

Testimony to the State Board for Educator Certification

Regarding Item #5, Adoption of Proposed Revisions to 19 TAC Chapter 227, Provisions for Educator Preparation Students

October 10, 2008

While we are in overall support of proposed revisions to Chapter 227, we do have a concern about a specific provision contained in Chapter 227 having to do with a “work experience” exception to the 2.5 GPA admissions requirement.

Proposed section 227.10(a)(3)(B) sets out an exception to the GPA requirement, which allows a program to admit up to 10% of any cohort of candidates into a program without the requisite GPA upon “documentation and certification that the candidates/ work, business or career experience demonstrates achievement equivalent to the academic achievement represented by the GPA requirement.”

We have both legal and philosophical concerns about this exception to the GPA requirement. First, the exception gives no criteria for determining whether a candidates’ work experience “demonstrates achievement equivalent” to the GPA requirement, thus exposing educator preparation programs to claims of discriminatory admissions, based on arbitrary and capricious determinations regarding admitting candidates under differing criteria (GPA vs. work experience), and regarding determinations about the value of any particular candidates’ work experience.

Additionally, one of the purposes of proposing minimum criteria for admissions to educator preparation programs is to set out objective criteria to ensure *consistency* between programs. By setting an objective standard (minimum GPA requirement) for admission, but then allowing an exception to the standard based on a subjective determination, the rules end up undermining the whole purpose of having the standard in the first place, because the exception will result in *inconsistent* admissions requirements between programs.

Additionally, we are concerned that with each iteration of the GPA admissions proposal, the requirements continue to be “watered down.” For example, when the original stakeholder group met to discuss suggested proposals, SBEC staff presented research supporting a 2.75 GPA requirement. However, the group decided that it was more reasonable to require a lesser standard, that being a 2.5 GPA. Then, the issue was raised about situations in which individuals performed well in classes directly related to his/her academic major, but performed poorly in other classes. Accordingly, the proposal was next changed to require EITHER a 2.5 overall GPA OR 2.5 in the last 60 hours to accommodate the situation described above. Then at the May 2008 SBEC meeting, due to a request from an interested party, SBEC staff presented draft substitute rule language to the Board allowing for an “experience” exception to the GPA requirement. The Board discussed the proposal at length, with various Board members expressing

concern about allowing for this kind of exception to the GPA requirement. As the official minutes for that Board meeting state, “After lengthy discussion, the Board directed Dr. Loonam to delete section 227.10(a)(4)(c)(*the cite has since changed*) {the “experience” exception to GPA requirement} and to bring the item back to the Board at the July 2008 meeting.”

At the July meeting, when the Chapter 227 revisions agenda item came up, SBEC staff presented the Board with six substitute rule language proposals to be used if the board voted to take action on stakeholder recommendations. These were presented as a unit for the board to vote on. Included among them was the exact same work experience exception language that the board had rejected in May. Although several board members remembered the concerns about this language and some discussion ensued during which time SBEC staff stated that 24 states have a higher GPA admissions requirement than 2.5, and that they weren't aware of any states with an exception for work experience, because SBEC staff recommended adoption of all six substitute language items as a unit, the work experience exception was adopted along with the other substitute language proposals. (Vote was 6-3, with one abstention.)

We want to remind the board of its original concern about this language; we are afraid that because the work experience exception substitute language was “lumped in” with all the other substitute language at the last board meeting, and because SBEC staff recommended the adoption of all the substitute language at the last board meeting, the board may have unwittingly adopted this provision despite the board's earlier concerns. Due to the potential legal ramifications discussed above, as well as to the ill-advised effect of continuing to “water down” a standard that was supposed to ensure quality and consistency among educator preparation programs **we ask you to reject proposed Section 227.10(a)(3)(B).**