April 12, 2016

Mr. Mike Morath
Texas Education Agency
1701 N. Congress Avenue
Austin, Texas 78701

Dear Commissioner Morath,

The school districts in Region 4 serve over 1.1 million students in 50 districts in Harris, Liberty, Chambers, Fort Bend, Brazoria, Waller, and Galveston counties. Like the rest of the state, our recent experiences with the March administration of STAAR were incredibly difficult for our schools, staff members, and students.

Our campuses experienced numerous issues with the shipping and receiving of materials, online testing for STAAR A, and coding issues with the pre-coded documents. Also, for the first time, we received information on test day that students were to leave item #61 on the English I EOC blank because the item did not have a correct answer. This immediately created confusion because some students had already chosen and marked the answer document. Teachers and students are concerned that all students may not be treated fairly since some students marked an answer and some did not.

We appreciate your quick response to the testing problems and the reassurance that students did not have to retest. But the reality for a Special Education student taking the EOC is that if the student did not retest, he/she has lost one testing opportunity to meet graduation requirements. Special Education students impacted by the online testing problems are our most at-risk for on-time graduation and student success.

Testing irregularities and mistakes created by ETS and the agency will have a negative effect on individual students and on campus and district ratings.

Results from the 2016 administrations of STAAR A are scheduled to be included in the accountability system for the new report card ratings coming out in January, 2017. Because of the issues surrounding these tests, we recommend that including STAAR A in the accountability ratings should be postponed for one more year to ensure that test issues/concerns have been resolved before students, campuses, and districts are held accountable.

 An itemized spreadsheet with issues impacting Region 4 campuses is attached for your review. This list includes numerous problems and errors including inaccurate and misleading information from ETS and in some cases, a lack of response from ETS and TEA.

At this time, there is a lack of confidence in the entire testing system based on the problems outlined in the spreadsheet as well as many other factors that schools have to deal with each year. Some people are convinced that placing a letter grade on a campus and school district based on test scores is the solution for improving student outcomes. If we apply the same logic to our current testing system, then it could be argued that it should earn a letter grade of "F". It is certainly "unacceptable" as your recent letter and press release stated. The superintendents in

Region 4 are concerned that Texas would use a flawed testing system for such high stakes measures.

We certainly hope for improved testing conditions in May when the bulk of assessments are administered. As mentioned earlier, without improved logistics and system improvements, test scores and accountability ratings will not be reliable and credible.

We request that you continue your work with the agency and ETS to address these issues and ensure reliable results for our students. Please be aware that the superintendents in Region 4 are available to assist in this work. Feel free to call on us for further information, feedback, and support.

Sincerely,

Region 4 School Superintendents
Dr. Wanda Bamberg, Aldine ISD
Mr. H.D. Chambers, Alief ISD
Dr. Buck Gilcrease, Alvin ISD
Mr. James Hopper, Anahuac ISD
Dr. Patricia Montgomery, Angleton ISD
Mr. Danny Massey, Brazosport ISD
Mr. Greg Ollis, Channelview ISD
Dr. Greg Smith, Clear Creek ISD
Dr. Darrell Myers, Cleveland ISD
Mr. Steven Galloway, Columbia-Brazoria ISD
Dr. Keith Moore, Crosby ISD
Dr. Mark Henry, Cypress-Fairbanks ISD
Dr. Donald Rhodes, Damon ISD
Mr. Greg Anderson, Danbury ISD
Dr. Jessica Johnson, Dayton ISD
Mr. Victor White, Deer Park ISD
Ms. Elizabeth Harris, Devers ISD
Ms. Vicki Mims, Dickinson ISD
Ms. Trish Hanks, Friendswood ISD
Dr. Angi Williams,Galena Park ISD
Mr. Larry Nichols, Galveston ISD
Mr. Randal O'Brien, Goose Creek CISD
Mr. Brandon Peavey, Hardin ISD
Dr. Angela Gutsch, Hempstead ISD
Ms. Carla Vickroy, Hitchcock ISD
Mr. Ken Huewitt, Houston ISD
Dr. Benny Soileau, Huffman ISD
Dr. Guy Sconzo, Humble ISD
Mr. Alton Frailey, Katy ISD
Dr. James Cain, Klein ISD
Dr. Willis Mackey, La Marque ISD
Mr. Lloyd Graham, La Porte ISD

