



ATPE Input to State Board for Educator Certification

Regarding Chapter 235, Teacher Pedagogy Standards

September 20, 2024

The **Association of Texas Professional Educators (ATPE)** appreciates this opportunity to offer written input to the State Board for Educator Certification regarding the proposed revisions to TAC Chapter 235, classroom teacher certification standards. ATPE appreciates the evolution of these standards so far, particularly in response to stakeholder and board feedback surrounding the removal of lesson design from the standards. While we appreciate that lesson design was reincorporated into the standards, we still have concerns about the overemphasis of lesson internalization and use of OER materials in the standards.

During the State Board of Education meetings last week, Commissioner Mike Morath and SBOE member LJ Francis had a conversation around the definition of lesson planning, which he also referred to interchangeably as design, versus lesson internalization. The conversation highlighted misunderstandings around these terms. ATPE would like to see a definition for lesson design added to the definitions in section 235.2. We feel this will clarify some confusion about what lesson design is and why it is still necessary even if a district adopts the new HQIM materials. We would suggest that it be added above the definition for “lesson internalization,” at #17.

In section 235.21(a), we suggest the following changes:

- Change the sentence “The standards *prioritize* the knowledge and skills required for teachers to select, evaluate, internalize, and implement high-quality instructional materials,” to “The standards *include* the knowledge and skills required for teachers to select, evaluate, internalize, and implement high-quality instructional materials **as well as the knowledge required to design lessons.**”
- Delete the sentence: “They assume that practicing teachers only engage in initial lesson design when working in a grade level and subject area for which high-quality instructional materials are not available, or when they are directed by their district to do so.” Educators engage in lesson design constantly, and

assuming they will only do so if HQIM materials are not available or they are directed by their district to do so is a very big assumption and one not backed up by everyday classroom teacher experiences and practices.

In section 235.21(b)(2), we suggest the following changes:

- Delete the phrase “and select the highest-quality district-approved option.” Who determines which option is the highest quality? Also, districts do not approve every lesson a teacher presents in a classroom. Teachers receive lessons from peers, from staff development (in and outside of school), or design their own. This autonomy should be maintained. Additionally, this is not mandated by HB 1605. The author made clear that he intended to maintain teacher autonomy throughout process of passing the bill last year.
- Delete the phrase “using OER and SBOE approved materials when available.” Again, this is not mandated by statute. We should not be emphasizing OER or SBOE approved materials over other materials a teacher may use, including district-created and teacher-created materials.
- In subsection (ii), we have concerns with the phrasing “Teachers identify the benefits of using high-quality instructional materials.” Again, this is emphasizing HQIM over other materials. We would suggest adding the phrase “and drawbacks” to make the standard more neutral.
- In subsection (iii), we have concerns with the use of the word “customize.” If a teacher customizes the HQIM materials, they are not implementing those materials “with fidelity,” as required statute under HB 1605 to retain liability protections. While we understand and appreciate that during his comments to the SBOE last week, Commissioner Morath stated that teachers are still expected to customize or modify their lessons to meet the needs of their students, this statement does not align with statute. Until and unless the statute can be changed, the pedagogy standards should not require something of educators that will mean they lose those valuable protections.

In section 235.21(b)(3), we suggest the following changes:

- Delete the phrase “when instructing in grade-levels and subjects in which there are not SBOE-approved tier one high-quality instructional materials available.” Again, statute does not require that teachers use SBOE-

approved HQIM materials above all others. Teachers should know how to design a high-quality lesson regardless of the availability of OER or HQIM.

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