



**Written Testimony on SBEC Agenda Item 15:
Action on Alternative Performance Assessment Pathways
for Educator Certification and Discussion of
Teacher Performance Assessment Options**

Dec. 9, 2022

The Association of Texas Professional Educators (ATPE) offers the following input to the State Board for Educator Certification (SBEC) on Agenda Item 15 for the Dec. 9 meeting: Action on Alternative Performance Assessment Pathways for Educator Certification and Discussion of Teacher Performance Assessment Options.

This agenda item calls for SBEC to direct Texas Education Agency (TEA) staff to initiate processes for finding and/or developing performance assessments that may be used “in addition to” edTPA. Implicit in the agenda item is the assumption that SBEC will soon take rulemaking action to make the nationally administered edTPA a requirement for certification candidates in Texas, as further discussed in Agenda Item 16. ATPE has submitted detailed written testimony on Agenda Item 16 expressing our concerns about such a direction and urging SBEC to delay any such rulemaking until after the 2023 legislative session.

ATPE is among the many stakeholders that have questioned the appropriateness of using edTPA as a summative assessment required for certification. Some of the concerns about edTPA include the following:

- Due to the prevalence of alternative certification in Texas, the majority of certification candidates in our state would become teachers of record *before* they would undertake a performance assessment as a certification exam, calling into question its efficacy as a measure of “day-one readiness” for educators.
- Candidates will spend more money to complete edTPA than they would spend to take the current Pedagogy and Professional Responsibilities (PPR) exam, which is worrisome in light of ongoing teacher shortages.
- Other states have tried using edTPA and then scrapped the program.
- Ironically, the edTPA performance assessment was developed to align with national Common Core curriculum standards, which our state has not only rejected but also outlawed in 2013 legislation that prohibited the State Board of Education (SBOE) from using Common Core.

Relying on edTPA as the state's default pedagogy exam will force educator preparation programs (EPPs) to revise their programs to align with a national teacher performance assessment rather than crafting an appropriate certification instrument that aligns with Texas standards for EPP curriculum and ensures teachers are well-versed in the Educators' Code of Ethics. As ATPE has stated in the past, TEA has put the cart before the horse by contracting with Pearson to administer edTPA as the state's pedagogy exam and then pushing SBEC to adopt the necessary rule changes to accommodate that contract.

The above concerns contributed to the SBOE's unanimous decision earlier this year to veto the first attempt at changing SBEC rules to require edTPA for certification. With the 2023 legislative session only one month away, lawmakers are also taking an interest in this issue and are expected to pass new legislation relating to educator preparation and certification in the coming months. For these reasons, ATPE has recommended that SBEC and TEA delay rulemaking that would replace the PPR with edTPA. Although we appreciate TEA's acknowledgement of a desire to pursue alternatives to edTPA, we believe this effort should be reframed without the assumption that edTPA will become the default pedagogy exam for Texas certification candidates.

ATPE appreciates the opportunity to share our input on this agenda item, as well as Agenda Item #16. We are eager to work with SBEC, TEA, lawmakers, EPP representatives, and educators to craft solutions for improving educator preparation and certification laws and rules in a manner that will help our state recruit and retain quality educators. Please contact ATPE Governmental Relations at (800) 777-2873 or government@atpe.org for any additional information.

The Association of Texas Professional Educators (ATPE) has been a strong voice for Texas educators since 1980. It is the leading educators' association in Texas with approximately 90,000 members statewide. 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 public schoolchildren of Texas.



**Written Testimony on SBEC Agenda Item 16:
Discussion of Teacher Performance Assessment
Implementation, Test Development Updates, and Amendments
to 19 TAC Chapter 230**

Dec. 9, 2022

The Association of Texas Professional Educators (ATPE) offers the following input to the State Board for Educator Certification (SBEC) on Agenda Item 16 for the Dec. 9 meeting: Discussion of Teacher Performance Assessment Implementation, Test Development Updates, and Amendments to 19 TAC Chapter 230: Professional Educator Preparation and Certification, Subchapter A, General Provisions, and Subchapter C, Assessment of Educators.

This agenda item calls for SBEC “to provide feedback on next steps to implement teacher performance assessment options as the pedagogy exam requirement” for those seeking certification in Texas. In its section of the agenda on “Background Information and Justification,” the Texas Education Agency (TEA) staff shared summaries of SBEC work sessions held in July and September with various stakeholders, along with the staff’s intent to create a plan for implementing a teacher performance assessment—specifically, edTPA—as the required pedagogy exam for certification beginning with the 2024-25 school year. The plan would allow SBEC to consider other performance assessment exams in the future (no earlier than 2026-27) that may be used as an alternative to edTPA.

TEA’s background narrative fails to acknowledge the lengthy discussions and complex actions related to edTPA that preceded the July and September meetings. In 2017, SBEC directed TEA staff to work with stakeholders and an advisory committee of Texas educators to improve the state’s certification structure and the Pedagogy and Professional Responsibilities (PPR) exam. The educators and groups representing educators on these committees (including ATPE) recommended replacing the current EC-12 PPR exam with a collection of narrower, grade-banded exams based on pedagogy standards developed by the advisory committee.

