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To Whom It May Concern:

The Texas Classroom Teachers Association, representing approximately 50,000 classroom teachers and instruction personnel statewide, has the following comments regarding Proposed Repeal of 19 TAC Chapter 153, School District Personnel, Subchapter BB, Commissioner's Rules Concerning Professional Development, §153.1011, Beginning Teacher Induction and Mentoring Program, and New §153.1011, Mentor Program Allotment

Regarding Proposed Section 153.1011(a)(1), the definition of "Beginning teacher" should include language from TEC Section 21.458(a) as follows:

§153.1011. Mentor Program Allotment.

- (a) Definitions. The following words and terms, when used in this section, shall have the following meanings, unless the context clearly indicates otherwise.
 - (1) Beginning teacher--A new classroom teacher in Texas who has less than two years of teaching experience in the subject or grade level to which the teacher is assigned.

The inclusion of the phrase "in the subject or grade level to which the teacher is assigned" is important to add, because, otherwise, the proposed definition is narrower than what the statute provides (i.e. the phrase "in the subject or grade level to which the teacher is assigned" means more teachers would be eligible to be assigned mentors because it would include teachers who are not necessarily brand new to the profession, but brand new to a given subject/grade level).

Regarding Proposed Section 153.1011(a)(3), the definition of "Mentor teacher" should include language from TEC Section 21.458(a)(1) and (2) as follows:

§153.1011. Mentor Program Allotment.

- (a) Definitions. The following words and terms, when used in this section, shall have the following meanings, unless the context clearly indicates otherwise.
 - (3) Mentor teacher A classroom teacher in Texas who, to the extent practicable, teaches in the same school and in the same subject or grade level, and who provides effective support to help beginning teachers successfully transition into the teaching assignment.

The inclusion of the phrase "to the extent practicable, teaches in the same school and in the same subject or grade level, and who" is important because this statutory language emphasizes best practices with regard to mentoring programs and gives districts guidance on selecting and assigning mentors.

Regarding Proposed Section 153.1011(b)(2), Mentor assignment should be revised to include language from TEC Section 21.458(a-1) as follows:

- (2) Mentor assignment. School districts must agree to assign no more than:
- (A) two beginning teachers to a mentor who serves as a teacher of record for, on average, six hours per instructional day; or
- (B) four beginning teachers to a mentor who serves as a teacher of record for, on average, less than six hours per instructional day.
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 - (2) four beginning teachers to a mentor who serves as a teacher of record for, on average, less than six hours per instructional day;
 - (B) <u>assign teachers as mentors who have agreed to serve as a mentor for at least one</u> school year;
 - (C) assign a mentor to a classroom teacher for at least two school years; and
 - (D) <u>assign a mentor to a classroom teacher by the 30th day of employment of the classroom teacher to whom the mentor is assigned.</u>

The inclusion of the underlined statutory language above is important because it outlines timelines for the required level of commitment that districts and mentors must make in order for the program to be implemented with fidelity.

Regarding Proposed Section 153.1011(b)(4): We appreciate the language in subsection(b)(4) which requires that, in designating specific time during the regularly contracted day for meeting between mentor and beginning teachers, districts must abide by mentor and beginning teachers' entitled planning and preparation requirements in TEC Section 21.404. We appreciate the inclusion of this language because we've heard consistent concerns from our members over the years about campus/district attempts to require certain activities of teachers during their preparation and planning periods that fall outside of the statutorily designated activities for preparation and planning periods.

Regarding "Mentor roles and responsibilities", contrary to the title of the provision, the substance of this provision is more about *school district* responsibilities.

Finally, there are other important statutory provisions in TEC Section 21.458(g)(2) which relate school district roles in designating time for mentors and beginning teachers to meet that should be included in this (retitled) section as follows:

(3) Mentor District roles and responsibilities. A school district must:

- (1) designate a specific time during the regularly contracted school day for meetings between mentor teachers and the beginning teachers they mentor, which must abide by the mentor and beginning teachers' entitled planning and preparation requirements in TEC, §21.404; and
- (2) schedule release time or a reduced teaching load for mentor teachers and classroom teachers in order to facilitate mentoring activities, including classroom observations or participating in supportive coaching.

The inclusion of the underlined statutory language above is important because it contains relevant and important details about ways in which school districts facilitate dedicated time for mentors and beginning teachers to engage in mentoring activities.

Regarding Proposed Section 153.1011(b)(5), "Meetings between mentors and beginning teachers", Subsection (A) specifies the amount of time that a mentor teacher must spend meeting with a beginning teacher assigned to the mentor, and includes the provision that "No more than 2 of the 12 required hours per semester for mentor teachers and beginning teachers to meet or observe one another may happen outside the regularly contracted school day."

This provision should be struck because it conflicts with the statutory requirement that a school district must designate a specific time *during the regularly contracted school day* for meetings between mentor teachers and classroom teachers assigned to a mentor (emphasis added) (TEC Section 21.458(g)).

Thank you for this opportunity to comment.

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