

**PUBLIC TESTIMONY FOR  
THE SELECT COMMITTEE ON PUBLIC SCHOOL ACCOUNTABILITY**

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## INTRODUCTION: Too Burdensome, Too Stressful, and Too Punitive

In recent years, there has been an outcry around the state about the negative effects and side-effects of state-mandated testing. Complaints include “teaching to the test,” resulting in “narrowing the curriculum” and test anxiety among students over the possibility of failing and among educators over the possibility of negative evaluations. In 2003, a federal accountability called Adequate Yearly Progress (AYP) added a different set of standards and sanctions. (See Table 1.) In both systems, the standards keep increasing over the coming years. AYP calls for 100% student to be “proficient” in Reading and Math by 2014. New tests are added, and definitions become more rigorous. With the imposition of new and tougher judgments, many educators are even more stressed about their own chances of getting a bad evaluation, or losing their jobs, being reassigned because of “their” test scores. It is difficult to focus on teaching and learning in such a “high stakes” environment.

**A Flood of Mandates:** Since 1980, “independent” districts and schools have been flooded with new laws, rules, and regulations about accountability, most recently House Bill 1 (2006) and Senate Bill 1031 and HB 2237 (2007), to name only three sources. The sole content of TEA’s Legislative Briefing Book for the Third Called Session of the 79th Legislature is only about HB 1 — 90 pages. The 2008 Accountability Manual is 226 pages while the 2008 AYP Guide is 130. Keeping up with different rules and regulations and results for two sets of accountability complicates matters even further. Various testing manuals are also many and thick.

Accountability results generate activities and paperwork for all schools, under the umbrella of Performance Based Monitoring. Even districts rated *Recognized* and *Exemplary* may have paperwork to do because of low TAKS performance of such small groups as Career and Technical Education students who are limited English proficient. PBM slices and dices performance data even more finely to cover areas not in the two main accountability systems four times a year. Its various manuals are a maze of about 80 pages covering 37 indicators. (One set of indicators covers additional NCLB indicators!) A related maze takes over 130 pages covering another 78 indicators. Monitoring activities include filling out forms for Data Analysis, meeting with Improvement Committees and outside consultants, and completing Continuous Improvement Plans (in addition or added to the mandated Campus Improvement Plans).

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*Is it possible to reform public schools to death?*

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**More and More Work to Do:** Campus administrators must carry out complicated logistics to give the various kinds of tests and re-tests scheduled for multiple times during the year, including coding answer documents accurately and seeing to test security. Centrally, another complicated set of logistics receive, distribute, collect, and return the tests, all under maximum security. Schools must provide “accelerated instruction” for students who did not pass, probably “drill and kill” activities, instead of the full scope of grade-level instructions intended by the full state curriculum. After release of results, there often are additional, non-instructional things to do and paperwork to be submitted, even by districts and schools that have “passed.” The result is more work, but with no more time and other resources.

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*Does the Legislature ever take anything off the public schools' plate, or does it only add things for them to be held accountable for?*

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**Many Trip Wires:** If a district or a school passes the more comprehensive state accountability, it might get caught on AYP (LEP Math). Many have “passed” both state and federal standards only to be listed on the PEG List for something that happened two years ago. Coding errors made months earlier have led to bad ratings. Even schools that have stayed off those three “bad lists” can still have to write Continuous Improvement Plans under Performance Based Monitoring which has criteria in addition to the accountabilities. All of these things to do require time, energy, and personnel to respond to the requirements and try to explain to the public and the media that their school or district is not “failing” everything. Neither state nor federal accountability systems gives credit for being mostly good.

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*If anyone wanted to make the schools look bad, the current complex of accountability systems would be a good way to do it.*

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**Even More Testing:** The 80th Legislature (2007) actually increased amount of state-mandated testing in SB 1032 and HB 2237!

1. End-of-Course tests (and multiple opportunities for re-testing) for all four high school grades (during the phase-in, high schools having to administer tests and re-tests for both TAKS and EOC’s for several years)
2. “College readiness assessments” for Grades 8 and 10
3. A “diagnostic assessment” for students in Grade 7 who did not pass Grade 6 TAKS Reading
4. International assessments that the Commissioner “can require”

Yet while more testing is being added, SB 1031 also limits the amount of district-required assessments to 10% of the instructional days. Testing and getting ready for testing and dealing with the results is out of hand in Texas. No wonder that people call Texas “test crazy.”

