

January 12, 2026

To: Texas Education Agency

Re: [Proposed Repeal and New Rules for 19 TAC Chapter 150, Commissioner's Rules Concerning Educator Appraisal and Teacher Incentive Allotment](#)

To Commissioner Morath and the Texas Education Agency,

The Commit Partnership, Educate Texas, and the 9 undersigned organizations thank you for the opportunity to submit public comment concerning the proposed repeal of 19 TAC §§150.1012–150.1014 and proposed new §§150.1041–150.1043 related to educator appraisal and the Teacher Incentive Allotment (TIA) systems, as published in the Texas Register on December 12, 2025.

TIA was created to achieve two core objectives: strengthening and stabilizing an effective teacher workforce while improving student outcomes statewide. By providing an accessible pathway for educators to earn six-figure salaries without leaving the classroom, TIA positions Texas as a national leader in education. In just six years, 42,294 teachers have earned a designation, serving more than 4.5 million students across TIA districts; meaning over two-thirds of Texas public school students are enrolled in a TIA-designated district.¹ TIA was also intentionally designed to address the persistent recruitment and retention challenges faced by rural and high-needs districts, helping to close opportunity gaps and improve outcomes for all students. Reflecting this intent, 63% of rural districts and 74% of high-needs districts statewide now participate in TIA.² Additionally, TIA-designated teachers remain as teachers within the same district at far higher rates than non-designated teachers.³

We greatly appreciate the agency's leadership in proposing rules that implement House Bill 2 (89R), and that reflect the continued evolution of TIA to better support strategic compensation, educator effectiveness, comprehensive strategic staffing, and student outcomes across Texas school districts. In particular, we commend TEA for consolidating and clarifying provisions related to local optional teacher designation systems and for establishing a framework to support enhanced teacher incentive allotment systems aligned with Texas Education Code §§21.3521 and 48.112.

We are incredibly supportive of several elements of the proposed rules, including updates to performance standards that broaden access to designations, and adjustments to the system renewal fee structure that better account for district size and rural status, meeting the legislative intent of supporting these school districts. Collectively, these changes have the potential to reduce administrative burden while strengthening the integrity and reach of high-quality teacher designation systems statewide which will continue to reduce district barriers to system implementation and allow more students to attend a TIA-designated district.

As districts work to implement both local and enhanced TIA systems, clarity and coherence across rule language will be critical to ensuring consistent implementation and access for educators and school systems. To that end, we respectfully offer the following considerations for the agency's review:

- I. The proposed new rule §150.1041(b) clarifies teacher designation eligibility requirements to account for the new designation "acknowledged" and adds a redesignation provision for master teachers whose designation is set to expire within one year.

¹ [Teacher Incentive Allotment Annual Report](#); TEA (2025).

² [Teacher Incentive Allotment Annual Report](#); TEA (2025).

³ [Teacher Incentive Allotment Annual Report](#); TEA (2025).

As currently drafted, the provision lacks sufficient clarity regarding the redesignation process, particularly for teachers holding a master designation. While we appreciate that the proposed provision allows additional time for master teachers to redesignate, potentially preventing a lapse in designation, further clarification is needed. We respectfully request greater specificity around the timelines and processes for redesignation for teachers approaching the expiration of their designation. Ongoing uncertainty around redesignation risks weakening confidence in the designation system and limiting its role in retaining highly effective teachers.

We thank you for the opportunity to provide input on these proposed rules and for the continued commitment to strengthening educator pipelines and compensation systems across the state. We appreciate the agency's thoughtful approach to implementing statutory changes in a manner that supports districts, recognizes educator excellence, and advances positive outcomes for Texas students.

Sincerely,

Bridget Worley
Chief State Impact Officer
The Commit Partnership

Supporting Organizations/Institutions:

