Commerce ISD
District of Innovation Plan (HB 1842)
2026-2031

Commerce ISD is utilizing HB 1842, of the 84th Legislative Session, in order to have more local control in certain areas. HB 1842 allows a traditional public school to have some of the same local flexibility that public charter schools have always been allowed. We feel this is a great opportunity for our local district to tailor plans based on the needs of our students and community.

This plan will be in effect for the 2026-2027 school year through the 2030-2031 school year. This plan may be amended at any time by the committee with approval of the Board of Trustees.

District Innovation Team

1. Steve Drummond, Superintendent
2. Patricia Tremmel, Ed.D, Assistant Superintendent
3. Barbara Peden, Director of Finance
4. Mike Pope, Director of Human Resources & Special Programs
5. Andrea Ellis, PhD., Director of CTE
6. Nicki Dawson, Director of Health Services
7. Jeanie Putman, District Coordinator of School Improvement, DEIC Coordinator
8. Kodi Wright, Elementary Principal
9. Rachel Copeland, Intermediate Principal
10. Mike Starling, Middle School Principal
11. Jenna O'Neal, High School Principal
12. Jamie Oglesby, Elementary School Teacher
13. Margaret London, Intermediate School Teacher
14. Jean Hamrick, Middle School Teacher
15. Katie Richie, High School Teacher
16. Kelly Zimmerman, Parent/Business Representative
17. Maria Ramirez, Parent/Business Owner

District of Innovation Renewal Timeline

Wednesday, June 17th - 2:00 p.m., Administration Office
Principal meeting to discuss the DOI Review Process

Monday, June 22nd & *Wednesday, June 24th - 3:45 p.m., Administration Office
DOI committee meets to review the draft DOI plan for 2026-2031
*Public meeting

Thursday, June 25- Posted final version of the Proposed plan available on Commerce ISD website

Tuesday, July 28, 2026 - 9:00am., Board Room
Board of Trustees approves the 2026-2031 District of Innovation plan

Wednesday, July 29, 2026
Notify the Commissioner of approval of the Plan along with the list of approved TEC exemptions.
Post the final approved plan on the District website.
Provide a copy of [link to] to the current local innovation plan to the Texas Education Agency for posting on the agency website
Update all policy changes with TASB if needed

1. School start date & Last day of School

(TEC 25.0811)(TEC 25.0812) (EB LEGAL)

TEC §25.0811 states that a school district may not begin student instruction before the 4 th Monday of August.

TEC §25.0812 states that a school district may not schedule the last day of school for students for a school year before May 15.

Currently
Students may not begin school before the 4th Monday of August. For many years this was the rule, however, districts had the option of applying for a waiver to start earlier. The vast majority of districts applied for the waiver and would begin the 3rd Monday, some even going as early as the 2nd Monday.

The Texas tourism groups lobbied to have this stopped because they believed it was hurting their tourism business. Therefore, several years ago the legislature took away all waivers and dictated that districts may not begin until the 4th Monday, with no exceptions.

Innovation Plan
To allow for a calendar that fits the local needs of our community, emphasize active learning, college & career readiness, and social and emotional needs of students, Commerce ISD will:

a. Provide flexibility to begin instruction earlier and develop a school calendar that meets the needs of the district.

a) This will enable Commerce ISD to improve active learning by balancing the amount of instructional time in each semester and allow the first and second semesters to be closer in the number of days of instruction

b) This will allow teachers to better pace and deliver instruction before and after the winter break.

b. Commerce ISD students will begin instruction no earlier than the 2nd Monday of August.

c. The District will set the last day of school as necessary to ensure the total number of required minutes per school year are met.

d. Better align dual credit and college calendars.

e. Target a goal to improve the district attendance rate and student success through the flexibility in the calendar.

2. Submitting waivers for Pre-Kindergarten – Grade 4 class size

(TEC 25.111) (TEC 25.112) (TEC 25.113) (EEB LEGAL)

TEC §25.111 requires that districts employ a sufficient number of teachers certified to maintain an average ratio of not less than one teacher for each 20 students in average daily attendance except as provided by §25.112.

