

The Honorable Jill Druesedow, Chair
State Board for Educator Certification
1701 North Congress Avenue
Austin, Texas 78701

September 30, 2019

**Re: Proposal for adding new factors to the definition of “good cause” for contract abandonment in Texas
Administrative Code §249.17(d)**

Dear Chair Druesedow and Members of the State Board for Educator Certification:

We are writing to comment on Agenda Item 11, the proposed addition to the “good cause” definition that gives SBEC the discretion to determine good cause for contract abandonment based on the specific facts presented in any given case on behalf of the following organizations:

- Fast Growth School Coalition (FGSC)
- Texas Association of Community Schools (TACS)
- Texas Association of Latino Administrators and Superintendents (TALAS)
- Texas Association of Mid-Size Schools (TAMS)
- Texas Association of School Administrators (TASA)
- Texas Association of School Boards (TASB)
- Texas Association of School Personnel Administrators (TASPA)
- Texas Elementary Principals and Supervisors Association (TEPSA)
- Texas School Alliance (TSA)
- Texas Urban Council (TUC)

Collectively, our organizations represent school administrators and school board trustees in small, rural, mid-size, suburban, and urban school districts. We all have serious concerns about the proposed addition to the good cause factors that may be considered when an educator is reported to have abandoned a contract, specifically with **§249.17(d)(1)(F)** which would allow a consideration to include “any other relevant circumstances or facts.” We see this factor to be so broad that it negates all other specified factors as good cause. Also, mitigating factors that may be considered when an educator has abandoned a contract are clearly outlined in §249.17(d)(2) which appears to conflict with the vagueness in the proposed §249.17(d)(1)(F).

We urge you to **strike §249.17(d)(1)(F) any other relevant circumstances or facts** from the proposed rule. Thank you for considering our recommendations. Please feel free to contact Casey McCreary, Associate Executive Director Education Policy, TASA with any questions at cmccreary@tasanet.org or 512-791-1263.

