

April 20, 2023

To: House Public Education Committee

Re: **House Bill 4514**

Position: Against

Chairman Buckley and honorable members of the House Public Education Committee,

Thank you for the opportunity to provide written testimony **in opposition to House Bill 4514 as filed**. The coalition of 9 undersigned organizations represent business, nonprofit, and education entities with a widespread interest in supporting Texas students to graduate high school ready for the next step.

As a coalition committed to academic excellence for all Texas students, we have grave concerns about HB 4514, which creates opaque A-F letter grades by adding a number of non-academic indicators into the formula. **This shift risks making the system ultimately less transparent, lowering academic rigor, and including indicators that distract from improving student outcomes and closing achievement gaps.** The undersigned firmly believe that both accountability and the assessment system within it must remain focused on core academic measures that research shows are critical to post-graduation success.

In light of this, we respectfully oppose HB 4514 as filed due to the following reasons:

**I. MODIFIES TEXAS' A-F FORMULA TO INCLUDE NON-ACADEMIC INDICATORS**

HB 4514 proposes a new A-F formula that will ask parents and community members to **untangle academic preparedness from a variety of non-academic indicators across three domain ratings**. Counting these indicators at a weight of 50% of campus' or district's A-F domain ratings, however, waters down the academic integrity of A-F letter grades. Our coalition believes non-academic functions of schools are incredibly important and supports increasing access to experiences for all Texas students, but does not believe that all taxpayers see core academic performance as on equal footing with these other components. **At a time when only 50% of Texas 3rd graders meet Reading expectations and approximately just 5% of 3rd graders who are performing below grade-level catch up,<sup>1</sup> we must focus our accountability system's letter grades on academic readiness to ensure all students have the basic literacy and numeracy skills needed to thrive.**

**II. RISKS OVERHAULING A-F FORMULA WITH NON-VALID INDICATORS AT A TIME WHEN STUDENT PROFICIENCY REMAINS LOW**

Though including non-STAAR indicators into A-F is a worthy goal, we urge the Committee to **reject any indicators that are not valid, reliable, and comparable across Texas' 1200 school districts** (and especially not to introduce new non-test based indicators without thoughtful piloting and evaluation). HB 4514 proposes several new indicators for elementary and middle schools to be introduced in the **2023-24 school year** which have not been evaluated as appropriate measures, with Legislators having yet to see simulations, modeling, reporting, or piloting on the impact on the formula across district and campus types to inform decisions this Session. For example, the *Extracurricular and Cocurricular Student Activity Accountability Indicator Study* conducted by TEA in 2022, suggested that further piloting would be necessary before implementation and

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<sup>1</sup> Texas Education Agency. (2022) 2022 STAAR Results Summary. <https://tea.texas.gov/sites/default/files/2022-staar-results-summary.pdf>; Texas Education Agency. (2021). 2021 STAAR Results Summary. <https://tea.texas.gov/sites/default/files/covid/Overview-of-2021-STAAR-Results.pdf>.

“should legislators wish to proceed with a change to incorporate an [extracurricular/cocurricular] indicator into accountability [as is proposed in HB 4514], the legislature would need to fund a five-year ECC student activity indicator phase-in plan.”<sup>2</sup>

Reporting these indicators, as opposed to incorporating them directly into the formula, provides helpful insight into school offerings in a clearer, concise way. Further, it helps ensure the formula accurately reflects the true performance and outcomes (not inputs) of a school. For example, since Louisiana adopted extracurriculars into its letter grade, all campuses have received full points in the extracurricular measurement, signaling no meaningful differentiation.<sup>3</sup> Not only does this not help differentiate quality by simply rewarding participation, it risks inflating scores and subsequently also obscuring academic performance. We urge the Committee to be cautious about potentially hyper-inflating scores through these kinds of metrics and at minimum ask that multi-year pilots as well as modeling and simulations of proposed indicators be evaluated before further discussion is warranted.

