



Your Ally. Your Voice.

Public Comments to the State Board for Educator Certification regarding the Update on Proposed Revisions to 19 TAC Chapter 227

October 24, 2014

The Association of Texas Professional Educators (ATPE) offers the following comments regarding the status of 19 TAC Chapter 227.10, relating specifically to the minimum grade point average (GPA) required for admission to an educator preparation program (EPP). ATPE has long advocated for higher standards and more selective recruitment of educators, working in conjunction with the State Board for Educator Certification (SBEC) and the Texas Legislature. Most recently, as deliberations on revisions to Chapter 227 took place, we maintained an active presence before SBEC and other entities in support of raising the minimum GPA requirement for entrance into an EPP. **ATPE remains in strong support of raising the minimum GPA requirement from 2.5 to 2.75 for the majority of future educators.**

BACKGROUND INFORMATION

Legislative action in 2013:

In 2013, the Legislature passed House Bill 2012, a comprehensive teacher quality bill that included language empowering SBEC to raise the minimum GPA for educator certification candidates. ATPE strongly supported the bill and viewed it as a step in the right direction for improving the selectivity of the teaching profession, which many experts consider essential to making Texas' public education system competitive with those of other states and countries. We supported language in that bill to raise the minimum GPA requirement from its current level of 2.5 (with exceptions) up to 2.75, and we worked with key Legislators to develop and advance this legislation, which took effect in September 2013.

SBEC's action in May 2014:

In April of this year, we learned that Texas Education Agency (TEA) staff would be recommending that SBEC maintain the minimum GPA requirement for educator preparation candidates at its existing level of 2.5 (with exceptions), despite the legislative intent of HB 2012 to generate higher standards. As the state's largest educators' association representing well over 100,000 members, the majority of whom are classroom teachers, ATPE was very disappointed to learn that TEA staff had not consulted with any stakeholders representing the members of the teaching profession in preparing their recommendation to the board on this important rule. We and the members of the SBEC board were told by TEA that their decision to recommend keeping the GPA requirement at 2.5 had been made after consultation with EPP

The Association of Texas Professional Educators (ATPE) has been a strong voice for Texas educators since 1980. It is the leading educators' association in Texas with more than 100,000 members statewide. With its strong collaborative philosophy, ATPE speaks for classroom teachers, administrators, future, retired and para-educators and works to create better opportunities for 5 million public schoolchildren. ATPE is the ally and the voice of Texas public school educators. For additional information, contact government@atpe.org.

representatives and a handful of school principals. We believe this illustrates the need for TEA to do more, as has been recommended by the Sunset Advisory Commission, to engage stakeholders – and especially those representing the profession that SBEC is tasked with overseeing – in decisions such as this one. ATPE would welcome an opportunity for further engagement with SBEC and TEA staff on issues relating to the education profession, including the standards for admission to the profession.

In May 2014, when SBEC took up its initial review of Chapter 227 as required by HB 2012, representatives of ATPE and the Science Teachers Association of Texas (STAT) were the *only* individuals who testified before the board; both witnesses urged SBEC to raise the standards for EPP admission. ATPE pleaded with the board to consider raising the minimum GPA from 2.5 to 2.75, despite the TEA staff's recommendation, while STAT urged SBEC to increase the college credit hour requirements for future teachers. SBEC agreed with our recommendations and voted to propose an increase in the EPP admission standards. ATPE greatly appreciated the board's thoughtful consideration of our testimony and its decision to propose a more rigorous minimum GPA requirement. When the proposed rule was published in the *Texas Register*, ATPE again provided formal written input supporting the rule change to increase the GPA requirement.

SBEC's action in August 2014:

At SBEC's next August 2014 meeting, ATPE voiced for a *third* time our support for increasing the minimum GPA requirement and submitted both oral and written testimony to the board. Unfortunately, the board voted at that meeting to reverse its earlier decision and keep in place 2.5 GPA requirement (with exceptions). We believe the board's final decision was made in reaction to limited, anecdotal evidence and vociferous complaints by a few for-profit businesses operating EPPs that would suffer financially if Texas raised its professional standards for becoming a teacher.

SBOE's action in September 2014:

We believe the final SBEC vote to keep Texas' EPP admission standards at a level lower than what has been recommended by education experts and to ignore the legislative intent of HB 2012 was a mistake. For that reason, ATPE was one of several groups that appealed to the State Board of Education (SBOE) and encouraged them to reject the SBEC rule as written. At a September 2014 meeting of the SBOE Committee on School Initiatives, we once again offered testimony in support of raising the state's minimum GPA requirement for EPP candidates, and we were pleased with the SBOE's decision to send the rule revisions back to SBEC for further analysis and reconsideration specific to the minimum GPA requirement.

