

Comanche ISD

District of Innovation Plan

August 2022-July 2027

During the 84th Legislative session HB 1842 was created to give public school district some local control in certain areas. Comanche ISD is opting to use HB 1842 to establish a District of Innovation Plan to help Comanche ISD students, staff, parents, and the community.

Beginning August 1, 2022 Comanche ISD will exercise this authority to exempt itself from the following State requirements for a five-year period. This plan may be amended by the District of Innovation committee with the approval from the Board of Trustees.

Probationary Contracts (TEC 21.102)(TEC 21.102 (c)) (DCA LEGAL)

Current law: For experienced teachers new to the district, the probationary period may not exceed one year if the person has been employed as a teacher in public education for at least five of the previous eight years.

Plan: The period of time referenced above is not sufficient to evaluate the teacher's effectiveness in the classroom. Teacher contract timelines demand that employment decisions be made prior to state assessment results. Therefore, at the discretion of the district, Comanche ISD may issue a probationary contract to an employee that meets the criteria of teaching in a Texas public school for five of the previous eight years.

Kindergarten – Grade 4 Class Size (TEC 25.112a-g) (TEC 25.113a-b) (EEB LEGAL)

Current law: TEC §25.112 requires districts to maintain a class size of 22 students or less for Kindergarten – 4th Grade classes.

Plan: Although this will not be a Comanche ISD best practice, we plan to use the flexibility of having more than 22 students in a classroom without applying for a waiver when students move into the district. This will allow Comanche ISD time to remedy the overcrowded classroom in a timely manner.

Uniform School Calendar (TEC 25.0811) (TEC 25.0812) (EB LEGAL) (EB LOCAL)

Current law: Texas Education Code Section 25.0811 states that a school district may not begin instruction before the fourth Monday in August. Texas Education Code Section 25.0812 states that a school district may not schedule the last day of school before May 15.

Plan: Flexibility of the beginning and ending of school dates allows the district to better meet the needs of the students, staff, and community of Comanche ISD. This exemption allows for student holidays to be put in place where some of our populations travel.

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Certification Required (TEC 21.003) (DBA LEGAL) (DBA LOCAL) TEC 21.003

Current law: Texas Education code states that “a person may not be employed as a teacher, teacher intern or teacher trainee, librarian, educational aide, administrator, educational diagnostician, or school counselor by a school district unless the person holds an appropriate certificate or permit issued as provided by Subchapter B.”

Plan: The current certification requirements inhibit the district’s ability to hire professionals with industry experience to teach Career and Technical Education (CATE). Comanche ISD plans to hire persons with industry experience or a 2-year degree in the event a certified teacher cannot be secured for a CTE position.

Due to current teacher shortages, the hiring of persons with a 4-year degree who are NOT appropriately certified through SBEC may be necessary in a variety of teaching fields. If a candidate fitting this description is hired, it is the responsibility of the candidate to show verification of enrollment in an alternative teaching certification program during the first semester of employment. Furthermore, the candidate must be certified within one calendar year of employment. Thus, transferring the certificate of employment from being carried locally to being carried by the certifying program. This type of exception will not be granted positions that are governed by federal guidelines, such as Special Education or Bilingual teachers. Comanche ISD plans to hire certified teachers when they are available and proven to be a viable candidate.

The campus principal and superintendent will do extensive research on each person’s expertise and credentials, and only as a last resort, recommend to the school board the individual be hired on a local certificate rather than a contract.

Attendance for Class Credit or Final Grade (TEC 25.092)

Current law: TEC 25.092 regulates the seat time for class credit.

Plan: With innovative ways for students to learn through virtual classroom opportunities, we will seek an exemption from the 90% “seat time” attendance rule as set forth in this code. This will lift barriers for learners who wish to engage in service-learning opportunities and for learners to have time to pursue potential career passions.

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Contract Service Days (TEC §21.401)

Current law: State law currently requires educators employed on a 10-month contract to provide a minimum of 187 days of service.

Plan: Comanche ISD plans to reduce the number of teacher days from 187 to 183 with no effect on annual teacher salaries. With teacher retention and recruitment a high priority, we feel this will give our current teachers a morale boost and encourage professional recruitment for Comanche ISD.

Inter-district Transfers (FDA Legal, Local) (Ed. Code 25.036)

Current law: a district may choose to accept, as transfers, students who are not entitled to enroll in a district. A transfer is interpreted to be for a period of one school year. Comanche ISD maintains a transfer policy under FDA (local) requiring non-resident students wishing to transfer to file a transfer application each school year. In approving transfer requests, the availability of space and instructional staff, availability of programs and services, the student's disciplinary history records, and attendance are also evaluated.