Dr. Thomas Randle, Lamar CISD
Dr. Cody Abshier, Liberty ISD
Mr. Curtis Rhodes, Needville ISD
Dr. DeeAnn Powell, Pasadena ISD
Dr. John Kelly, Pearland ISD
Mr. Stacy Ackley, Royal ISD
Dr. Leigh Wall, Santa Fe ISD
Mr. King Davis, Sheldon ISD
Dr. Rodney Watson, Spring ISD
Dr. Scott Muri, Spring Branch ISD
Dr. Robert Bostic, Stafford MSD
Mr. Randy Miksch, Sweeny ISD
Mr. Kevin Weldon, Tarkington ISD
Dr. Cynthia Lusignolo, Texas City ISD
Mr. Huey Kinchen, Tomball ISD
Mr. Danny Twardowski, Waller ISD

MATERIALS AND SHIPPING

1	Shipments not shipped/delivered on time
2	Materials not in boxes according to packing lists
3	Test booklets were not packed in numerical order. In talking to a district, it appears that different parts of the shipment are done by different groups and then just shoved all together.
4	Multiple packing lists in boxes. Duplicates, wrong campus, wrong district.
5	No blank answer documents have been shipped to campuses. District must order additional materials immediately to ensure enough blank answer documents are available to the campuses, as the district box does not contain enough.
6	Secure testing materials delivered to the incorrect campus/district. Campus had its entire precode list sent to Manor ISD. They did not receive their materials until the Thursday before testing. Elementary campuses contained middle school grade-level test booklets and EOC packing lists. Local area districts worked together to get materials delivered to the appropriate site.
7	Precoded answer documents for one district came back with incorrect middle initials. District checked precode file and initials do not match those on the precoded documents. District/campus personnel must now check EVERY precoded answer document for that error.
8	Precoded answer documents for one district were missing for 45 campuses. Reported to ETS on 3/21. Escalated after numerous calls, director called TEA on 3/22 to file complaint. No response from TEA by 3/24. ETS called back on 3/23 and stated they were reprinting the precodes and would ship them to arrive either 3/24 or 3/28 (which is the day before testing).
9	Braille materials shipped late. Contact name for the district was the name of the ETS contact who worked with the braille tests. Every district who received boxes of braille materials had the boxes addressed to the ETS contact, not the DTC.
10	TOMS online testing system was not operational until 3/21. This gave districts/campuses very little time to prepare for online testing. Maintenance of system occurred often during the week leading up to testing.
11	New secure browser uploads were made available on 3/23. Districts who had previously set up testing, had to go back and re-check all testing computers/tablets to ensure the browsers continued to work after the update.
12	Some districts had issues with testing sessions and students disappearing from the system after the weekend maintenance on 3/26 and 3/27. No communication from ETS or TEA was sent about the loss of data.

