

February 19, 2025

Senate Education Committee

Written Testimony – SB 324 Returning TSPC to the Oregon Department of Education  
Argument in Favor

Senator Frederick, Senator Weber and Members of the Senate Education Committee:

Apart from the Department of Education, TSPC has lacked the authority to oversee the placement of teachers they have licensed. SB 324 does not mandate that oversight, but does require that administrators provide qualified teachers for a certain percentage of instructional time. An increasing amount of that instructional time is taught by substitute teachers. Commendably, by rule, TSPC requires that long-term substitute teachers have teacher training. TSPC has always claimed that their budget did not allow them to track which of their 65,000 licensed Teacher Leaders, Professional and Preliminary teachers were working as substitute teachers. Such a list could be of great help to districts seeking to maintain their quality of education in long term teaching and in specialized educational subjects. ODE might be better able to assure placement of these teachers who have dedicated their lives to a career in education by investing years and money in their university education and continuing professional development. Although for years we have asked for SubFinder Systems to be programmed according to license type so that the most qualified teachers would be called to work first, currently these professional teachers must compete for jobs with district-sponsored Restricted and District Substitute license holders. Hopefully under ODE oversight, and with substitute teachers brought into new data management as members of the education workforce, school districts would have the information and the will to bring the best substitute teachers into their schools.

When I first began teaching in 1959, Teacher Standards and Practices Commission was a part of the Department of Education. At that time all teachers, including substitute teachers, held teacher certification from accredited universities. My undergraduate degree at Oregon College of Education gave me an excellent background in the teaching of reading and my Masters in Teaching from Portland State prepared me further for teaching English and science in a junior high school (after the flight of Sputnik). Our lesson plans were straight out of the benchmarks of the Oregon Department of Education.

As a separate entity, TSPC allowed substitute teachers to renew their licenses with 180 days of substitute teaching during the life of their license, which was considered equal to the one years' experience required of regular teachers. This policy continued even after Continuing Professional Development became the means of license renewal for regular teachers, partly because TSPC had no mechanism for evaluating the PDU's of thousands of substitute teachers, and partly because TSPC understood that CPD would be a disproportionate expense for teachers not having district contracts, as school districts provided CPD for their regular teachers. And we had successfully argued that working in other teachers' classrooms and doing the reflective thinking that substitute teachers do every day IS Professional Development.

In the 1990's the Restricted Substitute Teaching License was added, which required a BA, but no teacher education. This was supposed to be used by districts only in emergency, for example, a retired engineer to teach calculus. In 2010 a study of the license was done in which so many abuses were found that the Commission put it on the agenda for repeal. Instead, they voted to keep its availability, but maintained the restriction that it could only be used in the requesting district and for a certain number of days.

In 2006 when TSPC wanted to make CPD mandatory for all teachers, they disregarded testimony that retired teachers (the backbone of the substitute teaching profession) would rather quit than do the prescribed professional development as it was set up or pay the increased license fee. By 2015, hundreds of retired teachers working as substitutes failed to renew. Ironically for the Teacher Standards Commission, that is what caused the substitute teacher shortage and the subsequent lowering of standards. The Commission then removed all restrictions from the Restricted Substitute Teaching License. During the pandemic very few substitute teachers were called to work unless they were adept at teaching school online. Many retired or went to other professions. Smaller school districts asked their Education Service Districts to recruit substitute teachers; other districts hired out-of- state private temp agencies. TSPC was rightly concerned that those companies, now supposedly the supervisors of Oregon classroom teachers had no connection to the Department of Education. To their credit, TSPC has included in the requirements for the new District Substitute Teaching License: “A designated administrator will provide training, guidance, and supervision of the educator to support the educator’s service in the assigned schools.”

If we could have kept substitute teaching experience for the license renewal of retired teachers and waived their license fee, we might not have lost the hundreds of retired teachers, and would not have the shortage to the extent we have today. Would we have been more likely to have retained the retired teachers under ODE? I don’t know.

Historically, Oregon has taken pride in its public schools, so it has been saddening to see the fragmentation, the many emergency licenses, dumbing down of instruction, and lack of due diligence that have taken place to the point that parents want to take their children out of public schools.

It was encouraging to hear that the agencies are willing to work together, once they have time to do more planning on how the various factors can be brought together. SB 324 should bring all classroom teachers, including substitutes, under the Department of Education. The ultimate goal is that ODE would be facilitating best practices for all educators for the benefit of the students.

Respectfully submitted,  
Phyllis Kirkwood, Founding President  
Oregon Substitute Teachers Association