



Input to the State Board for Educator Certification Regarding Item 18: Discussion of Internship Requirements September 30, 2022

The Association of Texas Professional Educators (ATPE) offers the following input to the State Board for Educator Certification (SBEC) regarding Item 18: Discussion of Internship Requirements.

Senate Bill (SB) 15, passed by the 87th Legislature in the Second Special Session of 2021, contained permissive language allowing SBEC to propose rules stating that a candidate employed as a teacher in a virtual setting could satisfy their internship as a virtual teacher. SB 15 expires Sept. 1, 2023, but the legislature is expected to bring the matter of virtual schooling up again in January 2023, when the 88th Texas Legislature meets. More significantly, lawmakers will be considering the recommendations of the Texas Commission on Virtual Education, which has been meeting monthly throughout 2022 and was created specifically to offer direction for future legislation to replace the temporary SB 15.

Texas Education Agency (TEA) staff have identified three options for SBEC to consider, the first of which is to take no action and maintain current rules. ATPE urges SBEC to pursue Option One and maintain the current rules regarding the internship setting for the following reasons:

- **Rulemaking related to this provision of SB 15 is premature at this time.** Due to the complexity and length of the rulemaking process and the proposed SBEC and State Board of Education (SBOE) meeting dates, it is likely that new rules would be adopted shortly before the Sept. 1, 2023, expiration of SB 15. Furthermore, the rulemaking process would occur during a legislative session, when changes to virtual education-related statutes are anticipated. It would be a better use of SBEC's time to wait until the intent of the legislature regarding virtual education is made clear.
- **A virtual internship would conflict with existing law stating that a minimum number of observations conducted during an internship must occur in person.** Texas Education Code (TEC) 21.051(f) requires SBEC to propose rules, which SBEC adopted earlier this year, providing for at least "two observations to occur in person and two additional observations to occur in virtual settings that are equivalent in rigor to in-person options for observation, or three observations to occur in person." By law, some observations **MUST** occur in person. 19 TAC 228.35(g)(1) states that the in-person observation "must be on the candidate's site in a face-to-face setting." Will field supervisors travel to candidates' homes to observe them teaching at a computer?
- **A teacher who is prepared in a virtual internship will not be prepared for an in-person setting,** regardless of whether mentors help candidates "make connections between the

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virtual setting and the actual school setting” (as stated in the SBEC Board Book, Item 18, p. 3)¹. The internship experience has been identified by the Teacher Vacancy Task Force’s teacher preparation working group as a problem area that must be revised “so that interns have more support and practice-based experiences,” (Teacher Vacancy Task Force, Improving Teacher Preparation Breakout Notes, p. 8)². Introducing the ability for interns to complete their internship in a virtual setting could further erode the preparation of these individuals, who will then be even less prepared to execute essential skills such as classroom management as they enter an actual school setting. (SBEC rules distinguish “actual school settings” from virtual school settings or distance learning.) To make matters worse, virtual schools inherently segregate students, as only those with the means (e.g., technology, adult supervision) can engage in virtual learning. This further suggests that a virtual internship will not prepare a candidate to teach in an actual school setting, as the population of students will likely be much diverse and with more complex instructional needs.

- **It is premature to consider the creation of a standard certificate exclusively for virtual teaching** that would allow for a virtual internship, as the Texas Commission on Virtual Education has not completed its recommendations in this area. Furthermore, Texas cannot afford to implement a new certificate exclusive to virtual instruction at a time when schools cannot even find enough in-person educators and children need face-to-face instruction more than ever to make up for time spent out of school during the pandemic, which had serious consequences for their academic and behavioral growth.

Virtual instruction, *when done well*, can work for students. However, the track record of virtual schools in Texas and across the country has consistently shown that the virtual setting does not meet *most* students’ academic, behavioral, emotional, social, and physical needs. For the majority of students, an in-person setting is the most effective learning environment and is often the only appropriate environment for emergent bilingual students and students with special needs. It would be premature for SBEC to change its rules to accommodate virtual internships or devise a new certificate for virtual teachers at a time when state laws on virtual schooling are unsettled. Therefore, ATPE implores SBEC to focus on improving educator preparation for the majority of students who need an effective teacher physically in a classroom while the legislature works out virtual education in Texas.

ATPE appreciates this opportunity to provide feedback. Please contact ATPE Governmental Relations at (800) 777-2873 or government@atpe.org for any additional information.

1. <https://tea.texas.gov/sites/default/files/september-agenda-item-18.pdf>
2. <https://tea.texas.gov/sites/default/files/covid/tvtf-meeting-2022-08-25-notes-working-group-educator-preparation.pdf>

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