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

TEC §25.113 requires districts to notify parents of waivers or exemptions to class size limits.

Currently

Kindergarten – 4th Grade classes are to be kept at a 22 student to 1 teacher ratio according to state law. When a class exceeds this limit, the district must complete a waiver with the Texas Education Agency. These waivers are never rejected by TEA. This is a bureaucratic step that serves no purpose.

Along with the waiver, it is required that a letter is sent home to each parent in the section that exceeds the 22:1 ratio, informing them the waiver has been submitted. Many times soon after the waiver is submitted, students move out of the district and we are below the 22:1 ratio.

Innovation Plan

It is the philosophy of Commerce ISD that lower class sizes have a positive impact on Kindergarten -4th grade students and the district does not seek to unilaterally create higher class sizes. We believe, however, that appropriate class sizes can be monitored and maintained at the

local level without the necessity of waivers from the Texas Education Agency.

a. Hiring decisions will be based on projected 22:1 ratios.

b. Commerce ISD will, to the extent possible, begin each school year with enough teachers to establish a homeroom student to teacher ratio of 22:1 per Pre-Kindergarten-4 homeroom class. In the event that any class size exceeds this ratio during the school year, the superintendent will report this information to the Board of Trustees and to the parents of the affected students.

c. In the event that two or more core classrooms in any given grade level (grades Pre-Kindergarten -4) reaches 25:1 during the first grading period of the year, the District will actively seek an additional teacher.

d. A teacher may be hired at any time during the school year if the Superintendent determines it to be in the best interest of the students to do so.

e.The goal of the District is to keep the 22:1 ratio, with the flexibility to exceed the cap to adjust to growth and budget expenditures.

f. A TEA waiver will not be filed when a Pre-Kindergarten-4th classroom exceeds the 22:1 ratio.

3. Teacher and Principal Evaluation

(TEC 21.203) (TEC 21.351) (TEC 21.352) (DNA LEGAL, DNA LOCAL)

TEC §21.203- dictates that school district employment policies must require a written evaluation of every teacher at least annually. Furthermore, school boards are required to review the most recent evaluations before making any decisions regarding the non-renewal of a teacher's contract.
TEC §21.351- is the state statute mandating the creation and implementation of a recommended teacher appraisal process and performance criteria. It requires the state commissioner of education to establish guidelines for evaluating classroom teachers, which must include objective, performance-based data.
TEC §21.352- A teacher who is appraised less frequently than annually must be appraised at least once during each period of five school years.

Currently
The employment policies adopted by the board must require a written evaluation of each teacher at annual or more frequent intervals.

A teacher appraisal must be done at least once for each school year. A teacher may be appraised less frequently if the teacher agrees in writing and the teacher's most recent evaluation rated the teacher as at least proficient, or the equivalent, and did not identify any area of deficiency. A teacher who is appraised less frequently than annually must be appraised at least once during each period of three school years.

Principals are evaluated annually on a locally developed plan.

Innovation Plan
Commerce ISD will utilize the T-TESS for classroom teachers.

a. A minimum of 50% of a campus's teachers must be formally evaluated every year.

b. All Teacher Incentive Allotment eligible teachers will be formally evaluated annually as required by the district TIA plan.

c. All teachers will have an annual summative conference to discuss the year and to set classroom goals and a staff development plan.

d. Commerce ISD will have the option of local control to modify Appraise Less Frequently Than Annually.

e. Principals will continue to be evaluated annually on a locally developed plan.

e. These locally developed plans should reflect the strengths, areas of concern, and goals for Commerce ISD.

4. Teacher certification

(DK LEGAL, DK LOCAL, DK EXHIBIT, TEC 21.003a)

TEC §21.003(a) states that a person may not be employed as a teacher by a school district unless the person holds an appropriate certificate or permit issued by the appropriate state agency.

Currently
A public school employee must have the appropriate credentials for his or her current assignment specified in 19 Administrative Code Chapter 231, Requirements for Public School Personnel Assignments, unless the appropriate permit has been issued under Chapter 230, Subchapter F, Permits.

