



The following are the Texas State Teachers Association's comments and concerns about the Proposed Amendment to 19 TAC Chapter 150, Commissioner's Rules Concerning Educator Appraisal, Subchapter AA, Teacher Appraisal, §150.1012, Local Optional Teacher Designation System,

Text of §150.1012 – Local Optional Teacher Designation System.

- (c) Application procedures and approval process.
 - (2) The application shall include the following for each teacher group:
 - (B) test administration processes for all student growth that will lead to validity and reliability of results, including:
 - (i) test security protocols;
 - (ii) testing windows;
 - (iii) testing accommodations; and
 - (iv) annual training for test administrators; and

Although HB 3 explicitly states that performance standards may not require a district to use an assessment instrument adopted under Section 39.023 to evaluate teacher performance, the proposed rule as it is written effectively limits districts to choosing the State of Texas Assessments of Academic Readiness (STAAR) exam — which is the instrument adopted under Section 39.023 — as the student growth component of their teacher performance evaluations. §150.1012 (c)(2)(A)(ii) includes other allowable student growth components, including student learning objectives, portfolios, and district- or teacher-created assessments, all shown in research to more accurately reflect student learning. However, because these are not assessment instruments that would include test security protocols, testing windows, or annual training for test administrators in the way that the STAAR administration does, district applications that opt for a more holistic and research-evidenced student growth component would be unjustly disadvantaged and less likely to be approved. The Texas State Teachers Association does not believe that this rule as proposed aligns with the prohibition on using high stakes test to measure teacher performance.