



Comments on HB 8

Regarding testing and accountability

Aug. 20, 2025

The Association of Texas Professional Educators (ATPE) offers the following input in on House Bill (HB) 8 by Rep. Brad Buckley:

ATPE has consistently advocated for a reduction in state standardized testing as part of our ATPE Legislative Program, which is developed and voted on annually by our members, who are active and retired educators. While we appreciate the Legislature's willingness to discuss assessment and accountability reform, HB 8 falls short of delivering the meaningful changes that are urgently needed.

HB 8 proposes replacing the STAAR test in name only with a new "instructionally supportive assessment program" (ISAP). However, the bill does not address the central issues with high-stakes testing that have caused widespread frustration and harm. In fact, HB 8 risks compounding those problems by creating a new assessment structure that may increase the volume of testing without pausing the state's punitive accountability system, which would remain tethered to test performance.

True to its name, educators in the field are concerned that ISAP may indeed sap even more precious instructional time by increasing days spent on test administration. The bill mandates three rounds of assessments each year (beginning, middle, and end-of-year) in multiple subjects and grade levels. While through-year testing is framed as a means of measuring growth and supporting instruction, the increased frequency of administration, particularly in grades 3 through 8, raises serious concerns about lost instructional time and the continued overemphasis on standardized testing. We do appreciate that HB 8 attempts to limit local benchmark testing, but as it is currently drafted, the bill's exceptions allow the use of alternative assessments as benchmarks, which unintentionally risks creating a parallel system of assessment layered on top of the state tests. This directly undermines the stated goal of reducing test-related disruption in classrooms.

Moreover, HB 8 would not only fail to include a pause in accountability consequences during the transition to the new assessment system, but also it would reach back in time to enforce punitive accountability on schools for years in which they were not previously rated. The state

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should not be seeking to reach into the past to enact punitive measures. Similarly, students, educators, and schools should not have to be concerned about sanctions based on results from a new and unproven testing framework that has yet to even be designed, piloted, or validated. The absence of a multi-year pause while rolling out a new and unvetted system would force schools to navigate high-stakes accountability during a period of uncertainty, experimentation, and inevitable adjustment. This is not only unfair but also irresponsible. Educators cannot support a bill that preserves the same pressures under a new name without even allowing time to ensure the new system works as intended. We recommend the Legislature stop and reevaluate what parents and teachers are really asking for regarding testing and accountability reform and then pause the punitive aspects of the accountability system—while maintaining reporting—following the rollout and vetting of any new system.

While HB 8 includes some mechanisms for teacher review of test items and establishes a temporary advisory committee on accountability standards, these provisions, unfortunately, fall short of the robust, sustained stakeholder engagement that true reform demands. Educators and parents must have a formal and ongoing role in the design, implementation, and revision of both assessments and accountability metrics. A temporary advisory group dominated by legislators and with a limited scope does not meet this standard. ATPE recommends the creation of a permanent Texas Education Agency (TEA) advisory committee on testing and accountability that includes classroom teachers, parents of public school students, organizations representing educators, and other stakeholders with a direct connection to public school students. We recommend amending the bill to include “parents, and, as necessary, business and industry representatives” to ensure educators and parents are not sidelined in favor of industry interests in the standard-setting process.

ATPE also questions the need to curtail local districts’ ability to challenge what they view as administrative misuse or abuse of the accountability system, including in instances where the agency is acting with a lack of statutory authority. It seems reckless to effectively hand the commissioner a blank check by disallowing districts and charters either temporary relief from or a venue in which to test the validity of the commissioner’s self-proclaimed authority to take action when that action would directly and often negatively impact them and their students. Districts should have the right to challenge ratings based on a potentially flawed implementation of the accountability system in court because locally elected school boards, chosen by the same voters who elect their state legislators, are entrusted to represent their communities and make budgetary and educational decisions based on local needs and priorities.

Ironically, HB 8 as drafted is a great example of why testing for the sake of school accountability ratings is incompatible with educationally useful diagnostic testing. To be “fair”

for accountability purposes, a test must be strictly limited to grade-level and state expectations, as is prescribed by one part of HB 8. But it also must be administered only after content has been delivered to the students who are being tested and exclude from testing those students whose needs for modification make the test an inaccurate tool for determining whether a school has reasonably delivered an appropriate education to that student. This type of test may give policy makers and the broader community one view, albeit an incomplete view, of the health of the public school system, but it does little to address educators' and parents' need for deeper information on individual students. That kind of deeper diagnostic assessment, one that serves learning, requires a broader view. Its goal is not to determine if the system is ensuring the average student has a grasp of grade-level state standards, but it is to test individual students' limits and depth of knowledge on both the high and low ends. It must by default go outside the bounds of the grade level, often by as much as two to three grade levels above and below the current-year grade level, to determine where each student is on their educational journey. It should inform instruction, provide timely and useful feedback to educators, and support students, all objectives that cannot be effectively achieved if the test is also used as a punitive accountability instrument. The dynamic, adaptive nature of good diagnostic testing and the statically standardized nature of meaningful accountability testing are mutually exclusive, yet HB 8 calls for one test to accomplish both things. Beyond simply testing, true accountability should also attempt to reflect the full picture of student growth, school climate, community context, and educator impact, not reduce an entire campus to a single, overly simplified rating based largely on one narrowly focused metric.

Based on the concerns we have heard from the field and our review of the bill's mandates in light of best practices in designing meaningful assessment, we feel that HB 8 is not ready to move forward at this time. It does not reduce testing in practice. It calls for the design of a new test that is internally conflicted. It does not pause high-stakes consequences. It does not empower educators and parents with a true voice in the process. With the inherently limited timeframe of a special session, including such limited time for constituents to weigh in, we respectfully urge the Legislature to slow down and get this right. Texas public school students deserve more than a rushed rebranding of STAAR. They deserve a bill that does more than lay out basic goals for a thoughtful, collaborative, and student-centered approach to assessment and accountability. They deserve a bill that will bring those goals to fruition, restore trust, and put teaching and learning first. Although well meaning, HB 8 is not that bill. ATPE stands ready to continue to work with lawmakers and other stakeholders to bring forward real solutions to address the flaws of STAAR and our current accountability system.

Thank you for your consideration. For additional information, contact ATPE Governmental Relations at (800) 777-2873 or government@atpe.org.

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