



Adopting District of Innovation Status Would Harm Houston ISD Students and Teachers

**TLEEC Letter Against Houston ISD Adopting District of Innovation Status
Submitted to the Houston Independent School District's District Advisory Committee, November 14, 2023**

Dear Chair Chapman, Chair Barretto Milligan, and Members of the District Advisory Committee:

The Texas Legislative Education Equity Coalition (TLEEC) is a statewide collaborative of more than 30 organizations and individuals with the mission to improve the quality of public education for all children, with a focus on racial equity. We advocate at the local, state, and national levels for high-quality teaching, curriculum and instructional practices, and bilingual education for emergent bilingual students, as well as fair funding and enhanced college access and success. TLEEC has serious concerns about the District's proposal to adopt a district of innovation (DOI) plan in light of the undemocratic and inequitable state takeover initiated earlier this year.

Adopting District of Innovation Status Would Erode Accountability

Because the State has fired the District's democratically elected board of trustees and installed its own hand-picked board of managers, District leadership has indefinite power over policies and practices that have an immeasurable impact on the lives of students, families, and educators without any mechanism for holding the TEA or the District's appointed board of managers accountable (ACLU, 2023; Wilson & Latham Sikes, 2020). Adopting DOI status would further erode accountability and authentic family and community engagement by allowing District leadership to cherry pick the laws and policies it will comply with, allowing the District to opt out of critical state laws that protect the rights and opportunities of students and educators.

Proposed Exemptions Undermine Safeguards for Students

We are deeply concerned that the District will utilize DOI status to double down on practices that have been proven to fail students and diminish their educational opportunity. DOI status would allow the district to exempt itself from requirements on teacher certification, class size, and bilingual education, in addition to policies on discipline and parental notification. Many of these policies protect students and their families and help ensure that schools provide the learning environment necessary for all students to thrive.

Research has shown, for example, that in Texas, 87 percent of DOIs took exemptions allowing them to waive teacher certification requirements and 44 percent claimed exemptions to minimum class sizes and

maximum student teacher ratios (Guthery & Richards, 2020). Unfortunately, the District appears to be poised to continue this trend. For example, although research has shown strong associations between teacher preparation and certification and student outcomes (Cardichon et al., 2020; Guthery & Richards, 2020), the District’s proposed DOI plan includes seeking exemption from Texas Education Code 21.003 in order to “hire teachers ... who do not hold a certification” (HISD, 2023). As has been the case at some schools under the New Education System (Lehrer-Small, 2023), continuing to replace highly trained and certified educators with uncertified classroom teachers would be detrimental to student success. Students thrive when they have access to small class sizes and highly trained, certified teachers. Allowing Houston ISD to opt out of state education laws without meaningful accountability or authentic family and community engagement in creating the DOI plan will harm students.

The Democratic Process and Community Collaboration are Essential

Although the DOI plan was developed locally, it was not done in a democratic or transparent process. The plan was approved only after the superintendent and the board appointed an additional 40 members to the District Advisory Committee after previous attempts at adopting DOI status failed due to a lack of votes to approve the initiative. Additionally, each of the five District Advisory Committee members that also served on the DOI committee was appointed to the District Advisory Committee by the board; none of these five members are HISD employees with insights into the specific needs and concerns of the students attending and the educators serving the community. We believe any plan to change the District’s status must incorporate feedback and collaboration from the students and families it serves (IDRA, n.d.).

Recommendations

Voting to adopt district of innovation status would harm the learning of tens of thousands of students across Houston, especially underserved students of color and low-income students who stand to be enrolled in the schools that would be most impacted by this change. Instead, TLEEC makes the following recommendations:

- Do not adopt district of innovation status and, instead, uphold provisions in the Texas Education Code that provide legal safeguards for students and that are positively linked to student outcomes, such as teacher certification and limitations on class size.
- Adopt an equity-centered approach that includes authentic family and community engagement in making any changes that will affect the children enrolled in the district.

