



**Input to the State Board for Educator
Certification (SBEC)
Regarding Agenda Item 9:
Proposed Review of 19 TAC Chapter 239**

December 6, 2019

The **Association of Texas Professional Educators (ATPE)** offers the following comments regarding the proposed review of 19 TAC Chapter 239, Student Services Certificates.

House Bill (HB) 3 of the 86th Legislature repealed the authorizing statutes for Master Teacher Certificates, requiring the State Board for Educator Certification (SBEC) to designate those certificates as “legacy” certificates until such time as they expire. This change will leave some Master Reading Teacher (MRT) certificate holders unable to continue teaching in their current assignments once their Legacy Master Reading Teacher certificates expire, unless they obtain an additional certification. The proposed four-year rule review of 19 TAC Chapter 239 provides the board with an opportunity to enact the provisions of HB 3 in a way that preserves reading expertise in the classroom consistent with the goals of HB 3.

The existing MRT certification process takes a full year to complete and can cost thousands of dollars, typically paid for out of pocket by the teacher applying for the MRT certificate. It would be inefficient to subject MRT certificate holders to additional, unnecessary burdens simply to keep their current teaching assignments previously held by virtue of their MRT certificate. Furthermore, the loss of their expertise in the classroom would fundamentally undermine the goal of increasing student literacy prioritized by the Legislature through HB 3 and could make it more difficult for school districts to find enough appropriately certified personnel to fulfill the assignments previously covered by MRTs.

The classroom assignments open to a holder of the MRT certificate are identical to those of a Reading Specialist—a related certification unaffected by HB 3. ATPE suggests that the board work toward adopting new rule language that will allow valid Legacy MRT certificate holders to transition to Reading Specialists through the regular renewal process. ATPE has met with and provided the Texas Education Agency (TEA) staff with proposed language to accomplish this goal by amending 19 TAC 239.93 and 239.94 (attached), which specify the requirements for issuance of a Reading Specialist certificate.

The changes we are requesting would allow for the retention and utilization of the mastery already earned by teachers through the rigorous MRT certification process, allow MRT certificate holders to maintain their classroom placements, mitigate potential staffing constraints on school districts, and impose the fewest additional burdens on MRTs in the process.

ATPE appreciates the opportunity to provide feedback during this process and invites board members and TEA staff to contact ATPE Governmental Relations at (800) 777-2873 or government@atpe.org for any additional information.

Proposed Language:

§239.93. Requirements for the Issuance of the Reading Specialist Certificate.

- (a) Except as provided by subsection (b), to be eligible to receive the standard Reading Specialist Certificate, a candidate must:
- (1) successfully complete a reading specialist preparation program that meets the requirements of §239.92 of this title (relating to Preparation Program Requirements);
 - (2) successfully complete the examination based on the standards identified in §239.92 of this title;
 - (3) hold, at a minimum, a master's degree from an accredited institution of higher education that at the time was accredited or otherwise approved by an accrediting organization recognized by the Texas Higher Education Coordinating Board; and
 - (4) have two creditable years teaching experience as a classroom teacher, as defined in Chapter 153, Subchapter CC, of this title (relating to Commissioner's Rules on Creditable Years of Service) and the Texas Education Code, §5.001(2).
- (b) An individual who holds a valid Legacy Master Reading Teacher Certificate in accordance with Texas Education Code, §21.064 is, upon that certificate's expiration, eligible to receive a Reading Specialist Certificate, provided that the individual satisfies the requirements of Chapter 232 of this title.
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§239.94. Requirements to Renew the Standard Reading Specialist Certificate.

- (a) An individual issued the standard Reading Specialist Certificate under this title is subject to Chapter 232, Subchapter B, of this title (relating to Certificate Renewal and Continuing Professional Education Requirements).
- (b) An individual who holds a valid Texas reading specialist certificate issued prior to September 1, 1999, may voluntarily comply with the requirements of this section under procedures implemented by the Texas Education Agency staff under §232.810 of this title (relating to Voluntary Renewal of Current Texas Educators).
- (c) Notwithstanding subsections (a) and (b), an individual who holds a valid Legacy Master Reading Teacher Certificate issued under Chapter 239, Subchapter E, of this title may, upon that certificate's expiration, seek renewal under this section as a Reading Specialist.