### III. REMOVES FOCUS ON A KEY, VALUED ACADEMIC SUBJECT

Although the 8th Grade Social Studies STAAR test is not required by federal law, its current administration has provided key data on student performance and persistent shortcomings in our system. According to 2022 data from TEA, the proficiency rates for this test are as follows: 18% for economically disadvantaged students and 44% for non-economically disadvantaged students.

With a wide achievement gap in this subject—which covers essential knowledge and skills in U.S. History such as the creation and ratification of the U.S. Constitution— we urge the Committee to continue the state’s commitment to academic excellence, including in subjects not required by federal law. Close to seven in 10 voters were similarly against eliminating standardized testing in U.S. History.<sup>4</sup>

### IV. CREATES LESS VISIBILITY FOR PARENTS, COMMUNITIES, & POLICYMAKERS TO MAKE INFORMED-DECISIONS ON WHAT MATTERS MOST

Texas spent tremendous energy in 2017 creating a system that would accurately and fairly assess campus academics, rewarding the better of growth or performance. The state continues to thoughtfully refine these indicators with modeling to ensure certain school types or student groups are adversely affected. What Texas has built in its **A-F system allows an apples-to-apples academic snapshot**. Without this, it is challenging for parents to make informed decisions about their children’s education and impossible for school leaders and policymakers to identify and scale best practices that propel student learning.

In conclusion, we remain convinced that one of the best ways we can ensure continued improvement of student outcomes is through a robust system of **strong academic standards, statewide assessments, and school accountability**. The data bears this out: Between 2015 and 2019, Texas enacted a series of students-first policy changes, including transparent accountability through HB 22 (85R), robust funding

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<sup>2</sup> Texas Education Agency. (2022). Extracurricular and Cocurricular Student Activity Accountability Indicator Study. <https://tea.texas.gov/sites/default/files/ecc-report-dec-2022.pdf>.

<sup>3</sup> Louisiana Department of Education . (2022). 2021-2022 INTERESTS & OPPORTUNITIES. [https://www.louisianabelieves.com/docs/default-source/accountability/interests-opportunities-one-pager.pdf?sfvrsn=6c219c1f\\_8](https://www.louisianabelieves.com/docs/default-source/accountability/interests-opportunities-one-pager.pdf?sfvrsn=6c219c1f_8)

<sup>4</sup> Texas 2036. (2023). New poll spotlights Texans’ day-to-day concerns. <https://texas2036.org/posts/new-poll-spotlights-texans-day-to-day-concerns/>.

overhauls in HB 3 (86R), and marked testing improvements through HB 3906 (86R). Mirroring national research that test-based accountability leads to increased student outcomes,<sup>5</sup> these changes resulted in a marked improvement in Texas' scores, with Reading scores improving 12% and Math scores improving 5% on the STAAR exam. From 2016 to today, the state has also seen an 11% increase in the number of students who are College, Career, or Military Ready. But we are still not where we need to be and with only one year of A-F ratings before a COVID-induced pause we still have things to learn about the impact of our current system.

Texas' current **system merits a continued commitment to evaluate its impact beyond this initial period**. Upending the system now by folding in other indicators that have not been successfully and rigorously piloted could jeopardize academic progress and ultimately our ability to ensure students are set up for growth and success post-graduation.

**Texas students can achieve at high levels.** It is incumbent upon the state to maintain an accountability system that provides aligned incentives to improve student outcomes in every school district and equip teachers and students to succeed. The current system and forthcoming administrative improvements gets us closer to this goal than we have ever been. We respectfully ask you to reject changes, and ensure Texas has a clear picture of progress for the investments in our public education system.

Sincerely,



<sup>5</sup> McElroy, K. (2023). Does test-based accountability improve more than just test scores? *Economics of Education Review*, 94. <https://doi.org/10.1016/j.econedurev.2023.102381>