



Texas Classroom
Teachers Association

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To Whom it May Concern:

The Texas Classroom Teachers Association, representing 50,000 classroom teachers and instructional personnel statewide, has the following comments regarding Texas's draft ESSA Consolidated State Plan.

Generally, we have two key areas of concern which we address further along in our comments. First, it is our understanding that one of the primary purposes of ESSA is for states and local school districts to identify and address inequities in the assignment of ineffective, out-of-field, or inexperienced teachers to poor and minority students. Yet we see little in the draft Plan ensuring the state's ability to meet this obligation, particularly with regard to situations in which districts of innovation, as allowed by state law, exempt themselves from state teacher certification requirements.

Additionally, we are concerned that, despite ESSA's explicit provisions encouraging states to use accountability measures other than state standardized test performance, the draft Plan fails to do so for elementary and middle schools.

In the section of the draft Plan proposing **accountability indicators**, we were disappointed to see that the proposed indicator for School Quality or Student Success for elementary and middle schools was the level of student performance on STAAR Math and Reading. We believe that using student STAAR results as the indicator is a missed opportunity in that ESSA's inclusion of School Quality or Student Success accountability indicators is widely heralded as a clear recognition by Congress of the importance of school success being determined by more than just student test performance. Additionally, use of student STAAR results in this way doubles down on the use of state assessment results overall in our state's proposed federal accountability system.

Given that ESSA requires states to adopt at least one indicator of school quality or student success and lists several examples, including student engagement, educator engagement, and school climate and safety, TCTA was excited about the opportunity for Texas to add new and different accountability indicators to provide a more holistic evaluation of school success beyond test scores. Although certainly the Plan's proposal for high schools includes a long list of college/career/military readiness indicators that could all be grouped in the "student success" category, there are no "school quality" indicators proposed, such as the ones specifically listed in ESSA.

Additionally, given the well-known struggle that the state has had in identifying non-test-based indicators of school success for elementary and middle schools, this would seem to be an excellent opportunity to focus on incorporating “school quality” indicators for these grade levels in the state’s ESSA Consolidated Plan. One possibility that could potentially incorporate all the facets of school quality listed in ESSA (student/educator engagement and school climate/safety) is a validated school climate survey. Key advantages of such an approach are that it can be used statewide and for all grade levels. In fact, the U.S. Department of Education has developed school climate surveys for states to use to produce school-, district-, and state-level scores on various indicators of school climate from the perspectives of students, teachers and staff, principals, and parents and guardians. States can add their own items to the survey platform. <https://safesupportivelearning.ed.gov/edscls/measures>

Use of this type of indicator in other states’ accountability systems shows that such surveys can be designed to meet ESSA’s requirements for validity, reliability and comparability. Four states -- Illinois, Georgia, Nebraska and New Mexico – already use a measure of school climate and culture in their school classification systems. <https://www.americanprogress.org/issues/education/reports/2016/12/08/294325/innovation-in-accountability/>

California is also considering the California Office to Reform Education’s (CORE’s) culture-climate surveys as an option to assess school climate in its school classification system. (See Memo from Tom Torlakson, state superintendent of public instruction, to members of the State Board of Education, “Process to Identify Options for School Climate Surveys and a Composite Measure of English Learner Proficiency for the Local, State and Federal Accountability and Continuous Improvement System,” June 27, 2016, available at <http://www.cde.ca.gov/be/pn/im/documents/memo-dsib-amard-jun16item02.doc>.)

Accordingly, we urge inclusion of a school climate survey (to be developed, piloted, validated, etc.) as a possible future indicator for all grade levels in the state’s ESSA Consolidated Plan; we believe that TEA has the authority to do so under its authority to seek, accept and administer federal grant programs.

Next, we support provisions exempting 8th graders taking the Algebra I end-of-course exam from the corresponding 8th grade Math STAAR, as we believe this will remove an existing disincentive of having to take two tests for high-performing students who might otherwise consider taking Algebra I in 8th grade.

