

TO: State Board for Educator Certification

CC: Texas Commissioner of Education Mike Morath; Associate Commissioner Emily Garcia; Deputy Commissioner Kelvey Oeser; State Board of Education Chair Keven Ellis

RE: Continuing discussion of teacher performance assessment options

DATE: September 26, 2022

Texas should continuously improve the preparation and certification of teachers, as excellent preparation leads to happier, healthier, more effective teachers and enhanced learning outcomes for EC-12 students. Well-supported candidates and new teachers who feel successful in the classroom are more likely to be retained, lessening the hiring, training, and vacancy-related burdens on districts and existing teachers. An investment in educator preparation is an investment in Texas.

Over the past few years, the Texas Education Agency (TEA) piloted a portfolio-based certification exam, edTPA, as a replacement for the Pedagogy and Professional Responsibilities (PPR) EC-12 exam required for probationary and standard certification. Some education stakeholders were concerned with the impacts of implementing edTPA as a certification exam during a teacher shortage, due to the higher cost of the exam (\$311) and its lack of effect on the 40% of new teachers of record who hold an intern certificate, for whom edTPA would be required only *after* they begin teaching. Some educator preparation programs (EPPs) were interested in participating in the pilot, using the edTPA exam and framework to prepare their candidates and provide feedback to TEA.

In June 2022, the State Board of Education (SBOE) unanimously vetoed the State Board for Educator Certification (SBEC) recommendation to replace the EC-12 PPR with edTPA. Immediately following the veto, SBOE Chair Keven Ellis recommended stakeholders be involved in developing a path forward for educator preparation and certification. Accordingly, SBOE Member Marisa Perez-Diaz and representatives of teacher, administrator, university-based EPPs, and alternative certification program (ACP) professional organizations were convened as panelists during a July 2022 SBEC work session to discuss four TEA-developed options focusing on teacher performance assessments (TPA) and related policy decisions regarding educator certification and EPP curriculum and accountability.

During the work session, there was consensus among panelists that the TEA-presented options that included implementing edTPA as a certification exam were not preferable. Panelists also agreed that additional discussions were needed, both to ascertain key policy problems and to develop a path forward that is beneficial, flexible, and sensitive to the needs of all candidates, EPPs, and districts.

Panelists continued to discuss the four TEA-presented options on their own and with their professional organizations, focusing their efforts on developing an additional option that implements a TPA as a curricular requirement. The panelists met on August 5, 15, and 31, and met with Associate Commissioner Emily Garcia on Sept. 21. All panelists contributed feedback to this letter, which was shared among panelists and to the groups they represented at the July work session. The following represents clear overlaps of agreement between our groups on improving educator preparation in Texas and areas where more discussion and metrics are needed in this decision-making process.

Consensus:

- Candidates completing requirements to become a teacher of record should effectively demonstrate key competencies of a practicing teacher, such as writing a lesson plan and developing appropriate assessments to monitor and measure student growth.
- Embedding a TPA as a program requirement rather than a certification exam situates the demonstration of key competencies at a time within the EPP experience that facilitates feedback and candidate growth, rather than at the end of the EPP when it may be too late to correct deficiencies.
- EPPs should be able to choose a TPA that meets their local needs, either by developing a local TPA that meets certain SBEC-approved criteria or by choosing a vetted option from an approved list of TPAs (which could include edTPA) that meet the same SBEC-approved criteria.
- Also, SBEC should immediately discuss the development of a statewide, Texas-specific TPA, assessed by Texas educators, which could be included in the approved list of TPAs and used voluntarily by EPPs to fulfill a TPA requirement.
- As with any major policy change, criteria for a locally determined TPA should be evidence-based and reflective of extensive stakeholder feedback.
- As soon as possible, SBEC should discuss updating the PPR, including analysis of PPR data and history, as well as options for improving the exam such as grade banding and including constructed response, drawing on other exams that currently use this format (e.g., STR, ELAR 7-12, etc.).
- The state holds EPPs accountable using the five-year continuing review process, the Accountability System for Educator Preparation Programs (ASEP), and the complaint process. Whether or not lawmakers establish an additional ASEP indicator to assess a new TPA requirement, accountability for the quality of implementation of a TPA should fall on EPPs, not on candidates.

