



Texas Classroom
Teachers Association

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Testimony to the State Board for Educator Certification
Re: Item #8 Consider and Take Appropriate Action on Proposed Amendments to
19 TAC Chapter 228, Requirements for Educator Preparation Programs
By Holly Eaton, Director of Professional Development and Advocacy
May 18, 2018

Thank you for this opportunity to testify on this item. My testimony centers on one of the numerous revisions being presented to you in Chapter 228. Specifically, we have strong concerns about **Section 228.35(c)(top of page 28)**, regarding coursework and training for the new Trade and Industrial Workforce Training certificate. **The proposal for this section has changed significantly from what was presented to you the last two times, including at your March meeting.**

Last session, the legislature passed HB 3349, which requires SBEC to propose rules to create an abbreviated educator preparation program for a new Trade & Industrial Workforce Training certificate. Accordingly, last year, TEA staff reached out to stakeholders to help inform development of rule text to implement the bill, to then be presented to the board. Through that process, a proposal was developed to simply plug the new abbreviated educator preparation program into the existing structure for all educator preparation programs, but reduce the total minimum training hours required from at least 300 to at least 200 hours. This ensured that high standards for the new program were in place even though the overall program was abbreviated, including requiring that the bulk of the training occur before placement in the classroom and requiring the training to be offered by an approved educator preparation provider meeting SBEC standards.

However, at your March meeting, TEA staff relayed to you some additional requests from several constituent school districts of the House author of HB 3349, as well as from the House author herself. **These requests not only significantly changed the structure of the abbreviated program but expanded it to entire other certificate areas. Specifically, the requests were to expand the abbreviated educator preparation program to Marketing and Health Science certificates, to reduce the number of pre-service training hours required for these certification candidates from 180 to 110, and to allow almost half of the training to be handled by entities other than an approved educator preparation program (like school districts or CPE providers).**

These changes are reflected in the draft rule text being presented to you today in Section 28.35(c) (top of page 28).

We have significant concerns about these changes, based both on policy and the magnitude of the changes, and are asking that you instead adopt as substitute language for Section

228.35(c) the draft rule text that was presented to you in March (Section 228.35(b), Item #19, page 27, attached).

We ask you to do this for the following reasons:

The changes exceed the plain language of the legislation, which mentions nothing about Marketing and Health Science certificates and also requires that an actual approved educator preparation program provide the training. As such, this proposal has gone beyond the bounds of the plain language of the legislation, and therefore, the proper forum to make these changes is via the legislative process, not via this board.

Allowing almost half of the training to be provided by an entity other than an EPP raises significant policy issues regarding who has the responsibility to ensure that the training meets SBEC standards, who will be held accountable under the EPP accountability system for the preparedness of the certification candidates, and at what point does a training entity other than an EPP effectively become an EPP? These are major policy issues that require sufficient time to vet and consider.

This expanded proposal seeks to institutionalize a practice that we believe further erodes the value of teacher preparation and certification. In addition to the many loopholes to teacher certification that already exist in Texas **outside** of your purview (school district teaching permits, District of Innovation exemptions, Commissioner waivers, and out of state certification exam exemptions, to name a few), this proposal seeks to establish a weakened route **within** your purview, that being the formal teacher certification process.

Although we understand that you have very little control over the weakening of certification standards outside of your purview, you do have control over matters within your purview. And, as evidenced by the recent, hard-fought rule changes you've made to increase the standards for educator preparation and certification, you've honored your mission statement to uphold the highest level of educator preparation. Now is not the time to reverse course on that, especially given the increase of outside mechanisms to bypass normal preparation and certification requirements.

The expansions of HB 3349 being sought through the revised rule should be addressed through the legislative process, and not by simply adding provisions in rule that are not in the legislation.

Accordingly, we urge you to adhere to the specific charge of HB 3349 and adopt as substitute rule text the rule text reflected in Section 228.35(b) as it was presented to you in March.

Thank you for this opportunity to testify.

Attachment

SBEC agenda, March, 2018

Item #19, page 27 <https://tea.texas.gov/WorkArea/DownloadAsset.aspx?id=51539620257>

§228.35. Preparation Program Coursework and/or Training.

(b) Coursework and/or training for candidates seeking initial certification in the classroom teacher certification class. An EPP shall provide each candidate with a minimum of 300 clock-hours of coursework and/or training. An EPP shall provide a minimum of 200 clock-hours of coursework and/or training for a candidate seeking a Trade and Industrial Workforce Training certificate as specified by §233.14(e) (relating to Trade and Industrial Workforce Training: Grades 6-12 certificate) of this title. Unless a candidate qualifies as a late hire, a candidate shall complete the following prior to any clinical teaching or internship:

(1) a minimum of 30 clock-hours of field-based experience. Up to 15 clock-hours of this field-based experience may be provided by use of electronic transmission or other video or technology-based method; and

(2) 150 clock-hours of coursework and/or training that allows candidates to demonstrate proficiency in:

(A) designing clear, well-organized, sequential, engaging, and flexible lessons that reflect best practice, align with standards and related content, are appropriate for diverse learners and encourage higher-order thinking, persistence, and achievement;

(B) formally and informally collecting, analyzing, and using student progress data to inform instruction and make needed lesson adjustments;

(C) ensuring high levels of learning, social-emotional development, and achievement for all students through knowledge of students, proven practices, and differentiated instruction;

(D) clearly and accurately communicating to support persistence, deeper learning, and effective effort;

(E) organizing a safe, accessible, and efficient classroom;

(F) establishing, communicating, and maintaining clear expectations for student behavior;

(G) leading a mutually respectful and collaborative class of actively engaged learners;

(H) meeting expectations for attendance, professional appearance, decorum, procedural, ethical, legal, and statutory responsibilities;

(I) reflect on his or her practice; and

(J) effectively communicating with students, families, colleagues, and community members.