Another complication is the current push for all testing to be on-line. Where will all those computers come from? Where will the schools put them?

**More Test Security:** Senate Bill 1031 mandates include criminal penalties for disclosing the contents of any assessment mandated by the Legislature, random audits, and the issuing of subpoenas. This is no doubt in response to the high stakes pressure caused by high stakes testing. TEA now has a 14-point security plan, now including having students sign confidentiality oaths and the possibility of unannounced monitoring visits by TEA. Auditing and monitoring have also been stepped up, further increasing the high-stakes pressure.

**More Sanctions:** Federal AYP sanctions include school choice, supplemental education services, reconstitution of staff, potential loss of Title I and other federal funds. State sanctions now include (for a district) assignment of a monitor and “escalated interventions,” as determined by the Commissioner of Education, and (for a campus) alternative management or campus closure.

Here schools must deal with two different sets of sanctions. And the state begin its earlier than the federal, with the assignment of a Technical Assistance Team to any campus that is “acceptable” in the current year but would not be under the increased standards of the next year. Holding schools accountable with a rigid, “zero tolerance” application and tough sanctions may be rigorous, but it is not very helpful. It adds even more work and stress for the educators. At some point, the state’s trying to plug all the loopholes in the rules becomes being overly precise and punishes even districts and schools honestly trying to work with the students they are responsible for. (See Table 2.)

*Why are the sanctions under state accountability more severe and earlier than those under federal AYP? If meant to help schools, why are they called “sanctions”?*

**The Need for More “Administrative Fat”:** One outcome of so many rules is the need to employ staff to keep up with the requirements. Some in the public criticize this as “adding administrative fat” and taking away resources from the classroom. Damned if you do, and damned if you don’t. Another problem related to personnel is staff turnover. Whenever someone in the web of responsibilities moves, transfers, is promoted, or otherwise leaves, a new person must be trained to do the jobs — no small task.

**More Negative Press:** There are several opportunities a year for the media to report on “failing schools”: in August, when preliminary state accountability results are released and again in October with the final results. There are two different times for federal AYP results. In December, TEA releases the Public Education Grant list of many more schools from which parents may request a transfer. Many of these schools have met the standards of both state and federal accountability systems! These reports of “failing schools” imply those schools are doing nothing right, even though only one standard may have been missed by only a few students in only one sub-group. In addition, several Legislative mandates require notifying parents about performance, notably the PEG list and schools in the “School Improvement Program” for missing AYP. Those schools get to report bad news about themselves in addition to reading about it in the newspaper. (See also pages 5-6.)

**Moving Targets:** Amid all this confusion, the educators must realize that this year’s standards are (in most cases) higher than last year’s. Both state and federal targets keep moving. By 2010, the minimum for Reading, Writing, and Social Studies will be 70%, the current standard for *Recognized*. AYP has a different stair-step, confusing everybody. For example:

STATE PERFORMANCE STANDARDS, <i>ACADEMICALLY ACCEPTABLE</i> — Standard Procedures									
	2003-04	2005-06	2007-08	2008-09	2009-10 *	2010-11	2011-12	2012-13	2013-14
Reading/ELA	50%	60%	70%	70%	70%	TBA	TBA	TBA	TBA
Mathematics	35%	40%	50%	55%	60%	TBA	TBA	TBA	TBA

\* Subject to change

Note: No ratings given in 2003. 2004-05 not shown here. Writing, Social Studies, and Science not shown here.

Source: Accountability Manuals for 2004, 2005, and 2008)

AYP PERFORMANCE STANDARDS									
	2002-03 2003-04	2004-05 2005-06	2006-07 2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14
Reading/ELA	47%	53%	60%	67%	73%	80%	87%	93%	100%
Mathematics	33%	42%	50%	58%	67%	75%	83%	92%	100%

Source: 2008 Adequate Yearly Progress (AYP) Guide

**Multiple Reporting to Parents and the Public:** Schools must report test results and ratings to parents early in the fall as well as their Campus Improvement Plans. As mandated by HB 3297 (2005), every school also must notify parents (again) about the school’s rating and an explanation of the rating — at school or district expense. It must send the School Report Card parents in December or January. The media have reported some highlights several times during the year.