Plan: Comanche ISD is seeking to eliminate the provision of a one year commitment in accepting transfer applicants. On rare occasions, student behavior warrants suspension (in or out of school), placement in a disciplinary alternative program, or expulsion. In addition, student attendance may fall below the TEA truancy standard. In these rare cases, Comanche ISD seeks exemption from the one year transfer. Nonresident students who have been accepted as inter-district transfer may have such transfer status revoked by the Superintendent at any time during the year if the student is assigned discipline consequences of suspension (in or out of school), placement in a disciplinary alternative program, or expulsion. Additionally, students not meeting the State's 90% attendance standard may also be subject to immediate revocation of the transfer status.

Instructional Plan (Ed. Code 26.0062)

Current law: Under current law, each school district must post on the district's website at the beginning of each semester an instructional plan or course syllabus for each class offered in the district for that semester. The policy would require each teacher to provide to district administration and to the parent of each student enrolled in the class such an instructional plan or syllabus before the beginning of each semester for each class for which the teacher provides instruction.

Plan: Comanche ISD is committed to supporting all efforts of each campus to involve parents and community members as active participants in the education of Comanche ISD students. The District strives to support the actions of our teachers and other instructional staff as they develop curriculum and effective instructional strategies.

Because teachers use data-driven instruction aligned with student mastery of the Texas Essential Knowledge and Skills (TEKS), instructional plans are regularly adjusted to support student learning. Teacher autonomy to modify instruction based on real-time data and effective strategies does not align with publishing a fixed, comprehensive semester-long plan. Comanche ISD will not adopt a policy or create a

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requirement for its teachers to post at the beginning of each semester an instructional plan or course syllabus for each class offered in the District. However, Comanche ISD will ensure that course overviews are available at the request of parents or guardians.

Grievance Policy (Ed. Code 26A.001, 26.011, and 26A.002)

Current Law: The Texas Education Code and the Texas Constitution requires school boards to establish procedures for parents to file complaints if they believe their student's rights have been denied.

Under current law, each board of trustees must develop grievance procedures in accordance with Section 26A.001 of the Texas Education Code. Section 26A.001(g) requires each school district to adopt a standardized complaint policy and to annually submit a report to the Texas Education Agency on grievances filed in the district. The report must include the resolution and corrective action of each grievance filed.

Current law further requires a policy allowing 60 calendar days for a parent to file a grievance from the date on which the parent or person knew or had reason to know of the facts giving rise to the grievance. If the parent engaged in informal attempts to resolve the grievance, the parent could have 90 calendar days to file a grievance. State law further requires that such complaints be heard within ten calendar days of the complaint being filed. Moreover, in contradiction of existing law in the Texas Government Code, the recently adopted provisions in the Education Code would allow the person bringing the complaint to decide if it is heard in open or closed session, rather than the person against whom the complaint is brought.

Plan: Comanche has always and will continue to adhere to an established grievance policy with procedures and timelines outlined in Board policy. Such policies ensure thorough documentation of each step in the grievance process and provide adequate time for complaints to be filed and for complaints to be heard. All records related to grievances—including submitted forms, communications, investigations, findings, resolutions, and any corrective actions—are systematically maintained at the district level to ensure transparency, accountability, and compliance with legal and policy standards. The District is committed to monitoring the legality and appropriateness of every decision and action taken. The District is further committed to hearing, reviewing, and attempting to resolve all parent complaints, as well as to taking corrective action, where appropriate. Comanche ISD's long-standing grievance policy will ensure that all such complaints are carefully reviewed and that district responses are in alignment with state and federal regulations, as well as all other local board policies.

Comanche ISD follows established grievance procedures as outlined in district policy, specifically in relation to the timelines for filing an appeal prior to Texas Education Code §26.002 and for hearing such complaints. The district believes that a requirement for complaints to be submitted within 15 school business days from the date the student or parent either knew, or with reasonable diligence should have known, of the decision or action that is the subject of the grievance ensures prompt attention and resolution of parent concerns. In cases where the student or parent does not receive the requested relief at the prior grievance level, or if the response deadline has passed without a reply, the parent may proceed by requesting a conference with the Superintendent or the Superintendent's designee to appeal the previous decision. This appeal

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must be submitted in writing, using the district-provided form, within ten school business days of receiving the written response from Level One or Level Two. If no written response is provided, the appeal must be submitted within ten days following the deadline for the response at the applicable level. Accuracy of information and access to individuals that are needed to provide necessary information surrounding an issue could be compromised after 60 to 90 days. It is imperative that grievances and complaints are filed in a timely manner to ensure the best prompt response.

