



Texas Classroom
Teachers Association

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To Whom It May Concern:

The Texas Classroom Teachers Association, representing approximately 50,000 classroom teachers and instructional personnel statewide, has the following comments regarding **Proposed Priorities, Requirements, Definition, and Selection Criteria-Education Innovation and Research- Teacher-Directed Professional Learning Experiences**.

First, we greatly appreciate the proposal as a recognition that teachers are indeed, professionals, and like other professionals have earned their credentials after extensive training in a discrete body of knowledge and skills. As such, they should be entrusted with professional judgment and discretion in determining their own continuing learning needs.

TCTA has long advocated for teacher self-selection in professional development opportunities, even in the face of growing pressure for educators to be trained in all manner of areas in reaction to an increasing multitude of situations that cause students to struggle (e.g. poverty, school shootings, homelessness, suicide). The point is not to diminish the value of any these kind of training requirements, but to balance the need for educator training as a function of being a school employee, with time and opportunity for professional development more closely connected with teacher instructional practice.

Time is indeed a key factor in this discussion. Unlike for other professions and jobs, teaching is a uniquely different way of working, one that involves a complete and intense focus on young learners for extended periods of time, with few or no breaks, or “down time” for taking care of the administrative tasks, planning, and paperwork associated with teaching. In addition to instructional duties, teachers have many other duties that require time during the school day, including serving as hallway monitors, bus monitors, student club sponsors, after-school tutoring, etc. There is very little time in a typical teacher’s workday for any kind of planning or collaboration with peers, much less for reflection or professional learning.

And unlike for other professions, teachers cannot easily leave their “office” (i.e. classrooms) to engage in collaboration or professional learning without making extensive arrangements for substitute coverage, lesson plans, administrative approval, etc. Consequently, most teacher professional learning occurs outside of the regular workday.

Accordingly, time outside of all the school-related demands placed on teachers is uniquely and extremely limited for teachers. Given this, the increasing number of mandatory training demands in an already tight schedule are likely to be delivered perfunctorily, in turn yielding little in the way of meaningful value, and crowd out time for teachers to pursue more instructionally relevant professional learning. As a result, teachers in general hold a very dim view of the professional development, staff development, and training that they have traditionally been required to undergo.¹

That is why it is essential, and why we appreciate, the Proposal's emphasis on allowing teacher-directed professional learning to be substituted for other mandatory professional development activities. In effect, enabling teachers to meaningfully self-select and engage in professional learning that meets their own identified needs, requires that existing mandated professional development activities be simultaneously reduced.

Again, we appreciate the surfacing of this important issue that this Proposal brings, and we appreciate the opportunity to provide our comments in the following pages.

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¹ Nearly all survey respondents received mandated professional development, but very few respondents indicated that it was one of the most important supports.
Investing in What it Takes to Move From Good to Great Exemplary Educators Identify Their Most Important Learning Experiences APRIL 2017, <http://www.nnstoy.org/wp-content/uploads/2017/04/Investing-in-What-it-Takes-to-Move-From-Good-to-Great.pdf>

Regarding **Proposed Priority 1—Teacher Directed Professional Learning**, TCTA is in support of this Proposed Priority, which provides for an applicant to propose a project in which classroom teachers receive stipends to select professional learning alternatives that are instructionally relevant and meet their individual needs related to instructional practices for high-need students. Additionally, teachers receiving stipends must be allowed the flexibility to replace no less than a majority of existing mandatory professional development with such teacher-directed learning, which must also be allowed to fully count toward any mandatory teacher professional development goals (*e.g.*, professional development hours required as part of certification renewal, designated professional days mandated by districts).

Specifically regarding the aspect of awarding stipends to classroom teachers for use on self-selected professional learning opportunities, this mechanism is really just a devolution of the long-standing practice of school district expenditures on professional development vendors for staff development, but instead of the professional learning choice/expenditures being made at the district level, they're made at the teacher level, which we believe is an appropriate and likely more effective approach.