**Misleading Results:** A system that bases accountability ratings on the lowest performing student group(s) often gives such misleading information. Also, when every district, and school must meet the same standards, it is harder for those with a high percentage of limited English speaking and/or economically disadvantaged students to be *Recognized* and *Exemplary* than for those with affluent and advantaged students.

*A principal once said, “There are a lot of ways to raise test scores, and most of them are immoral.” Now two decades later, SB 1031 (2007) has made such behaviors Class C Misdemeanors.*

**Mandating Student Success:** The Legislature in 1999 mandated what became “the Student Success Initiative.” Students in Grade 3 are required to pass the Reading test and students in 5th and 8th grades must pass Reading and Math before being promoted to the next higher grade level. Passing the exit-level test began as a graduation requirement with the freshman Class of 1987. There are now four pressure points for students, intended to make sure everyone is on “grade level.” The Grade Placement Committee Manual is over 70 pages long, adding more rules to follow. (The educators must also coordinate with the rules in the ARD Manual and the LPAC Guide, as applicable.) Another statistic, mandated in 2003, called the Texas Success Initiative, is supposed to tell the percent of high school students will be “college ready” and not have to take postsecondary “developmental courses.”

**An Unnecessary Bias about Dropout, GED, and Graduation Rates:** It is not 1950 anymore. Why is it still appropriate insist on defining graduation rate as getting a diploma in four years? Currently, TEA includes “continuers” in its Completion Rate, those still enrolled in school for a fifth year. This inclusion gives appropriate credit to districts and schools for keeping youth in school and not dropping out. Why not also identify how many of those receive a diploma? In addition, for many (?) youth, a GED certificate is better than no credential at all. (See also p. 8.)

**College Readiness for All Students:** All this in a context of enforcing compulsory school attendance, keeping everybody in school while staying on grade level and graduating on time (in four years). Now come new initiatives in the name of college readiness for all. The Governor’s website touts that “Texas is the first state in the nation to make a college-prep curriculum the standard coursework in Texas high schools, starting with the class of 2008.” The Texas Higher Education Coordinating Board says that Texas colleges and universities “must” more than double in enrollment by 2015. It is hard to imagine “everybody” being qualified academically and psychologically to benefit from college enough to actually graduate. (Similar thinking is in No Child Left Behind that calls for 100% of the nation’s students to be “proficient” in reading and math by 2014! What would colleges and universities do with all those students if they enrolled? Will those additional graduates be able to find jobs in their fields of study?

(continued)



**The Difficulty of Staying Focused:** It is difficult to stay focused in a high-pressure, high-stakes environment full of distractions and requirements where people are rewarded and punished on the basis of a multiple-choice proxy for student performance. It is hard to find people who can be instructional leaders and managers of all other things required of them in 21st-century schools in Texas. It is confusing to keep up with two or three or four accountability-related systems with different sets of standards, different results, and different sanctions.

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*The situation of Texas schools today is reminiscent of Alice's experience in Wonderland where "it takes all the running you can do, to keep in the same place. If you want to get somewhere else, you must run at least twice as fast as that" (Lewis Carroll, Through the Looking Glass, 1871).*

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**Conclusion:** Teaching and learning must receive the attention they deserve without so many distractions. Reducing the stress and pressure and the punitive nature of the current accountability system can go along way toward that goal. The rest of this testimony will make a few specific proposals.

## RECOMMENDATIONS FOR IMPROVEMENT

### 1. Continue to give “heads up” of changes in what public districts and schools are required to do; especially:

- a. The Commissioner’s Final Decisions document, made available in April, which includes rationales for those decisions that show consideration has been given concerning the potential effect of new indicators and changes in definitions
- b. The chapters in the annual Accountability Manuals, such as the Calendar of coming events and deadlines and “Preview of 2009 and Beyond”
- c. The “report, report, use” phase-in of new indicators and definitions

### 2. Continue to include fairness in assigning accountability ratings.

In Texas, millions of students, teachers, and administrators are involved. Humans are never exactly alike. There are always extenuating circumstances that should be taken into consideration. Enforcing rules rigidly assumes that the rules for human behavior have been written with a meaningful precision.