In the section of the draft Plan regarding **School Improvement Resources**, there is a provision that “Texas will withhold seven percent of state Title I funding to distribute to LEAs through both formula and competitive grant applications for school improvement.” It then provides that “A portion of the seven percent set aside will be distributed to Comprehensive or Targeted schools via a series of competitive

grant programs” and that “TEA will give priority points to applications that **ensure the campuses have the operational flexibility** necessary to successfully implement their plans.”

Although ESSA refers to “operational flexibility,” it only does so in the context of **states** using the funds NOT allocated to local school districts under the seven percent set aside to, as appropriate, reduce barriers and provide operational flexibility for schools in the implementation of comprehensive support and improvement activities or target support and improvement activities. (Sec 1003(b)(2)(C)). However, the draft Plan provides that Texas will give priority to applications that ensure that campuses *already have* operational flexibility.

Additionally the term “operational flexibility” is not defined in the draft Plan. However, in a May 5, 2017, letter to school districts, TEA announced a School Redesign Fund Grant Opportunity, using funding available through the state-reserved set-aside of Title I funds under ESSA. The letter provides that “Exceptional applicants will present a strong plan for bold, evidence-based school redesigns that provide campus leadership with the operational flexibility necessary for a successful implementation.” The letter further defines “operational flexibility” as alternative management, in-district campus charters, and districts of innovation. Finally, the letter provides that “The applicant provides assurance that the necessary operational flexibility will be provided to campus leaders and to the school redesign partner to fully develop and implement the school redesign program.”

Given the similarities between the May 5 letter and the provisions in the draft Plan, one could reasonably surmise that TEA’s intent in the draft Plan is to give grant award priority to schools with alternative management, in-district campus charters and districts of innovation. If this is the case, we have strong concerns, not only because the state would be favoring and encouraging these controversial forms of school structure over others, but because it does not comport with ESSA provisions which clearly contemplate the **state** using the funds not allocated to local school districts under the set-aside to, as appropriate, reduce barriers and provide operational flexibility for schools in the implementation of comprehensive support and improvement activities or target support and improvement activities.

Accordingly, we recommend eliminating the provisions in the draft Plan providing for TEA to give priority points to applications that ensure the campuses have the operational flexibility necessary to successfully implement their plans. ESSA clearly contemplates that in the context of comprehensive/targeted support/improvement, it is the state’s role to provide operational flexibility for schools as appropriate and needed rather than giving priority for grant awards to schools already having operational flexibility.

ESSA requires states to describe in their state plans **how low-income and minority children enrolled in Title I schools are not served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers**, and the measures the state

education agency will use to evaluate and publicly report the progress of the state educational agency in this area.

The draft Plan provides that TEA has prioritized three priority contributing factors for the differences in proportionate rates of access to educators. 1) Insufficient training and support for teachers – between districts and within districts. 2) Insufficient training and support for campus leadership – between districts. 3) Alignment of districts systems for recruiting, developing, supporting, and retaining effective teachers and principals – between districts. The draft Plan then lists a series of strategies that will be used to address these areas, including continued support of implementation of the Texas Teacher Evaluation and Support System (T-TESS); supporting the changes made to teacher preparation rules in the form of increased standards that were enacted during the 2016-2017 school year; continued implementation of the Educator Excellence Innovation Program (EEIP), and continued implementation and expansion of Lesson Study, an inquiry based, job-embedded professional development process where teachers work collaboratively to develop, teach, and assess research-based lessons.

The draft Plan also provides that the measure that TEA will use to evaluate and publicly report the progress of the state equity plan can be found here: <https://texasequitytoolkit.org/> On the landing page of the texasequitytoolkit.org website, there's a statement that "In accordance with the [Every Student Succeeds Act \(ESSA\)](#), TEA will annually report on the state's equity gaps as they capture the extent to which low-income students and students of color are taught by inexperienced teachers, out-of-field teachers, and experienced ineffective teaching."

This statement is followed by a link to the Texas Approved State Equity Plan (2015).

Included in the Texas State Equity Plan is an "Equity Gap Analysis", which summarizes the results of any equity gap identified using the metrics identified by NCLB/ESSA.