TLEEC thanks this committee for consideration of our letter and urges the committee to vote against adopting district of innovation status.

For questions, please contact TLEEC either through Dr. Chloe Latham Sikes at IDRA (chloe.sikes@idra.org), Jaime Puente at Every Texan (puente@everytexan.org), or Paige Duggins-Clay, J.D. at IDRA (paige.duggins-clay@idra.org).

The Texas Legislative Education Equity Coalition (TLEEC) is a collaborative of organizations and individuals with the mission to improve the quality of public education for all children, with a focus on racial equity. The coalition convenes organizations and individuals who advocate in the interest of public school students at the local, state and national levels.

TLEEC Member Organizations

ARISE Adelante
Austin Justice Coalition
Big Thought
Breakthrough Central Texas
Coalition of Texans with Disabilities (CTD)
Dr. Hector P. García G.I. Forum
Easterseals Central Texas
Educators in Solidarity
Ethnic Studies Network of Texas (ESNTX)
Every Texan
Houston Community Voices for Public Education
IDRA (Intercultural Development Research Association)
Measure
McNeil Educational Foundation for Ecumenical Leadership
Mexican American Civil Rights Institute (MACRI)
Mexican American Legal Defense and Educational Fund
(MALDEF)
Mexican American School Boards Association (MASBA)

National Association for Chicana and Chicano Studies (NACCS)
– Tejas Foco
San Antonio Hispanic Chamber of Commerce
Texas American Federation of Teachers
Texas Association for Bilingual Education (TABE)
Texas Association for Chicanos in Higher Education (TACHE)
Texas Association of Diversity Officers in Higher Education
(TADOHE)
Texas Association of Mexican American Chambers of
Commerce (TAMACC)
Texas Center for Education Policy, University of Texas – Austin
Texas Hispanics Organized for Political Education (HOPE)
Texas League of United Latin American Citizens (LULAC)
Texas NAACP
Texas State Teachers Association (TSTA)
The Arc of Texas

Other Signatories:

Houston Education Association/TSTA (Texas State Teachers
Association)
Latino Texas Policy Center

Resources

- ACLU. (2023, March 31). Correspondence to U.S. Department of Justice, Civil Rights Division regarding Houston ISD Complaint. https://www.aclutx.org/sites/default/files/aclutx_complaint_-_texas_education_agency_redacted.pdf
- Cardichon, J., Darling-Hammond, L., Yang, M., Scott, C., Shields, P. M., & Burns, D. *Inequitable Opportunity to Learn Student Access to Certified and Experienced Teachers*. Learning Policy Institute. https://learningpolicyinstitute.org/sites/default/files/product-files/CRDC_Teacher_Access_REPORT.pdf
- Guthery, S., & Richards, M.P. (2020). The Expansion of Exemption: Texas' Districts of Innovation. *Texas Education Review*, 8(2), 80-86. <http://dx.doi.org/10.26153/tsw/9201>
- HISD. (2023). *A District of Innovation*. <https://www.houstonisd.org/cms/lib2/TX01001591/Centricity/shared/pdfs/HISD-District-of-Innovation-Plan-11-06-23-DRAFT.pdf>
- IDRA. (n.d.). *Family Engagement: Online Technical Assistance Toolkit*. <https://www.idra.org/support/family-engagement-online-technical-assistance-toolkit/>
- Lehrer-Small, A. (2023, October 26). Exclusive: Houston ISD Replaced Half of Employees this Year at Overhauled Schools. Houston Landing. <https://houstonlanding.org/exclusive-houston-isd-replaced-half-of-employees-this-year-at-overhauled-schools/>
- Wilson, T., & Latham Sikes, C. (2020). Another Zero-Tolerance Failure –State Takeovers of School Districts Don't Work. IDRA. <https://www.idra.org/resource-center/another-zero-tolerance-failure-state-takeovers-of-school-districts-dont-work-issue-brief/>