



Local Licensure and Teacher Shortage: Policy Analysis and Implications

Sarah Guthery
University of Oklahoma

Kathryn V. Dixon
Texas A&M University-Commerce

We use frame analysis to analyze the first iteration of the Texas District of Innovation policy, which allows districts to take exemption from state education requirements mandating the hiring of a state certified teacher. We analyzed 451 district policies and find the plans use very similar, and sometimes identical, language to frame both the problem of teacher shortage and their proposed solutions, even though the districts may be geographically and demographically different. The districts most often propose two solutions to the certified teacher shortage, 1) flexibility and 2) local control over teacher certification decisions, including hiring unlicensed teachers and locally certified teachers.

VERSION: July 2024

Suggested citation: Guthery, Sarah, and Kathryn Dixon. (2024). Local Licensure and Teacher Shortage: Policy Analysis and Implications. (EdWorkingPaper: 24-993). Retrieved from Annenberg Institute at Brown University: <https://doi.org/10.26300/0sdf-fm09>

LOCAL LICENSURE AND TEACHER SHORTAGE

Local Licensure and Teacher Shortage: Policy Analysis and Implications

Sarah Guthery, Ph.D.

Associate Professor, Department of Educational Leadership and Policy Studies,
University of Oklahoma

Kathryn V. Dixon, Ph.D.

Associate Professor and Assistant Dean, College of Education and Human Services,
Texas A&M University-Commerce

LOCAL LICENSURE AND TEACHER SHORTAGE

Background & Context

As the certified teacher shortage continues nationwide, there have been many policy innovations designed to bring new certified teachers to districts. Most of these programs are designed and offered by education preparation providers (i.e., universities, for-profit and non-profit teacher preparation programs). However, national policies and programs have not yet delivered viable solutions for districts that are experiencing teacher shortage. Over the last decade, districts have begun to create and train their own teachers in Grow Your Own (GYO) programs. GYOs are rising in popularity and are now operating in various formats in 40 states (Edwards & Kraft, 2024). The conversation on teacher shortage is often framed by the producers of teachers, including the traditional schools of higher education and “advocacy organizations” (Darling-Hammond, 2019, p. 3). Interestingly, districts, which are the recipients of teachers, are not typically represented in the conversation. We, therefore, offer a novel contribution to the literature on teacher shortage, a study on the language and solutions districts offer when they are allowed to directly write their own teacher licensure policies.

Starting in 2015, Texas has allowed public school districts to convert to a District of Innovation (DOI) to more flexibly find local solutions to common problems, including teacher shortage. DOIs are allowed to take exemptions from portions of the education code including the state requirement of hiring licensed teachers (Texas H.B. 1842). Using frame analysis, we examine these written policy solutions which are authored by individual districts to ascertain how districts view the problem of teacher shortage, and how they propose to train and create more teachers. Specifically, we ask:

R1: What diagnostic, prognostic and motivational framing do districts use to describe the problem, solution and rationale of hiring uncertified teachers?

LOCAL LICENSURE AND TEACHER SHORTAGE

R2: Are districts finding unique local solutions to teacher shortage, or are there common exemptions with underlying language patterns that are identifiable statewide?

R3: What, if any, additional waivers are the districts requesting regarding uncertified teachers?

Literature Review

Teacher Shortage

Hiring enough certified teachers has been a persistent annual challenge for districts in states all over the U.S. and often the problem of teacher shortage is entwined with teacher sorting because not every district or every type of teacher is in shortage (Ingersoll, 2001; Toropova et al., 2021). While recruiting qualified teachers can be a challenge for any district, research shows that schools that serve low socio-economic status and minority communities often face a much greater challenge (e.g., Kraft et al., 2016; Ingersoll, 2005). Teachers willing to teach in high-poverty schools with a high concentration of minority students are less likely to be fully certified, highly educated, or teaching in-field (Van Overschelde & Piatt, 2020; Darling-Hammond et al., 2002; Lankford et al., 2002). Additionally, studies have found that teachers who do teach in these high-need schools are not just under qualified relative to their counterparts in wealthier settings, they are rated as less effective (Clotfедder et al., 2007; Lankford et al., 2002).

While certain school settings are harder to staff with all teachers, there are certain fields for which teachers are universally difficult to recruit. Teachers in science, technology, engineering and mathematics (STEM) have been particularly hard for schools of all demographics to staff (Hutchison, 2012). STEM teachers are more likely to have graduate degrees and be from more selective universities, leading to higher-than-average turnover due to higher-paying other career options. Retaining a STEM teacher is particularly difficult in a high-poverty, high-minority schools (Nguyen & Redding, 2018). The shortage is so acute and the

LOCAL LICENSURE AND TEACHER SHORTAGE

implications so profound, that in a 2008 congressional report details the national importance of developing STEM career-ready graduates and qualified STEM teachers (Kuenzi, 2008). While emphasizing the timely nature and importance of effective STEM teachers, this report cites six prior reports detailing the critical teacher shortage and calling for national action.