The first analysis, based on the metric of inexperienced teachers, found that "The results of the analyses show that schools with high concentrations of minority students and students living in poverty do have higher percentages of inexperienced teachers than schools with low concentrations of those students (see Figure 1). Across the state, on average, schools had 9 percent of their teachers with less than one year of experience. Schools in the highest student minority quartile had 12.1 percent of their teachers with less than one year of experience. In comparison, schools in the lowest quartile of minority students had 6.2 percent of teachers who were inexperienced. The trend is similar in terms of students living in poverty. Schools in the highest quartile by student poverty status had 11.8 percent of their teachers with less than one year of experience. In comparison, schools in the lowest quartile by student poverty status had 6 percent of their teachers who were inexperienced. "

Regarding the analysis based on the metric of out-of-field teachers, the finding was “Across the state, on average, schools had less than one percent (0.4 percent) of their teachers in an out-of-field teaching assignment (see Figure 3). Although the percentages are small, the distribution of out-of-field teachers by student minority status and poverty status demonstrates that there are higher percentages of out-of-field teachers in schools with high concentrations of minority students and students living in poverty. Schools in the lowest minority student quartile had 0.3 percent of their teachers in an out-of-field assignment, whereas schools in the highest minority student quartile had 0.7 percent of their teachers in an out-of-field assignment. The trend is similar by student poverty status. Schools in the lowest quartile of poor students had 0.2 percent of their teachers in an out-of-field teaching assignment. In comparison, schools in the highest quartile of poor students had 0.6 percent of their teachers in an out-of-field assignment.”

These analyses are followed by a conclusory statement, that “As the data analyzed in Section 3 suggest, differences in access to excellent educators do exist statewide. However, most differences between students in high-poverty, high-minority schools and their counterparts on low-poverty, low-minority campuses are relatively small with the exception of the difference involving teachers with less than one full year of experience. The magnitude of the difference of this metric impacts by far the largest number of teachers and students of all the metrics considered. Consequently, this gap regarding inexperienced teachers was labeled as the equity gap around which the 2015 Equity Plan would be framed.”

Finally, a later section of the State Equity Plan, “Selection of Strategies” identifies five strategies to address equity gaps, including “Encourage training and support for mentors of novice teachers.”

Given that the largest equity gap identified in the Texas State Equity Plan is the rate of assignment of inexperienced teachers to poor and minority students, and that this gap is the one around which the 2015 Equity Plan is framed, it seems that the bulk of the strategies identified by the state to address equity gaps should be focused on addressing inexperienced teachers. Inarguably, one of the most effective strategies identified by research in addressing inexperienced teachers is high quality mentoring and induction programs. A significant research base establishes the effectiveness of high quality mentoring and induction programs in reducing teacher attrition, increasing teacher retention, and contributing to student success.

The draft Plan does identify some strategies that could also be helpful in addressing inexperienced teachers. For example, the Educator Excellence Innovation Program (EEIP) includes induction and mentoring as an initiative for which grant funding can be provided, but the draft Plan does not propose to prioritize EEIP grant funding for this use. We recommend that it do so.

Nonetheless, Texas would be remiss in omitting high quality mentoring and induction programs for new teachers as a strategy, given its identification by the

research as one of the most effective strategies for addressing inexperienced teachers. **Accordingly, we recommend that the draft Plan include “State support for high quality local school district mentoring and induction programs based on state program standards” as a strategy to be included in this section of the draft Plan.**

Next, we reference back to the statement on texasequitytoolkit.org landing page, that “In accordance with the [Every Student Succeeds Act \(ESSA\)](#), TEA will annually report on the state's equity gaps as they capture the extent to which low-income students and students of color are taught by inexperienced teachers, out-of-field teachers, and experienced ineffective teaching.”

TEA sent a March 24, 2017 letter to school districts stating that in accordance with ESSA Title I, Part A requirements, the state is required to report on state-level equity gaps for out-of-field and inexperienced teachers, and that a new form, the PR 1500 will require each campus within a district that receives Title I funds to report on out-of-field teachers and teacher years of experience.