If a district assigns an inappropriately certified or uncertified teacher to the same classroom for more than 30 consecutive instructional days during the same school year, it shall provide written notice of the assignment to the parents or guardians of each student in that classroom.

In the event a district cannot locate a certified teacher for a position or a teacher is teaching a subject outside of their certification, the district must request emergency certification from the Texas Education Agency and/or State Board of Educator Certification. TEA then approves or denies this request. This system is burdensome and does not take into account the unique financial and/or instructional needs of the district..

Innovation Plan

Commerce ISD, in compliance with House Bill 2 Texas Education Code 21.0032, has established a structured and data-driven approach for reducing the number of uncertified teachers hired in the district. This plan will be fully implemented by the 2029-2030 school year.

Commerce ISD will make every attempt to employ individuals who hold the appropriate certification for posted vacancies.

a. In order to best serve CISD students, decisions on certification will be handled locally. This will allow more flexibility in our scheduling and more options for our students in class offerings. Parents will be notified if a locally certified teacher is employed for their child's class.
b. The campus principal may submit to the superintendent or designee a request to allow a certified teacher to teach one certified area in a related field for which he/she is not certified.
    a) The principal must specify in writing the reason for the request and document what credentials the certified teacher possesses which qualify this individual to teach this subject/field of study.
    b) Emergency or financial situations creating the need for this assignment should also be noted.
c. When possible, lesson plans for the uncertified teacher will be created in partnership with certified teachers in the same field.
d. Commerce ISD will allow District Teaching Permits (local certification) based on skills and experiences outside the traditional teacher certification pathway.

    a) An individual with certain qualifications who is not certified as a teacher can be eligible to teach in hard to fill positions including, but not limited to, TEA approved shortage areas such as mathematics, science, Languages Other than English (LOTE), Career & Technical Education (CTE), dual credit instructors, STEM/STEAM (Science, Technology, Engineering, Arts & Mathematics), etc. The Superintendent will report this action to the Board of Trustees prior to the individual beginning any employment.

    b) A person seeking District Teaching Permit (local certification) should have the abilities and related knowledge/experience to fulfill the requirements of the position.

c) The principal may submit to the superintendent and/or the superintendent's designee, a request for District Teaching Permit (local certification) outlining all the individual's credentials and qualifications.

d) Qualifications that may be considered include but are not limited to:

i. Professional work experience

ii. Formal training and education

iii. Active professional relevant industry certification or registration

iv. Combination of work experience, training, and education

v. Demonstration of successful experience working with students.

e) The superintendent or his/her designee will then approve the request if they believe the individual possesses the knowledge, skills and experience required of the position and feel the individual could be an asset to students.

f) Determinations shall be made on a case-by-case basis.

e. For grades k-12, in all subjects except Pre-kindergarten, Special Education, and ESL/Bilingual, the campus principal may recommend a candidate for a classroom instructor position in the event that they are unable to fill a vacant position with a certified teacher. Staff hired under this exemption would be an at-will employee on a classroom instructor salary schedule until they obtain a Statement of Eligibility from an Educator Preparation Program or meet Texas state certification requirements. Parents of students in classrooms served by non-certified classroom instructors will be contacted in writing according to the state and federal regulations.
f. An employee working under a District Teaching Permit (local certification) will adhere to the same professional standards, ethics, and requirements of all certified teachers.
g. An employee working under a District Teaching Permit (local certification) will be appraised under the same teacher appraisal system as required of all certified teachers.

The flexibility in allowing Commerce ISD to make local decisions about teacher certification will provide a better opportunity to secure high quality staff for hard to fill, difficult to secure teaching fields. Flexibility in hiring professionals in certain trades and vocations to teach the crafts of those trades and vocations (such as welding, HVAC, Healthcare, Fine Arts, etc.) in Career and Technical/STEAM courses. In each of these areas, the District may find applicants with strong real-world experience in those fields, who meet our rigorous standards of professional strengths and aptitude, but who do not come from the traditional education fields. This flexibility is especially important during the recent teacher shortages that the state and nation has been experiencing.