As we pointed out in our introductory comments, it is imperative that teachers be given the time and space to pursue professional development more closely connected with teacher instructional practice. Teachers have repeatedly identified the importance of choice in professional development. For example, a 2017 survey of National Board Certified Teachers asked NBCTs to identify which professional supports and experiences helped them to increase their effectiveness as educators as they progressed through the various stages of their careers. The teachers identified National Board Certification and other ongoing formal education (such as graduate coursework) as the most important experiences, followed by self-chosen professional development outside of the school district. Additionally, the top two most important characteristics of professional development identified by the teachers emphasized the importance of choice and application of learning: that the professional development be self-selected for relevance and grounded in day-to-day teaching practice. *Investing in What it Takes to Move From Good to Great Exemplary Educators Identify Their Most Important Learning Experiences* APRIL 2017, <http://www.nnstoy.org/wp-content/uploads/2017/04/Investing-in-What-it-Takes-to-Move-From-Good-to-Great.pdf>

Also, a 2014 study by the Gates Foundation found that teachers with more choice in professional development report much higher levels of satisfaction with professional development—those who choose all or most of their professional learning opportunities are more than twice as satisfied with professional development as those with fewer options. *Teachers Know Best: Teachers' Views on Professional Development*, Gates Foundation, 2014 <http://k12education.gatesfoundation.org/wp-content/uploads/2015/04/Gates-PDMarketResearch-Dec5.pdf>

As we pointed out earlier, given that time outside of all the school-related demands placed on teachers is extremely limited for teachers, in order to meaningfully enable teachers to pursue self-selected, instructionally relevant professional learning, existing mandated professional development activities must be simultaneously reduced. Accordingly, we strongly support the Department's proposal that teachers be allowed to replace no less than a majority of existing mandatory professional development with such teacher-directed learning, which must also be allowed to fully count toward any mandatory teacher professional development goals (e.g., professional development hours required as part of certification renewal, designated professional days mandated by districts).

Regarding **Proposed Priority 2—State Educational Agency Partnership**, we agree that state involvement as a partner in supporting Priority 1 is necessary for successful systems-level change, since teacher certification and training requirements are usually under the purview of state education agencies.

Regarding **Proposed Priority 3—Local Educational Agency Partnership**, we agree that local educational agency involvement as a partner in supporting Priority 1 is necessary, since LEAs, as employers of teachers, set policies and standards for most aspects of teacher employment (other than those imposed by state law/rules), including professional development.

Indeed, under the Proposed Requirements, requirement (d)(1) speaks to the LEA's role in supporting Priority 1 when it references the professional days/activities from which participating teachers will be released in order to enable teacher-directed learning opportunities and to ensure that teacher-directed learning replaces no less than a majority of existing mandatory professional development; and other methods in which participating teachers will be given the flexibility to participate in teacher-directed learning (e.g., by providing release from and substitute teacher coverage during regular instructional days) and how such methods will also ensure participating teachers are released from no less than a majority of existing professional development requirements. Release time and substitute teacher coverage are areas over which LEAs have direct control (at least in Texas).

Regarding the **Proposed Requirements**, we support many of the requirements listed – in particular:

(b) Describe the anticipated level of teacher participation, including—(1) Current information on teacher satisfaction with existing professional learning;

(c) Describe the proposed stipend structure, including— (2) A rationale for how the estimated dollar amount per stipend is sufficient to ensure access to professional learning activities that are, at minimum, comparable in quality, frequency, and duration to the professional development other non-participating teachers will receive in a given year;

(d) Describe details about the stipend system, including—

(1) How the applicant will update its policies to offer stipends to teachers such that no less than a majority of existing mandatory professional development is replaced by teacher-directed professional learning, including—

(i) The professional development days or activities from which participating teachers will be released in order to enable teacher-directed learning opportunities and to ensure that teacher-directed learning replaces no less than a majority of existing mandatory professional development; or

