

State Plan for Meeting the Highly Qualified Teacher Goal

Texas Education Agency
Revised June 1, 2007

Introduction

The Revised State Plan for Meeting the Highly Qualified Teacher (HQT) Goal for the State of Texas submitted on July 7, 2006, was developed by the Division of NCLB Program Coordination at the Texas Education Agency (the Agency, TEA) in collaboration with Agency staff, Title I Committee of Practitioners, local education agency (LEA) personnel, Education Service Center (ESC) staff, and representatives from educational professional organizations in the state. The general public also was provided a six-day review and comment period in which to provide input into the contents of this plan. Comments from all the participants were reviewed and addressed appropriately within the final plan. This revised submission has been coordinated with the Title I Committee of Practitioners, regional ESC staff, Agency staff, and reviewed by the National Comprehensive Center for Teacher Quality.

As directed by USDE staff, the Agency is responding in general terms to the peer review of the July 7, 2006, submission in this introductory section and has added additional content within the plan requirements. In general, the Agency finds the peer review report of the state's July 7, 2006, submission to be inaccurate and incomplete. Many of the comments provided by the peer review panel appear to be from a lack of understanding or misinterpretation of the data presented in the plan. TEA made every effort to address each individual criterion under each plan requirement in a clear and concise format. Several of the comments provided are, in TEA's opinion, inaccurate statements. For example:

- The peer review panel indicated that the data analysis requirement (Requirement 1) was not met and that TEA had not addressed any of the five evidence points (criteria) required by USDE. In actuality, TEA included seven pages of data displayed in tables to address all five USDE criteria. The reviewers seemed confused by the Agency's use of 2004-05 data supplemented with 2005-06 data extrapolated from the sample of districts that had reported to TEA prior to the 2005-06 deadline. TEA staff had actually discussed with USDE the concern that the plan was due to USDE prior to the 2005-06 data being collected by the Agency. USDE had recommended that TEA report 2004-05 data and supplement with extrapolated 2005-06 data. USDE actually commended the Agency for the availability of highly qualified teacher data when USDE monitored TEA highly qualified teacher requirements this past spring.
- The reviewers indicated in the review document that TEA did not "identify districts and schools around the state where significant numbers of teachers do not meet highly qualified teacher standards" as required in the plan. In actuality, TEA included a list of all districts and campuses in the state and reported the percentage of highly qualified teachers at each. This review team decision is contradicted in Requirement 2 where the reviewers later indicated that TEA had identified districts that have not met the annual measurable objectives for all core academic subject area teachers to be highly qualified.
- The reviewers do not seem to understand that technical assistance to be provided by the regional education service centers described in the plan. The reviewers indicated that the plan did not "include a description of the technical assistance TEA would provide to assist LEAs in successfully carrying out

the LEA's highly qualified teacher plans" in Requirement 3 after having commended TEA "for the use of the regional education service centers to provide technical assistance to LEAs" under Requirement 2.

- The review team indicated that Requirement 6 was not met and commented that TEA "did not provide an equity plan". This comment is unfounded as TEA did submit a separate equity plan as an attachment to the plan. The continued misunderstanding of the data analysis in Requirement 1 caused the reviewers to further provide an incomplete review of the plan.

This revised submission strives to clarify the items that were misunderstood and address the valid comments provided by the review panel. However, it is important to note that Texas is a "right to work" state, with no collective bargaining; accordingly, unlike other states, teachers in Texas do not negotiate union contracts which address issues like assignment. Because Texas teacher contracts routinely contain provisions allowing teachers to be assigned as needed, many experienced teachers are subject to assignment at-will, often with short notice prior to or during the school year. For these reasons, this state plan will serve as a framework for LEAs to revise their local Teacher Quality Plans and ensure that all core academic subject area teachers are highly qualified by the end of the 2006-07 school year. LEAs will be required to revise and implement their plans at the local level during the upcoming school year.

Attachment 1, the *Texas Strategic Plan to Address the Teacher Shortage*, the state's long-range plan for addressing several related issues, also supports this plan.

Requirement 1: The revised plan must provide a detailed analysis of the core academic subject classes in the State that are currently *not* being taught by highly qualified teachers. The analysis must, in particular, address schools that are not making adequate yearly progress and whether or not these schools have more acute needs than do other schools in attracting highly qualified teachers. The analysis must also identify the districts and schools around the State where significant numbers of teachers do not meet HQT standards, and examine whether or not there are particular hard-to-staff courses frequently taught by non-highly qualified teachers.

USDE Criteria

Does the revised plan include an analysis of classes taught by teachers who are not highly qualified?

TEA Response:

For highly qualified teacher purposes in Texas, elementary is defined as grade levels PK-6 and secondary is grades 7-12. Data provided below is the statewide aggregate of highly qualified teacher data reported by individual campuses.

Based on 2004-05 highly qualified teacher data, statewide, 2.29% of elementary classes were taught by non-highly qualified teachers in 2004-05 and 6.34% of secondary classes were taught by non-highly qualified teachers. In rank order of highest percentage of non-highly qualified teachers statewide, secondary foreign language classes have the highest percentage of non-highly qualified teachers (8.24%) followed by secondary mathematics (7.48%), geography (6.55%), science (6.49%), reading/language arts (6.40%), history (5.93%), economics (5.86%), English (5.55%), arts (4.79%), and civics and government (4.49%).

High-poverty elementary schools had 0.79% more elementary classes taught by non-highly qualified teachers than low-poverty elementary schools. On the average, high poverty secondary schools had 2.85% more secondary core academic subject area classes taught by non-highly qualified teachers than low-poverty secondary schools. The greatest inequity (gap) in secondary classes between high-poverty and low-poverty schools exists in English classes (5.40%). Other inequities in classes were economics (3.80%), arts (3.38%), geography (3.00%), history (3.00%), science (2.99%), mathematics (1.51%), reading/language arts (1.22%), foreign language (0.33%), and civics/government (0.33%).

High-minority elementary schools had 2.28% more elementary classes taught by non-highly qualified teachers than low-minority elementary schools. On the average, high minority secondary schools had 3.43% more secondary core academic subject area classes taught by non-highly qualified teachers than low-minority secondary schools. The greatest inequity (gap) in secondary classes between high-poverty and low-poverty schools exists in English classes (4.50%). Other inequities in classes were economics (4.22%), science (3.66%), arts (3.57%), civics/government (3.41%), mathematics (3.39%), history (3.10%), foreign language (2.82%), reading/language arts (2.72%) and geography (1.59%).

Table 1 below identifies the percentages of classes taught by non-highly qualified teachers.

Table 1. Percentage of Core Academic Subject Area Classes Taught by Non-Highly Qualified Teachers in Texas: 2004-05							
	Statewide Taught by Non-Highly Qualified Teachers	Low Poverty Taught by Non-Highly Qualified Teachers	High Poverty Taught by Non-Highly Qualified Teachers	Inequity Between Low and High Poverty	Low Minority Taught by Non-Highly Qualified Teachers	High Minority Taught by Non-Highly Qualified Teachers	Inequity Between Low and High Minority
Total Elementary (one teacher equals one class)	2.29	1.89	2.68	0.79	1.10	3.38	2.28
Total Secondary (one section equals one class)	6.34	5.51	8.36	2.85	4.62	8.05	3.43
English	5.55	4.22	9.62	5.40	3.62	8.12	4.50
Reading/ Language Arts	6.40	6.76	7.98	1.22	4.71	7.43	2.72
Mathematics	7.48	7.16	8.67	1.51	5.45	8.84	3.39
Science	6.49	5.50	8.49	2.99	4.36	8.02	3.66
Foreign Language	8.24	6.13	6.46	0.33	7.24	10.06	2.82
Civics/Gov't	4.49	4.56	4.89	0.33	4.25	7.66	3.41
Economics	5.86	5.60	9.40	3.80	5.42	9.64	4.22
Arts (Music, Art, Dance, Theater)	4.79	4.29	7.67	3.38	3.52	7.09	3.57
History	5.93	4.87	7.87	3.00	4.11	7.21	3.10
Geography	6.55	5.36	8.36	3.00	5.62	7.21	1.59

Source: 2004-05 Highly Qualified Teacher Compliance Report, Revised 9-20-06.

USDE Criteria

Is the analysis based on accurate classroom level data?

Data reviewed for this revised plan are based on 1,229 LEAs (including charter school LEAs), over 7500 campuses, and almost 300,000 teachers. These teachers serve students in more than 171,500 elementary classrooms and over 550,000 secondary classes across the state.

