



# Public Comments on Proposed State Board for Educator Certification Amendments to 19 TAC 230.21

April 7, 2022

The Association of Texas Professional Educators (ATPE) respectfully submits the following comments in opposition to rule amendments proposed by the State Board for Educator Certification (SBEC) in 19 TAC Chapter 230.21, specifically those that implement the edTPA exam as a replacement for the Pedagogy and Professional Responsibilities (PPR) exam required for licensure.

The proposed rules would implement a three-year phase-in to replace the PPR with edTPA. In 2022-23, candidates would choose either the PPR or edTPA to fulfill their pedagogical exam requirement for licensure, but no cut score would be set yet, and all candidates would pass edTPA by submitting a complete portfolio. In 2023-24, all candidates would be required to take edTPA, similarly without a cut score and by submitting a complete portfolio. In 2024-25, all candidates would be required to pass edTPA based on an official cut score as set by a committee using the edTPA pilot data and 2022-23 data. Educator preparation programs (EPPs) would not be held accountable for candidate performance on edTPA until further rulemaking updates are made to the Accountability System for Educator Preparation Programs (ASEP). The proposed rules also amend the figure in 19 TAC 230.21(e), which specifies the exams candidates must take to earn a particular teaching certificate, replacing each instance of the PPR exam with a related edTPA exam for that certificate area.

## **ATPE has several concerns and associated questions with requiring edTPA for the certification of Texas educators:**

### **BURDENSOME COST**

EdTPA will charge teacher certification candidates an extra \$195 over the existing cost of the PPR, which is a major financial barrier at a time when we already have a shortage of current and prospective teachers. At the Feb. 11 SBEC meeting, the Texas Education Agency (TEA) indicated it had negotiated with the testing vendor, Pearson, to offer financial assistance to candidates. It is important that financial assistance be easy to acquire, widely available, equitable, and permanent. Additionally, it is important to consider how implementing edTPA will affect EPPs as the cost may vary across EPP type and size, with higher costs potentially passed down to candidates participating in programs that struggle to absorb the impact.

1. TEA indicated that “candidates will receive a \$30 rebate after receiving their edTPA scores.” Will these rebates be permanent? Are they automatic, or is there a process to apply for the rebate? If so, what is the process? If every candidate is eligible to receive the \$30 rebate, can TEA negotiate a lower cost for the exam so a rebate is not required?
2. TEA also indicated that “financial assistance waivers” will be allocated. How many waivers will there be, how will they be allocated, what is their value, and are they permanent?

---

*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.*

3. TEA said EPPs will be able to purchase vouchers in order to embed edTPA costs into their program costs. What is the cost of a voucher, and how many vouchers will be available? How has this option affected licensure costs across demographic groups in other states using edTPA?
4. What “long-term plans,” as mentioned by agency staff Feb. 11, does TEA have to update exam design to eliminate duplicative testing across the exams educators must take to be certified, thereby reducing the total number of exams educators must take?
5. If edTPA is adopted, what will the total cost of certification be for a candidate wishing to become certified in one subject area? In two subject areas?
6. What are the overall costs to EPPs to implement edTPA, including hiring an edTPA coordinator, and what impact has this had on program viability and candidate cost, across program size and type, in other states?

### **INSUFFICIENT PILOT DATA**

The candidate score data from the edTPA pilot is not connected to student outcomes, principal evaluations, or first-year teacher surveys. Furthermore, peer-reviewed research (Gitomer et al., 2019) details concerns with the procedures and statistics used to make claims about edTPA’s reliability in scoring candidates. Teachers who participated in the Texas pilot also testify that missing certain edTPA rubric elements (e.g., having no special populations in one’s class) can unfairly impact a candidate’s score.

1. Has TEA conducted an analysis of how edTPA has impacted teacher effectiveness in Texas? How have the candidate scores from the edTPA pilot corresponded to student outcomes, principal evaluations, or first-year teacher surveys?
2. Has TEA collected candidate feedback from those who participated in the edTPA pilot and, if so, has there been a systematic analysis of candidate experiences with the exam indicating that taking the exam improves candidate readiness to teach?
3. What evidence or third-party independent research does TEA have, other than comparing Texas edTPA pilot participant scores to national edTPA scores, to conclude that edTPA is a reliable indicator of candidate readiness?
4. How does TEA plan to verify the validity and reliability of the pilot data in the process of setting a cut score for candidates during the implementation of edTPA as this cut score has high-stakes implications for candidates and for EPP accountability?

### **CONSTRICTING THE TEACHER PIPELINE**

Recently, Gov. Greg Abbott publicly recognized that Texas has a teacher shortage by calling upon TEA to convene a teacher vacancy task force. Not only is it incumbent upon the state to keep current teachers, but also it is imperative to ensure there are no unnecessary barriers to entry for new teachers. Implementing edTPA as a mandatory exam for licensure in Texas has the potential to constrict the teacher pipeline due to its burdensome requirements and extreme cost.