(ii) Other methods in which participating teachers will be given the flexibility to participate in teacher-directed learning (e.g., by providing release from and substitute teacher coverage during regular instructional days) and how such methods will also ensure participating teachers are released from no less than a majority of existing professional development requirements;

(2) How the applicant will ensure that teacher-directed learning will fully substitute for mandatory professional development in meeting mandatory professional development goals or activities (e.g., professional development hours required as part of certification renewal, district- or contract-required professional development hours);

(3) How the applicant will provide information to teachers about professional learning options not previously available to teachers (e.g., list of innovative options, qualified providers, other resources);

(4) In addition to any list of professional learning options or providers identified by the applicant, mechanisms for teachers to independently select different high-quality, instructionally relevant professional learning activities connected to the achievement and attainment of high-need students (based on teacher-identified needs such as self-assessment surveys, student assessment data, and professional growth plans);

(g) Describe the proposed strategy to expand the use of professional learning stipends (pending the results of the evaluation), including the following:

(1) Plans for continuously improving the stipend system in order to, over time, offer more teachers the opportunity to engage in teacher-directed professional learning and, for participating teachers, ensure a higher percentage of all mandatory professional learning is teacher-directed.

(2) Mechanisms for incorporating effective practices discovered through teacher-directed professional learning into the professional development curriculum for all teachers; and

(h) Provide an assurance that—

(1) At a minimum, the SEA or LEA involved in the project (as an applicant, partner, or implementation site) will maintain its current fiscal and administrative levels of effort in teacher professional development and allow the professional learning activities

funded through the stipends to supplement the level of effort that is typically supported by the applicant;

(3) Projects will allow for a variety professional learning options for teachers and not limit use of the stipend to a restrictive set of choices (for example, professional learning provided only by the applicant or partners, specific pedagogical or philosophical viewpoints, or organizations with specific methodological stances).

However, we do feel that there are some important areas that are missing from the proposed requirements that we recommend be included:

- **First, given the subject matter, and in general, the conventional wisdom that teacher input must be sought when developing initiatives involving teacher implementation, it is vitally important that an applicant provide evidence of significant teacher input in developing the plan as well as how teacher feedback was incorporated into the plan.**
- **Next, an important component of any initiative is an evaluative component in which various aspects of the initiative are evaluated for effectiveness in achieving stated goals, whether the evaluation is conducted internally by the applicant or by an external entity. Accordingly, we recommend that the applicant be required to address how the initiative will be evaluated.**
- **An instrumental component of any evaluation of the initiative must include anonymous teacher feedback regarding their experiences in participating in the initiative. Accordingly, we recommend that an applicant be required to explain how anonymous teacher feedback will be sought as part of the evaluation process.**
- **An applicant should be required to explain how it will potentially incorporate successful features of the initiative into ongoing professional development policies and practices.**

Finally, the Department asked for input on the challenges that applicants would have in meeting the requirement that teacher-directed professional learning must replace no less than a majority of the existing mandatory professional development for participating teachers. The challenges we would identify are namely state laws requiring training in certain topics. Although the Texas Commissioner of Education is authorized to waive many of the mandatory educator training requirements in the Texas Education Code, he is not able to waive educator training requirements contained in some parts of the Education Code (e.g. Ch. 38) or contained in other Codes. Thus, allowing teachers to substitute self-selected professional learning for the statutorily-mandated training not subject to Commissioner waiver authority would normally require action by the state legislature.

Regarding educator certification continuing professional education requirements for certificate renewal, Texas Education Code section 21.054 provides that at least 25% of the total continuing professional education hours required for educator

certificate renewal must be in certain mandated topics. The remainder “shall be related to the certificate(s) being renewed and focus on the standards required for issuance of the certificate(s), including (1) content area knowledge and skills; and (2) professional ethics and standards of conduct.”

However, the Commissioner of Education does have waiver authority over this section of the Code under Texas Education Code section 7.056, so legislative action would be necessary.