Highly Qualified Teacher data in Texas are collected through the state's automated grant system "eGrants." One component of the eGrants system is the NCLB Highly Qualified Teacher Compliance Report, a campus level data report submitted annually by the LEA. Data contained in the Highly Qualified Compliance Report are submitted annually as of the end of the school year and due to the Texas Education Agency (TEA) the following July 15. See Attachment 2 for a sample campus compliance report. The LEA superintendent, or designee, is required to certify and submit the campus reports. The electronic signature entered by the superintendent or designee certifies to the following.

"I hereby certify that the information contained in this report is, to the best of my knowledge, correct and that the local agency named above has authorized me as its representative to submit this data. I further certify that reported program activities were conducted in accordance with all applicable Federal and State laws and regulations, application guidelines and instructions, the Provisions and Assurances, Debarment and Suspension, Lobbying Requirements, Special Provisions and Assurances, and the schedules of the approved application for funding."

After all compliance data are submitted and reviewed, the Agency notifies LEAs that the following system-generated reports are available to the LEA and to publicly report the LEA and campus progress regarding highly qualified teachers.

- State Aggregate Report
- State Aggregate High-Poverty Report
- State Aggregate Low-Poverty Report
- Regional Aggregate Report
- Regional Aggregate High-Poverty Report
- Regional Aggregate Low-Poverty
- LEA Aggregate Report
- LEA Aggregate High-Poverty Report
- LEA Aggregate Low-Poverty
- Campus Report for each school in the LEA

All these reports are available at <http://www.tea.state.tx.us/nclb/hqreport.html>.

Since the complete 2005-06 data submission from campuses is just being finalized and the Agency has not completed the data validation process, this data analysis in Requirement 1 and subsequent report are based on the school year 2004-05 highly qualified data. In order to simplify the data analysis, all data reported under Requirement 1, including AYP data, will be from the 2004-05 school year.

In response to the peer review of the July 7, 2006, submission the Agency has strengthened the data validation process to be implemented in the Fall of 2006. All LEAs in Texas were assigned one of three performance level statuses on the highly qualified indicator in the Performance-Based Monitoring Analysis System (PBMAS)--Met, Not Met, and Not Assigned a performance level (because of small numbers)—that is discussed below in Requirement 2. These performance levels were based on LEAs' 2004-2005 highly qualified data.

The data validation process being implemented by the Division of NCLB Program Coordination will encompass a random sample of 10% of LEAs stratified by ESC region and 2006 PBMAS performance level status on the highly qualified indicator. Each selected district will conduct the validation process on campus selected by the Agency.

- Districts that Met the Indicator will be required to complete the validation process below on their 2004-2005 highly qualified data.
- Districts that were Not Assigned a performance level on the Indicator will be required to complete the validation process below on their 2004-2005 highly qualified data, and
- Districts that Did Not Meet the Indicator will be reviewed to determine if they reported 100% highly qualified in 2005-2006. Any district in this sample group reporting 100% highly qualified in 2005-2006 will be required to complete the validation process below on their 2005-2006 data. Districts in this sample group reporting less than 100% HQ in 2005-2006 will be required to validate their 2004-2005 highly qualified data and submit the required improvement plan as a monitoring intervention for not meeting the indicator.

In addition, any district that did not meet the PBMAS indicator but has reported 100% highly qualified in 2005-06 will be required to complete the validation process on their 2005-06 data as their required intervention process for not meeting the PBMAS indicator.

The data validation process will include:

1. Data Validation Checks—The Agency will require the LEA to conduct and certify a comprehensive desk audit of the highly qualified. Any campus report not meeting the standards below will be contacted by the Agency and required to amend the data, as deemed necessary.
 - a. Elementary campuses report elementary classes, but no secondary classes unless 6th grade is on the elementary campus.
 - b. Elementary campuses report a number of classes within 10% variance of the number of students enrolled on the campus divided by 22 students per classroom.
 - c. Secondary campuses report only secondary classes.
 - d. Secondary campuses report a number of classes within 10% variance of the number of students enrolled on the campus divided by 30 students per classroom.
 - e. Secondary middle school campuses report classes in the core subject areas required to be taught at the middle school grade levels.
 - f. Secondary high school campuses report classes in the core subject areas required to be taught at the high school grade level.TEA will provide the districts with a checklist and certification statement to be completed and submitted back to the Agency.

2. Random Validation Checks—The Agency will request the highly qualified teacher documentation for a number of teachers on each selected campus. Agency staff will verify the highly qualified teacher determinations of the LEA and require any amendments to the data as deemed necessary.

The 2005-06 data will be validated over the next few months through this new data validation process in order to be able to submit finalized data to USDE in the 2005-06 Consolidated State Performance Report. If requested by USDE, the Agency will provide an updated data analysis for Requirement 1 after the complete validation process is completed and any necessary data amendments are received by the Agency.

Low- and high-poverty data quartiles are calculated as required by USDE by rank ordering all schools by poverty, then dividing the schools into four equal categories to establish the quartile groups. Schools were ranked based on the low-income percentage of the school as reported to the Agency by the LEA in the LEA's Consolidated NCLB Application for Federal Funding, Schedule SC5000—Title I Campus Selection spreadsheet. When the quartile cut point fell on a percentage with multiple campuses having the same percentage, the cut point was raised to the next highest campus; therefore, the low- and high-poverty quartiles have a slightly different number of campuses. Low-poverty schools are those 1897 schools with 0-27.90% students from low-income families. High-poverty schools are those 1895 schools with 76.32-100% students from low-income families. For additional information on the SC5000 schedule see page 41 of the application document at <http://www.tea.state.tx.us/nclb/PDF/NCLBAA07Composite.pdf> and pages 35-36 of the instruction document at <http://www.tea.state.tx.us/nclb/PDF/NCLBAA07Instructions06-07.pdf>.

Low- and high-minority data quartiles are calculated by rank ordering all schools by percentage of minority students, then dividing the schools into four equal categories to establish the quartile groups. Schools were ranked based on the percentage of students from any race/ethnic subgroup other than White as reported to the Agency by the LEA through the Public Education Information Management System (PEIMS), Fall Submission, Record 101—Student Data Demographics. When the quartile cut point fell on a percentage with multiple campuses having the same percentage, the cut point was raised to the next highest campus; therefore, the low- and high-minority quartiles have a slightly different number of campuses. Low-minority schools are those 1981 campuses with 0-30.9% students from any race/ethnic subgroup other than White. High-minority schools are those 1976 campuses with 91.8%-100 students from any race/ethnic subgroup

other than White. For additional information regarding the PEIMS data system in Texas or the PEIMS 101 Record see <http://www.tea.state.tx.us/peims/>.

USDE Criteria:

Does the analysis focus on the staffing needs of schools that are not making AYP? Do these schools have high percentages of classes taught by teachers who are not highly qualified?

TEA Response:

Districts meeting AYP are more likely to have 100% of the core academic subject area teachers highly qualified when compared to districts not meeting AYP. 34.6% of districts Meeting AYP have all core academic subject area teachers highly qualified, while only 27.3% of districts Not Meeting AYP have all teachers highly qualified. A higher percentage of districts Not Meeting AYP (72.7%) have also not met the highly qualified teacher requirement than districts Meeting AYP (65.2%). Consequently, districts Not Meeting AYP have higher percentages of classes taught by non-highly qualified teachers.

Campuses meeting AYP are much more likely to have the core academic subject areas teachers highly qualified when compared to campuses not meeting AYP (Table 2). 64.7% of campuses Meeting AYP have all core academic subject area teachers highly qualified, while only 33.2% of campuses Not Meeting AYP have all teachers highly qualified. A higher percentage of campuses Not Meeting AYP (66.8%) have also not met the highly qualified teacher requirements than campuses Meeting AYP (35.3%). Campuses Not Meeting AYP also have higher percentages of classes taught by non-highly qualified teachers.

Table 2. Comparison of Percentage of Highly Qualified Teacher Rate at Districts and Campuses Making AYP and Not Making AYP; 2004-05				
	Meeting AYP and 100% HQT	Meeting AYP and Not 100% HQT	Not Meeting AYP and 100% HQT	Not Meeting AYP and Not 100% HQT
Districts	34.6%	65.2%	27.3%	72.7%
Campuses	64.7%	35.3%	33.2%	66.8%

Source: 2004-05 Highly Qualified Teacher Compliance Report, Revised 6-21-06 and 2005 AYP.

Of the 93 districts and 540 campuses represented above as not meeting AYP and not meeting 100% highly qualified, the majority are above 90% highly qualified (Table 3).

Table 3. Districts and Campuses Not Meeting AYP by Percentage of Highly Qualified Teachers; 2004-05				
	Not Meeting AYP and 100% HQT	Not Meeting AYP and 95.0-99.9% HQT	Not Meeting AYP and 90.0-94.9% HQT	Not Meeting AYP and less than 89.9% HQT
Districts	27.3%	22.7%	15.6%	34.4%
Campuses	33.2%	25.4%	17.9%	23.5%

Source: 2004-05 Highly Qualified Teacher Compliance Report, Revised 6-21-06 and 2005 AYP.