- a. Continue to include such features as (1) Required Improvement, (2) Exceptions with Safeguards, (3) giving credit to high schools for keeping “Continuers” in school for a fifth year, and (4) reporting GED recipients.
- b. Continue to look for fair ways to evaluate registered Alternative Education Campuses. These schools serve at least 75% of their enrollment at-risk of not graduating. Therefore, they are not only different from “regular schools,” they can be very different from each other. TEA has tried several methods over the years. Good features of the current version include the use of the Texas Growth Index and the 11<sup>th</sup>-grade re-testers and especially counting GED recipients in their Completion Rate. (It doesn’t seem fair that none of these schools can ever be *Recognized* or *Exemplary*.)

### 3. Make state accountability less confusing to the public and the media while eliminating some work required of schools.

A prominent method for “improving” schools is the releasing bad news to the media. Often the news seems contradictory, as when a school meets the standards of one system but not the other. Two strange possibilities are specified in TEA’s Accountability Manual. A school could be *Recognized* or *Exemplary*, but miss AYP. Or it could be *Academically Unacceptable* but meet AYP. Another is when a school meets the standards of both but is placed on the state’s PEG list. Such news comes three or four times through the school year, often reporting “failing” schools, even though those schools may be doing well in many other areas not

reported in accountability. Too much information can be confusing and misleading but not informative. It can erode public confidence.

**a. Eliminate the PEG List in order to reduce the number of seemingly contradictory public reports about districts and schools.**

The PEG List is a system that resembles “high stakes” accountability. A school is placed on the state’s PEG list for not meeting the criteria for two of three years: 50% in each of the four tests used for accountability ratings and/or a rating of *Academically Unacceptable*. Once placed on the list, a school remains on it for two more years, even if it becomes *Exemplary* in those years — even though it meets the two different standards of state and federal accountability!

In 2003, a new accountability system was first implemented with a new set of graduated standards. The minimum standard for Reading/ELA, Writing, and Social Studies was 50% while Math was 35% and Science was 25%. The PEG list, first implemented in 1995, maintained the same (now higher) 50% criteria.

The two state programs seem to contradict each other greatly in the number of “bad” schools. The public in general and the media in particular must wonder what the state means by saying in the Fall several hundred schools have met state and federal standards but, in December, saying many of them are schools from which parents may apply to transfer their children. In addition, parents often do not understand the differences in school transfer options in the PEG List and those in the School Improvement Program of AYP.

The following chart compares the number of Texas schools rated “unacceptable” to those on the PEG list:

Year	Rated Academically Unacceptable	On the PEG List (Effective the Next School Year)
2003	—	205
2004	24	420
2005	52	821
2006	55	924
2007	56	831

Source: Compiled from the TEA website

Note two things about the chart above:

1. That a PEG list was issued even for 2003, the first year of TAKS, when no accountability standards were set and no ratings were given.

2. That the number of schools on the PEG list in 2005, 2006, and 2007 is 14 or 15 times higher than the number rated *Academically Unacceptable*.

With the arrival of AYP adding a second layer of conflicting rules and sanctions, the PEG should be retired.

**b. Eliminate the TAT list and the accompanying activities to make state Accreditation Monitoring less complicated and punitive.**

Table 1 on a following page displays the complexity of the systems that take over after the two sets of accountability results are released. HB 1 (2006) created a maze of follow-up monitoring activities intended to “help” the districts and schools back on track. But the comparison in Table 2 shows the state now has “sanctions” and “interventions” that are more punitive and begin earlier than AYP’s “School Improvement” activities. (Note the difference in the language and tone of state “sanctions” and federal “improvement.”)

Most strange is the state’s identification of “TAT schools,” that met the state accountability standards of the current year but would not meet those increased standards of the following year. Those schools must meet additional requirements — at district or school expense — after only one year.

Schools that have problems with both state and federal accountabilities have two sets of teams and activities to deal with. While federal SIP grants are available for federal “improvement” activities, schools must pay for state sanctions.