Several states have eliminated edTPA as a required licensure exam due to negative effects, including impacts on the diversity and supply of the teacher pipeline. States that have eliminated edTPA include Georgia, Washington, Wisconsin, and Delaware. New York and New Jersey, citing teacher shortage concerns, are also expected to eliminate edTPA.

1. What has been the impact on the teacher pipeline, disaggregated by demographic group, in other states that have implemented edTPA as a required exam for licensure?

2. TEA staff has shared that other states have eliminated edTPA due to “local context.” What are the exact reasons other states have decided to eliminate edTPA as a required licensure exam? Did other states experience teacher pipeline issues?
3. What steps will TEA take to ensure edTPA does not constrict the teacher pipeline in Texas?

### **DAY-ONE READINESS**

According to TEA data, 70% of newly certified Texas teachers in 2020-21 were from out of state or went through alternative or post-baccalaureate certification programs. These teachers typically enter the classroom *before* completing standard certification. Unfortunately, according to TEA teacher retention data, teachers prepared through the alternative certification route have a five-year retention rate of 60.3% compared with 70.2% for those prepared through traditional university-based programs. For this reason, ATPE and other stakeholders have advocated that bolstering educator preparation program (EPP) curricula by requiring a performance assessment *during* preparation, rather than after as a licensure exam, would benefit Texas educators more by ensuring meaningful feedback *before* standard certification. Despite this advocacy, TEA has consistently adhered to a strict timeline and plan to fully implement edTPA as a licensure exam rather than as part of the EPP curriculum.

1. How is the edTPA experience different for alternative certification candidates who become teachers of record while still completing their preparation program, contrasted with candidates in traditional EPPs who complete edTPA before becoming a teacher of record?
2. Has TEA analyzed the experiences of candidates in the edTPA pilot across EPP type? What were those experiences and what lessons were learned?
3. Has TEA analyzed the ability of alternative certification candidates to successfully meet the edTPA requirements while working full-time as a teacher of record?
4. What data exist to show how implementing edTPA improves teacher effectiveness and retention of teachers prepared in alternative certification programs?
5. What barriers, if any, exist that would prevent SBEC from proposing rules to require a performance-based assessment as a part of program completion for candidates?

### **MISALIGNMENT TO TEXAS TEACHER STANDARDS**

Approving the nationally developed edTPA as the state’s pedagogy exam for certification would inhibit flexibility and innovation for Texas EPPs. In 2013, Texas lawmakers banned the use of Common Core or any other national curriculum or test to ensure Texans maintained control over K-12 education standards. Similarly, adopting edTPA would require every EPP to conform to the same vendor-controlled, national curriculum, which would not cover all Texas teacher standards because it was not created for Texas.

For example, in TEA’s Request for Proposal (RFP # 701-19-001) published September 2017 in the Electronic State Business Daily, vendors were asked to propose a performance-based assessment or constructed-response assessment to replace the PPR that reflected PPR standards, the Educator Code of Ethics found in 19 TAC Chapter 247.2, and other relevant standards and/or rules as appropriate for new teachers. However, edTPA, the result of the contract award, does not assess the Educator Code of Ethics standards, which are crucial to educators’ understanding of the ethical and professional expectations they must uphold in relation to students, parents, and the community. Furthermore, the lack of testing in this area jeopardizes the recent work of the Legislature in strengthening educator misconduct laws to protect students.

---

*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.*

1. Which of the teacher standards delineated in 19 TAC 149.1001 are aligned to edTPA, and which are not?
2. Which of the teacher standards in 19 TAC 235, Classroom Teacher Certification Standards, are aligned to edTPA, and which are not?
3. Does edTPA assess the Texas Educator Code of Ethics in 19 TAC 247.12? If not, what plans does TEA have to ensure no educator is certified without having been assessed on the Code of Ethics?
4. How does the adoption of edTPA align to the original RFP published by TEA that mandated the Educator Code of Ethics be included in vendor proposals to replace the PPR?
5. Does TEA plan to replace or remove any teacher standards in 19 TAC 149.1001 or 19 TAC 235 to align with edTPA?
6. Which parts of the T-TESS rubric are assessed under edTPA, and which are not?

TEA has asked SBEC to approve a high-stakes licensure exam that has broad opposition across a diverse group of EPPs, teacher and administrator organizations, and community members. ATPE believes the risk of worsening the teacher shortage is too high, especially given the lack of sufficient evidence that edTPA improves candidate readiness, especially for the vast number of Texas candidates who are prepared through alternative certification programs. We also have concerns about adopting a national test for certification and the turns away from edTPA that other states have taken. Furthermore, Texas has undergone a rigorous process to ensure our state's educators are taught and assessed on teacher standards that ensure ethical and professional conduct in the classroom, and such standards would not be assessed under edTPA. Constricting the teacher pipeline and requiring EPPs to adhere to a curriculum that is stifling and absent of key Texas teacher standards is not a responsible action to take to strengthen Texas education.

ATPE appreciates the opportunity to provide feedback during this process and invites board members and TEA staff to contact ATPE Governmental Relations at (800) 777-2873 or [government@atpe.org](mailto:government@atpe.org) for any additional information.