Of the 70 elementary campuses not meeting AYP and not reporting 100% highly qualified teachers, 54 (77.1%) have less than 25% of their classes taught by non-highly qualified teachers. At the secondary level, the highest percentages of non-highly qualified teachers on the 470 campuses not meeting AYP and not 100% highly qualified are in the areas of English, Reading/Language Arts, Mathematics, and History.

Attachment 3 lists the percentage of highly qualified teachers and AYP status for each LEA in the state for 2004-05. Attachment 4 lists the percentage of highly qualified teachers and AYP status for each campus in the state for 2004-05.

USDE Criteria:

Does the analysis identify districts and schools around the State where significant numbers of teachers do not meet HQT standards?

TEA Response:

Attachment 3 lists the percentage of highly qualified teachers for each LEA in the state for 2004-05. Attachment 4 lists the percentage of highly qualified teachers for each campus in the state for 2004-05.

USDE Criteria:

Does the analysis identify particular groups of teachers to which the State's plan must pay particular attention, such as special education teachers, mathematics or science teachers, or multi-subject teachers in rural schools?

TEA Response:

Based on 2004-05 data highly qualified teacher data, the following groups of teachers have the highest percentage of non-highly qualified teachers in the state and greatest needs for technical assistance.

- Secondary high minority school teachers (especially English, economics, science, arts, civics/government, and mathematics). See Table 1 above.
- Secondary high poverty school teachers (especially English, economics, arts, geography, history, and science). See Table 1 above.
- Attachment 3 also indicates that charter school teachers in general have lower percentages of highly qualified teachers. This is in part due to the state statute not requiring all charter school teachers to be fully certified or to have a Bachelor's degree.

Based on 2005-06 data that has not yet been validated, Secondary Special Education teachers in all core subject areas will also be a priority for the state.

Once the 2005-06 data are validated and the charter school and Special Education needs are identified more clearly, TEA will devise and implement additional strategies, by December 2006, to implement to meet the needs of these teachers.

USDE Criteria:

Does the analysis identify particular courses that are often taught by non-highly qualified teachers?

TEA Response:

Statewide the priority core academic subject areas are secondary foreign language, mathematics, geography, and science with 8.24%, 7.48%, 6.55%, and 6.49% of classes taught by non-highly qualified teachers respectively, in 2004-05 (Table 4). For campuses not meeting AYP, the priority areas include English, Reading/Language Arts, Mathematics, and History.

Table 4. Statewide Core Academic Subject Area Classes: 2004-05		
	Statewide Taught by Highly Qualified Teachers	Statewide Taught by Non-Highly Qualified Teachers
Elementary (one teacher equals one class)	97.71	2.29
Total Secondary (one section equals one class)	93.66	6.34
English	94.45	5.55
Reading/ Language Arts	93.60	6.40
Mathematics	92.52	7.48
Science	93.51	6.49
Foreign Language	91.76	8.24
Civics/Government	95.51	4.49
Economics	94.14	5.86
Arts (Music, Art, Dance, Theater)	95.21	4.79
History	94.07	5.93
Geography	93.44	6.34

Source: 2004-05 Highly Qualified Teacher Compliance Report, Revised 9-20-06.

When analyzing data to ensure that poor or minority children are not taught by inexperienced, unqualified, or out-of-field teachers at higher rates than are other children, the most significant gap between both poverty and minority quartiles is in English classes at the secondary level (Table 5). The gap at the elementary level is not significant between high- and low-poverty campuses, but is higher between high- and low-minority campuses.

Table 5. Percentage Gap Between Low Poverty/Minority and High Poverty/Minority Campuses: 2004-05		
	Gap Between Low and High Poverty	Gap Between Low and High Minority
Elementary (one teacher equals one class)	0.79	2.28
Total Secondary (one section equals one class)	2.85	3.43
English	5.40	4.50
Reading/Language Arts	1.22	2.72
Mathematics	1.51	3.39
Science	2.99	3.66
Foreign Language	0.33	2.82
Civics/Gov't	0.33	3.41
Economics	3.80	4.22
Arts (Music, Art, Dance, Theater)	3.38	3.57
History	3.00	3.10
Geography	3.00	1.59

Source: 2004-05 Highly Qualified Teacher Compliance Report, Revised 9-20-06.

Requirement 2: The revised plan must provide information on HQT status in each LEA and the steps the SEA will take to ensure that each LEA has plans in place to assist teachers who are not highly qualified to attain HQT status as quickly as possible.

USDE Criteria:

Does the plan identify LEAs that have not met annual measurable objectives for HQT?

TEA Response:

Attachment 3 lists the LEAs in Texas, in descending order of percentage of highly qualified teachers based on 2004-05 end-of-year HQT data, that were not meeting the 100% highly qualified teacher in each core academic subject area requirement. Attachment 4 lists campuses with the corresponding percentage of highly qualified teachers. LEAs have been required to develop and implement written teacher recruitment and retention (Teacher Quality) plans since September of 2003. This NCLB requirement has been reiterated over the past year in preparation for the end of the 2005-06 school year and the expected flexibility described in the Secretary's October 2005 and March 2006 letters.

USDE Criteria:

Does the plan include specific steps that will be taken by LEAs that have not met annual measurable objectives?

TEA Response:

TEA defines "not making progress toward the state's annual measurable objectives for two consecutive years" under the Section 2141 requirements as the following.

- The LEA's percent of highly qualified teachers is below 95%; or
- The LEA's percent of highly qualified teachers did not increase at least 5 percentage points per year and result in at least 80% of teachers being highly qualified.

This definition is expected to involve approximately 200 LEAs in Section 2141 activities. The actual list of LEAs will be identified publicly in October, 2006.

LEAs that have not made progress toward the state's annual measurable objectives for teacher quality for two consecutive years (under Section 2141 requirements) will be required to complete the state's Continuous Improvement Process currently in place under the Performance-Based Monitoring (PBM) system as part of the interventions required of LEAs. TEA monitoring and intervention activities have been designed to focus on a data-driven and performance-based system that utilizes a continuous improvement model. Activities reflect an emphasis on data integrity, data analysis, increased student performance, and improved program effectiveness. The system for TEA monitoring is referenced as the PBM system.

The PBM system reflects the use of graduated interventions based on LEA performance as evidenced by the Performance-Based Monitoring Analysis System (PBMA) indicators and, for the No Child Left Behind (NCLB) program, performance on a set of Initial Compliance Review (ICR) indicators conducted by the Division of NCLB Program Coordination. For each individual NCLB program area, results on program-area PBMA and ICR indicators and patterns across indicators are examined to determine required levels of intervention, including levels of compliance and/or performance review. The Interventions and Investigations unit of the Program Monitoring and Interventions Division develops and implements integrated program review processes for NCLB programs statewide that promote program effectiveness, improved student performance, and compliance with statutory requirements for students served by NCLB.

For LEAs identified as not meeting the Annual Measurable Objectives for Teacher Quality for two consecutive years under Section 2141, two processes will be required in the Continuous Improvement Planning process.

1. Focused Data Analysis--The purpose of the focused data analysis (FDA) is to work with stakeholders to gather, disaggregate, and analyze the LEA's highly qualified teacher data to determine possible causes for areas of concern and address identified issues in the Continuous Improvement Plan. The focused data analysis, as it pertains to highly qualified teachers data, will require the LEA to analyze the district's highly qualified teacher data to identify inequities between high- and low-poverty campuses and high- and low-minority campuses. The FDA will also identify priority subject areas and groups of teachers on the campuses that are not meeting highly qualified teacher requirements.
2. Continuous Improvement Plan--The purpose of this activity is to develop and implement a continuous improvement plan (CIP) which has integrated the LEA's decisions based on the results and findings of all required intervention activities. Districts will be required to address the highly qualified teacher needs identified in the focused data analysis, including any inequities and how the district will target subject areas and groups of teachers.

LEAs will receive technical assistance, on behalf of TEA, from the twenty regional Education Service Centers (ESCs). TEA will provide funding to the regional ESCs to provide the agreed upon technical assistance that is described below in Requirement 3. Additional information on the NCLB component of the PBM system is available at <http://www.tea.state.tx.us/pmi/nclbmon/2006/> or in Attachment 5.

USDE Criteria:

Does the plan delineate specific steps the SEA will take to ensure that all LEAs have plans in place to assist all non-HQ teachers to become HQ as quickly as possible?

TEA Response:

The TEA will conduct the following activities to ensure that the LEAs in the state have the applicable highly qualified teacher plans and are implementing the plans to assist any non-highly qualified teachers to become highly qualified as soon as possible.

1. The following assurances are certified by each LEA upon receipt of Title I, Part A and/or Title II, Part A application for funding.
 - a. The LEA will work in consultation with campuses as the campuses develop and implement their plans or activities under sections 1118 and 1119. [P.L. 107-110, Section 1112(c)(1)(H)].
 - b. The LEA will comply with the requirements of section 1119 regarding the qualifications of teachers and paraprofessionals and professional development. [P.L. 107-110, Section 1112(c)(1)(I)].
 - c. The LEA will ensure, through incentives for voluntary transfers, the provision of professional development, recruitment programs, or other effective strategies, that low-income students and minority students are not taught at higher rates than other students by unqualified, out-of-field, or inexperienced teachers. [P.L. 107-110, Section 1112(c)(1)(L)].
 - d. Teachers hired after the first day of school year 2002-2003, and teaching in a core academic subject area, must be highly qualified if teaching in a program supported with Title I, Part A funds. [P.L. 107-110, Section 1119(a)(1)].

- e. A plan has been developed to ensure that all teachers teaching in core academic subjects within the LEA are highly qualified not later than the end of the 2005-2006 school year. [P.L. 107-110, Section 1119(a)(3)].
 - f. The LEA will publicly report, each year, the annual progress of the LEA as a whole and of each of the Title I, Part A campuses, in meeting the following measurable objectives—
 - an annual increase in the percentage of highly qualified teachers at the LEA, to ensure that all teachers teaching in core academic subjects are highly qualified not later than the end of the 2005-2006 school year; and
 - an annual increase in the percentage of teachers who are receiving high-quality professional development to enable such teachers to become highly qualified and successful classroom teachers. [P.L. 107-110, Section 1119].
 - g. The principal of each Title I, Part A campus attests annually in writing as to whether such campus is in compliance with the requirements of section 1119. Copies of attestations are maintained at each Title I, Part A campus and at the main office of the LEA; and are available to any member of the general public on request. [P.L. 107-110, Section 1119(i)].
 - h. The LEA will use, unless a lesser amount is sufficient, not less than 5 percent, or more than 10 percent, of Title I, Part A funds for each of fiscal years 2002 and 2003, and not less than 5 percent of the funds for each subsequent fiscal year, for professional development activities to ensure that teachers who are not highly qualified become highly qualified not later than the end of the 2005-2006 school year, and paraprofessionals meet the requirements in section 1119. [P.L. 107-110, Section 1119(l)]
 - i. The LEA conducted an assessment of local needs for professional development and hiring as identified by LEA and school staff with the involvement of teachers, including teachers participating in Title I, Part A programs. [P.L. 107-110, Section 2122(c)(1) and (2)].
 - j. Based on the needs assessment, the LEA will target funds to schools within the LEA that (a) have the lowest proportion of highly qualified teachers; (b) have the largest average class size; or (c) are identified for school improvement under section 1116(b). [P.L. 107-110, Section 2122(b)(3)].
2. Stage 1 School Improvement Program (SIP) schools have a TEA-required administrative mentor as part of the state's school support program to schools identified for needing improvement. These mentors are required to review the campus' highly qualified plan and provide any necessary technical assistance in revising the plan as needed. Beginning with 2007-08, Title I SIP schools (Stage 2 and above) will be required to submit their campus teacher quality plans for TEA review in order to receive a grant award for the Title I School Improvement funding. TEA will then conduct a review of the plans and provide technical assistance to the campuses and LEAs as needed.
 3. TEA will require all districts that do not report 100% highly qualified teachers for 2005-06 to submit their district plans to the Agency within 60 days of notification. TEA will then conduct a review of the plans and provide technical assistance to the LEAs as needed. Staff will negotiate the plans with the LEA to ensure all requirements are addressed. Plans will be required to address the strategies and/or activities to ensure the following:
 - Increase the percentage of highly qualified core academic subject area teachers on each campus to meet 100% by end of 2006-07, or later if applicable exception for multi-subject Special Education teachers or multi-subject rural school teachers.

- Increase the percentage of core academic subject area classes taught by highly qualified teachers on each campus to meet 100% by end of 2006-07, or later if applicable exception.
- Increase the percentage of core academic subject area classes taught by highly qualified teachers on high poverty campuses to meet 100% by end of 2006-07, or later if applicable exception.
- Increase the percentage of teachers receiving high-quality professional development on each campus to meet 100% by end of 2006-07.
- Ensure low-income students and minority students are not taught at higher rates than other student groups by inexperienced, out-of-field, or non-highly qualified teachers.
- Attract and retain highly qualified teachers.
- Assist teachers not currently highly qualified to meet the highly qualified requirements in a timely manner.

In the event that an LEA fails to submit the required plan to TEA, TEA will place the LEA's Title II, Part A funding on hold until the plan is submitted as requested.

4. For 2006-07 and beyond, additional questions regarding the teacher quality plan will be added into the Highly Qualified Teacher Compliance Report that is submitted by each campus to TEA annually.

It is important to note that Texas is a local-control state and the LEA is responsible for determining highly qualified teacher status, documenting that status, and ensuring the implementation of the highly qualified teacher requirements. The LEA is responsible, not the state agency, for providing technical assistance to individual teachers to ensure the individual teacher meets the highly qualified teacher requirements. The LEA also has the option on not renewing such teacher's contract if the teacher fails to meet the contractual obligations. The state will ensure LEA plans are implemented and that the technical assistance to LEAs described below in Requirement 3 is implemented by the regional education service centers.

Response Amended June 1, 2007

Requirement 3: The revised plan must include information on the technical assistance, their HQT plans, particularly where large groups of teachers are not highly qualified, and the resources the LEAs will use to meet their HQT goals.

USDE Criteria:

Does the plan include a description of the technical assistance the SEA will provide to assist LEAs in successfully carrying out their HQT plans?

TEA Response:

In Texas, regional Education Service Centers (ESCs) have responsibility for providing technical assistance to school districts (Texas Education Code, Section 8.051) not the state Agency. Each ESC is governed by a board of seven directors and operates under rules implemented by the Commissioner of Education. TEA, through the Commissioner, has oversight of the operation and administration of the ESCs. The Commissioner evaluates the performance of each ESC annually.

TEA will provide technical assistance to LEAs through the twenty regional ESCs. The Agency funds staff at each ESC through the NCLB School Support program. This ESC staff provides technical assistance and training to all districts related to highly qualified teacher requirements. ESC staff will conduct proactive assistance to LEAs not meeting the 100% highly qualified requirement and will respond to all requests for assistance from LEAs. ESCs will be responsible for providing needs-based assistance to specifically target areas needing improvement by the LEA and/or campus. Each ESC will have the flexibility to implement a variety of approaches and methods for service delivery to include large group, small group, clusters, and one-on-one technical assistance, professional development, and/or distance learning.

TEA will provide the ESCs with the data on the districts within each ESC that have not met the highly qualified teacher requirement. ESCs will be asked to provide to TEA a plan for technical assistance to districts within the region based on the identified needs of the districts. The ESCs also be requested to provide documentation of technical assistance provided to LEAs.

Technical assistance will be provided by each ESC specifically related to the following indicators required to be included in the LEA teacher quality plans and implemented by LEAs not meeting the 100% highly qualified teacher requirement:

- Increasing the percent of highly qualified teachers;
- Increasing the percent of classes taught by highly qualified teachers;
- Increasing the percent of classes in high-poverty schools taught by highly qualified teachers;
- Increasing the percent of teachers receiving high-quality professional development;
- Increasing the percentage of highly qualified teachers on each campus to meet 100% by end of 2005-06, or later if the Rural or Special Education flexibility exceptions apply;
- Ensuring low-income students and minority students are not taught at higher rates than other student groups by teachers who are not highly qualified (equitable distribution plan);
- Attracting and retaining highly qualified teachers; and
- Assisting teachers not currently highly qualified to meet the highly qualified requirements in a timely manner.

ESCs will also continue to provide content and pedagogy training in the core academic subject areas for teachers not meeting the highly qualified requirements who are striving to complete the HOUSSE procedures by the end of the 2006-07 school year (as described in Requirement 5).

TEA staff will update the existing statewide training for Highly Qualified Teachers that currently is offered in all twenty regions to include a specific module of the teacher quality plan requirements and implementation. All ESC staff has previously been trained in the campus improvement planning process.

Under the provisions of Section 2141, the ESCs also will provide the statutorily required assistance to LEAs developing the LEA improvement plan using the PBM Continuous Improvement Planning process described in Requirement 2.

USDE Criteria:

Does the plan indicate that the staffing and professional development needs of schools that are not making AYP will be given high priority?