Alternative Certification

Even as the demand for new teachers increases, enrollment in teacher preparation programs by top undergraduate candidates has been falling (Will, 2022; Corcoran et al., 2004; Leigh, 2012). Further, those who do graduate as teachers are more likely to return to their familiar neighborhood setting than other college graduates (Reininger, 2006). This combined with a geographic preference to work close to home has put some districts at a permanent disadvantage when recruiting new teachers (Boyd et al., 2005). Alternative certification was introduced in 1980s as a way to quickly certify more teachers willing to work in hard-to-staff schools (Walsh, & Jacobs, 2007). However, despite the rapid expansion of the concept, the introduction of the quicker path to certification has not ended the problem of teacher shortage for districts. Even though alternative certification has brought thousands of new teachers to the classroom, due to the high rate of turnover, there has been debate about the efficiency of this path (Redding & Smith, 2016; Guthery & Bailes, 2019). High poverty and high minority districts must replace alternatively certified teachers at rates higher than their traditionally certified counterparts. Templeton et al. (2022) created the 2022 Texas Teacher Workforce Report, which details the 10-year teacher retention rates based on certification pathway. They found that among the certified teachers who entered the profession in 2011-2012, 50% of those prepared by university-based educator preparation programs (EPP) remained in the profession after 10 years

LOCAL LICENSURE AND TEACHER SHORTAGE

as opposed to 39% of those prepared by for-profit alternative certification programs and 35% of those prepared by nonprofit alternative certification programs.

Texas has documented their problem of teacher shortage for decades, and in 2002 drafted a “Strategic Plan to Address Teacher Shortage” (THEBC, 2002). In this report, the Higher Education Coordinating Board collaborated with multiple state agencies to expand the number of highly qualified teachers employed in the state by 84,000. In order to meet this goal, traditional schools of education and alternative certification programs were challenged to “increase the number of teachers certified annually from 16,700 in 2002... to 50,000 by 2015” (THEBC, 2002, p. 3). In the 2015-2016 school year, Texas certified 24,313 new teachers, with 12,209 being alternatively certified (Smith, 2021). Despite the large increase in new teacher production, Texas was 25,687 teachers short of the ambitious target and districts still had numerous vacancies. Since then, the rate of alternatively certified teachers entering the workforce has only increased with 58% of all initial standard teaching certificates issued in 2020-2021 being to individuals prepared in alternative certification programs (Templeton et al., 2022).

Grow Your Own

In an ongoing effort to fill hard-to-staff vacancies, school districts have sought to expand credentialing exemptions for teachers. There is a national movement encouraging districts to grow their own teachers by providing new paths to the classroom in multiple models, with some bypassing outside preparation programs (Valenzuela, 2017; Edwards & Kraft, 2024). Grow Your Own (GYO) programs offer a path to teacher certification based in local districts where people who want to be teachers would not otherwise have access to the traditional or alternative routes to teaching (Gist et al., 2019; Valenzuela, 2017). There is a burgeoning literature base supporting the concept of community-based teacher paths, with notable benefits including increased teacher retention, high school graduation rates, and college attendance (Domina & Ruzek, 2012;

LOCAL LICENSURE AND TEACHER SHORTAGE

McCullom, 2011; Lau, Dandy & Hoffman, 2007). The concept of GYO is rooted in social justice, and ideally under-resourced communities benefit from developing people within their community and elevating them to positions of status for students as role models (Rueda & Monzó, 2002; Herrera et al., 2011).

In a comprehensive literature review of GYO programs, Gist et al. (2019) describe various models in use across the United States, all of which are programs working within a university partnership. Valenzuela (2017) reviewed publications on GYO programs to establish a common language and identified four overarching types of GYO programs which are all attached to a university in some way. GYO programs vary depending upon the district utilizing the model, some are targeted to paraprofessionals, some to active parents, some to middle and high schoolers in hopes of creating a community pipeline. Typically, GYO programs offer a path to state certification, however several studies have noted that despite increased support, home-grown teacher candidates frequently fail the state certification exam thus limiting the usefulness of these community-based programs (Petchauer, 2014; Tyler, 2011; Rogers-Ard, Knaus, Epstein & Mayfield, 2012). The inability of GYO teachers to become certified has restricted the expansion of GYO programs because ultimately, the power to define who is a teacher still resides with the state.

Districts of Innovation in Texas

While there are many established national models for GYO, Texas has pursued a slightly different version of the program, where districts have the option to hire an uncertified teacher, or create a local certificate and eliminate a university partner as well as state testing. In 2015, Texas passed House Bill 1842 allowing traditional public-school districts to become “Districts of Innovation” (DOIs). To be eligible for an exemption to state education code, a district must post

LOCAL LICENSURE AND TEACHER SHORTAGE

a written plan identifying their objection to the education code, the proposed change to code, and their rationale (TEC §12A.001). This designation gives traditional public schools the unique ability to opt out of multiple state education codes and exercise local control over decisions.

Converting to a DOI allows a traditional public-school district the same allowances as charter schools already operating in the state, and allows districts to exempt themselves from state regulations such as the school calendar, class size, teacher certification, student discipline, and minimum length of the school day (Guthery & Richards, 2020). The rapid expansion of DOIs was facilitated by minimal eligibility and process requirements. In fact, the Texas Education Agency (TEA) states on their website that the agency “does not have the authority to approve or reject plans” (TEA, 2024) and that districts simply notify TEA that they have adopted a plan and provide that plan to be published on TEA’s website. In less than six years, 980 of Texas’ 1,024 traditional public-school districts have converted to DOIs with roughly 3/4ths of all traditional public-school students attending a DOI (Texas Education Agency, 2021). Using the adopted DOI plans, we analyzed what changes to state policies districts propose when they are allowed to draft their own teacher shortage solutions.

