



**The following are the Texas State Teachers Association’s comments on proposed revision to 19 TAC Chapter 153, Subchapter BB, commissioner’s rules concerning professional development. The proposed rule action would add new §153.1011 to implement the mentor program allotment enacted by House Bill (HB) 3, 86<sup>th</sup> Texas Legislature, 2019.**

The Texas State Teachers Association applauds the state’s commitment to supporting quality mentoring programs. Research universally suggests that quality induction programs benefit students and greatly improve retention rates of new teachers. However, TSTA has concerns with the proposed rules regarding mentor selection guidelines, the overly prescriptive nature of the mentor/teacher meeting requirements and the application and approval process.

**1. 19 Texas Administrative Code §153.1011 – Program requirements.**

**Text of §153.1011 – Program requirements. Mentor selection.**

(b) Program requirements.

(1) Mentor selection. To qualify as a mentor teacher, a classroom teacher must:

(C) have at least three complete years of teaching experience with a superior record of assisting students, as a whole, in achieving improvement in student performance. **Districts may use the master, exemplary, or recognized designations under TEC, §21.3521, to fulfill this requirement;**

Recommending in rule that districts use teacher designations under TEC, §21.3521 to identify quality teacher mentors is unnecessary. Participation in the Teacher Incentive Allotment (TIA) is an optional program for districts and is subject to commissioner approval. It will likely be the case that many districts eager to participate in TIA will not be approved, and to associate the quality of a selected mentor to this designation system might have the unintended consequence of giving preferential treatment for mentor allotment approval to districts who have approved TIA designation plans. Moreover, it is very likely that districts with approved plans will naturally identify and select designated teachers as mentors, and districts without approved designation plans are equally capable of identifying teachers *with a superior record of assisting students*.

**2. 19 Texas Administrative Code §153.1011 – Program requirements.**

**Text of §153.1011 – Program requirements. Meetings between mentors and beginning teachers**

(b) Program requirements.

(5) Meetings between mentors and beginning teachers. A mentor teacher must:

(B) address the following topics in mentoring sessions with the beginning teacher being mentored:

- (i) orientation to the context, policies, and practices of the school district, including:
  - (I) campus-wide student culture routines;
  - (II) district and campus teacher evaluation systems;
  - (III) campus curriculum and curricular resources, including formative and summative assessments; and
  - (IV) campus policies and practices related to lesson planning;
- (ii) data-driven instructional practices;
- (iii) specific instructional coaching cycles, including coaching regarding conferences between parents and the beginning teacher;
- (iv) professional development; and
- (v) professional expectations.

Sections (B)(i)(I) – (IV) exceed the parameters outlined in HB3 as program requirements of meetings between mentors and beginning teachers and are therefore unnecessarily prescriptive and superfluous in rule. Mentor teachers, selected for their professional record of student performance, will know better than any rule can predict how to orient a new teacher to the context, policies, and practices of the local context. Bridling him or her to a rigid list in rule is unnecessary, and it will also inhibit the organic development of the mentor-teacher relationship shown in its own right to be so valuable to beginning teachers.

Furthermore, sections (B)(ii) - (v), which reflect the language in HB3, adequately cover the apparent intent of (B)(i)(I) – (IV). For instance, (B)(ii) *data-driven instructional practices*, is sufficient language to guide a mentor to covering formative and summative assessment and other local practices related to lesson planning.

### **3. 19 Texas Administrative Code §153.1011 – Application approval process.**

#### **Text of §153.1011 – Application and approval process**

- (c) Application approval process. Each year, TEA will provide an application and approval process for school districts to apply for mentor program allotment funding. Funding will be limited based on availability of funds, and, annually, the commissioner shall adopt a formula to determine the amount to which approved districts are entitled. The application shall address the requirements of TEC, §21.458, and include:

HB3 states that all districts that have implemented a mentoring program under Section 21.458 are “entitled to an allotment” as determined by commissioner formula. In addition, this formula will be adopted to determine “the amount to which” qualifying districts are entitled, *not if, dependent on the availability of funds*, a district is entitled.

Additionally, there is no requirement in HB3 that the commissioner adjust the formula annually, only that the commissioner adopt a formula. Annual adjustments will only serve to obscure the application process for districts and invariably disrupt from year to year the quality mentoring programs lawmakers were intending to promote.

The Texas State Teachers Association is excited that Texas has committed to supporting quality mentoring programs for beginning teachers. In order to ensure that this allotment adequately reflects legislative intent and is fairly distributed to the benefit of all beginning teachers across our great state, we are recommending three edits to the proposed rule: strike reference to TIA as a guideline to mentor selection; strike the subpoints under (b)(B)(i) as these are unnecessary and overly prescriptive; and ensure all districts are entitled to an allotment as determined by a set and predictable formula.