TEA Response:

As part of the assistance described above, TEA will provide to each ESC a list of LEAs not meeting AYP and not meeting the 100% highly qualified requirement. The ESCs will then prioritize technical assistance and professional development needs and/or requests to ensure that the needs of these targeted LEAs are met. Each ESC will provide documentation to TEA to ensure this priority group is served. Each ESC will provide professional development to districts on AYP requirements, Mathematics content and pedagogy strategies, Reading/Language Arts content and pedagogy, strategies for improving achievement for English Language Learners, and Special Education pedagogy in order to address the needs of campuses not meeting AYP.

In addition, Stage 1 School Improvement Program (SIP) schools have a TEA-required administrative mentor as part of the state's school support program to schools identified for needing improvement. These mentors will be required to review the campus' highly qualified plan and provide any necessary technical assistance in revising and implementing the plan as needed. Beginning with 2007-08, Title I SIP schools (Stage 2 and above) that do not have 100% of their teachers highly qualified will be required to submit their campus/district teacher quality plans for TEA review in order to receive a grant award for the Title I School Improvement funding. TEA will then conduct a review of the plans and provide technical assistance to the campuses and LEAs as needed.

Response Amended June 1, 2007

USDE Criteria:

Does the plan include a description of programs and services the SEA will provide to assist teachers and LEAs in successfully meeting HQT goals?

TEA Response:

TEA offers a variety of options for teachers to improve their content knowledge and skills in order to meet the core academic subject area competency requirement for demonstrating highly qualified teacher status. Teachers needing to meet this requirement to demonstrate highly qualified have the options of 1) using the HOUSSE procedures, 2) completing additional college coursework, or 3) adding additional subject area certifications.

Below are some examples of the various types of assistance and support provided by TEA and available to Texas teachers.

Certify by Examination

Under current State Board for Educator Certification rule, a teacher who holds an appropriate Texas classroom teaching certificate and a bachelor's degree may add classroom certification areas by successfully completing the appropriate certification examination(s) for the area(s) sought. Certification by examination is not available for:

- initial certification;
- career and technology certification based on skill and work experience;
- a class of certificate other than classroom teacher (e.g. School Counselor, Principal, Superintendent, Learning Resources/School Librarian, Educational Diagnostician);
- a certificate for which no certification examination has been developed.

Professional Development at Regional Education Service Centers

As indicated in the data analysis described in Requirement 1, many of the secondary teachers not meeting highly qualified requirements have needed additional training in the core academic subject area content knowledge. Over the past three years all ESCs have provided an abundance of training in the core academic subject areas. The ESCs will continue this core academic subject area content training through summer 2006 and beyond. ESCs also provide a variety of training in pedagogy to assist teachers.

Texas Teacher Quality Grant Program

Begun in 1985 as Title II of the Education for Economic Security Act (EESA), the Teacher Quality Grants Program is designed to support training and retention of elementary and secondary teachers. The Teacher Quality program was most recently reauthorized in 2002, funded under Title II, Part A of the No Child Left Behind (NCLB) Act (P.L. 107-110). The Act requires states to provide professional development activities in core academic subject areas in order to ensure that highly qualified teachers, paraprofessionals, and (where appropriate) principals, administrators and pupil services personnel have subject matter knowledge in the academic subjects they teach.

The Teacher Quality Grants Program represents one of the largest federal initiatives for using professional development to improve teaching and learning. The original intent of the Teacher Quality Grants Program was to support professional development activities in all core academic fields. However, because of the limits on funding for the higher education grants in Texas, and because of statewide needs, primary emphasis remains on the subjects of mathematics and science. Statewide needs are identified cooperatively with the TEA and the Texas Higher Education Coordinating Board (the state agency responsible for higher education) as required by state and federal statutes.

The specific purpose of the Teacher Quality Grants Program is to assist teachers and other staff to gain access to professional development, in core academic subjects, that:

- is sufficiently sustained, intensive, and of high quality to have a lasting and positive effect on the teachers' classroom performance;
- is tied to challenging state content standards and challenging state student performance standards;
- is integrated into the systemic reform efforts of states, school districts, and individual schools;
- reflects recent scientifically based research on teaching and learning;
- includes strong academic content and content-specific pedagogical elements;
- incorporates activities and effective strategies for serving historically underserved and underrepresented populations to promote learning and career advancements; and

- is part of the everyday life of the school and creates an orientation toward continuous improvement throughout the school.

The projects are comprised of an intensive summer component (2-4 weeks) focusing primarily on content and an academic year component blending content and discipline-related pedagogy. By statute, project partnerships must include a faculty member from an Arts and Science department or college, a faculty member from an education department or college and a high-needs school district. The faculty can be associated with a two- or four-year, public or private accredited higher education institution. The LEA must meet the poverty threshold established through census data and also have a high percentage of teachers teaching out of field. Financial and programmatic contributions by participating school districts, non-public schools, other private organizations, and the sponsoring higher education institution are encouraged.

Seventy-two projects have been recommended for funding for the 2006-2007 grant year. The awards are approximately \$85,000 each and total approximately \$5.9 million. Of the proposed projects, 25 are recommended for funding to Hispanic-serving institutions (approximately 35 percent) and three to Historically Black Colleges or Universities. In addition, 25 of the recommended projects will be awarded to independent colleges or universities, and four will be awarded to community college partners. In terms of subject areas, the recommended projects were nearly evenly divided between mathematics (38) and science (34). The projects serve both rural and urban school districts and are located in every area of the state to assist with equitable access by teachers.

Teacher Advancement Program (TAP)

The Teacher Advancement Program is focused on attracting, retaining, developing and motivating talented people to the teaching profession. TAP's goal is to draw more talented people to the teaching profession—and keep them there—by making it more attractive and rewarding to be a teacher. TAP provides the opportunity for good teachers to earn higher salaries and advance professionally, just as in other careers, without leaving the classroom. At the same time, TAP helps teachers become the best they can be, by giving them opportunities to learn better teaching strategies and holding them accountable for their performance.

TAP is based on four elements:

(1) Multiple Career Paths—TAP allows teachers to pursue a variety of positions throughout their careers—career, mentor and master teacher—depending upon their interests, abilities and accomplishments. As they move up the ranks, their qualifications, roles and responsibilities increase and thus, so does their compensation. This allows good teachers to advance without having to leave the classroom.

(2) Ongoing, Applied Professional Growth—TAP restructures the school schedule to provide time during the regular school day for teachers to meet, learn, plan, mentor and share with other teachers, so they can constantly improve the quality of their instruction and hence, increase their students' academic achievement. This collaborative time allows teachers to learn new instructional strategies and have greater opportunity to become more effective teachers. Ongoing Applied Professional Growth in TAP schools focuses on identified needs based on instructional issues that specific teachers face with specific students. Teachers use data to target these areas of need, instead of trying to implement the latest fad in professional development.

(3) Instructionally Focused Accountability—TAP has developed a comprehensive system for evaluating teachers and rewards them for how well they teach their students. Teachers are held accountable for

meeting the *TAP Teaching Skills, Knowledge and Responsibility Standards*, as well as for the academic growth of their students.

(4) *Performance-Based Compensation*—TAP changes the current system by compensating teachers according to their roles and responsibilities, their performance in the classroom, and the performance of their students. The new system also encourages districts to offer competitive salaries to those who teach in "hard-to-staff" subjects and schools. By combining these elements in an effective strategy for reform, TAP is working to turn teaching from a revolving-door profession into a highly rewarding career choice. The real reward will be the outstanding education available to each and every student in the country.

The University of Texas System is managing the Texas Teacher Advancement Program on behalf of the Texas Education Agency.

New Teacher Project

The Texas New Teacher Project (TNTP) creates and implements high-quality alternate routes to certification to attract and prepare exceptionally talented people from non-traditional backgrounds to teach, particularly for high need areas and hard-to-staff schools. They offer high-need certified teacher recruitment programs to help school systems address specific needs and vacancies in shortage area subjects such as math, science, and special education.

The New Teacher Project, or Texas Teaching Fellows (as the program is called in Texas), enter into strategic partnerships with school districts to focus on Human Resource reforms that increase the efficiency and effectiveness of hiring processes. The focus is on improving teacher recruitment, selection, placement, pre-service training, and program administration, beginning with a thorough analysis of current efforts. The New Teacher Project staff makes recommendations and works with existing staff to implement those recommendations, building the school district or state's capacity to recruit and develop excellent new teachers for years to come.

The program staff design and implement innovative rural recruitment programs for states with large rural areas that face challenges attracting high-quality teachers. TNTP has helped coordinate the recruitment and hiring efforts of widely scattered rural districts to maximize their ability to draw new teachers to their schools. They develop innovative training and certification programs for high-achieving individuals with or without prior education backgrounds.