Parental Access to Student Library Records (Ed. Code 33.024)

Current Law: Under current law, each school district using a learning management system or an online learning portal shall, through the system portal, provide to each parent of a child enrolled in the district or school a record of each time the parent's child checks out or otherwise uses a library book or other reference material. The record must include, as applicable, the title, author, genre, and return date of the library material.

Plan: Comanche ISD will support all campuses by involving the parents and community members as active participants in the education of District students. Comanche ISD does not currently use a learning management system or online portal with the capability to automatically track and share records of student library checkouts. However, parents or guardians who wish to receive this information may request it from the school librarian, who will provide an electronic copy of their child's library checkout history via email. Because the District does not have systems in place capable of tracking and generating such reports for each student enrolled in the District, for each book a child checks out, for every visit to the school library, Comanche ISD will not provide each parent a record of each time the parent's child checks out or otherwise uses a library book or other library material.

Local School Library Advisory Council (Ed. Code 33.025)

Current Law: Current law requires the school district to establish a School Library Advisory Council at any campus where either 10% of parents or 50 parents (whichever is fewer) submit a written request for such a council. The council must include at least five members, with a majority being parents of currently enrolled students who are not employed by the district. The council is tasked with reviewing library materials, providing input on the selection and removal of resources, making recommendations to ensure materials are age-appropriate and aligned with community values, reviewing all books and other material objected to by any District parent, and advising on such objections. The law also requires districts to notify parents of their right to request council formation and to maintain transparency through open meetings, public records, and timely reporting of council activities and decisions.

Plan: Comanche ISD encourages and supports all campus efforts to involve District parents and community members as active participants in the education of Comanche students. Comanche ISD will be exempted from Texas Education Code §33.025, which mandates the creation of a School Library Advisory Council upon petition by 10% of parents or 50 parents. The District believes this requirement is redundant and unnecessary, as Comanche ISD already has strong,

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board-approved procedures in place for selecting, reviewing, and reconsidering library materials—led by certified librarians and educators and aligned with state-mandated requirements and guidance from the Texas Education Agency. Creating such advisory councils risks undermining the professional judgment of educators and librarians, introduces the judgment of non-certified individuals, introduces potential for politicization of instructional resources, and could very easily lead to inconsistency across campuses. Furthermore, the statute presents an administrative burden, requiring staff time and resources that would be better directed toward student learning and support. Comanche ISD’s existing processes already allow for meaningful parental review and involvement, including access to their child’s library checkout records if requested, formal challenge procedures, and transparency in material selection. In addition, concerned individuals may also speak with teachers, administration, and/or the school board through District complaint processes and/or during the open forum of any regularly scheduled board meeting. The District remains committed to ensuring age-appropriate and educationally sound resources while maintaining an efficient and effective oversight structure that includes educator expertise and parent input, without the disruption and/or duplication caused by the statutory requirements in §33.025.

Acquisition of Library Materials (Ed. Code 33.026)

Current Law: Current law outlines specific procedures school districts must follow before acquiring library materials. The law requires that materials be reviewed and approved in advance by a certified school librarian and be verified for compliance with age-appropriateness, educational suitability, and community standards. Additionally, it mandates a multi-step vetting process, documentation of acquisition decisions, and the public posting of selected materials before they are made available to students.

Plan: Comanche ISD will be exempt from this statutory provision because the District already has robust, board-approved policies, implemented by certified librarians in place that govern the acquisition of library materials in a manner that ensures transparency, appropriateness, and educational value. These policies and procedures are fully compliant with the standards required by Texas law and guidance from the Texas Education Agency. The statutory process under §33.026 introduces redundant and restrictive requirements that may delay access to timely instructional and enrichment resources. It also places bureaucratic barriers in front of trained library professionals who are certified to select age-appropriate, curriculum-aligned materials, that are consistent with standards set by Texas law. Additionally, the public pre-approval requirement undermines the expertise of certified school educators and creates delay and roadblocks in getting library materials to students who benefit from them. Furthermore, the mandated documentation process creates an administrative burden that consumes time and resources better allocated to instructional support. While Comanche ISD fully supports transparency and parental engagement in the school library process, the rigid requirements of TEC §33.026 are unnecessary and duplicative of local safeguards already in place. This exemption allows Comanche ISD to preserve instructional flexibility, uphold librarian professionalism, and provide students with timely access to enriching and appropriate materials—without compromising accountability or community trust.

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