POLICY CONSIDERATIONS AND RESEARCH

Raising entrance standards will help, not hurt, the profession:

Our support for a more rigorous GPA requirement is based on studies that show we can better prepare Texas teachers and create a higher achieving student body by raising standards for entrance into the profession. Research shows that having access to an effective educator is the most important school-based factor affecting a student's academic success. ATPE has devoted

significant resources in recent years to research on teacher quality, including studies directed by a University of Texas professor regarding the characteristics of highly effective teachers. That research has reiterated the importance of having high standards for the profession and our understanding that making the education profession more selective will raise the prestige of teaching and entice more of our most talented youth to pursue education as a career. We dispute the unfounded suggestion that raising the EPP admission standards in Texas would cause “catastrophic” teacher shortages in our public schools. ATPE also believes that higher professional standards would put us in a better position to pursue other benefits for educators that have been elusive, such as higher compensation for teachers.

Higher standards will make Texas more competitive and reduce teacher turnover:

Still, the most important reason to raise the standards for entrance into the Texas teaching profession is the success of our students. Several countries demonstrating the most international success in student achievement have imposed much more selective entrance requirements for their teachers than seen throughout much of the United States. In Finland, for example, eligibility to become a teacher is limited to the top 10 percent of high school graduates. By placing adequate minimum standards for educator preparation and certification, we can ensure that our teachers are well-prepared to deal with the tough demands of the classroom and at the same time help reduce costly teacher turnover, which has been estimated to cost the state approximately a half-billion dollars per year. Arguably, Texas already loses far more teachers to frustration and disillusionment upon realizing they were not well-suited or well-prepared for the teaching profession than we would as a result of raising our entrance standards.

Student and teacher success – not private business profits – should motivate standards:

A number of outstanding EPPs in Texas, particularly those operated by universities, impose their own GPA requirements that are higher than the state’s minimum requirement. However, we must ensure that candidates who enter those programs that elect *not* to raise their standards above the state’s minimum criteria are still well-prepared to succeed in the teaching profession. Today, more individuals are entering the teaching profession by way of alternative certification, and the state’s largest alternative certification providers are for-profit businesses that fall into the category of those choosing to stick with the state’s minimum standards for admission, presumably so as to maximize their enrollment numbers. It is worth noting, once again, that Texas was the first and remains one of very few states that allow for-profit companies to operate EPPs, thereby creating an obviously perverse incentive to keep EPP admission standards low enough to maximize profits by those companies. ATPE believes it is time for SBEC to focus on what is best for the profession and the children it serves rather than the conflicting interests of a small group of private business owners that have been heavily criticized for maintaining low standards.¹ The goal should be ensuring that our state’s schoolchildren will be taught by well-qualified teachers, regardless of their pathway to the profession.

¹ For example, a 2014 report by the National Council on Teacher Quality (NCTQ) assigned “F” grades to our state’s largest producers of new teachers, which are for-profit alternative certification programs. NCTQ’s grading criteria including the programs’ choice to require only a minimum 2.5 GPA for admission. The report also blamed the failure of the Texas alternative certification programs, in part, on state regulations, which are the source of the minimum standards imposed by these programs.

GPA requirements are particularly important for alternative certification candidates:

Setting an adequate GPA floor as an entrance requirement is an important step for all EPPs, but it is of even greater urgency in alternative certification settings because of the nature of alternative certification. Alternative certification candidates are individuals who have already earned a college degree not necessarily related to teaching or the subject matter they might eventually teach. Unlike students pursuing educator certification in a traditional university setting while earning their degree and going through a period of student teaching, alternative certification candidates become teachers of record with full responsibility for the classroom almost immediately; this occurs while they are still pursuing certification and well before they have met all the requirements for standard certification, such as passing Texas' certification exams. Although they are regulated under the same set of SBEC rules, alternative certification programs operate in a substantially different manner than traditional university-based EPPs.

Thus, experts agree that in order to be successful, alternative certification candidates must have a strong academic foundation *prior* to being admitted to an EPP that is going to offer them such an accelerated route into teaching. One of the ways to measure such a candidate's acumen is looking at his college transcript. We recognize that college GPAs do not correlate to future professional success in 100 percent of cases, which is precisely why Texas' EPP admission standards already provide for exceptions to the GPA rule, and we wholeheartedly support maintaining those exceptions. Nevertheless, GPA remains one of very few available indicators that can be used to determine a candidate's academic foundation and content knowledge, especially in an alternative certification environment, which is why it has been widely used across the country as a qualification for admission.

Concluding remarks:

As we have stated on numerous prior occasions, ATPE believes we do a disservice to teachers and students by placing ill-prepared educators in the classroom and expecting them to achieve excellence in a high-stakes environment. Rather than focusing so much time and energy on finding ways to get low-performing teachers out of the classroom, our state would be better served by focusing on raising the standards for entrance into the profession to ensure that teachers enter the classroom adequately prepared and with great potential.

ATPE respectfully urges SBEC to revisit this issue and consider proposing a new set of revisions to 19 TAC Chapter 227 that will satisfy the Legislature's intent and the recommendations from the field for higher EPP admissions standards. We would welcome an opportunity to work with the board on this issue going forward as we have in the past, and we are also willing to help seek clarification from the Legislature, if needed, provide additional research or assist the board and TEA staff in any way requested. Thank you for your work to improve the quality of the teaching profession in Texas.