In all partnerships, the Texas Teaching Fellows work with individual school districts to create programs that best meet their specific needs. The New Teacher Project brings expertise gained through recruiting, selecting, training and supporting more than 13,000 new teachers in school districts across the country.

The UT System is managing the New Teacher Project in Texas on behalf of the Texas Education Agency.

Teach for America

Teach for America is the national corps of outstanding recent college graduates of all academic majors who commit two years to teach in urban and rural public schools, and become lifelong leaders in the effort to expand educational opportunity. Their mission is to build the movement to eliminate educational inequity by enlisting some of our nation's most promising future leaders in the effort.

TFA teachers go above and beyond to ensure that more students growing up today in our nation's lowest income communities have the educational opportunities they deserve. In the long run, TFA teachers build

a force of leaders with the insight and credibility that comes from having taught in a low-income community. They work from education and from every other sector to effect the fundamental changes needed to ensure that all children have an equal chance in life.

The UT System is managing the TEA-funded portion of the Teach for America program in Texas.

Transition to Teaching Program

To address the existing shortage of certified, high-quality teachers, there is a national movement called “transition to teaching” where mid-career professionals are attracted from their current places of employment to enter the teaching profession. These individuals are trained through rigorous, effective alternative certification programs and then mentored through their first two years of teaching by highly-successful veteran teachers. The transition teachers are prepared for the teacher certification examination and receive ongoing applied professional development throughout their two-year induction program. There is a high level of interest in the state of Texas to replicate these “transition to teaching” models.

The UT System is managing the Transition to Teaching programs on behalf of the Texas Education Agency. In addition, the UT System will be charged with developing relationships between large corporations, such as IBM, with the ultimate goal of replicating these “transition to teaching” programs in Texas. The focus is on secondary math and science teachers; however, other teacher shortage areas also may be explored.

Texas Beginning Educator Support System (TxBESS)

“Teachers do not enter the classroom as finished products. Most teachers who remain in the profession improve and grow over time. When they first enter the classroom, new teachers do not possess all the knowledge and skills they will need to become highly effective, but with experience, practice, assistance and training, novices can become better teachers.¹” TxBESS began in 1999, as an initiative of the State Board for Educator Certification (SBEC), as a comprehensive induction program that has proven to be highly effective in retaining Texas teachers; serving approximately 10,000 beginning teachers in over three-hundred school districts.

Beginning teachers, teachers new to a district and/or assignment, mentor teachers, principals, district administrators, the Community, and students all benefit from the systemic initiative to support beginning teachers. The standards-based trainings, including mentoring, professional development, and formative assessment are included in a complete kit of training materials for trainers, mentors, principals, district administrators, school board members, campus and district mentor coordinators, and beginning teachers.

TxBESS is economically feasible—teacher attrition is costly and has a negative impact on student achievement. The research-based program complies with federal requirements in NCLB and focuses on instruction and improving student achievement. It is extremely flexible and can be adapted to meet local needs, including assisting teachers in improving content knowledge and skills.

Evaluation reports on the TxBESS program are available at <http://www.sbec.state.tx.us/SBECOnline/txbess/evalrpt.asp>.

¹ Educational Testing Service “*Education Issues 2004*” p22. (<http://ftp.ets.org/pub/corp/candbrief2004.pdf>)

USDE Criteria:

Does the plan specifically address the needs of any subgroups of teachers identified in Requirement 1?

TEA Response:

The teacher quality initiatives described above are specifically designed to meet the state's needs in shortage areas of teachers in mathematics, science, and special education. These initiatives will continue to be implemented and will specifically address the needs identified in the data analysis contained in Requirement 1 in the areas of mathematics, science, and addressing issues for hard-to-staff teachers in high poverty, high minority, and rural school districts. Additional strategies to meet the needs identified in Requirement 1 are contained in the state's equity plan which is attached to this revised plan as a separate document (Attachment 6).

USDE Criteria:

Does the plan include a description of how the State will use its available funds (e.g., Title I, Part A; Title II, Part A, including the portion that goes to the State agency for higher education; other Federal and State funds, as appropriate) to address the needs of teachers who are not highly qualified?

TEA Response:

State level NCLB administrative funds will continue to be expended to implement the teacher initiatives described above. In addition, Title I, Part A state-level activity funds and NCLB consolidated administrative funds are used to fund technical assistance and professional development opportunities provided by the twenty regional education service centers described in Requirements 2 and 3. The ESCs will focus content area professional development in the core academic subject areas of mathematics, science, English, Reading/Language Arts, the social sciences, and other core subject areas identified in each regional area as priorities. LEAs will be required to provide assistance to teachers not highly qualified in any of these core academic subject areas. The SAHE portion of the Title II, Part A funds continues to fund the Texas Teacher Quality Grant Program, which will continue to focus on the areas of mathematics and science. Title II, Part B—Math Science Partnership funds are used to implement initiatives in science and mathematics to improve content knowledge and pedagogy skills of teachers, especially those teaching out-of-field or not fully certified or qualified in the content areas.

In addition, House Bill 1 of the 79th Legislature, 3rd Called Session, added Subchapters N and O, Chapter 21, to the Texas Education Code. Subchapter N establishes a teacher incentive program for high poverty campuses with high levels of achievement and improvement. This program will be funded at \$100 million in FY 2007, 2008, and 2009. Seventy-five percent (75%) of the funds provide teachers who have had the biggest impact on student achievement with financial awards. The remaining 25% of the funds may be used to reward other campus staff and leadership, teacher mentoring, and research-based professional development. Funds from this program must also be used on evaluation of the program.

Subchapter O establishes a teacher incentive program that provides funding to any district that wants to establish a local teacher incentive program. This program is funded at \$840 multiplied by the number of classroom teachers for FY 2008 and \$1000 multiplied by the number of classroom teachers in FY 2009. Sixty percent (60%) of the funds from this program must be used by districts to create incentive plans to reward educators, principals, and other school staff. Forty percent (40%) of the funding from this program

may be used for additional programs such as teacher stipends, principal awards, teacher mentoring and implementing components of the Teacher Advancement Program.

Section 21.458 of the Education Code allows each school district to assign a mentor teacher to each classroom teacher with less than two years teaching experience. Teacher mentors must 1) teach in the same school; 2) teach the same subject or grade level as applicable (to the extent practicable); and 3) meet qualifications as determined by the commissioner. The commissioner is required to adopt rules to administer the program, including rules addressing the qualifications and duties of teacher mentors. Rules must include the following requirements for teacher mentors:

1. completion of a research-based mentor and induction training program approved by the commissioner;
2. completion of a mentor training program provided by the district; and
3. have at least three complete years of teaching experience and a superior history of improving student performance.

The program provides appropriate funding to school districts to fund mentor teacher stipends, additional meeting time for mentors and teachers, and mentor training. Districts must use the funds provided for mentor teacher stipends, scheduled time for mentors to work with teachers and mentoring support through mentor trainers.

These new incentive programs will support the state in encouraging all teachers on high-poverty schools to become highly qualified in order to improve student achievement and be eligible for the incentive programs. The mentoring program supports campuses with large numbers of beginning and inexperienced teachers in order to ensure that poverty and minority students are not taught by higher percentages of inexperienced, out-of-field, and non-highly qualified teachers than other groups of students.

USDE Criteria:

Does the plan for the use of available funds indicate that priority will be given to the staffing and professional development needs of schools that are not making AYP?

TEA Response:

Schools not meeting AYP are eligible for and will benefit from the local teacher incentive and mentoring programs. In addition to the initiatives identified above which meet the needs of many campuses not meeting AYP, TEA will ensure that any additional discretionary state-level funding for teacher quality initiatives target LEAs not meeting AYP and not meeting the annual measurable objectives for teacher quality. Many of these schools already meet the criteria for participation in the initiatives previously listed and benefit from those state-funded programs.

In addition, Stage 1 School Improvement Program (SIP) schools, beginning in September 2006, have a TEA-required administrative mentor as part of the state's school support program to schools identified for needing improvement. These mentors are required to review the campus' highly qualified plan and provide any necessary technical assistance in revising and implementing the plan as needed. Part of this review of the plan and mentoring program includes addressing professional development needs of staff on the school improvement campus (which has not met AYP for two or more consecutive years).

Requirement 4: The revised plan must describe how the SEA will work with LEAs that fail to reach the 100 percent HQT goal by the end of the 2006-07 school year.

USDE Criteria:

Does the plan indicate how the SEA will monitor LEA compliance with the LEAs' HQT plans described in Requirement 2 and hold LEAs accountable for fulfilling their plans?