After two years of being rated “unacceptable,” schools must begin “campus reconstruction planning” whereas the federal follow-up “improvement” activities call for “Restructuring” after missing AYP for five years.

HB 1 has added to the “high stakes” and punitive nature of accountability but not necessarily to “school reform” and “improvement.” These extra activities are time-consuming distractions from their basic work of teaching and learning. Ironically, the state continues to add regulations of school districts that it has called “independent” for two or three decades.

**c. Eliminate the reporting requirement of HB 3297.**

HB 3297 (2005) requires that schools notify parents about the school’s rating and give an explanation of the rating. Districts and campuses look on this task as busy work to say again what has already been said, often several times.

**4. Make accountability less punitive in areas where they can look as though they are artificially “failing.”\***

\* “Artificial failers” is a term that TEA has used to refer to certain kinds of Special Education students who exceed the federal AYP cap not counted as not meeting AYP standards whether or not they pass the tests.

It should not assume that rules and regulations for groups of humans can be written with such precision that the “good guys” and “bad guys” can always be neatly identified.

**a. Do not require that districts and schools meet standards on every measure.**

At present, ratings are determined by whether districts and schools meet standards on each of up to as many as 36 measures, depending on the size of the school. These multiple measures are five student groups times five tests plus five student groups for the two other indicators (Dropout Rate or Completion Rate). Currently each district and school must meet standard for each group that meets the minimum size requirement. No credit is given for 34 of 36 or 24 of 25, no matter how diverse the students are.

**b. Make the definition of “meeting standards” fairer for small schools and those without a diverse population.**

(1) Small elementaries are at a disadvantage. When there are only two teachers at each grade level, low performance by one class can “doom” the school’s rating in Grade 4 Writing or Grade 5 Science. The inexperience of long-term substitutes and new teachers can contribute to this problem.

(2) Many schools in El Paso and other border districts are predominately one student group (Hispanic), most if not all are also Economically Disadvantaged. In such schools, students not passing one of the TAKS tests (for example, Math) count against a school two or three times. For example, in All Students, Hispanic or African American, and Economically Disadvantaged. Schools with 80%-100% in one student group do not really have separate student groups. This system can make such schools artificially exceed the number of Exceptions allowed in the Accountability Manual. Districts and schools should not be put in double or triple jeopardy.

**c. Eliminate Completion Rate I (without GED):**

It is not 1950 anymore when schools did not enroll many students that now cannot legally be excluded. In the 21st century, there are many family and social issues that prevent students from completing in four years, not the least of which is difficulty with English. Students from Mexico and other countries sometimes enter US schools in middle or high schools. If they come into elementary schools, they can be eligible for Spanish TAKS through Grade 6. But students entering in (say) Grade 8 have less time to become fluent enough in English to pass a 26-credit graduation program (which the state now considers “college preparatory”) and pass the exit-level TAKS tests.

TEA gives districts and schools credit for transfers who are found enrolled in or graduated from other Texas public schools. However, its computers can look only for students in this state — especially not those in another country.

All high schools should be evaluated on the same indicator as Alternative Campuses are now. At present, the Completion Rate calculated for schools under standard

accountability procedures includes continuers (in school for a fifth year) but excludes GED recipients. Yet some students “grow up” and receive a high school diploma at a later time or enroll in a community college without a diploma. To say that a school or district that misses Completion Rate or Graduation Rate means only that that a number of students did not receive a diploma “on time” (in four years). Why assume that the schools are necessarily to blame for all these students not being “on time”? What’s magic about four years?

In many cases, they are students for whom the public schools — even registered Alternative Campuses — may not be their own best education option. For some, a GED is better than no diploma.

There are a some good questions seldom asked: (a) How many Continuers earn a diploma as a result of that fifth year? (b) How many GED recipients enroll in a post-secondary institution, including vocational-technical schools after high school graduation? (c) How many actually receive a two-year or four-year diploma, a license, or a certificate? The answers to such questions might give good reason to redefine “dropout.”

