

Via
E-Mail

014906
2025-2026

September 3, 2025

King Davis, Superintendent
Brett Williams, Board President
Killeen ISD

Subject: Turnaround Plan Requirement

Superintendent Davis and Board President Williams,

The purpose of this communication is to provide information for your school system regarding turnaround plan requirements for campuses that received a second and third consecutive unacceptable rating with the 2023-2024 and 2024-2025 state accountability ratings. Campus performance history is outlined below:¹

Campus Name	CDCN	Consecutive Unacceptable Rating Count	2025	2024	2023	2022	2021	2020	2019
Manor Middle	014906044	3	F	F	F	NR-SB 1365	NR-Disaster	NR-Disaster	D
Palo Alto Middle	014906048	3	F	F	D	NR-SB 1365	NR-Disaster	NR-Disaster	F
Eastern Hills Middle	014906046	2	F	F	D	C	NR-Disaster	NR-Disaster	C

While this letter addresses campuses that meet the criteria for turnaround plan requirements due to consecutive unacceptable ratings, please be aware that six other campuses within your district have earned a D rating in the 2024–2025 school year. The Division of School Improvement has sent correspondence to your district regarding interventions for these campuses.

¹ Campuses were issued ratings of *Not Rated* in 2020 as schools were closed the last several months of the 2019-20 school year. In 2021, campuses could earn an acceptable rating if performance improved but were otherwise issued a rating of *Not Rated*. In 2022, to align with Senate Bill 1365, districts and campuses received an A, B or C rating or were assigned a label of *Not Rated: Senate Bill 1365*. Under Texas law, a *Not Rated* rating does not break the chain of unacceptable accountability ratings for purposes of TEC §39A.111.

The issuance of ratings for the 2022-2023 and 2023-2024 school years has been delayed due to litigation. In 2023, a lawsuit was filed by some Texas school districts to prevent the Texas Education Agency (“TEA” or the “Agency”) from releasing academic accountability ratings for the 2022-23 school year (the “2023 Lawsuit”). As part of the 2023 Lawsuit, the district court entered an injunction that prevented the Agency from releasing ratings for that year. In 2024, a group of districts sued the Agency to prevent the release of academic accountability ratings for the 2023-24 school year. Following the recent judicial rulings by the 15th Court of Appeals, 2023 A-F ratings were released in the TEA Login (TEAL) Accountability application on April 17, 2025, and were made publicly available on TXSchools.gov on April 24, 2025. Preliminary 2024 A-F ratings were released in the TEAL Accountability application on August 13, 2025, and were made publicly available on TXSchools.gov on August 15, 2025. Preliminary ratings for the 2024-2025 school year were also released in the TEAL Accountability application on August 13, 2025, and were made publicly available on TXSchools.gov on August 15, 2025.

Requirement to Develop a Campus Turnaround Plan

Per Texas Education Code (TEC) §39A.101, if a campus has been identified as unacceptable for two consecutive school years, the commissioner shall order the campus to prepare and submit a campus turnaround plan. Palo Alto Middle received a first unacceptable rating in SY 2018-2019, a D rating in SY 2022-2023, and a second consecutive unacceptable rating in SY 2023-2024. Eastern Hills Middle received a first unacceptable rating in SY 2023-2024 and a second consecutive unacceptable rating in SY 2024-2025. Manor Middle received a first unacceptable rating in SY 2022-2023 and a second consecutive unacceptable rating in SY 2023-2024. These three campuses are hereby ordered to develop and submit turnaround plans by **November 14, 2025**.

Requirement to Implement a Campus Turnaround Plan

Additionally, per TEC §39A.106, a campus turnaround plan must take effect no later than the school year following the third consecutive unacceptable rating. Manor Middle and Palo Alto Middle both received a third consecutive unacceptable rating in SY 2024-2025. Therefore, both campuses are required to **begin implementation of the campus turnaround plans as soon as they are approved**. Per TEC §39A.110(b), once the campus receives two consecutive acceptable (C or better) overall performance ratings, further modification of the plan does not require agency approval (and implementation of the plan may cease).

Summary of Turnaround Plan Requirements based on 2024 and 2025 A-F Ratings

The following table provides a summary of Killeen ISD’s turnaround plan requirements based on the 2025 ratings:

Campus Name	CDCN	Intervention based on 2025 rating
Manor Middle	014906044	Develop and Implement a Campus Turnaround Plan
Palo Alto Middle	014906048	
Eastern Hills Middle	014906046	Develop a Campus Turnaround Plan

Failure to Improve Campus Performance Following Turnaround Plan Implementation

If a campus earns an unacceptable performance rating for five consecutive school years, the commissioner, pursuant to TEC §39A.111, is compelled to either appoint a board of managers to govern the school system or order the closure of the campus. The applicable statute requires one of those two actions and provides no discretion. For the purposes of this count of consecutive years of unacceptable performance, a D rating is not an acceptable rating that breaks the campus’ consecutive-year count, although earning a D does provide a sanction pause such that the campus’ consecutive-year count does not increase upon earning a D rating

and may extend the five-year limit. However, this sanction pause is only available twice, and the campus' consecutive-year count does increase upon earning a third D rating.

Furthermore, please be advised that TEC §39A.102(b-1) obligates the commissioner to appoint a conservator to the district to ensure the district supports its low-performing campuses and implements the district's turnaround plans, but the law allows for discretion regarding the necessity of such an appointment. Given this, the agency will engage in a thorough review and analysis of the district's performance and will notify the district of the decision with regard to a conservator appointment in future correspondence.

Next Steps and Additional Support

A staff member from the Division of School Improvement will reach out to schedule a consultation call to discuss your turnaround plan requirements. We encourage you to work with your regional education service center (ESC) for technical assistance, resources, guidance, and training. Additional information regarding intervention requirements and resources is located on the Division of School Improvement [webpage](#).

Sincerely,



Steve Lecholop
Deputy Commissioner, Office of Governance

cc: Dr. Kenny Berry, ESC 12 Executive Director
Dayna Patzke, ESC 12 School Improvement Lead