Theoretical Framing

We use frame analysis (Goffman, 1974; Entman, 1993; Benford & Snow, 2000; Burns & Carson, 2005; Coburn, 2006) to analyze the DOI’s local policy plans and the language they used to take exemption to state policies on teacher licensure. Goffman (1974) originally proposed frame analysis as a way to examine social events and answer the big question, of ‘what is going on here’? We use Benford and Snow’s (2000) approach to frame analysis, which is a more clearly defined method of examining social movements. While their original work is specific to social movements and collective action, their ideas regarding diagnostic and prognostic framing

LOCAL LICENSURE AND TEACHER SHORTAGE

have been used in analyzing policy development (i.e., Verloo, 2005; Dixon, 2015). In the context of our study, we examine the choice of words and phrases used in DOI plans to make sense of public policy to discern the motivations and assumptions of policymakers. It is through these words and phrases that we are able to “transform fragmentary or incidental information into a structured and meaningful policy problem, in which a solution is implicitly or explicitly enclosed” (Verloo, 2005, p. 20).

We examine the language districts use in their local DOI policies using Benford and Snow’s (2000; Snow & Benford, 1988) core framing tasks: *diagnostic framing*, *prognostic framing*, and *motivational framing*. *Diagnostic framing* identifies the problem in policy-related documents and can be either explicitly stated or implied by the solutions proposed. *Prognostic framing* outlines the proposed solutions, which can include an implementation plan for people involved, actions to be taken, and methods for solving the problem. Finally, *motivational framing* pinpoints the rationale for the proposed solution.

We layer in the theory of licensure as a lens to the frame analysis to help interpret and contextualize individual school districts' descriptions in their own language regarding the problems of teacher shortage, and their proposed solutions and rationales. In a series of seminal articles on occupational licensure, Kleiner (2010) defines a professional license as a license issued by the government typically through a licensing board and requires a minimum level of competence. By restricting who is a licensed professional, licensed professionals have the ability to negotiate for work conditions and higher pay in solidarity with other license-holders since there is a limited supply of licensed professionals (Kleiner, 2000). Further, individuals in a licensed profession have incentives to stay in their profession and continue to invest in their ongoing education since they will not face replacement from low-cost substitutes. There are also

LOCAL LICENSURE AND TEACHER SHORTAGE

benefits to society when the risk of malpractice by the licensed professional is high. It is through these lenses that we examine the language that districts use to frame problems, solutions, and their rationale regarding teacher licensure.

Methodology

We used archival analysis to identify every district that became a DOI using the official list publicly available from TEA with links to the plans (TEA, Districts of Innovation, n.d.). We accessed all publicly posted DOI plans filed with the state during the first iteration starting in 2016. Each DOI's local plan may take exemption to state education code provided that they identify a specific rule for exemption. Additionally, they must provide a rationale and a local plan in lieu of the rule. Those plans must be publicly stated and remain posted. It is from these plans that we created a database with all of the districts' original language regarding motivation, problems, and solutions around teacher certification. These plans are retained in their original form and are not edited by TEA, nor are the plans formally approved by the state. In fact, TEA explicitly states that the districts' plans are independent of state approval. "The Texas Education Agency does not have the authority to approve a district's innovation plan. However, the Agency retains the authority to engage in investigative, intervention and enforcement activities if the district is not in compliance with legal requirements for which an exemption cannot be claimed." (TEA, Districts of Innovation, n.d.).

DOI Sample Defined

We first identified every DOI plan in the first wave of adoption filed with the state of Texas from its inception in 2016 to August 2021. Since districts can craft their own individual plans, there is variation around how many exemptions districts took and which ones they selected. The most popular exemption DOIs have taken is moving the first day of school earlier

LOCAL LICENSURE AND TEACHER SHORTAGE

in August (96.4%). This exemption allows districts to move the first day to earlier in the summer, allowing more instructional days before testing in the spring. The exemptions to state regulations regarding teacher certification (87.0%) and teacher contracts (50.9%) are the second and third most popular exemptions. Table 1 lists the exemptions taken by districts to multiple chapters of state education code, illustrating how broad the DOI reform is and the expansion of local control over many areas of education previously regulated by the state. Table 1 is split into exemptions taken by DOIs that affect professional protections for teachers and all other exceptions to Texas Education Code (TEC) rules that are unrelated to certifications, or the rights and responsibilities of a classroom teacher.