**Table 1: Two Different Accountability-related Systems**

	<b>State</b>	<b>Federal</b>
<b>Accountability Systems based primarily on high stakes” testing”</b>	State accountability (standard procedures for “regular schools” and alternative accountability for schools registered in the Alternative Accountability system) — first implemented in 1993	Federal Adequate Yearly Progress (AYP) under No Child Left Behind, first implemented in Texas in 2003
<b>Accountability-related Systems</b>	<ol style="list-style-type: none"> <li>1. The state’s Public Education Grant list (PEG), a parent transfer option, first implemented in 1995</li> <li>2. HB 3297, requiring web posting of “most current” accountability ratings, AEIS reports, and School Report Cards plus providing notice to parents with first report card</li> <li>3. The Academic Excellence Indicator System, an annual report that must be made widely available; about 19 pages per district or school with wall-to-wall numbers</li> <li>4. Annual School Report Cards, which repeat selected data from AEIS, to send home with each student, at district or school expense</li> </ol>	Similar to but different from the parent school transfer option in AYP’s School Improvement Program (SIP)
<b>Accountability Follow-up Systems:</b>	<ol style="list-style-type: none"> <li>1. State Accreditation Monitoring, sanctions for schools “unacceptable” for one-five years, plus “TAT schools” that are “acceptable” by current-year standards <u>but not by next year’s</u> (see Table 2.)</li> </ol>	The School Improvement Program (SIP) in NCLB, required activities for schools that have missed AYP for two or more years (Stages 1-5) (See Table 2.)
	<ol style="list-style-type: none"> <li>2. Performance-based Monitoring (PBM)* of all schools, whose main categories include               <ol style="list-style-type: none"> <li>a. PBMAS</li> <li>b. Data Integrity</li> <li>c. NCLB Initial Compliance Reporting</li> </ol> </li> </ol>	



**Table 2. The Maze of Different Sanctions and Interventions:  
Redundant and Potentially at Cross Purposes**

Note: There are similar consequences for districts.

<b>State</b>	<b>Federal NCLB: AYP</b>
Implemented by TEA's Program Monitoring and Interventions Division*, Accreditation Monitoring	Implemented by TEA's Program Monitoring and Interventions Division*, NCLB Program Monitoring
Campuses that met standards in current year but would not under next year's standards, requiring a Technical Assistance Team (TAT)	—
1st-year AU campuses, requiring Campus Intervention Team (CIT), Focused Data Analysis*, CIT Needs Assessment and Evaluation, and School Improvement Plan (SIP)**	Missed one year, no requirements
—	School Improvement Program (SIP), requiring an approved Technical Assistance
2nd-year AU campuses, requiring CIT, Reconstitution Planning, and SIP with Campus Reconstruction Plan	<ul style="list-style-type: none"> <li>• Stage 1 (missed two years), requiring parent notification, and school choice, and transportation</li> </ul>
3rd-year AU campuses, requiring CIT, SIP and Campus Reconstruction Plan implemented, and hearing under TEC §39.132(a)(6)	<ul style="list-style-type: none"> <li>• Stage 2 (missed three years), requiring parent notification, school choice and transportation, plus supplemental education services (SES)</li> </ul>
4th year AU and/or Imminent Concern, requiring CIT, and hearing under TEC §39.132(a)(6); additional sanctions determined by the Commissioner	<ul style="list-style-type: none"> <li>• Stage 3 (missed four years) Corrective Action as well as parent notification, school choice and transportation, and supplemental education services (SES)</li> </ul>
5th year AU, alternative management or campus closure determined by the Commissioner	<ul style="list-style-type: none"> <li>• Stage 4 (missed five years) Restructuring as well as parent notification of school choice and transportation, and supplemental education services (SES)</li> </ul>
	<ul style="list-style-type: none"> <li>• Stage 5 (missed six years) Alternative Governance as well as parent notification of school choice and transportation, and supplemental education services (SES)</li> </ul>

\* PMI also implements PBMAS, another complex of the state's accreditation monitoring activities covers student performance in minute detail in ways not addressed in either state or federal accountability. An example is the performance of LEP students in Career and Technology Education (CATE).

\*\* Also used in the federal SIP phases of AYP (right column)

Source: Accreditation Monitoring, Program Monitoring and Interventions; [tea.state.tx.us/pmi/accmon/2008](http://tea.state.tx.us/pmi/accmon/2008)