<http://tea.texas.gov/WorkArea/DownloadAsset.aspx?id=51539614030>

At the top of the form, there are two boxes that can be checked. One of them says “District is a District of Innovation that has access (sic) exemptions from state certification requirements.”

This leads us to our concern. **Given that some districts of innovation may have exempted themselves from state educator certification requirements, and given that ESSA requires the state to describe in its State ESSA Plan how low-income and minority children enrolled in Title I schools are not served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, what provisions will the state include in the State ESSA Plan regarding how it intends to address or require these districts to address equity gaps that exist based on disproportionate assignment of out-of-field teachers to poor and minority students?** (ESSA specifically requires local school districts to identify in their local Plans how they will identify and address any disparities that result in low-income students and minority students being taught at higher rates than other students by ineffective, inexperienced, and out-of-field teachers (Sec 1111(b)(2)). **We believe that it is imperative that the State ESSA Plan include provisions addressing this issue.**

In the section of the draft Plan regarding **Use of Funds for Title II, Part A for state-level activities**, the draft Plan provides that Texas will use federal Title II, Part A funds to pursue two strategies: to fund the creation of the Texas Equity Toolkit and to provide for skill development for principal supervisors.

However, as we stated earlier in the context of the draft Plan’s provisions regarding equitable assignment of teachers, given that the State Equity Plan identifies high rates of inexperienced teachers to poor and minority students as by far the largest

gap of all the metrics considered and identifies support/training for mentor teachers as a strategy to address this, **we recommend that “state support for high quality local school district mentoring and induction programs based on state program standards” be included as a strategy in this section of the draft Plan describing how the state will use Title II, Part A set-aside funds.**

Further, inclusion of state support for local school district quality mentoring programs as a strategy for use of state Title II set-aside funds in the state’s ESSA Consolidated Plan aligns with TEA’s top priority in its own Strategic Plan: Recruiting, Supporting, and Retaining Teachers and Principals, as reflected in Rider 41 of TEA’s budget for the 2018-19 biennium, which specifically lists mentoring as an initiative for which funding will be used along with other “initiatives that will systematically transform educator quality and effectiveness statewide....”

Finally, one of the recommendations from the Educator Preparation Collaborative’s report, the findings of which TEA has promoted in other contexts, is that relevant state agencies should provide support for mentoring, including considering using Titles I, II, and III funds to support mentorship, which is a key component of professional development for teachers.

Under Data and Consultation, there is a provision to “Describe how the State will use data and ongoing consultation as described in ESEA section 2102(d)(3) to continually update and improve the activities supported under Title II, Part A.”

ESSA specifically provides that State Plans shall include a description of how the state will use ongoing consultation as described in Section 2101(d)(3) to continually update and improve activities supported under Title II, Part A.

Section 2101(d)(3) provides that in developing the State application, a State shall—

“(A) meaningfully consult with teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, charter school leaders (in a State that has charter schools), parents, community partners, and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the purpose of this title;
(B) seek advice from the individuals, organizations, or partners described in subparagraph (A) regarding how best to improve the State’s activities to meet the purpose of this title; and
(C) coordinate the State’s activities under this part with other related strategies, programs, and activities being conducted in the State.”

However, although the draft Plan includes provisions related to the use of data, it does not include provisions regarding how the state will use ongoing consultation to continually update and improve the activities supported under Title II, Part A.

Accordingly, we recommend that the state’s ESSA Consolidated Plan include provisions outlining how the state plans to use ongoing meaningful consultation with teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), etc. to continually update and improve activities supported under Title II, Part A.

Finally, the Every Student Succeeds Act requires State Plans to contain assurances that, among other things, the State educational agency will ensure that all teachers and paraprofessionals working in a program supported with funds under Title I meet applicable State certification and licensure requirements, including any requirements for certification obtained through alternative routes to certification. ((Sec 1111(g)(2)).

However, we do not see this assurance in the draft Plan and we recommend that this assurance be included.

Thank you for this opportunity to comment.

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