13	Districts who had ordered braille materials, and had screen shots of the order, called to check on the status of the order. They were told that they had not ordered materials. When they went back into the system, the order had been deleted. The district continued with ETS and sent the screen shots, and materials were delivered.
14	Some districts are reporting that they were not sent either the correct braille materials ordered, or not the full order of materials, and they are continuing to wait for a resolution as of 3/30.
15	Only the District Testing Coordinator can access student testing history. In the past, campus coordinators could access this information as they were the ones in need of the historical information. DTC cannot look up every new student in a district.
16	ETS and TEA give conflicting answers to district questions. During testing on 3/28, with all of the computer glitches, districts were told to continue testing, to try to retest, to submit, to not submit, etc.
17	Boxes sent to district have no identifying marks to show they are testing materials. One even came in a small "Home Depot" moving box. District materials have been delivered to other districts.
18	Need electronic lists of precodes posted PRIOR to administration. Allows time for campuses to verify precoded information when precoded answer documents are not arriving until the day before testing. This allows the campus to predict what hand-gridding will be necessary, and additional materials can be ordered at an earlier date.
19	Allow districts to download all campus's reports together in one file. The time it takes to download each file individually is excessive.
20	Make sure reports are delivered by the deadline posted. One district did not get all of the December reports until February.
21	Students reported as testing elsewhere.
22	Better packing lists and reports to show what each campus/district is receiving.
23	Need to include a security checklist which contains a list of all boxes and all materials in the shipment.
24	Need to be able to see an entire district's report of materials, not just by campus.
25	Need to be able to download the TELPAS completing report at the district level instead of downloading for each campus separately.
26	Student information precoded on answer document inaccurate and not reflective of file uploaded.
27	Having to order additional materials which may or may not arrive on time. Often the supplemental order would arrive before the initial shipment.

28	Some answer documents which were on the precode list were missing from the shipment and never arrived.
29	Precodes never arrived for various campuses and grades/subjects.
30	Districts were required to pay for pickup of secure testing materials before UPS would pick up the shipment. TEA/ETS stated that the labels should include that, and many didn't have to, but others had to pay to ship materials.
31	Placement of secure book numbers on back of book was problematic when checking in test booklets. Numbers were upside down from how they could quickly and easily be checked.
32	A district reported that they ordered braille materials and were told that they would receive either 2 books or no books next week.
33	The boxes ETS sent us and requires we use to ship testing materials back were not big enough to hold all the material for the majority of our campuses. We realized this and called ETS requesting additional boxes be sent so that we could meet the shipping deadline of April 4. We still do not have the boxes and have officially missed the ETS shipping deadline.
34	It was a mess. There was no "rhyme nor reason" to what was in the boxes.
35	Materials were in random boxes.
36	I received one box with 2 sheets of paper in it. Materials which were on the packing list were missing. When I called, I was told to wait for it. I ended up reordering.
37	Boxes were numbered by campus. This makes is difficult to determine if a campus box is missing. Entire district should be numbered consecutively. Ex: 1 to 575
38	I had to drive a box of materials to another district. ETS said they would take care of it, but they didn't so I drove it to the neighboring district.
39	They do not have a system for packing. The packing slips are just as confusing. Boxes do not come as a complete shipment, but as random boxes that come in every day or so.
40	Items were missing which ETS insisted were delivered. They were delivered two days later.
41	I found materials which were to be delivered to other districts. One box had three different packing lists inside.
42	I had no sequential sets of test booklets.
43	Some campuses had no packing lists, while other campuses had two identical packing lists.
44	Large print materials were mixed in with other tests.

45	Test administrators are required to have a blank answer document on testing day for demonstration purposes. Couldn't do that without ordering additional answer documents.
46	I am still missing boxes from other deliveries.
47	Braille tests were not delivered in a timely manner.
48	No way for ETS to track shipments. They couldn't tell if the materials had left their warehouse or not.
49	Materials were not delivered by the due date on the calendar of events.
50	Shipping labels were missing information (DTC name, campus name, etc.).
51	Too much overage.
52	Not enough overage.
53	Campus received 20 books which were not documented anywhere on the shipment. When DTC called to report to ETS, the DTC was told to ship them back with the others.
54	Missing Spanish version tests which were ordered.
55	Missing large print books.
56	EOC shipment was lost. They were originally delivered to a church. Then they were delivered to the district at 8:00 pm in the back of a pickup covered with a tarp.
57	Boxes with two stacks of test booklets are too heavy to lift and carry.