Sidelining the work of the advisory committee, TEA staff began pushing the board to replace the PPR with edTPA. In mid-2018, TEA announced its selection of the vendor NCS Pearson to launch edTPA in Texas as a replacement for the PPR by the 2021-22 school year. The agency awarded the contract (beginning Sept. 1, 2018) to Pearson following a Request for Proposal seeking a new test vendor who could provide a performance-based assessment or constructed-response assessment that would reflect the new grade-banded PPR standards, the SBEC-adopted Educators’ Code of Ethics in 19 TAC Chapter §247.2, and other relevant criteria. As a nationally administered assessment, edTPA

was not developed with Texas-specific standards in mind and does not ensure new teachers understand the Texas Educators' Code of Ethics.

Both SBEC members and stakeholders—including ATPE and educator preparation program (EPP) representatives—objected to TEA's unilateral decision to contract with Pearson to make edTPA the state's new certification exam without broad stakeholder support or even input. We complained about the one-size-fits-all design of edTPA and its reliance on a nationalized, Common Core-style curriculum. We pointed out its misalignment with Texas teacher standards and shared information about other states' negative experiences with edTPA and research questioning its effectiveness. We expressed concern about the higher cost for candidates taking edTPA at a time when schools face teacher shortages. Perhaps most significantly, we cast doubt on the effectiveness of edTPA in measuring teachers' "day-one readiness" considering that 70% of Texas' new teachers are alternatively certified and will have already become teachers of record under intern certificates or emergency licenses *before* they undertake edTPA requirements. TEA and those who supported using edTPA testified that it would inspire positive changes in the EPP curriculum.

As a result of the criticism, SBEC and TEA began a three-year, state-funded pilot of edTPA. However, as former ATPE Lobbyist Andrea Chevalier wrote [in a blog post](#), the pilot "wasn't meant to answer the question of *whether* Texas should adopt edTPA; it was merely intended to answer when and how edTPA would become mandatory for certification." TEA continued with its plans for SBEC to make edTPA the required certification exam, merely postponing the effective date by three years on account of the pilot and the COVID-19 pandemic. In February and April 2022, with the pilot incomplete and notwithstanding serious questions raised by ATPE and other stakeholders, SBEC voted to actuate TEA's plan to replace the PPR with edTPA.

The elected State Board of Education (SBOE) must review all SBEC rulemaking actions, and at their June meeting, SBOE members *unanimously* vetoed the SBEC rule change to adopt edTPA as a certification exam. They expressed concerns similar to ATPE's about the higher cost of edTPA, the need to hold EPPs more accountable for preparing candidates to become teachers, TEA's aggressive lobbying for edTPA, and its contracting standards that favor large companies such as Pearson. SBOE Chairman Keven Ellis admonished TEA and SBEC to engage stakeholders more in crafting solutions. Some on the board, including Ellis and Member Pat Hardy, echoed the sentiment of ATPE and other stakeholders that edTPA may be more useful as a formative assessment tool incorporated into EPP curriculum than as a summative pedagogy assessment required for certification. They also expressed support for a Texas-developed certification exam, which edTPA is not.

Now, despite warnings from the SBOE, the reservations of stakeholders, and the cautionary tales of other states that have abandoned edTPA, we appear back in the same place we were when TEA

initially pushed SBEC to adopt rules making edTPA the required pedagogy exam. Many stakeholders' recommendations, such as focusing not only on assessing certification candidates but also on improving their preparation, continue to be ignored in the haste to fulfill the misguided contract with Pearson, which TEA rushed into before seeking SBEC approval for the prerequisite regulatory changes. Meanwhile, questions remain unanswered about edTPA's higher cost, its misalignment with Texas rules and standards, its timing and ill fit with our state's alternative certification structure, and the in-depth analysis of the Texas edTPA pilot.

ATPE is pleased that TEA's proposal contemplates developing "other vetted alternative[s]" for future use. However, nebulous promises of future "alternatives" do not negate the fact that TEA's proposal continues to require, at least through the 2027-28 school year, that educator certification candidates, including those already teaching on intern certificates, complete edTPA. Nor does the discussion of "alternative performance assessments" address the lingering precursory question of whether it is even appropriate to use a performance assessment as a certification exam. Before those discussions can come to fruition, Texas EPPs will be forced to quickly change their programs to align with the nationally developed edTPA instead of focusing on training their candidates to better understand and comply with Texas' standards and Code of Ethics. TEA continues to put the cart before the horse and prioritize its relationship with Pearson over the need to improve EPP curriculum and accountability and create reliable measures of teacher readiness.

ATPE is also wary of the push for another round of SBEC rulemaking around edTPA to begin in February 2023 while the Texas Legislature is in session. Lawmakers will be contemplating statutory changes to educator preparation and certification that could require sweeping changes to SBEC rules. Considering that significant intervening factor and the likelihood that the SBOE would reject any SBEC rule that looks nearly identical to its ill-fated attempt this year to adopt edTPA as a certification requirement, ATPE recommends that SBEC delay rulemaking until after the legislative session. Until then, SBEC could spend more time evaluating the edTPA pilot, reviewing the experiences of other states, and having meaningful conversations with EPPs and stakeholders to build consensus on how to improve educator recruitment and preparation *before* candidates are responsible for being a teacher of record.

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

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