Commerce ISD prides itself on having an effective application process that includes multiple interviews and extensive background checks that must come back with stellar reviews. The candidates that we screen, who may not be certified in a particular area, would still be

high-quality teachers. Additionally, this could provide the District flexibility to hire credentialed college instructors or university professors in specific content areas and afford more students the opportunity to take dual credit courses.

HB 2 passed in the 2025 legislative session requires this provision to be eliminated for Foundational Courses by September 2030. Confirmation of Commerce ISD plan approval by the Commissioner on February 23, 2026.

5. Inter-district Transfers

(TEC 25.036) (FDA LEGAL, LOCAL)

TEC §25.036 Currently, a district may choose to accept, as transfers, students who are not entitled to enroll in the district, and is interpreted to require a transfer to be for a period of one school year.

Currently
Commerce ISD maintains a transfer policy requiring nonresident students wishing to transfer into the district 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, threat assessment, work habits, and attendance records are also evaluated. In order to be accepted, a transfer student shall have followed Board policies, including the Student Code of Conduct, rules and regulations, and attendance and testing requirements of the previous district.

Innovation Plan
Transfer students are expected to follow the attendance requirements, rules and regulations of the district. The district is seeking to eliminate the provision of a one year commitment in accepting transfer applicants and may rescind a transfer at any time during the school year. 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 circumstances, Commerce ISD seeks exemption from the one year transfer commitment.

Additionally, the district may, at the discretion of the Board, charge tuition, within statutory limits. The Board may waive tuition for a student based on financial hardship upon written application by the student, parent or legal guardian. The District may initiate withdrawal of students whose tuition payments are delinquent. Appeals may be made in accordance with local policy.

6. Probationary Contracts (TEC 21.102(b)) (DCA LEGAL)

TEC §21.102(b) states that a probationary contract may not exceed one year for a person who has been employed as a teacher in public education for at least five of the eight years preceding employment with the district.

Currently

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. A one year probationary period is not sufficient to evaluate the teacher's effectiveness in the classroom since teacher contract renewal timelines demand that employment decisions be made early in the spring semester, and prior to the availability of student data.

Innovation Plan
Commerce ISD seeks relief from this rule so that experienced teachers, counselors, or nurses new to the district that have been employed as a teacher in public education for at least five of the eight previous years, a probationary contract may be issued for up to three years from the last date of district employment.

7. Teacher Contract Days (TEC 21.401)

Currently
Currently educational law in Chapter 21 defines a teacher contract as a 10 month contract equivalent to 187 days.

Innovation Plan
Commerce ISD would like the flexibility to adjust the teacher contract days not to exceed 187 days based on the board approved calendar with no effect on teacher salaries. This would better align with the 75,600 minutes required of students.

8. Commissioner Standardized GPA Rules (TEC 28.0252)

During the 89th Legislative Session, the Texas Legislature passed Senate Bill 1191 (2025), which requires the Commissioner of Education to develop a standardized method for calculating high school grade point averages (GPAs). Under this law, all public schools in Texas must give equal additional weight to Advanced Placement (AP), International Baccalaureate (IB), OnRamps dual enrollment, and other dual credit courses. The intent of the bill is to create a fair and consistent statewide system for recognizing advanced coursework, ultimately promoting greater equity in college admissions and scholarship opportunities for students across districts. School districts are required to use the standard method developed by the Commissioner.

Innovation Plan
While the anticipated amendments to Section TEC 28.0252 of the Texas Education Code is commendable, it also presents immediate challenges for districts. Therefore, Commerce ISD requests relief from the requirement to use the standard method developed by the Commissioner. Commerce ISD will continue to follow its current GPA calculation methods under existing district policies and procedures. Once state requirements are finalized, the District will carefully review the guidance, determine any necessary changes, and make further assessment on whether to implement the Commissioner's standards or continue with

its then existing district policies and procedures. Just as importantly, Commerce ISD is committed to developing a strong and timely communication plan so that students and families are fully informed of any adjustments to GPA calculation. Our goal is to maintain clarity, fairness, and transparency throughout this transition to ensure students are not disadvantaged during the process.

