where it is not a subset of TSI?