Table 1. Texas State Education Code and the Classification of Exemptions

Teacher Certification and Job Code	All other Unrelated Exemptions
<i>Chapter 11. School Districts</i>	
	Powers and duties of school boards
	School uniforms
	District level decision making
	Campus level site-based decision making
	Dropout prevention review
<i>Chapter 21. Educators</i>	
Teacher contracts	Administrator appraisal and incentives
Teacher certification required	Principal Appraisal and Incentives
Field based experience and internship waiver	Duties and benefits changes for professional staff
Presentation and recording of certificates	
Parental notification of unqualified teacher	
Continuing contracts and contract terms	
Teacher Appraisal and Incentives	
Salary Reduction for teacher/admin.	
Planning and preparation time- duty free lunch	
Religious observance denial of compensation	
Requiring or coercing teachers to join groups	
Right to join or not join professional associations	

LOCAL LICENSURE AND TEACHER SHORTAGE

Leave of absence for temporary disability	
Staff development requirements	
Mentors	
<i>Chapter 22. School District Employees and Volunteers</i>	
Salary reductions for professional dues	Discrimination based on jury service
Incentives for early retirement	
Requiring or coercing charitable contributions	
<i>Chapter 25. Admission, Transfer and Attendance</i>	
Student/teacher ratios, class size	School calendar
Parent notification of class size	Minimum attendance
	Minutes of instruction/length of school day
	Transfer acceptance for a year
<i>Chapter 37. Discipline; Law and Order</i>	
Student removal by teacher	Designation of campus behavior coordinator
<i>Chapter 44. Fiscal Management</i>	
	Purchasing contracts
	Energy savings
<i>Chapter 45. School District Funds</i>	
	School district banking and investment

We then identified the 451 original district plans which proposed an exemption to the state education code (Chapter 21) requiring districts to hire a licensed teacher. This exemption allows a district to hire non-state certified teachers and implement their own local set of criteria for teachers. Currently, to become a licensed teacher in Texas, an entrant must complete the educator preparation program of their choosing (traditional or alternative), pass one state test on pedagogy, and pass one state test on content (other certifications are available by additional exam). Despite a wide variety of licensing programs available and alternative certification being widely used in the state, there are still not enough licensed teachers available to fill all of the district vacancies (Templeton et al., 2022). Every district plan taking an exemption to Chapter 21, the education code mandating a state licensed teacher, was included in our database for analysis.

LOCAL LICENSURE AND TEACHER SHORTAGE

Next, we analyzed the differences in plans and the language districts chose to use when they were allowed to directly draft new local teacher certification rules. Using frame analysis, we analyzed the documents individually, focusing on the representations of *problems* (both explicitly stated and implied), *solutions* (including plans for implementation), and *rationales*. We used emergent coding and notation of specific wording and phrasing to identify common themes within each distinct frame (problems vs. solutions vs. rationales). We then affirmed the codes and themes using cross-validation by three researchers to check for internal consistency. Common themes found within frames were then used in a comparative analysis across all district proposals. Finally, we identified notable addendums to existing policy as they updated their local plans.

Main Findings

The length and detail of proposals analyzed ranged from documents containing a single sentence rationale to multi-paragraph proposals with bulleted lists. However, as expected, regardless of proposal length, districts employed common words and phrases in their proposals and, therefore, common themes emerged. We organized the results of our comparative analysis according to the core framing tasks. The results of our analysis are divided into the framing of the problem, the rationale for taking an exemption to state requirements for licensed teachers, and the proposed solutions. Table 2 illustrates the exact phrasing used by the 451 districts in their exemption plans alongside the number of districts using a distinct phrase. Detailed analysis of the words and phrases presented in Table 2 follow in the subsequent sections.

Table 2.

Language of Exemption Framing

Diagnostic Framing	Prognostic Framing	Motivational Framing	Implementation Plans
--------------------	--------------------	----------------------	----------------------

LOCAL LICENSURE AND TEACHER SHORTAGE

Inflexibility of state certification requirements (n=101)	Exemptions (n=226)	To best serve students (n=99)	One-year local certificate (n=51)
Difficulty in finding fully certified teachers (n=51)	Implementation of local certification requirements (n=357)	Flexibility in hiring (n=124)	At-will employment (n=49)
Inhibit districts from hiring certified teachers in <i>hard-to-fill positions</i> (n=101)	Flexibility (n=312)	Flexibility in course scheduling (n=105)	Need to obtain state certification (n=8)
“current state teacher certification requirements inhibit the district’s ability to hire...” (n=91)	flexibility in hiring practices (n=172)	Meeting students’ needs (more than half)	
Teacher shortage (n=39)	flexibility to establish local certifications (n=244)	“in order to best serve _____ ISD students, decisions on certification will be handled locally,” (n=99)	
		flexibility would enrich applicant pools (n=124)	

Diagnostic Framing

The most common phrase used to state the inflexibility of current state certification requirements is that current rules “inhibit districts from hiring certified teachers in hard-to-fill positions,” an exact phrase used by 101 of the 451 districts. These positions labeled “hard-to-fill” varied by district, but most commonly consisted of Career Technology Education (CTE), Science, Technology, Engineering, and Mathematics (STEM), dual-credit, fine arts, and Languages other than English (LOTE) courses. Additionally, some districts (n=39) stated that general teacher shortages in addition to their geographic location created challenges in recruiting

LOCAL LICENSURE AND TEACHER SHORTAGE

certified teachers for certain courses, particularly in CTE, dual-credit, and LOTE. In explaining their unique location and needs, five districts with teacher shortage and close proximity to a military base filed an exemption to hire out-of-state teachers. Another five districts explicitly stated that their rural location in addition to the existing teacher shortage is the reason they need an exemption.