9. Planning and Preparation Time (TEC 21.404)

TEC §21.404 requires that each classroom teacher is provided at least 45 minutes for planning and preparation during each school day, which must be consecutive.

This statutory requirement, while intending to ensure planning time, limits the district's flexibility in scheduling and maximizing overall planning opportunities for teachers. Our board goal of having a sound and efficient learning organization that supports learning is inhibited by this rigid mandate, as it can create scheduling constraints that prevent optimal utilization of teacher time for collaborative planning, professional development, and individualized student support, ultimately hindering the efficiency and effectiveness of our learning environment.

Innovation Plan
With adoption of Bluebonnet Learning, the official state-developed Open Education Resources (OER) curriculum in Texas, fully classified as High-Quality Instructional Materials (HQIM), we are finding teachers are needing support with Internalization, and also adopting other HQIM curriculums, Commerce ISD seeks:

a) the flexibility to prioritize local control over teacher planning time. Having flexibility in planning and preparation time helps in creating schedules where select teachers can reach more students and have more planning time on teacher teams. All teachers will have appropriate planning and preparation time, but flexibility is requested.

10. Counselor Work Time

(TEC 33.005, TEC 33.006)(33.006(d)) (FFEA LEGAL) (FFEA LOCAL)

TEC § 33.006 states that a school counselor must "spend at least 80 percent of the school counselor's total work time on duties that are components of a counseling program developed under Section 33.005." Further, "time spent in administering assessment instruments or providing other assistance in connection with assessment instruments, except time spent in interpreting data from assessment instruments, is not considered time spent on counseling."

The 87th Legislation passed modifications relating to counselor duties require a school counselor, in part, to spend at least 80 percent of the school counselor's total work time on duties that are components of a counseling program. The code, in part reads, A school counselor shall work with the school faculty and staff, students, parents, and the community to plan, implement, and evaluate a comprehensive school counseling program that conforms to the most recent edition of the Texas Model for Comprehensive School Counseling

Programs developed by the Texas Counseling Association.

The school counselor shall design the program to include • a guidance curriculum to help students develop their full educational potential, including the student's interests and career objectives; • a responsive services component to intervene on behalf of any student whose immediate personal concerns or problems put the student's continued educational, career, personal, or social development at risk; • an individual planning system to guide a student as the student plans, monitors, and manages the student's own educational, career, personal, and social development; and • system support to support the efforts of teachers, staff, parents, and other members of the community in promoting the educational, career, personal, and social development of students.

The code additionally requires the Board to adopt a related policy and/or a policy delineating spending less than 80 percent on counseling components. The District must also provide documentation relating to assessment and compliance to the Commissioner of Education upon request.
To comply with this new rule and ensure the ability to provide requested documentation to the Commissioner, District counselors must track their daily time in 15 minute increments.

Innovation Plan

Relief from this statute will allow the district, in consultation with our District Lead Counselor, and other agencies including but not limited to East Texas A&M University Counseling Department and/or Region X, to utilize counselors in a manner that best meets student and district needs, without concern to §33.005 and §33.006 compliance.

Additionally, this relief will eliminate the administrative burden of requiring counselors to track their time daily. Further, this will relieve the administrative burden of responding to requests from the State regarding compliance and will relieve the financial burden to the District in providing systems for tracking, storing, sharing said tracking of time.

Proposal will allow local control over what duties school counselors will perform based on staffing and student needs. Exempt the district from the statutory provision that requires school counselors (1) to spend at least 80 percent of the counselor's total work time on duties that are components of a counseling program; (2) requires the district to set the percentage of work time that school counselors are required to spend on components of the counselor program; and (3) restricts the district from including provisions in school counselors' contracts requiring such to perform duties not identified in policy. This innovation will be implemented by the district as follows:

a. The district is committed to ensuring that the academic and emotional needs of all students are met. In order to accomplish this goal with limited staffing, the district must balance the roles of academic guidance, emotional support, and other administrative tasks in each counselor's workload.

b. In addition to the role of providing student support through individual and crisis

counseling, this exemption will allow the district to enhance the work of school personnel and parents through the counselor's role of guiding student goal setting and planning by promoting understanding of standardized test results and other assessment data.

