January 28, 2014

Commissioner Williams,

The Texas State Teachers Association (TSTA) supports high standards for teachers to ensure that every student benefits from instruction of an effective teacher; however, we believe it is important to highlight some concerns we have, especially as they relate to the impact these standards may have on a statewide appraisal instrument. Last year, the legislature recognized that Texas parents and teachers strenuously object to the over-emphasis on student performance on standardized test scores. Should the proposed teaching standards be developed in tandem with appraisals based in large part on student performance on standardized tests, that appraisal system could undermine the very qualities that are essential to teaching excellence.

TSTA supports rigorous standards for teachers. We believe achieving such standards requires a broad-based approach that should:

- Define the craft of teaching and the expertise teachers bring to the classroom;
- Minimize language addressing the complexities and intricacies of the teaching process;
- Encourage and promote a common vision of effective teaching and collaboration among educators in support of student achievement;
- Promote a reflective process, shared involvement, and educator ownership; and
- Reflect the broad constructs of teaching practices and behaviors necessary to inform teacher evaluation.

Our comments on specific elements of the proposed rule are set forth below.

Ed Martin,
TSTA Director of Public Affairs

19 TAC Chapter 149. Commissioner’s Rules Concerning Teacher Standards
Subchapter AA. Teacher Standards

Chapter 149.1001. Teacher Standards

(a) Purpose. The standards identified in this section shall be used to align with the training, appraisal, and professional development of teachers.

- Our primary concern relates to this section, and the potential for the development of a burdensome teacher appraisal instrument founded on these standards.
- In their current form, the “micro-specificity” of the standards dictates teacher practices and behaviors without recognition of the craft of teaching and the individualized expertise teachers bring to the classroom.

Chapter 149. 1001(b)(2)
(A)(iii) Teachers accept responsibility for the growth of all of their students, persisting in their efforts to ensure high levels of growth on the part of each learner.

- Despite decades of efforts by “experts,” no one has yet defined a measure of student growth that is limited to the impact of learning experiences provided by an individual teacher in the classroom, exclusive of other factors that impact student performance.
- Teachers should accept responsibility for the growth of students within the scope of the learning experiences of students in their classrooms.
- Teachers do not have control over the background, prior-learning experiences, and prior knowledge students bring into their classrooms.

Chapter 149. 1001(b)(3)(B) Teachers design and execute quality lessons that are consistent with the concepts of their specific discipline, are aligned to state standards, and demonstrate their content expertise.

- The state’s emphasis on curricula that do not reflect the concepts of a specific discipline may/can create conflict with state standards.

Chapter 149. 1001(b)(4)

(B)(ii) Teachers create a physical classroom set-up that is flexible and accommodates the different learning needs of students.

- The standard addresses something that is often beyond the control of the teacher. Many factors influence classroom environments, such as the number of students in the classroom, the size of the classroom, and the actual space per student.

Chapter 149. 1001(b)(6)

(A)(iii) Teachers engage in relevant, targeted professional learning opportunities that align with their professional growth goals and their students’ academic and social-emotional needs.

- The standard assumes teachers have some level of autonomy regarding their professional development.
- Current professional development reflects the capacity and the needs of the district rather than the needs of the teachers, and the professional development that is offered in their geographic area (region, e.g.) is not always aligned with the teacher’s specific needs.

(D)(iii) Teachers serve as advocates for their students, focusing attention on students’ needs and concerns and maintaining thorough and accurate student records.

- Effective teachers advocate for their students but sometimes their advocacy runs counter to the interests and needs of the school district. For instance, a teacher may suggest that students with IEPs take too much instructional time away from non-handicapped students, only to find that their concern runs counter to a Special Education program that often utilizes an unrealistic practice of inclusion.
- The standards should respect and provide protections for teachers who advocate for students.