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Apr 11, 2018
Office of the State Actuary

Lisa Pattison, 1st grade teacher
P.O. Box 81, Monitor WA, 98836

March 1, 2018

Randy Davis, TRS Actives
Washington Education Association
351 Alta Via Dr, Camino Island, WA 98282

RE: WAC 415-112-140

Dear Director Guerin:

This letter concerns WAC 415-112-140, my substitute teaching hours, my inability to **purchase** substitute service credit, and revision of this WAC for the greater good of teachers and students in Washington. **I believe WAC 15-112-140 is unfair, outdated, and needs revision.**

WAC 415-112-140, (To qualify for TRS Plan 2 and Plan 3) states:

- (1) If you have never been a member of the teachers' retirement system (TRS), you may establish membership in Plan 2 or Plan 3 if you worked as a teacher for **seventy or more hours per month** during at **least five months** within a single school year period of September 1st through August 31st, during the 1991-92 school year or later. **After a substitute achieves membership in TRS, all other service qualifies for retirement.**

Requiring a substitute to qualify before earning service is unfair. A substitute teacher should get retirement credits for the percentage of hours they have worked in a year. 1/2 year of hours should equal 1/2 year of credit etc...

That being said, if there has to be a requirement, 5 months of 70 plus hours is difficult to achieve. There are 9 months in a school year. Expecting half-time service for 5 months before offering retirement may seem fair. However, 2 of those 9 months, December and June, only consist of two weeks. Even full-time teachers only work 70 hours those months. In addition, some districts have a Mid-winter Break in February which cuts possible days in that month by 25%. All districts have Spring Break, another month where possible hours are cut by 25%. September is difficult to achieve hours because teachers are setting up routines, miss class only for extreme emergencies, and districts never offer trainings or hold meetings.

I chose to substitute for 3 years to spend more time with my small children while still gaining skills as a teacher and serving in the profession I love. I worked as many days as I could as a substitute. I tried to refuse jobs only if I, or one of my children, was sick. Unfortunately, I am not eligible to purchase credit for those years because I did not meet the 70 or more hours per month for 5 months requirement. I was short by 1-2 days during a few months, but have up to 30 hours more than the requirement for several other months.

1996-1997 school year I subbed in 3 districts traveling a total of up to 20 miles a day. I worked 288.25 total sub hours.

1997-1998 school year I worked 560 hours. I chose to work only in 1 district. I had established a reputation as an excellent sub and believed in the Mission Statement of that district.

1998-1999 school year I worked 549 hours. Almost entirely by request at 1 school. This is my 18th year as a teacher at that school.

I have been a dedicated teacher in the Wenatchee School District and member of TRS for 17 years. I worked over 1,300 hours as a **substitute teacher**. **In total that is about the same amount as 1 year of full-time service.** I am not able to **purchase** retirement credit for that time because of the 5 month requirement. I found out by accident about the ability to purchase past substitute service. At the time I subbed, I was not informed of the option to purchase retirement or told about the 70 hours per month requirement to qualify. If I had been informed, I may have worked at acquiring the few additional days I would have needed in one month. I was given no choice at the time, which is unfair.

The requirement for Plan 1 members was 150 hours anytime within a school year. (WAC 415-112-140) When there was an abundance of substitutes, attracting subs was not critical. Changing the WAC might have made sense. Currently, The WAC does not fit the needs of Washington. Other states, such as California, automatically give substitutes credit in their Teachers Retirement System. Please rectify this situation.

WAC 415-112-140 needs to be changed for the following reasons:

- Quality substitute teachers are a valuable and important part of our education system.
- Washington State has a Substitute Shortage, we need to attract quality substitutes. My district has hired emergency subs who have little or no experience as teachers. Sometimes they struggle. We were told at a staff meeting not to expect subs to teach curriculum. Several teachers I know, including myself, have decided not to serve on important committees, such as curriculum adoption, because they require multiple days out of the classroom. We don't want our kids to miss 5 or more days of learning with sub-quality teaching.
- My district discontinued offering trainings during the school day because there are not enough Substitutes to cover. Consequently, the quality and duration of teacher trainings has suffered. Often, sub jobs are unfilled. Reading specialist, councilors, or the principal are pulled from their valuable post to serve in the classroom.
- Dedicated, certified substitute teachers need to be attracted to our profession.
- Teachers in my position would be more likely to sub after retirement, if their past service was recognized.

The Following Changes are needed:

- Automatic entry into TRS is granted upon Substituting in a district. If that isn't possible:
- Substitute membership in TRS Plan 2 or Plan 3 can be established after 350 hours of substitute service within a single school year period of September 1st through August 31st, (remove the at least 70 hours within 5 months). Or add through an average of 70 hours per month over 7 months (considering 3 months of a school year not even full-time teachers work 140 hours in the month and other months 100 or more hours are easy to achieve.)
- If a Substitute teacher becomes a full-time teacher within a district where he/she worked, the qualifying requirements will be waived, and past substitute credit may be purchased after 10 years of full-time service.

Fixing WAC 415-112-140 would be an easy win and positively affect the lives of many in education.

Thank you for considering this important change to WAC 415-112-140 for the sake of teachers and students in Washington.

I would greatly appreciate a response to this letter with your comments and suggestions.

Sincerely,



Lisa Pattison
1st Grade Teacher
Lincoln Elementary