



Testimony on SBEC Agenda Item 17: Proposed Agreed Order for A+ Texas Teachers Educator Preparation Program

April 29, 2022

The **Association of Texas Professional Educators (ATPE)** offers the following input to the State Board for Educator Certification (SBEC) regarding Item 17 of the April 2022 agenda. The item calls for the board to approve a proposed settlement agreement or “agreed order” between the state and the A+ Texas Teachers (ATT) Educator Preparation Program (EPP) stemming from violations of SBEC rules found during a program review under the Accountability System for Educator Preparation (ASEP).

ATPE does not typically weigh in on proposed sanctions or related settlement agreements between the board and EPPs or between the board and individual educators. However, due to the size and reach of ATT, the duration and nature of the violations cited, and the media attention the proposed settlement has garnered, we feel compelled to share input on the suitability of SBEC sanctions in this case and with respect to all EPPs found to be out of compliance.

As the state’s largest educators’ association, ATPE is concerned about the noticeable downward shift in educator morale and increased reports of educator resignations in recent years. These workforce issues aggravate a long-standing problem of teacher turnover among novice teachers, who are more likely to leave the profession in their first five years. Those who leave the profession often cite lack of support as a motivating factor for their departure, along with inadequate pay for the volume of work they must undertake. Accordingly, it disturbs us when the state’s largest producer of new teachers is found to violate so many SBEC rules that relate directly to preparation and ongoing support of its certification candidates.

Educator certification candidates spend thousands of dollars and considerable time to become certified, and our state’s EPPs owe them a commitment to training and support that will prepare them to face the rigors of the classroom and set them up for success as teachers. That commitment extends naturally to the students who will be taught by those prospective teachers and whose learning, development, safety, and well-being will be placed in their hands.

With respect to alternative certification programs, the need for rigorous standards and mentoring is even greater. Alternative certification candidates enter the classroom and become teachers of record on an expedited basis, well before they have undergone the training and practice afforded a candidate in a traditional EPP. This is precisely why state law and SBEC rules have mandated that providers adhere to minimum standards for admission—largely to ensure candidates have necessary knowledge of the content they will teach—and support candidates through mentoring and supervision, field-based experiences, and observations.

Deviations from those EPP standards do a disservice to prospective teachers, who, through no fault of their own, miss out on a robust preparation experience and may find it harder to obtain jobs—not to mention the potential harm to students if they are taught by ill-prepared teachers. In the case of ATT, the program’s advertising—from its “Want to Teach? How Soon Can You Start?” billboards to current website advertising stating one “can start teaching in just a few weeks”—suggests the private, for-profit EPP has long banked upon speed in churning out a high volume of new teachers through an entirely virtual curriculum. This appears to have come at the expense of those teachers’ preparation. It is worth noting that ATT has publicly opposed legislative and regulatory efforts over the course of many years to raise EPP admission standards or preparation requirements that might slow its candidates’ route to the classroom, arguing such changes would lead to teacher shortages. The National Council on Teacher Quality has debunked those claims, however, and also assigned “D” and “F” ratings to ATT for multiple years of its Teacher Prep Review, largely based on the EPP’s low admission standards and lacking supervision of candidates (See National Council on Teacher Quality’s reviews of Texas Teachers at [https://www.nctq.org/review/viewProgram/Texas-Teachers-\(formerly-A-Texas-Teachers\)-TX-2](https://www.nctq.org/review/viewProgram/Texas-Teachers-(formerly-A-Texas-Teachers)-TX-2).)

SBEC is entrusted with regulating and overseeing EPPs. SBEC also regulates the profession by upholding ethics and disciplinary standards for educators. EPPs and individual educators both run the risk of SBEC sanctions if they violate their duties. However, SBEC has taken much greater steps to ensure transparency and consistency in its imposition of sanctions against individual educators than it has for sanctions against EPPs. For educators, SBEC has prescribed Disciplinary Policy Guidelines and adopted Enforcement Action and Decision-Making Guidelines in 19 TAC Chapter 249 to guide the board’s actions.

SBEC rules are more nebulous when it comes to sanctioning an EPP for violations such as those committed by ATT. For example, 19 TAC Rule §229.4 states merely that “an EPP may be assigned Accredited-Probation status if the SBEC determines that the EPP has violated SBEC rules, orders, and/or TEC, Chapter 21,” and that “an EPP may be assigned Not Accredited-Revoked status if the EPP has been on Accredited-Probation status for one year, and the SBEC determines that revoking the EPP’s approval is reasonably necessary to achieve the purposes of the TEC, §21.045 and §21.0451.” Without clear guidelines, there is less consistency across cases of EPP noncompliance, and the resulting settlements can vary greatly based on EPP characteristics and resources.

Another difference between SBEC’s discipline of certified educators and its treatment of EPPs is that individual educators across the board have been required to satisfy *all* the conditions of any suspension before their certificates are reactivated and they are allowed to return to the classroom. In the matter before SBEC today, ATT has been allowed to continue operating and even admitting new applicants throughout the extended period it has been out of compliance, an accommodation not always offered in prior cases involving ASEP sanctions. ATPE appreciates that the Texas Education Agency (TEA) plans to conduct a random sampling of 50 candidates from ATT to help determine if the EPP has corrected the remaining deficiencies found. However, we question whether proof that 40 candidates (80% of the random sample) received the necessary field support and training will alleviate concerns about a program that

enrolls 70,000 candidates. Forty candidates represent less than 0.06% of the program's enrollment, and such a small sampling may not provide enough evidence the serious deficiencies found by the agency have been rectified.

With the future success of so many prospective teachers hanging in the balance, the ATT investigation has garnered media attention, including an April 2022 *Dallas Morning News* article asking whether SBEC will consider the program "too big to fail" and allow it to continue operating despite its noncompliance. At a time when there are so many fears about teacher shortages, ATPE is not asking for the state to shut down ATT, but we do believe additional oversight is warranted in light of the extent of the ongoing deficiencies and reports of a large volume of customer service complaints to TEA about the EPP. Additionally, as a program already in operation for several years, ATT should not have been permitted to produce so many thousands of Texas teachers without already having met *foundational* and *fundamental* requirements of an EPP, such as certification of the quality of the online program, establishing the use of research-based curriculum, requiring candidates to demonstrate proficiency *before* becoming a teacher of record, having the infrastructure to provide the mandatory field supervision and mentoring to candidates, and ensuring its candidates understand the Educators' Code of Ethics, which is of the utmost importance.

Section 21.0451 of the Texas Education Code authorizes SBEC "to take any necessary action, including one or more of" an enumerated list of sanctions in the law for EPP violations. The options outlined include requiring the EPP to obtain technical assistance or professional services from a contractor and appointing a monitor to report on the activities of the EPP. (Revocation and closure are additional sanctions available following a contested case hearing through the State Office of Administrative Hearings.) ATPE recommends SBEC consider requiring additional and more frequent monitoring of ATT to ensure its candidates are indeed prepared to enter the challenging profession of teaching with the support they need to be successful and give their students an exemplary public education.

The mission of SBEC is, in part, to ensure the safety and welfare of Texas schoolchildren by upholding the highest level of educator preparation. That mission demands greater scrutiny of the operations of the EPPs this board has allowed to do business in our state and consistent application of sanctions and corrective actions. SBEC must take steps to protect not only the aspiring educators who invest their time and financial resources into these programs in good faith but also the students they will ultimately teach. It is not too hyperbolic to suggest the future of Texas depends upon it. ATPE appreciates the opportunity to provide input and invites board members and TEA staff to 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.