



**Association of Texas
Professional Educators**
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April 2, 2020

The Hon. Mike Morath, Commissioner
Texas Education Agency
1701 N. Congress Avenue
Austin, Texas 78701

Dear Commissioner Morath:

On behalf of the Association of Texas Professional Educators (ATPE) and the approximately 100,000 educators we represent, I write to ask for your help in preserving the validity and fidelity of our state's teacher and principal appraisal systems, as well as the many programs to which they are linked.

The COVID-19 pandemic has forced Texas educators to make sudden, dramatic changes to the manner in which they practice, and the profession we proudly represent has responded with quick action, determination, and passion to keep students learning despite the crisis at hand. Likewise, we recognize and appreciate the swift response taken by you, the Texas Education Agency, and Gov. Greg Abbott to address the education system's changing needs under these unusual circumstances and provide much-needed flexibility, such as the decision to cancel STAAR administration. Although we are aware TEA has conveyed to school officials the availability of waivers of certain aspects of appraisal requirements, we believe more expansive action is necessary to prevent negative consequences in the short and long term.

As the association representing the state's largest community of professional educators, ATPE has long advocated for robust, rigorous, and interactive appraisals. Our members and staff participated in the multi-year efforts resulting in creation of the T-TESS and T-PESS appraisal systems. We lobbied for a comprehensive, supportive evaluation framework that incorporated frequent, meaningful observations and timely, year-round feedback that fostered professional growth and skills to help students succeed. The Texas educators we represent and communicate with daily remind us that important aspects of pedagogy cannot be assessed through objective student performance data alone. Distance learning is a necessary but less-than-ideal accommodation to keep students on a forward path while their schools are closed, but the human connection cannot be replicated. The same is true for educators who have lost opportunities for face-to-face interaction with peers and supervisors—an important component of professional development and growth.

Educators crave collaboration and constructive feedback. Even under normal conditions, opportunities for authentic observation of an educator's teaching practices are limited. Observation is critical to obtaining a complete and accurate picture of an educator's strengths and weaknesses, and the lack of meaningful opportunities for such observations under current conditions is even more acute. These are extraordinary circumstances, and we cannot expect ordinary outcomes, even in the context of educator evaluations.

The campus disruptions caused by the coronavirus pandemic have forced teachers and administrators to shift their focus to ensuring continuity of learning through rapidly assembled and deployed distance learning resources. In our view, this radical change in priorities, coupled with uncertainty over the circumstances of the next few months for our schools and communities, jeopardizes successful administration of evaluations with fidelity this school year. Many of our

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members are now juggling professional responsibilities with new personal childcare requirements. Many educators' families also face significant economic hardships related to spousal job loss during the pandemic. Our hardworking educators fear proceeding with evaluations during the current crisis will take focus away from the already daunting task of keeping the educational environment as intact as possible for students.

As you know, evaluations drive local decisions that carry enormous weight for the educators we represent. Appraisals help determine base pay rates as well as eligibility for additional compensation through bonuses, merit awards, and other forms of differentiated pay. Promotions and assignments, professional development plans, and employment separation decisions all routinely involve consideration of appraisal results. Increasingly, educator appraisal results are being integrated in locally developed incentive pay programs, which may be tied to opportunities for greater funding through state and federal sources. This is certainly true with respect to the Teacher Incentive Allotment (TIA) included in last year's House Bill 3.

All of these employment decisions, including non-renewal, which are so often predicated on performance as measured by T-TESS and T-PESS, must be based on valid and reliable data so as not to erode confidence in the evaluation process itself. With TIA coming online over the next several years, it is even more important for districts to work to increase the quality of inputs going into the appraisal process and the integrity of the evaluations themselves to create employee confidence in the new system. (A primary obstacle faced by previous state-level incentive pay initiatives was a lack of educator confidence in their validity and accuracy.) Given current conditions, it is hard to imagine all Texas school districts will be able to complete the appraisal process in a manner that meets these standards, ensures inter-rater reliability and comparability across districts, and fosters employee trust.

Additionally, our members understand public education is likely to face significant budget pressure ahead. Some educators fear their districts may use evaluations administered this spring (in a truncated and less robust manner due to these extraordinary circumstances) as the basis for contract non-renewal decisions merely in an effort to spare personnel costs in the upcoming 2020-21 school year. We know financial exigencies can compel school boards to make unpopular cost-cutting decisions in extreme circumstances, but we do not want to see those decisions being based unreliably on compromised educator evaluations.

For these reasons, we are requesting a state moratorium on the administration of T-TESS and T-PESS during the 2019-20 school year. Again, we appreciate the flexibilities and guidance Gov. Abbott and TEA have already provided to school districts, and we ask that you direct districts to refrain from administering incomplete teacher or principal evaluations during the current school year to preserve the validity of the evaluation system and the many programs linked to it.

Thank you for your thoughtful consideration of this matter.

Sincerely,



Shannon Holmes, Ed.D.
Executive Director