Areas for further discussion:

- *How is a TPA defined?* Although there is some shared understanding in the field about the concept of a TPA, which is a form of authentic assessment of tasks expected of a teacher, it is essential that stakeholders and SBEC work together to develop a clear definition. Some argue that a formal observation or mentor teacher observation is a performance assessment. A clear definition would allow for essential conversations among EPPs regarding the development of locally determined and state-developed instruments and how the implementation of these would fit into the varied certification pathways in Texas.
- *How would “demonstration of key competencies,” whether as part of a TPA or not, fit into the current certification structure?* If the demonstration of competencies (e.g., planning a lesson, administering assessments, analyzing student data) or a TPA is required before issuance of the intern certificate, interns may need more field experience to complete any tasks involving students. To provide this opportunity, EPPs currently can go above the minimum required 30 hours of field experience. However, some EPPs may find it difficult to increase field experience outside of the academic year. Therefore, it may be necessary to differentiate “key” competencies that can be demonstrated and mastered prior to student exposure, such as lesson planning, to ensure clear and consistent expectations for EPPs in supporting candidates earning an intern certificate and becoming a teacher of record. In implementing a TPA, a clear timeline

and process must be developed to allow EPPs a practical and supportive pathway to assure their program and TPA meet curriculum requirements and candidate needs, regardless of the certification pathway. Similar considerations should be given for candidates using work experience to fulfill certification requirements, who would also have limited exposure to students.

- *How can the state hold EPPs accountable for a locally determined TPA?* EPPs are required to provide curriculum and training, such as teaching candidates how to write a lesson plan, but there is great inconsistency in the quality of this training. Implementing a TPA that meets SBEC-approved criteria could raise the bar by specifically outlining *how* candidates demonstrate their knowledge. SBEC has the authority (TEC 21.045(b)(5)) to require EPPs to submit any information necessary to determine EPP effectiveness and could therefore require data related to the quality of the TPA (which can be included in the EPP's annual performance report), holding programs responsible for compliance with a set minimum level of candidate competency. Although there is not an indicator within ASEP that relates to the quality of implementation of a TPA, SBEC has the authority (TEC 21.0451(a)(4)(B)) to set procedures to change the accreditation status of an EPP that violates state law or rules and the authority (TEC 21.0451(a)) to establish rules to sanction EPPs that are out of compliance with state law or rules.
- *How can the state thoughtfully revise late-hire provisions to better support candidates?* Under the late-hire provision (TEC 21.051(d), 19 TAC 228.35(d)), candidates who enroll in an EPP 45 days before the first day of instruction can be hired without completing any other program requirements other than passing a content exam. Even if SBEC made a TPA a requirement for obtaining an intern certificate, it would likely be waived by the late-hire provision, allowing candidates to teach for an entire year before demonstrating key competencies.
- *What can the state do to define and address issues in Texas educator preparation?* Texas should strive to continuously improve educator preparation. There is no silver bullet that will solve our issues. Regularly and effectively engaging stakeholders from the preparation spectrum in policy decisions, as well as conducting a full analysis of all available data related to educator preparation outcomes in Texas, will lead the state to a deeper, more precise understanding of current issues and solutions. Any proposed changes, such as implementation of a local TPA, statewide TPA, revised PPR, etc., should be presented with cost estimates and details on how the state plans to comply with Texas Government Code (TGC) 2001.0045 should any costs be increased from current rule.

The July 2022 SBEC Work Session panelists appreciate TEA's and SBEC's efforts to collaborate in finding the best path forward for better preparing Texas teachers. These policy decisions must reflect a shared mission and goal of continuously improving the success and effectiveness of educators and, ultimately the education that Texas students receive.

The following professional organizations below, listed under their stakeholder representative for the July SBEC work session, provided feedback supporting the development of this letter and approved having their organization name included. Given the nuanced nature of this conversation, there are varying opinions within the membership of each organization listed, but we hope this letter provides insight on areas of agreement among stakeholders.

Heather Doyle (TCTCT):

Texas Association of Certification Officers, Texas Coordinators for Teacher Certification Testing (TCTCT)

Andrea Chevalier (ATPE):

Texas State Teachers Association, Texas Music Educators Association, Career and Technical Association of Texas, Texas Classroom Teachers Association, Texas American Federation of Teachers, Association of Texas Professional Educators (ATPE)

Karen Dooley (TASB):

Texas Association of School Administrators, Texas Association of Community Schools, Texas Association of School Personnel Administrators, Texas Elementary Principals and Supervisors Association, Texas Association of School Boards (TASB)

Michael O'Malley (TACTE):

Associate and Assistant Deans and Directors of Texas, Texas Association of Teacher Educators, Education Deans of Independent Colleges and Universities of Texas, Texas Association of Colleges for Teacher Education (TACTE)

*The Texas Alternative Certification Association declined to endorse these recommendations due to the nuanced nature of the issue and the varied voices within their membership but looks forward to continued collaboration.