



# Input on Ch. 228 Proposed Rule Changes

Regarding the importance of lesson design

**April 20, 2026**

The **Association of Texas Professional Educators (ATPE)** offers the following input regarding the proposed text of Ch. 228. These comments are the same that we offered in the public comment period, we just wanted to submit them specifically to the Board.

Ch. 228.41(a)(2)(D) states:

*(D) Teachers use high-quality instructional materials and internalize lesson content by reading the texts, completing learning tasks and assessments, rehearsing lesson delivery, and identifying any personal gaps in understanding.*

While ATPE appreciates that lesson internalization is an important skill when utilizing a predeveloped lesson or curriculum, such as Bluebonnet, we also understand that lesson design is a fundamental pedagogical skill that must be leveraged even when using predeveloped lessons in order to ensure the material is differentiated for all learners.

The ATPE Legislative Program, which is member-written and member-driven, states the following regarding curriculum:

*Allow teachers and administrators to determine the appropriate content and/or methodology of curriculum and educational programs, including e-learning programs.*

ATPE respects the professionalism of our educators and respectfully requests that lesson design be given equal weight to lesson internalization, as was recently done in Chapter 235 discussions. Both are important in the classroom today, and both can coexist. Even if HQIM were universally implemented, the ability to design differentiated lessons would continue to be an important skill. However, HQIM and, more narrowly, open-education resources (OER), currently only exist for a small subset of Texas Essential Knowledge and Skills (TEKS).

**Lesson design is a core skill and must continue to be given equal weight and emphasis, particularly while HQIM and OER materials do not exist for every grade level, subject, and course.**

We would therefore suggest the following minor change in §228.41(a)(2)(E) so that it references your rule text for these essential skills rather than restating aspects of Chapter 235, Subchapter C:

*The Association of Texas Professional Educators (ATPE) is the leading educator association in Texas and has been a strong voice for Texas educators since 1980. With its strong collaborative philosophy, ATPE speaks for classroom teachers, administrators, future, retired and para-educators and works to create better opportunities for the more than 5 million Texas public schoolchildren. ATPE is the ally and the voice of Texas public school educators.*

(E) Teachers engage in initial lesson design and prepare instruction that follows a logical scope and sequence, connects students' prior knowledge to new content, and includes clear learning objectives, grade or course level content, explicit instruction, student engagement, academic language, deliberate practice, and assessment appropriate to the discipline.

For additional information, contact ATPE Governmental Relations at (800) 777-2873 or [government@atpe.org](mailto:government@atpe.org).

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