COMMUNICATION

1	I have no confidence in the response I get because the response varies depending upon when I call and who I speak with.
2	I have been on hold for 45 minutes to 2 hours.
3	I am not able to speak with a manager or "team lead." When I leave a request to be called back by a manager, I never receive a call back.
5	I feel sorry for the agent who answers the phone call because they are not trained and prepared.
6	I don't feel they are doing anything because they are overwhelmed.
7	They become agitated at my questions.
8	They make up answers just to get me off the phone.
9	They stated that they couldn't answer a question about a "green icon" because the manual they were using was in black and white and they didn't know which icon was the green icon.
10	I am amazed at the lack of knowledge about the Texas system.

11	I was told to change the "L" on the upload file to "A" for a STAAR L student because the upload wouldn't accept "L" as a test.
12	Told if we couldn't upload the file to get the student registered for the correct version of the test online, that the student could just test on a paper test.

ONLINE TESTING

1	Need to receive more directions ahead of testing.
2	Delete/Void the transfer out/in concept. We need a better plan. Inability to "grab" students and bring them into your district and wait for someone else to "release" is not user friendly.
3	Date of birth calendar is not user friendly. Easy to make clerical error.
4	District needs the ability to view ALL sessions at one time and not have to look at them by campus.
5	List students alphabetically on online roster.
6	More roles and responsibilities. DTC needs additional help in working with some of the system.
7	Create an OSA and OTA role to actually be able to do something with the online testing.
8	Campuses are listed by city and not by district. Some campuses are listed as Pasadena (school name) and other as Houston (school name) when all is in Pasadena ISD.
9	Students in testing sessions who need to be deleted cannot be deleted from the session. This can lead to mistakes in testing.
10	Not enough practice "tests" for students in the new system. Two questions is not enough.
11	Need more training modules. Need screen shots and training tools for campuses and CTCs.

DATA VALIDITY AND SECURITY

1	Seven Thousand (7000) December retesters from one district were included in a different district's data file.
2	Report files are unable to be batch downloaded from the ETS site. This requires each file to be accessed and downloaded individually. For most districts, this has been an enormous time drain on their staffs.

3	Data file formats were posted when the files were received. With the changes in the file formats, districts (and the vendors used for student management and student data management) must have the data file format prior to the release of the file. This means districts must wait even longer in order to disaggregate their data at the district, campus, teacher, and student level. This takes time away from the SSI processes which are required by law.
4	Students were reported at incorrect campuses. ETS stated it was a header issue and the campuses did not fill out the header sheet correctly. This has never been an issue in the past, it seems strange that campuses now have issues with knowing their CDC number.
5	Campuses received Confidential Student Reports for students, but the student does not appear on the roster of testers for the campus.
6	Timing of information seems to be at the last minute (or during testing). It is difficult to do adequate training for testing without materials and information. Changes to the TOMS Online Users Guide were made public March 4. This is less than one month prior to testing. Many districts had already completed test training for this administration.
7	When SIRS files are requested, entire administrations are coming back empty with no student information.
8	When the data file comes back from Spring testing over the summer, will all students have a UNIQUE ID to share with parents to look up scores?
9	On the student portal, SA is showing up for regular oral administration.
10	I don't trust the precoded "campus report" from ETS.
11	DTCs can change a students record themselves? They can correct spelling, PEIMS, etc. Record corrections are a mess.
12	We do not believe anything from ETS with data - especially after the December EOC results came in. We still don't have an answer about one student and if he should test on Tuesday. Have emailed 6 times with no resolution.
13	SIRS is not working. Keep getting "wrong template" message. ETS cannot tell me the problem.
14	A district reported that they had spoken to TEA about a Form 63 English I EOC test, question #12 which was "incorrect." They had been given instructions to tell students to leave the answer blank. No other districts reported this error or any guidance on how to handle the situation. Something of that magnitude should have been broadcast to the entire state through DTC email blast.