Because policy documents are meant to provide solutions, the wording used in these documents typically focused on what would be done to solve the problem as opposed to explicitly stating the problem itself. As a result, oftentimes the problem is implied by the wording used to describe the solution and deeper analysis of the documents included in this study revealed such diagnostic framing that is implied by proposed solutions. Districts' requests for exemption from state certification requirements imply that districts are potentially missing out on hiring quality teachers if those with the knowledge and ability to teach specialized classes do not qualify under traditional teacher certification pathways. Additionally, districts (n=51) state their desire to hire appropriately certified teachers, but claim that exemptions are helpful "where that is not reasonably possible," implying a difficulty with finding state certified teachers for certain courses.

Finally, districts state that it is difficult to recruit on pay given their proximity to higher paying districts (n=4). In rural areas "shortages are magnified by pay scale" and other "industries that pay significantly more than education" (n=6).

Prognostic Framing

Analysis of the 451 proposals revealed two distinct solutions repeatedly and explicitly stated by the districts: *exemptions* and *flexibility*. An overwhelmingly simply stated solution by the districts was to allow for *exemptions* (n=226) to the current state requirements so that

LOCAL LICENSURE AND TEACHER SHORTAGE

districts can create and implement their own local requirements. While some districts elaborated on the details of the local requirements, many proposals simply stated that “decisions on certification will be handled locally” (n=99). In all, 357 districts mentioned creating and/or implementing local requirements for certification in some way as part of a solution.

The word *flexibility* was repeatedly used throughout the proposals’ prognostic framing. Of the 451 district proposals analyzed, 312 districts explicitly stated the word *flexibility* as part of the solution to the problem. Under the umbrella of *flexibility*, districts specified a need for *flexibility in hiring practices* (n=172) and *flexibility to establish local certifications* (n=244). Within requests for *flexibility in hiring practices*, districts sought autonomy to make decisions related to candidates’ qualifications for teaching, hiring of candidates deemed qualified, and teaching assignments. A small number of districts outlined plans within the need for *flexibility to establish local certifications*, but most did not expand on that solution, as outlined in the following section.

Motivational Framing

Districts framed their motivation for seeking exemptions to state certification requirements using very common, and sometimes identical, wording. Frequently used phrases included “in order to best serve _____ ISD students, decisions on certification will be handled locally” (n=99), “this exemption will afford the district flexibility” (n=35), and “current state teacher certification requirements inhibit the district’s ability to hire...” (n=91).

While many districts proposed *flexibility* as a solution, other districts explicitly mentioned the word *flexibility* as rationale for an open-ended exemption. More specifically, the rationales for exemptions from state certification requirements included *flexibility in hiring* and *flexibility in course scheduling*. Of the districts citing *flexibility in hiring* as a motivation, 124 claimed this

LOCAL LICENSURE AND TEACHER SHORTAGE

flexibility would enrich applicant pools for teaching positions by allowing them to consider industry experts, community college and university faculty, and teachers seeking to teach courses outside of their certification area. The other common rationale for an exemption under the umbrella of *flexibility* was *course scheduling*, which was explicitly stated in 105 district proposals. The motivation for many districts to request exemptions from state certification requirements and flexibility in hiring practices was to provide more course offerings and more options for course scheduling in order to meet the needs of their students. Along this same vein, more than half of the districts mentioned meeting students' needs as the rationale for their proposals.

Implementation Plans

Of the 451 districts that filed a DOI plan exempting themselves from the education code requiring a district to hire a state-certified teacher, 94 did not provide a specific plan for determining 'highly qualified' other than taking an exemption to the rule. Of the plans provided by districts, there are three certification alternatives specified; creating a local certification (n=357), recognizing out-of-state certification (n=28), and recognizing industry certification (n=10). Only 8 districts explicitly stated the expectation that a locally licensed teacher would obtain a state license.

Beyond stating an exemption to state certification rules, most districts did not provide specific procedures for implementing the local plans. The implementation procedures that were included varied greatly, but one consistent theme was a hierarchical approval process. Many districts (n=120) indicated that campus principals would submit a request for hiring a teacher using the local certification exemption to the district superintendent, who would evaluate the request and supporting justification. If approved by the superintendent, the request would then be

LOCAL LICENSURE AND TEACHER SHORTAGE

subject to approval by the Board of Trustees. Many district proposals (n=51) included a statement that the local certification would be valid for only one year. A nearly equal number of districts (n=49) explicitly stated that the individuals would be employed “at-will.”

A few districts (n=6) stated that they plan to implement a separate pay scale for locally certified teachers. According to the districts that specified an implementation plan, these districts would pay locally licensed or not licensed teachers on a reduced pay-scale. One district stated that “An employee working under a District Teaching Permit (local certification) will not receive a contract, but will work on an at-will basis and have a separate pay scale from state certified teachers.” Another district stated that the locally certified teachers would, “receive compensation based on the state minimum salary scale, without the district-provided above base stipend paid to certified staff members.”

