



**Texas Association of School Boards**  
P.O. Box 400 • Austin, Texas 78767-0400 • 512.467.0222  
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*Serving Texas Schools Since 1949*



October 16, 2019

The Honorable Mike Morath  
Commissioner of Education  
Texas Education Agency  
William B. Travis Building 1701  
N. Congress Avenue Austin,  
Texas 78701

RE: Proposed rule changes to 19 Texas Administrative Code sections 97.1061, .1063-.1064.

Dear Commissioner Morath:

On behalf of the Texas Association of School Boards (TASB) and the Texas Association of School Administrators (TASA) and the memberships of both organizations, we submit these comments on the proposed rules at 19 Texas Administrative Code sections 97.1061, .1063-.1064 concerning interventions and sanctions for campuses, campus intervention teams, and campus turnaround plans. Our specific comments and recommendations are as follows:

**§97.1061(h)** The proposed rule requiring a CIT to remain in place for a two-year period after a campus has met standard following a prior year's unacceptable rating applies a one-size-fits-all approach that does not consider a campus that has had a CIT for a one-year period and that is ready to move forward without a CIT by utilizing its staff and resources to sustain improvements. We recommend striking "for a two-year period" in the proposed rule.

**§97.1063(b)(2)** The proposed rule requiring a campus principal's direct supervisor be a CIT member if the coordinator of school improvement is not the principal's direct supervisor is unnecessary. The organizational structure of an individual school district should be determined at the district level and not dictated at the state level. We recommend striking this proposed rule in its entirety.

**§97.1064(a)** It is unclear what is deemed an "unacceptable" campus in this section of proposed rule. Texas Education Code section 39.054 states that an F is the only rating assigned the label of unacceptable, whereas a rating of A, B, C, or D are deemed acceptable. We assert that the term "unacceptable" should apply only to an F-rated campus. Please clarify what is deemed unacceptable for this proposed rule.



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**§97.1064(k)** It is unclear what is deemed an “acceptable” campus in this proposed rule. Texas Education Code section 39.054 states that an F is the only rating assigned the label of unacceptable. Please clarify what is deemed unacceptable for this section of proposed rule.

We appreciate the opportunity to provide comments on the proposed rules related to sanctions and interventions.

Sincerely,

Joy Surratt Baskin  
Director, Legal Services  
Texas Association of School Boards

Casey McCreary, Ed.D.  
Associate Executive Director, Education Policy  
Texas Association of School Administrators