



## Public Comments on Proposed Amendments by the State Board for Educator Certification (SBEC) to 19 TAC Chapter 228

July 23, 2018

ATPE respectfully offers the following **comments on the proposed amendments to 19 TAC Chapter 228, Requirements for Educator Preparation Programs**. Specifically, we express strong concerns regarding the proposal under Section 228.35(c), the new abbreviated pathway to the Trade and Industrial Workforce Training certificate.

Research shows that access to an effective educator is the most important school-based factor affecting a student's academic success, and ATPE believes *all* students deserve access to a well-trained educator. In recent years, the State Board for Educator Certification (SBEC) has actively worked to raise the standards for educator preparation in Texas. ATPE has supported those efforts based on the recognition that we cannot expect a teacher to achieve excellence without the foundation of strong preparation.

Based on this, ATPE has four primary concerns with the proposed amendments in 228.35(c):

1. The proposal reduces by 70 hours the training time required of the candidates before entering the classroom as the teacher-or-record. The hours required of educators before entering the classroom as the sole educator responsible for the learning and well-being of the students in a classroom are critical training hours aimed at ensuring these candidates are prepared to teach. This time is not spent on understanding subject matter, but on understanding the science behind teaching that subject matter to a child. Pedagogy, or the science of teaching, involves critical time spent learning to use teaching strategies based on the theories of learning and an understanding of individual student needs, backgrounds, and interests. ATPE sees no reason why candidates seeking the Trade and Industrial Workforce Training certificate should receive less training in this critical area than what is expected of every other candidate. Likewise, students of these educators deserve well-trained educators as much as their peers learning in different classrooms.

**Recommendation:** Omit as follows the preservice clock-hour exceptions provided for this certificate under 228.35(c)(1)(b) and 228.35(c)(2) so that these candidates are subject to the same 180 critical pre-service hours required of all other candidates.

(1) A candidate shall complete the following prior to any clinical teaching or internship:

(A) the field-based experience described in subsection (b)(1) of this section; and

(B) ~~80 clock hours of~~ coursework and/or training described in subsection (b)(2) of this section and the educator standards related to those fields.

(2) Prior to completion of the program, a candidate shall complete ~~90 clock hours of~~ coursework and/or training described in §228.30(a)-(d) of this title (relating to Educator Preparation Curriculum). ...

2. The proposal expands the abbreviated program path to the marketing and health science certificates. The addition of the marketing and health science certificates to this abbreviated pathway was never a part of the discussion as the 85<sup>th</sup> Texas Legislature negotiated and passed the enacting bill, H.B. 3349. As the bill analysis states, H.B. 3349 addresses an alleged “shortage of trained workers in the technical professions...by creating an abbreviated educator preparation program (EPP) for a candidate seeking certification in trade and industrial workforce training.” ATPE does not believe the addition of the marketing and health science certificates is appropriate here and the addition has not been properly vetted.

**Recommendation:** Omit as follows the reference to the marketing and health science certificates.

(c) Coursework and training for candidates seeking initial certification in the classroom teacher certification class in Trade and Industrial Workforce Training, ~~Marketing: Grades 6-12, or Health Science: Grades 6-12.~~ 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 in §233.14(b), (c), and (e) of this title (relating to Career and Technical Education (Certificates requiring experience and preparation in a skill area)).

3. The proposal allows entities other than approved EPPs to provide the remaining 90 hours of training. This provision is once again outside of the bounds of the enacting bill. Further, it calls into question what entity is responsible for, approved for, and accountable for training educators. SBEC’s own standards for holding EPPs accountable would be weakened tremendously by the addition of this language. This board would not have jurisdiction over these entities or the instruction they offer to candidates. Instead, the candidate’s EPP would simply need to confirm the candidate attended the additional instruction through obtaining a “certificate of attendance, sign-in sheet, or other written verification.” It would also limit the ability of this board to share quality information with prospective and current EPP candidates, as the entities and instruction would not be held accountable under the Accountability System for Educator Preparation Programs in your rules.

**Recommendation:** Omit as follows the language in 228.35(c)(2) that allows entities other than an EPP to deliver training.

(2) Prior to completion of the program, a candidate shall complete 90 clock-hours of coursework and/or training described in §228.30(a)-(d) of this title (relating to Educator Preparation Curriculum). ~~The additional coursework and/or training may be provided by a school district, a campus, an EPP, or another entity that is an approved TEA continuing professional education provider. Appropriate documentation such as certificate of attendance, sign-in sheet, or other written verification must be validated by the candidate's EPP.~~

4. The proposal fails to prevent educators certified and trained under this expedited path from easily seeking additional certifications. The Texas Education Code states that the SBEC must "provide for a certified educator to qualify for additional certification to teach at a grade level or in a subject area not covered by the educator's certificate upon satisfactory completion of an examination or other assessment of the educator's qualification." This statute and process, often termed "cert-by-exam," allows certified educators to utilize their initial training and potential experience in the classroom to seek additional certifications by passing the appropriate test. This is done based on the recognition that all initial certifications require the same 300 hours of training, including the critical emphasis on pedagogy discussed earlier. This rule would change that and could result in a large number of students and subjects taught by educators trained under the abbreviated 200 hour structure, which is again not the intent of H.B. 3349.

**Recommendation:** Add language as follows to prevent educators certified under the abbreviated pathway from seeking additional certifications by examination.

(3) **Candidates prepared and certified under this subsection are not eligible for additional certifications under TEC Section 21.056.**

In an effort to stay focused on the needs of *all* students, ATPE encourages SBEC to adopt the above changes to 228.35(c). In summary, (1) maintain the same 180 preservice hours required of all other educator candidates; (2) remove the addition of the marketing and health science certificates; (3) omit language allowing entities other than approved EPPs to provide training; and (4) add a provision prohibiting certification by exam for these certificate holders.

ATPE is supportive of other amendments under the proposal, which maintain high standards for educator preparation in Texas. This includes defining a long-term substitute as one who has served "30 consecutive days in an assignment as a classroom teacher" under 228.35(f)(C), and the addition of "appropriate relationships, boundaries, and communications between educators and students" to the required curriculum for EPPs and students in 228.30(c)(7).

ATPE recognizes that paths outside of SBEC’s jurisdiction have weakened the standards for training educators in Texas, but we impress upon the board that those are the exceptions. SBEC is tasked with setting the rule. We encourage you to maintain your mission of “upholding the highest level of educator preparation” by avoiding the trend to create exceptions to the high standards for educator preparation that all educators and students deserve. **ATPE respectfully urges SBEC to revise the proposed amendments to 19 TAC Chapter 228.35(c)** as outlined above.