Borrowed Language Across Districts

Deeper analysis of the districts’ stated motivation for seeking exemptions to state certification requirements that used very common, and sometimes identical, wording revealed a few trends worth noting. The phrase “in order to best serve _____ ISD students, decisions on certification will be handled locally,” was found in 99 district innovation plans. This phrase was originally used in 2016 by seven school districts. This same phrase was then used by 62 districts for their innovation plans the following year, suggesting that districts writing plans for submission in 2017 likely perused the 2016 plans, which were publicly available, for inspiration. Between 2018 and 2020, this exact phrase was found in decreasing quantities of plans, but still present. Another commonly used phrase found in the motivational framing of 91 innovation plans was “current state teacher certification requirements inhibit the district’s ability to hire...”

LOCAL LICENSURE AND TEACHER SHORTAGE

which was originally used in 2016 by nine districts. This phrase is also found in 57 innovation plans written for submission in 2017, again suggesting a trend of districts consulting the first round of published plans for wording ideas. Interestingly, a comparison of the lists of districts whose plans contained both of these commonly used phrases revealed a total of 22 district plans using both phrases between 2016 and 2020. Only one district of the original group to submit plans in 2016 used both phrases, suggesting that this district plan served as a form of template for other district plans in subsequent years.

Analysis shows that districts which explicitly stated the phrase “teacher shortage” in the framing of the problem (n=31), are located in different geographic regions of Texas. We did not find urbanicity nor geographic location to be a determining factor in how districts framed and solved the problem of teacher shortage. And, while many districts are classified as rural, there are urban districts, and urban-adjacent districts that use the phrasing, indicating the distance from cities and geographic region is not the only barrier to recruitment. It is also interesting to note the use of similar, and sometimes even identical, wording among the various district proposals. This leads us to believe that at a minimum, there were collaborative conversations between district administrators that were possibly supplemented by the sharing of proposal drafts, if not actual templates.

Limitations

We found in our analysis that overlapping existed between solutions and rationales-what some districts stated as a solution to the problem was presented as rationale by other districts. We saw this with the idea of *flexibility* in that many districts sought flexibility as the solution itself while other districts used flexibility as a rationale for seeking the solution of an exemption

LOCAL LICENSURE AND TEACHER SHORTAGE

from state certification requirements. From an analysis perspective, this overlapping can make discernment between solution and motivation difficult.

Discussion

On a larger scale, this analysis revealed that Texas school districts are facing a widespread problem of finding and retaining state certified teachers and are seeking exemptions from the state certification requirements. According to a recent report from the University of Houston Education Research Center, the percentage of uncertified first-year public school teachers had historically remained very low, ranging from 2%-6% from 2012-2021. Two years later, in the 2022-23 school year, 36% of first-year traditional public school teachers were uncertified. By comparison, charter schools which have historically operated under these exemptions, have more rapidly and dramatically changed over the last decade. In 2012-13, 16% of first-year charter school teachers were uncertified, and only a decade later, the percentage has increased to 82% (Templeton et al., 2024).

One theme that emerged from this study is that solutions proposed by the districts are short-term solutions for a larger, long-term problem. And, despite giving every district the power to write their own policies on teacher production, DOIs produced strikingly similar policies regardless of geographic locale or urbanicity. School districts with the DOI distinction are planning to rely on waivers to fill positions when those waivers could become nonrenewable at any point. Most school districts do want a licensed teacher, and are wanting to create some path towards certification, illustrating the value they still place on teacher certification. When given the option to completely bypass teacher certification, the majority of districts did not, and opted to honor industry certificates, out-of-state certificates, and creating local certification. To preference state certified teachers, many locally certified teachers will not be issued contracts,

LOCAL LICENSURE AND TEACHER SHORTAGE

will work at-will, and will need to obtain state teacher certification within a certain timeframe. However, the best retention rates are for traditionally prepared teachers at a university (Guthery & Bailes, 2019; Templeton et al., 2022), and with nearly half of those teachers leaving, it is questionable how unprepared and uncertified teachers will stay long enough to meet the additional demands of state certification.

Policy Implications

Districts which have elected to become DOIs and define teachers in their own community have also simultaneously opted to take exemptions to the TEC which protects the rights of all teachers. Since collective bargaining is illegal in Texas, there is not a formal union arrangement that unilaterally bargains to protect all teachers' rights. However, teachers working in traditional public schools have previously enjoyed statewide protections in the TEC. But, because a DOI teacher only holds a local certificate (or a waiver), they must work only in the district where they started, or risk losing their credentials. In alternative certification, the teaching license belongs to the person, not the district. So, if a teacher becomes an alternatively certified (licensed) teacher in one district, and then decides that there are better working conditions or pay elsewhere, their license goes with them. However, some DOIs are taking exemptions to state requirements and those teachers are never formally recognized as a licensed professional by the state, so their ability to teach resides solely in the hands of the district that allowed them to teach on a waiver.

Nationally, this idea of a local teacher is gaining popularity, and a common view of the Grow Your Own (GYO) program is that it produces teachers who are from the community for the community. One perceived benefit of a local certificate is that districts can establish their own criteria and can eliminate external state assessments that tend to preclude teachers of color

LOCAL LICENSURE AND TEACHER SHORTAGE

at higher rates (Gist, 2019). Research on GYO has viewed the creation of local teachers as one potential solution to teacher shortage and called for an expansion to communities of color, and particularly paraprofessionals of color (Edward & Kraft, 2024; Gist, 2019). This makes sense given the premise of GYO teacher certification is built on social justice and valuing individual communities. However, when viewed through the theory of licensure, the view of GYO as a social justice good for teachers and communities is debatable. In the theory of licensure, a licensed professional will enjoy higher pay and professional protections as there is a limited number of licensees, and they are not easily replaceable with low-cost substitutes (Kliner, 2011). As we found in analysis, some districts which have created local certifications have also elected to hire local teachers at-will, off contract, and for less pay. The policies of local licensing and GYO are most likely to be detrimental to women, and most especially Hispanic and Black women who are most likely to benefit from the increased earnings and protections in licensed and unionized professions (Berik & Kongar, 2021).