TEA Response:

In addition to the review of LEA teacher quality plans described under Requirement 2, TEA will continue to monitor NCLB program compliance, including highly qualified teacher requirements, through the Performance-Based Monitoring (PBM) system which includes the NCLB Compliance component of the Performance-Based Monitoring Analysis System (PBMAS).

The PBM system reflects the use of graduated interventions based on local education agency (LEA) performance as evidenced by PBMAS indicators and, for the NCLB program, performance on a set of Initial Compliance Review (ICR) desk audit indicators conducted by the Division of NCLB Program Coordination. For each individual NCLB program area, results on program-area PBMAS and ICR indicators and patterns across indicators are examined to determine required levels of intervention, including levels of compliance and/or performance review. The Interventions and Investigations unit of the Program Monitoring and Interventions Division develops and implements integrated program review processes for NCLB programs statewide that promote program effectiveness, improved student performance, and compliance with statutory requirements for students served by NCLB.

For consistency in monitoring processes, highly qualified teacher requirements will continue to be monitored through this compliance system. District and campus Highly Qualified Teacher Compliance Reports will be reviewed and validated for completeness and accuracy. Additional desk audit indicators related to highly qualified requirements and the highly qualified teacher plans will be added to the PBMAS system. Consistent with the process to be implemented under Section 2141, LEAs identified as not meeting the Annual Measurable Objectives for Teacher Quality will be required to implement two processes in the Continuous Improvement Planning process.

1. Focused Data Analysis--The purpose of the focused data analysis (FDA) is to work with stakeholders to gather, disaggregate, and analyze the LEA's highly qualified teacher data to determine possible causes for areas of concern and address identified issues in the Continuous Improvement Plan. The focused data analysis, as it pertains to highly qualified teachers data, will require the LEA to analyze the district's highly qualified teacher data to identify inequities between high- and low-poverty campuses and high- and low-minority campuses. The FDA will also identify priority subject areas and groups of teachers on the campuses that are not meeting highly qualified teacher requirements.
2. Continuous Improvement Plan--The purpose of this activity is to develop and implement a continuous improvement plan (CIP) which has integrated the LEA's decisions based on the results and findings of all required intervention activities. Districts will be required to address the highly qualified teacher needs identified in the focused data analysis, including any inequities and how the district will target subject areas and groups of teachers.

ESC staff will monitor implementation of the district's highly qualified teacher plans and provide continuous assistance and feedback to districts. ESCs will provide documentation to TEA regarding the implementation of the plans.

Beginning with school year 2007-08, this continuous improvement process will be required to be implemented by any LEA in any year that the LEA did not report 100% highly qualified teachers in the core academic subject areas and the CIP will be required to be submitted to the Texas Education Agency for review by December 15th of the following school year. For example, if an LEA does not meet the 100% highly qualified requirement by the end of the 2006-07 school year, the plan submitted to TEA by December 15, 2007, and the continuous improvement planning process must be implemented during the 2007-08 school year.

Any LEA who has not met the 100% highly qualified teacher requirement and subsequently subject to the Section 2141 interventions, solely due to teachers who are eligible for the multi-subject new special education teacher or multi-subject rural teacher flexibility, will not be required to submit the interventions to the Agency by the December deadline for review. The interventions will be maintained locally and made available to the Agency upon request.

Response Amended June 1, 2007

USDE Criteria:

Does the plan show how technical assistance from the SEA to help LEAs meet the 100 percent HQT goal will be targeted toward LEAs and schools that are not making AYP?

TEA Response:

TEA will provide technical assistance through the twenty regional ESCs to LEAs that have not met the 100% highly qualified requirement and are not making AYP. Technical assistance and professional development will be needs-based to specifically target areas needing improvement by the LEA and/or campus. Each ESC will have the flexibility to implement a variety of approaches and methods for service delivery to include large group, small group, clusters, and one-on-one technical assistance, professional development, and/or distance learning. As indicated in the data analysis described in Requirement 1, many of the secondary teachers not meeting highly qualified requirements have needed additional training in the core academic subject area content knowledge. All ESCs will continue to provide content area knowledge and skill training in the core academic subject areas. The ESCs also will provide a variety of training in pedagogy to assist teachers.

TEA will provide to each ESC a list of LEAs not meeting AYP and not meeting the 100% highly qualified teacher requirement. The ESCs will then prioritize technical assistance and professional development needs and/or requests to ensure that the needs of the targeted LEAs are met. Each ESC will provide documentation to TEA to ensure this priority group is served.

TEA staff will update the existing statewide training for Highly Qualified Teachers that currently is offered in all twenty regions to include a specific module of the teacher quality plan requirements and implementation. All the ESC staff has been trained in the campus improvement planning process.

USDE Criteria:

Does the plan describe how the SEA will monitor whether LEAs attain 100 percent HQT in each LEA and school:

- in the percentage of highly qualified teachers at each LEA and school; and
- in the percentage of teachers who are receiving high-quality professional development to enable such teachers to become highly qualified and successful classroom teachers?

TEA Response:

TEA will continue to collect data on highly qualified teachers through the automated Highly Qualified Teacher Compliance Reporting System. Data are collected on high quality professional development in the Title I, Part A Compliance Reporting System. Both sets of data will be monitored on an annual basis as part of the Initial Compliance Review (desk audit) portion of the NCLB Compliance Component of PBMAS previously described.

USDE Criteria:

Consistent with ESEA §2141, does the plan include technical assistance or corrective actions that the SEA will apply if LEAs fail to meet HQT and AYP goals?

TEA Response:

Under the provisions of Section 2141, the ESCs also will provide the statutorily required assistance to LEAs developing the LEA improvement plans, or agreements, using the PBM Continuous Improvement Planning process. TEA will require the implementation of this process for 1) any LEA being required to implement the Section 2141 requirements for not meeting the annual measurable objectives and AYP, as applicable, and 2) any LEA not meeting the 100% highly qualified teacher and professional development requirements.

School year 2006-07 will be the first year of implementation of Section 2141 requirements. LEAs that have not made progress toward the state's annual measurable objectives for teacher quality for two consecutive years (under Section 2141 requirements) will be required to complete the state's Continuous Improvement Process currently in place under the Performance-Based Monitoring (PBM) system as part of the interventions required of LEAs. TEA monitoring and intervention (corrective action) activities have been designed to focus on a data-driven and performance-based system that utilizes a continuous improvement model. Activities reflect an emphasis on data integrity, data analysis, increased student performance, and improved program effectiveness. The system for TEA monitoring is referenced as the PBM system.

The PBM system reflects the use of graduated interventions (corrective actions) based on LEA performance as evidenced by the Performance-Based Monitoring Analysis System (PBMAS) indicators and, for the No Child Left Behind (NCLB) program, performance on a set of Initial Compliance Review (ICR) indicators conducted by the Division of NCLB Program Coordination. For each individual NCLB program area, results on program-area PBMAS and ICR indicators and patterns across indicators are examined to determine required levels of intervention, including levels of compliance and/or performance review. The Interventions and Investigations unit of the Program Monitoring and Interventions Division develops and implements integrated program review processes for NCLB programs statewide that promote program effectiveness, improved student performance, and compliance with statutory requirements for students served by NCLB.

For LEAs identified as not meeting the Annual Measurable Objectives for Teacher Quality for two consecutive years under Section 2141, two processes will be required in the Continuous Improvement Planning process.

1. Focused Data Analysis--The purpose of the focused data analysis (FDA) is to work with stakeholders to gather, disaggregate, and analyze the LEA's highly qualified teacher data to determine possible causes for areas of concern and address identified issues in the Continuous Improvement Plan. The focused data analysis, as it pertains to highly qualified teachers data, will require the LEA to analyze the district's highly qualified teacher data to identify inequities between high- and low-poverty campuses and high- and low-minority campuses. The FDA will also identify priority subject areas and groups of teachers on the campuses that are not meeting highly qualified teacher requirements.
2. Continuous Improvement Plan--The purpose of this activity is to develop and implement a continuous improvement plan (CIP) which has integrated the LEA's decisions based on the results and findings of all required intervention activities. Districts will be required to address the highly qualified teacher needs identified in the focused data analysis, including any inequities and how the district will target subject areas and groups of teachers.

Beginning in school year 2007-08, for LEAs failing to make progress for three consecutive years and not meeting AYP, the TEA will implement the corrective actions required by statute.

1. LEAs will be required to implement Accountability Agreements with TEA and jointly develop professional development program
2. TEA will require professional development to meet the needs of the campuses
3. TEA will provide Title II, Part A funds directly to campuses to meet identified needs
4. TEA will prohibit LEAs from hiring additional paraprofessional FTEs

LEAs will receive technical assistance, on behalf of TEA, from the twenty regional Education Service Centers (ESCs). TEA has provided funding to the regional ESCs to provide the agreed upon technical assistance that is described above in Requirement 3. In addition, the ESCs already provide technical assistance to campuses not meeting AYP and will continue to do so. Additional information on the general NCLB component of the PBM system is available at <http://www.tea.state.tx.us/pmi/nclbmon/2006/> or in Attachment 5.

