

July 23, 2025

Commissioner Mike Morath
Texas Education Agency
1701 N. Congress Avenue
Austin, Texas 78701
(512) 463-9734

Re: Request for Reconsideration – TEA Complaint #2025-02-0276
Failure to Investigate Alleged Noncompliance with Texas Family Code Chapter 261 by Dallas
ISD Employees

Dear Commissioner Morath,

I am writing in response to the Texas Education Agency's (TEA) recent decision, conveyed by the assigned investigator, that "TEA will not be moving forward with opening this matter." While I understand the Agency's discretion in determining which matters to pursue, I respectfully request reconsideration based on the seriousness of the legal obligations at issue and the potential systemic consequences of nonenforcement.

As outlined in the previous correspondence attached, this matter involves concrete evidence that Dallas ISD employees—specifically a teacher, assistant principal, and principal—failed to comply with mandatory reporting duties under Texas Family Code Chapter 261. After receiving student disclosures of suspected child abuse on or about April 8, 2022, the three failed to fulfill their mandatory duty to personally and immediately report the abuse to the Department of Family and Protective Services (DFPS), as explicitly required. Although this was not discovered until August 22, 2024, this complaint was filed within the three-year statute of limitations and warrants exceptions be made if necessary to proceed, based on the District's concealment.

Chapter 261 imposes non-delegable, personal obligations on professionals who have reason to believe that a child has been abused or neglected. These are not aspirational guidelines—they are binding statutory mandates established by the Legislature intended to safeguard children and provide them assistance. This is a clear issue of legal compliance that should not be dismissed without thorough examination.

To date, neither Dallas ISD nor DFPS has produced a valid, complete, and statutorily compliant report from any of the mandated reporters involved. One report cited by the District was confirmed by DFPS to be nonexistent. Another report, was concealed and ignored by the District because it was materially deficient, omitting required critical identifying information and thereby invalid under Chapter 261. Moreover, internal District records confirm that decision-makers adjudicated these serious student allegations in the absence of a proper DFPS report—raising grave concerns about compliance, accountability, and due process. In the absence of a valid, complete, and statutorily compliant Child Protective Services report being produced by Dallas ISD, any alternative explanation or internal documentation offered by the District cannot be accepted as a substitute for a legally sufficient report.

I urge the TEA to: reconsider the decision in light of the legal and ethical duties imposed by Chapter 261; reopen this case; investigate the compliance of all mandated reporters involved; and take appropriate steps to enforce the standards enshrined in Chapter 261. Respectfully, TEA's refusal to investigate this matter risks sending the message that school districts may circumvent their mandatory reporting obligations without consequence. This creates a dangerous precedent that undermines the very purpose of Texas's mandatory reporting framework. A failure to investigate is, in this case, functionally equivalent to a failure to enforce, a selective application of standards, and a tolerance of the misuse of mandatory reporting mechanisms, concealment, and other procedural irregularities. This not only impedes accountability but also compromises student safety, family welfare, educator due process, and the rights of all parties involved. Conduct that permits the weaponization of students and child protection procedures for personal interests, if left unexamined, will erode the compelling public trust and signals broader systemic issues.

These issues of noncompliance and concealment are not isolated. Other concerns stemming from this incident have been addressed in your own ruling in TEA Docket No. 004-R2-10-2022, and proceedings before the Equal Employment Opportunity Commission, Dallas County Judicial District Courts, and the Northern District of Texas Court. Each of these proceedings has highlighted serious lapses in the District's compliance and accountability mechanisms. TEA's willingness to act in this matter would affirm the same commitment to lawful enforcement, ethical governance, the protection of student and employee rights, and a dedication to truth above all else.

Thank you for your attention to this urgent and important matter and for your continued leadership in protecting the interests of Texas students and educators. I look forward to your response and remain available to provide any additional information necessary for your review.

Sincerely,

Joe M. Bravo
Dallas ISD ID: 81333