Considering potential long-term solutions, we posit there should be a clear and accessible pathway for local teachers to gain certification from the state. When given the opportunity to author their own policies around teacher certification, the vast majority of districts wanted a certified teacher of some sort, even if the certification was local. The district policies make clear a licensed teacher is the first choice, not just for the prestige of the certification, but because it signals preparation and training. With teacher shortages noticeably present in rural districts, many of which are geographically remote, the need for online or hybrid teacher certification programs cannot be overstated.

As we contemplate the big picture of addressing teacher shortages, student and district needs, and certification options, we pose some questions for consideration. Given the large

LOCAL LICENSURE AND TEACHER SHORTAGE

number of districts asking for locally licensed teachers, and proposing similar and even identical policies, should this be a discussion at the state level, including the implications of widespread exemption? Districts are being placed in a position where they want to hire state certified teachers, but are having to choose between a vacant classroom and an uncertified teacher. This could set traditional districts on the same path as charter districts in the state, with new teacher rates of unprepared and unlicensed teachers at 82%. Unprepared teachers are the most likely to leave the classroom, and relying on large numbers of uncertified and locally certified teachers is likely to result in higher turnover and more vacancies. And, finally, what does it mean for the teaching profession if there are two types of teachers, one with their own state license and autonomy, and one tied to a single district? Future research will have to determine if DOI teachers are, overall, a positive for districts, students, and the teaching profession.

References

- Benford, R. D., & Snow, D. A. (2000). Framing processes and social movements: An overview and assessment. *Annual review of sociology*, 26(1), 611-639.
- Burns, T. R., & Carson, M. (2005). Social order and disorder: Institutions, policy paradigms and discourses--an interdisciplinary approach. In P. Chilton & R. Wodak (Eds.), *A new agenda in critical discourse analysis: Theory and interdisciplinarity* (pp. 283-309). Amsterdam/Philadelphia: John Benjamins.
- Boyd, D., Lankford, H., Loeb, S., & Wyckoff, J. (2005). Explaining the short careers of high-achieving teachers in schools with low-performing students. *American economic review*, 95(2), 166-171.

LOCAL LICENSURE AND TEACHER SHORTAGE

- Burns, T.R., & Carson, M. (2005). Social order and disorder: Institutions, policy paradigms and discourses – an interdisciplinary approach. In P. Chilton & R. Wodak (Eds.), *A new agenda in critical discourse analysis: Theory and interdisciplinarity* (pp. 283-309).
- Clotfelter, C. T., Ladd, H. F., & Vigdor, J. L. (2007). Teacher credentials and student achievement: Longitudinal analysis with student fixed effects. *Economics of Education Review*, 26(6), 673-682
- Coburn, C.E. (2006). Framing the problem of reading instruction: Using frame analysis to uncover the microscope of policy implementation. *American Educational Research Journal*, 43, 343-379.
- Corcoran, S. P., Evans, W. N., & Schwab, R. M. (2004). Women, the labor market, and the declining relative quality of teachers. *Journal of Policy Analysis and Management*, 23(3), 449-470.
- Darling-Hammond, L., Chung, R., & Frelow, F. (2002). Variation in teacher preparation: How well do different pathways prepare teachers to teach?. *Journal of Teacher Education*, 53(4), 286-302.
- Dixon, K.V. (2015). Framing bilingual education policy: Articulation in Texas. *Journal of Bilingual Education Research and Instruction*, 17(1).
- Domina, T., & Ruzek, E. (2012). Paving the way: K-16 partnerships for higher education diversity and high school reform. *Educational Policy*, 26(2), 243-267.
- Edwards, D. S., & Kraft, M. A. (2024). Grow Your Own: An Umbrella Term for Very Different Localized Teacher Pipeline Programs.
- Entman, R.M. (1993). Framing: Towards clarification of a fractured paradigm. *Journal of Communication*, 43, 51-58.

LOCAL LICENSURE AND TEACHER SHORTAGE

- Gist, C. D. (2019). For what purpose? Making sense of the various projects driving grow your own program development. *Teacher Education Quarterly*, 46(1), 9-22.
- Goffman, E. (1974). *Frame analysis: An essay on the organization of experience*. Cambridge, MA: Harvard University Press.
- Guthery, S., & Bailes, L. P. (2023). Unintended Consequences of Expanding Teacher Preparation Pathways: Does alternative licensure attenuate new teacher pay?. *AERA Open*, 9, 23328584231159900.
- 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>.
- Hutchison, L. F. (2012). Addressing the STEM teacher shortage in American schools: Ways to recruit and retain effective STEM teachers. *Action in Teacher Education*, 34(5-6), 541-550.
- Imazeki, J., & Goe, L. (2009). The Distribution of Highly Qualified, Experienced Teachers: Challenges and Opportunities. TQ Research & Policy Brief. *National Comprehensive Center for Teacher Quality*.
- Ingersoll, R. M. (2001). Teacher turnover and teacher shortages: An organizational analysis. *American educational research journal*, 38(3), 499-534.
- Ingersoll, R. (2005). Teacher shortages and educational inequality: The problem of ensuring disadvantaged schools have enough qualified teachers. *National Education Association Visiting Scholars Series, Washington, DC*.
- Ingersoll, R. M., & Tran, H. (2023). Teacher shortages and turnover in rural schools in the US: An organizational analysis. *Educational Administration Quarterly*, 59(2), 396-431.

