



## REQUIREMENTS FOR LOCAL DESIGNATION SYSTEM

*The Texas State Teachers Association offers the following comments to the proposed revisions to 19 TAC Chapter 150, Commissioner's Rules Concerning Educator Appraisal, Subchapter AA, Teacher Appraisal*

The Texas State Teachers Association (TSTA) appreciates the work of the Texas Education Agency (TEA) in drafting the proposed amendment concerning teacher appraisal and the requirements for a school district's local designation system. Overall, TSTA believes that the proposed rule language and Figure 19 TAC §150.1012 (c)(1)(C) will help standardize and clarify agency expectations for acceptable designation plans, especially as they pertain to the use of student learning objectives and portfolios to measure student growth.

TSTA maintains concern that the designation plan parameters inherently favor the use of value-added metrics (VAM), which experts agree are a better measure of correlation than causation<sup>1</sup>. The clarity offered by the figure will provide districts who wish to participate in the incentive allotment better guidance regarding how to design designation plans that do not rely on VAM but instead include the more valid and reliable student performance component options.

TSTA does however have some concerns with the proposed revisions to §150.1012 (c), application procedures and approval process. The rule text in §150.1012 (c)(2)(A)(i)(II) describes the attributes of an acceptable teacher observation rubric with specificity, but the application requirements of the teacher observation rubric component in proposed Figure 19 TAC §150.1012 (c)(1)(C) is worded differently and is less clear.

In §150.1012 (c)(2)(A)(i)(II), the section overviewing the required components of teacher observation, an acceptable rubric is described as “based on observable, job-related behaviors that are described with progressive descriptors for each dimension, including alignment to §149.1001 of this title (relating to teacher Standards) and a clear proficiency indicator.”

However, in proposed Figure 19 TAC §150.1012 (c)(1)(C), the teacher observation rubric is required to be one that “accurately measures teacher effectiveness, aligns to all of the dimensions of the T-TESS, and is in compliance with §21.351 or §21.352.” While we understand that the two effectively mean the same thing, TSTA believes the proposed Figure language should match proposed rule language.

TSTA recommends changing the language of the Teacher Observation Rubric component of Figure 19 TAC §150.1012 (c)(1)(c) to “District uses an approved teacher observation rubric that accurately measures teacher effectiveness, describes behaviors with progressive descriptors for each dimension, including alignment to §149.1001 of this title (relating to teacher standards), and includes a clear proficiency indicator.”

TSTA appreciates the opportunity to comment on the proposed revisions to Local Optional Teacher Designation System. We believe the Figure overall will serve to standardize agency expectations for non-VAM student performance component options. Matching rule text language with the proposed Figure as it relates to the teacher observation rubric requirements will also help clarify agency expectations for teacher appraisal attributes. TSTA does not support merit pay programs such as the Teacher Incentive Allotment, but austerity is forcing districts to play the game of chase for funding and they at least deserve access to an intelligible rulebook.

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<sup>1</sup> American Statistical Association, [Statement on using Value-added models for educational assessment](#), Alexandria, VA. (2014).