Requirement 5: The revised plan must explain how and when the SEA will complete the HOUSSE process for teachers not new to the profession who were hired prior to the end of the 2005-06 school year, and how the SEA will limit the use of HOUSSE procedures for teachers hired after the end of the 2005-06 school year to multi-subject secondary teachers in rural schools eligible for additional flexibility, and multi-subject special education who are highly qualified in language arts, mathematics, or science at the time of hire.

TEA does not believe that this requirement is reflective of the statutory intent of NCLB, and may adversely impact large numbers of teachers who are certified but assigned out-of-field in order to meet school district needs pursuant to their teaching contracts.

USDE Criteria:

Does the plan describe how and when the SEA will complete the HOUSSE process for all teachers not new to the profession who were hired before the end of the 2005-06 school year?

TEA Response:

TEA will require all experienced (not new to the profession) teachers who were hired before the end of the 2005-06 school year (which includes summer school offered as part of the 2005-06 school year) to complete the HOUSSE procedures for determining highly qualified teacher status in their current teaching assignments by June 1, 2007, or the last day of student instruction of the Spring term 2007, whichever is later. Any experienced teacher currently in process of demonstrating subject matter competency using a HOUSSE procedure must also complete the HOUSSE procedures by June 1, 2007, or the last day of student instruction of the Spring term 2007, whichever is later. This additional year will provide incentive and opportunity for teachers to complete any impending professional development or college coursework needed to complete their highly qualified teacher status using HOUSSE as well as allow additional time to pass content area assessments.

Experienced teachers who were eligible to implement HOUSSE procedures during the 2006-07 school year may document any highly qualified teacher determinations using HOUSSE options at any such time while HOUSSE options exist in federal statute. All activities to count as points in such HOUSSE options must have been completed by June 1, 2007, or the last day of student instruction of the Spring term 2007, whichever is later.

Response Amended June 1, 2007

USDE Criteria:

Does the plan describe how the State will limit the use of HOUSSE after the end of the 2005-06 school year to the following situations:

- Multi-subject secondary teachers in rural schools who, if HQ in one subject at the time of hire, may use HOUSSE to demonstrate competence in additional subjects within three years of the date of hire; or
- Multi-subject special education teachers who are new to the profession, if HQ in language arts, mathematics, or science at the time of hire, may use HOUSSE to demonstrate competence in additional subjects within two years of the date of hire.

TEA Response:

While any teacher previously determined to be highly qualified using HOUSSE procedures will continue to be considered highly qualified in the same core academic subject area, the Agency feel it is important to ensure teachers have the greatest flexibility available.

After the completion of the HOUSSE process described above by the end of the 2006-07 school year for experienced (not new to the profession) teachers who were hired before the end of the 2005-06 school year, HOUSSE procedures will be approved only for the following reasons when implemented as described in TEA's *Guidance for Implementation of NCLB Highly Qualified Teacher Requirements* posted on the TEA web site at <http://www.tea.state.tx.us/nclb/hqteachers.html>.

1. Multi-subject secondary teachers in eligible rural schools who, if highly qualified in one subject at the time of hire, may use HOUSSE to demonstrate competence in additional subjects within three years of the date of hire.
2. Multi-subject special education teachers who are new to the profession, if highly qualified in language arts, mathematics, or science at the time of hire, may use HOUSSE to demonstrate competence in additional subjects within two years of the date of hire.
3. Visiting international teachers, who participate in foreign teacher exchange programs officially recognized by the State Board for Educator Certification and the Texas Education Agency, may use HOUSSE for a period not to exceed three years. These visiting international exchange teachers may implement HOUSSE as described in TEA's *Guidance for Implementation of NCLB Highly Qualified Teacher Requirements* posted on the TEA web site at <http://www.tea.state.tx.us/nclb/hqteachers.html>.
4. Any experienced (not new to the profession) secondary teacher who was eligible to use the HOUSSE option prior to the end of the 2006-07 school year, who has demonstrated highly qualified status in their teaching assignment and is subsequently asked or required to add or change teaching assignments may use HOUSSE to demonstrate highly qualified teacher status in the new assignment. This use of HOUSSE will be phased out by the end of the 2008-09 school year.

Because Texas teacher contracts routinely contain provisions allowing teachers to be assigned as needed, many experienced teachers are subject to assignment at-will, often with short notice prior to or during the school year. Texas is a "right to work" state, with no collective bargaining. Accordingly, unlike other states, teachers in Texas do not negotiate union contracts which address issues like assignment. TEA will add data elements to the 2007-08 and 2008-09 Highly Qualified Teacher Compliance Report to monitor the use of this HOUSSE option for teachers required to add or change assignments.

5. Any experienced secondary teacher teaching a foreign language in which the state does not currently have both written and oral teacher certification exams may use HOUSSE to demonstrate highly qualified teacher status. This use of HOUSSE will be phased out as additional written and oral certification exams are developed and implemented. TEA will add data elements to the 2007-08 and beyond Highly Qualified Teacher Compliance Report to monitor the use of this HOUSSE option for foreign language teachers.
6. Any experienced secondary teacher may continue to use HOUSSE to demonstrate subject matter competency for mathematics or science for determining highly qualified teacher status. This HOUSSE option will phase out by the end of the 2012-2013 school year.
7. Any experienced teacher documented as highly qualified by an LEA and subsequently determined to not be highly qualified by the original method by TEA during the highly qualified teacher validation process; but determined by TEA to be highly qualified by using HOUSSE options may be documented by the LEA as highly qualified as determined by TEA.

Response Amended April 10, 2007; June 1, 2007

Requirement 6: The revised plan must include a copy of the State’s written “equity plan” for ensuring that poor or minority children are not taught by inexperienced, unqualified, or out-of-field teachers at higher rates than are other children.

USDE Criteria:

Does the revised plan include a written equity plan?

TEA Response:

Texas’ Plan for Equitable Distribution of Highly Qualified Teachers to ensure that poor or minority students are not taught at disproportionate rates than other children by inexperienced, unqualified, or out-of-field teachers is attached as a separate document (Attachment 6). The attached state plan will serve as a framework for LEAs to revise their local Teacher Quality Plans and ensure that all core academic subject area teachers are highly qualified by the end of the 2006-07 school year. LEAs will be required to revise and implement their plans at the local level during the upcoming school year. Attachment 1, the *Texas Strategic Plan to Address the Teacher Shortage*, the state’s long-range plan for addressing several related issues, also supports the attached plan

USDE Criteria:

Does the plan identify where inequities in teacher assignment exist?

Does the plan delineate specific strategies for addressing inequities in teacher assignment?

TEA Response:

Specific strategies in seven areas are identified in the plan (Attachment 6). The “Targeted Subject or Group” identified in the right-hand column align to the priority needs (or inequities) identified in the data analysis section addressed in the introduction to the plan.

USDE Criteria:

Does the plan provide evidence for the probable success of the strategies it includes?

TEA Response:

The strategies and resources included in the plan have proven records of success for increasing the number of certified teachers in the state and providing programs that have improved the knowledge and skills of teachers. As the number of newly certified teachers in the state increases, the number of highly qualified teachers in the state will also increase since any new teacher certified in their assignment also is highly qualified. Evaluation reports of some of the strategies are included in the equity plan. Additionally, TEA guidance and monitoring of LEA plans will ensure that strategies are being implemented. TEA’s collection and analysis of data will reflect whether progress is being made. The strategies being continued have demonstrated success in the past and it is expected for this success to continue. The state has increased it’s percentage of highly qualified teachers and classes each year with the implementation of these strategies and the continued implementation will assist the state in meeting the goal of 100% of all core academic subject area teachers being highly qualified.

USDE Criteria:

Does the plan indicate that the SEA will examine the issue of equitable teacher assignment when it monitors LEAs, and how this will be done?

TEA Response:

TEA will incorporate indicators related to equitable distribution of teachers into the Initial Compliance Review desk audit that is used for determining NCLB compliance and interventions in the PBM system described in Requirement 2 and contained in Attachment 5. The indicators will annually review the data reported in the Highly Qualified Teacher Compliance Report comparing high/low poverty campuses and high/low minority campuses. TEA will implement an additional criteria of "LEAs not meeting 100% highly qualified teachers for two consecutive years" when determining on-site visits of LEAs. On-site visits to LEAs, by ESCs, TEA, or TEA designees, may be implemented to review highly qualified teacher data and provide additional technical assistance. The monitoring of equitable assignments is specifically addressed in section 7 of the plan.