LOCAL LICENSURE AND TEACHER SHORTAGE

- Kleiner, Morris, M. 2000. "Occupational Licensing." *Journal of Economic Perspectives*, 14 (4): 189-202. DOI: 10.1257/jep.14.4.189
- Kuenzi, J. J. (2008). Science, technology, engineering, and mathematics (STEM) education: Background, federal policy, and legislative action.
- Kongar, E., & Berik, G. (Eds.). (2021). *The Routledge handbook of feminist economics*. Routledge.
- Kraft, M. A., Marinell, W. H., & Shen-Wei Yee, D. (2016). School organizational contexts, teacher turnover, and student achievement: Evidence from panel data. *American Educational Research Journal*, 53(5), 1411-1449.
- Lankford, H., Loeb, S., & Wyckoff, J. (2002). Teacher sorting and the plight of urban schools: A descriptive analysis. *Educational evaluation and policy analysis*, 24(1), 37-62.
- Leigh, A. (2012). Teacher pay and teacher aptitude. *Economics of education review*, 31(3), 41-53.
- Nguyen, T. D., & Redding, C. (2018). Changes in the demographics, qualifications, and turnover of American STEM teachers, 1988–2012. *AERA Open*, 4(3), 2332858418802790.
- Redding, C., & Smith, T. M. (2016). Easy in, easy out: Are alternatively certified teachers turning over at increased rates?. *American Educational Research Journal*, 53(4), 1086-1125.
- Smith, T.G. (2021). *Newly Certified Teacher Demographics by Preparation Route 2014-15 through 2019-20*. Data Source: ECOS. Texas Education Agency.
<https://tea.texas.gov/sites/default/files/newly-certified-teacher-demographics-by-preparation-route-tgs210603.pdf>

LOCAL LICENSURE AND TEACHER SHORTAGE

Snow, D.A., & Benford, R.D. (1988). Ideology, frame resonance, and participant mobilization.

International Social Movement Research, 1, 197-218.

Templeton, T. (2024, May 20). *Texas teachers a decade in review: Preliminary findings from the*

2024 teacher workforce reports [Conference presentation]. TACTE Spring Retreat,

Galveston, TX, United States.

Templeton, T., Horn, C., Sands, S., Mairaj, F., Burnett, C., & Lowery, S. (2022). *Texas Teacher*

Workforce Report. University of Houston for the Charles Butt Foundation.

[https://charlesbuttfdn.org/wp-content/uploads/2022/12/Texas-Teacher-Workforce-](https://charlesbuttfdn.org/wp-content/uploads/2022/12/Texas-Teacher-Workforce-Report-2022.pdf)

[Report-2022.pdf](https://charlesbuttfdn.org/wp-content/uploads/2022/12/Texas-Teacher-Workforce-Report-2022.pdf)

Texas Education Agency (TEA) (n.d.). *Districts of innovation*. Texas Education Agency.

Accessed June 2024. <https://tea.texas.gov/texas-schools/district-initiatives/districts-of>

[-innovation](https://tea.texas.gov/texas-schools/district-initiatives/districts-of)

Texas Education Code (TEC), Chapter 12. Districts of Innovation. (2015).

<https://statutes.capitol.texas.gov/Docs/ED/htm/ED.12A.htm>

Texas Higher Education Coordinating Board (THECB), (2002). Texas Strategic Plan to

Address the Teacher Shortage. <http://www.thecb.state.tx.us/DocID/PDF/0510.PDF>

Texas H. Bill 1842, Session 84, (2015).

<https://capitol.texas.gov/tlodocs/84R/billtext/html/HB01842F.HTM>

Toropova, A., Myrberg, E., & Johansson, S. (2021). Teacher job satisfaction: the importance of

school working conditions and teacher characteristics. *Educational Review, 73*(1), 71-

97.

LOCAL LICENSURE AND TEACHER SHORTAGE

Van Overschelde, J. P. & Piatt, A. (2020). U.S. every student succeeds: Negative impacts on teaching out-of-field. *Research in Educational Policy and Management*, 2(1), 1-22.

<https://doi.org/10.46303/repam.02.01.1>

Verloo, M. (2005). Mainstreaming gender equality in Europe: A critical frame analysis approach. *The Green Review of Social Research*, 117, B, 11-34.

Walsh, K., & Jacobs, S. (2007). Alternative Certification Isn't Alternative. *Thomas B. Fordham Institute*.

Will, M. (2022). Fewer people are getting teacher degrees. Prep programs sound the alarm. *Education Week*, 41(28), 14-16.