11. Grievance Procedures (TEC 26A, TEC 26A.001, 26A.002, 26A.003, 26A.004 & TEC 26.011,) **Affected Local Policies:** FNG (Local), DGBA (Local), GF (Local)

Currently

In the 89th Regular Legislative Session, the Texas Legislature amended TEC §26.011 to require boards of trustees to adopt a grievance procedure that complies with newly enacted Chapter 26A. Chapter 26A establishes specific requirements regarding grievance procedures, timelines, posting requirements, and reporting obligations. These requirements apply to grievances concerning violations of parental rights guaranteed by Chapter 26, board policy, or provisions of Title 2 of the Texas Education Code. (FNG Local, DGBA Local, GF Local)

Innovation Plan

Commerce ISD acknowledges and respects parental rights in public education. This exemption does not diminish any substantive parental rights guaranteed under TEC Chapter 26; rather, it allows Commerce ISD to maintain procedural efficiency appropriate for a district of our size while continuing to address all grievances in good faith.

Upon adoption of this amendment, Commerce ISD will continue to operate under its existing grievance procedures as outlined in Board Policies FNG (Local), DGBA (Local), and GF (Local). The District's current grievance process provides parents, employees, and community members with a fair, timely, and efficient means of addressing concerns while preserving the District's ability to investigate issues and provide appropriate remedies. Policies established 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 complaints, as well as to taking corrective action, where appropriate.

Commerce ISD's long-standing grievance policies 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.

Commerce ISD follows long established and functional 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.

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. The District wishes to resolve all grievances as quickly as possible for all parties involved.

The District therefore requests relief from the timelines, processes and procedures imposed by 26.011, 26A.001,26A.002, 26A.003 and will maintain its current grievance forms, processes and procedures for all grievants including parents and students, employees and the public at large.

Accordingly, the District will not be required to comply with the following requirements of TEC 26A.001, 26A.002 & 26A.003:

- **TEC 26A.001(e)(2):** A person involved in reviewing a grievance may (but is not required to) recuse himself or herself from reviewing the grievance if the person is the subject of the grievance.
    - *Rationale:* The person reviewing a grievance is often in the best position to investigate and provide information relevant to the grievance. An individual's ability to appeal a decision at any level of the grievance process allows for the grievance to be reviewed by a person or persons who are not the subject of the grievance.
- **TEC 26A.001(e)(3):** Except as otherwise required by the District's grievance policy, a higher level of review will not be required if the person who reviews the grievance is the subject of the grievance.
    - *Rationale:* Beginning a grievance at the appropriate level allows for the appropriate development of a record for review and promotes resolution at lower levels of the grievance process.
- **TEC 26A.001(e)(4):** The District will not require an indication of each document that supports the decision.
    - *Rationale:* This requirement is administratively burdensome because information regarding the decision is already included in the record.
- **TEC 26A.001(e)(5):** The District will not allow a person who files a grievance to add additional claims to the grievance after the first hearing of the grievance. Additional claims made after the first grievance hearing must be filed separately.
    - *Rationale:* The District encourages all claims related to an incident or issue to be brought forward within the same grievance. This requirement promotes efficiency in the grievance process by ensuring an appropriate record is developed for each claim and avoiding the conflation of issues.
- **TEC 26A.001(e)(9):** The District may (but is not required to) issue a decision on the merits of the concern raised in the grievance.
    - *Rationale:* The requirement to issue a decision on the merits regardless of any procedural errors or the type of relief requested is administratively burdensome when the grievance

has clearly failed to comply with grievance timelines or is seeking relief the District is unable to provide.

- **TEC 26A.001(e)(10):** The District is not required to allow a meeting to be open or closed at the request of the person who filed the grievance. The Board may hold a grievance hearing or deliberate a grievance in closed session only in accordance with the Texas Open Meetings Act.
    - *Rationale:* The Board is in the best position to protect confidential student and employee information when it has the discretion to enter closed sessions as permitted by the Texas Open Meetings Act.
- **TEC 26A.001(e)(11):** The Board will not be required to provide a description of information the Board intends to rely on that is not already contained in the record.
    - *Rationale:* The Board will only consider the information in the Level Three Record and the information presented in the Level Three Hearing in reaching its determination.
- **TEC 26A.001(g):** The District shall not be required to submit to TEA a report on grievances filed in the District during the preceding year.
    - *Rationale:* This requirement is administratively burdensome and creates unnecessary paperwork documenting grievances that have already been resolved.

TEC 26A.002 - Timelines for Filing and Appeal

- A parent or person standing in parental relation to a student shall file a grievance within 15 business days from the date on which the parent or person knew or had reason to know of facts giving rise to the grievance.
    - *Rationale:* Delays in filing a grievance may negatively impact the District's ability to investigate the issue and provide the relief requested.
- Attempts at informal resolution shall not extend the deadline to file a grievance.
    - *Rationale:* Allowing extended deadlines based upon engagement in informal resolution is administratively burdensome and creates uncertainty as to the deadline to file a grievance.
- Appeals must be filed within 10 business days after the date on which a decision on the grievance was made.
    - *Rationale:* Extending the amount of time a person may appeal a decision unnecessarily delays the grievance process.
- Written decisions on hearings that are not before the board must be provided within 10 business days.
    - *Rationale:* Permitting the District's administration 20 days to provide a response unnecessarily delays the grievance process.

TEC 26A.003 - Posting of Procedures and Forms

- The District shall make its forms for filing a grievance available upon request. District grievance policies are made available online.
    - *Rationale:* The requirements of section 26A.003 are administratively burdensome and may have the effect of discouraging informal resolution of issues.
- The District shall not be required to permit grievances to be submitted electronically through the District website.

    - *Rationale:* Permitting grievances to be submitted electronically through the website may have the effect of discouraging informal resolution of issues and is administratively burdensome.
- The District shall not be required to submit to the agency the location on the district's website at which the information required by subsection (a) is available.

12. Library Advisory Council (TEC 33.025) EFB (Legal), EFB (Local)

Currently: 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.

Innovation Plan Commerce ISD seeks to 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. Commerce ISD has strong procedures in place for selecting, reviewing, and considering library materials by certified educators and aligned with state-mandated requirements and guidance from the Texas Education Agency. Creating such advisory councils risks undermining the professional judgement of educators and librarians, introduces the judgement of non-certified individuals, introduces potential for politicization of instructional resources, and could very easily lead to inconsistency across campuses.

Commerce ISD's existing processes allows for meaningful parental review and involvement, including access to their child's library checkout records, the ability to restrict selections from the library for their child, formal challenge procedures, and transparency in materials selection. Concerned individuals may speak with teachers, administration, and/or the school board through District compliant 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 for our students.

13. Acquisition of Library Materials (TEC 33.026)

Currently
Current law outlines specific procedures school districts must follow before acquiring library materials. The law requires that materials be reviewed 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.

Innovation Plan
Commerce ISD requests to be exempt from this statutory provision because the district has procedures in place 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 introduced restrictive requirements that may delay access to timely instructional and enrichment materials. It also places bureaucratic barriers in front of trained professionals who are qualified to select age-appropriate, curriculum-aligned materials that are consistent with the Texas law. While Commerce 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. Commerce ISD's existing processes already allow for meaningful parental review, involvement, and input, including access to their child's library checkout records, the ability to restrict which materials their child checks out from the school library, 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. This exemption allows Commerce 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.

14. Instructional Materials- Syllabi (TEC 26.006, 26.0062)

Currently
According to current law, a teacher's syllabus or more broadly, their instructional plan and materials is subject to greater parental scrutiny and district-level policy. Parents are entitled to review all materials used in a class, instructing textbooks, supplementary materials, and online content. Districts must also ensure that parents can access instructional materials on the District's website or homepage at the beginning of the semester.

Innovation Plan
Commerce ISD is recommending an exemption from TEC 26.006 and 26.0062 in order to provide flexibility while continuing to uphold our strong commitment to transparency and

parental engagement. We believe parents are essential partners in the education of their children, and we are committed to ensuring they have meaningful access to the instructional materials in our classrooms. To that end, Commerce ISD will be posting on our district website the scope and sequence links for all K-12 core and state-tested content areas. This provides families with an overview of what their children will be learning throughout the year.

At the same time, we recognize that the statutory requirement, as written, does not fully align with the diverse instructional needs of our district and can create unnecessary burdens without improving transparency for families. The district continues to build the infrastructure and support necessary to expand access to additional courses not yet available online. Importantly, if parents have concerns about instructional materials, Commerce ISD has a review process in place to address questions and provide clarification. In cases where appropriate, we also offer alternative assignments to ensure that families feel supported and respected. This approach allows us to meet the intent of the law—ensuring openness and collaboration with families—while doing so in a way that is sustainable, student-centered, and responsive to parent needs

15. Parent-Teacher Conferences (TEC 28.022(a))

Currently
Under this new law, public schools are now required to provide parents with at least two in-person conference opportunities each school year. This provision establishes a direct and explicit requirement one not present in previous statutes, ensuring families have meaningful, face-to-face opportunities to engage with educators and actively support their child's academic progress.

Innovation Plan
At Commerce ISD, we prioritize and value strong partnerships with parents, recognizing the vital role families play in success. While the current statutory requirement mandates two parent-teacher conferences each year, this approach can be restrictive and may not represent the best option for families, particularly given the recent history of low parent-teacher conference attendance locally. Under our current Board Policy and procedures, in addition to our annual parent-teacher conference, we host Meet the Teacher, Title 1 Parent Night, Open House, and other campus/program specific scheduled events, while also providing a variety of innovative ways to keep families informed of their child's academic progress. Beyond this, parents are always encouraged and welcome to request additional conferences as needed, and our staff will gladly accommodate as many meetings as necessary to support family schedules and ensure open, ongoing communication.

16. PHYSICAL EDUCATION – Minimum Minutes Required
(TEC 25.114) (EHAB LEGAL) (EHAA LEGAL)

TEC §25.114 requires the implementation of PE curriculum, to the extent practicable, utilizing student/teacher ratios that are small enough to ensure the safety of students. If the school district establishes a student/teacher ratio greater than 45 to 1 in a PE class, the district

shall specifically identify the manner in which the safety of the students will be maintained.

Innovation Plan
Commerce ISD believes the flexibility of non-structured/play exercise recess promotes physical activity by allowing play and exercise to be an enjoyable experience for students. Commerce ISD believes in providing support to enable students to develop the motor, self-management, and other skills, knowledge, attitudes, and confidence necessary to participate in physical activity throughout life.

a. All recess minutes may be counted toward the fulfillment of physical education time calculations.
b. Recess may be overseen by the student's classroom teacher or paraprofessional as deemed necessary by the campus principal.
c. The District will determine the student: teacher ratio of physical education classes and will consider what is in the best interest of students when making such decisions.

17. DEPOSITORY CONTRACTS

(TEC 45.206) (BDA LEGAL) (BDAE LOCAL)

A school district must have a depository bank into which the Texas Education Agency (TEA) can deposit funds for the district. The district creates a depository relationship with a bank by executing a depository contract with the bank. Currently The depository shall serve for a term of two years and until its successor is selected and has qualified. A district and its depository bank may agree to extend the contract for three additional two-year terms. The contract may be modified for each two-year extension if both parties mutually agree to the terms. The contract term and any extension must coincide with the district's fiscal year. Forcing a district to re-bid depository banks when business operations are smooth and without deficit is a misuse of resources that can be avoided.

Innovation Plan: By gaining exemption from this requirement, Commerce ISD will be allowed to maintain satisfactory working relationships with its existing depository bank without the need to re-bid for the work at the exact timelines required by law. Provided the district determines contract pricing remains competitive, the District is pleased with the services of the depository bank and there is no operational or financial reason to change depository banks, Commerce ISD will exempt itself from requiring a re-bid of the contract. This exemption will lessen the administrative burden related to preparing and reviewing a Request for Proposal (RFP) and will mitigate any impact to employees that would alter their direct deposit instructions. Additionally, it will afford the district flexibility with respect to established banking relationships.