

Regarding the edTPA certification initiative

March 17, 2022

Dear Chairman Kelly and SBEC Members:

On March 7, 2022, Governor Greg Abbott directed Education Commissioner Mike Morath to create a task force to help school districts address ongoing staffing shortages. In his letter, Abbott acknowledges the critical role highly qualified teachers play in the education of Texas students and urgently directs stakeholders and experts to explore best practices for addressing this shortage. The task force is expected to “research the possibility of flexibility of certification” and “provide an update on initiatives at TEA that could help impact these vacancies.”

The undersigned, who together represent a diverse set of stakeholders and experts across the educator pipeline, are also deeply concerned about the impact of the educator shortage on Texas students. We submit this letter to you regarding edTPA, a certification initiative on the SBEC agenda, and one we believe will dramatically and negatively affect the teacher pipeline. Requiring edTPA as a high-stakes licensure exam for all candidates and preparation programs, which is the opposite of flexibility, would increase barriers to certification — especially for candidates of color and those experiencing financial challenges.

SBEC has engaged in robust discussions for several years regarding if and how to implement edTPA in Texas. Considering the current staffing crisis and the expressed importance of having highly qualified teachers in every classroom, the board has repeatedly called for space to consider alternatives. Despite this, agenda items have consistently adhered to a strict timeline of implementation, leaving the adoption of edTPA as a certification exam as the only option.

Accordingly, we respectfully request that you:

- Vote NO to the adoption of the proposed amendments to 19 TAC §230.21, which would mandate every candidate take the edTPA for certification.
- Direct TEA staff to propose rule text for TAC §228.40 that would require a performance assessment that meets specified criteria to be a mandatory component of preparation.

Vote NO on the proposed amendment to 19 TAC Chapter 230, Professional Educator Preparation and Certification, Subchapter C, Assessment of Educators, §230.21, Educator Assessment

We submit the following reasons for the NO vote:

1. **If adopted, the proposed amendments will require the use of edTPA as a certification exam required for licensure. This will preclude its use as a formative performance assessment, which is the intended use of the instrument, and an alternative approach discussed by the board at multiple convenings.**

The board has engaged in many discussions regarding the utility of performance assessment to prepare educators for the classroom. Board members have also expressed interest in maintaining time and space to consider alternatives, including the use of performance assessment as a curricular requirement in Chapter 228, Educator Preparation Curriculum Requirements. Approving this item will render considerations about alternative approaches moot, since it establishes an edTPA certification exam as the only formalized route available.

2. The use of edTPA as a certification exam will reduce the supply and diversity of the teacher workforce.

Peer-reviewed research and the experiences of other states show that due to language and technology bias, Hispanic teachers are three times as likely to fail the exam and Black candidates perform at lower levels than other candidates. The implementation of edTPA has also been shown to accelerate the decline of teacher production overall. Few states have implemented edTPA as the sole licensure option, and many have since discarded it in favor of more flexible, yet rigorous, curricular-based preparation options. Specific reasons these states have given for eliminating edTPA include the negative impact on the teacher pipeline, the negative impact on the diversity of the teacher pipeline, and the creation of unintended barriers and burdens (including financial) to teacher candidates.¹

3. Using edTPA as a certification exam is not in the best interest of Texas students.

The edTPA has not been shown to improve student learning. Implementation of edTPA has also been shown to result in the decline of clinical placements in classrooms serving larger percentages of harder-to-educate students, because the unique needs of these populations conflict with the edTPA rubric expectations.²

Additionally, edTPA is not aligned to Standard 4 of the T-TESS rubric, which covers Professional Responsibilities including the Texas Educator Code of Ethics and the responsibility to contact parents and guardians regarding students. Furthermore, edTPA does not assess the day-one readiness of 69% of first-year Texas teachers because their certification route puts them in the classroom as teacher of record before they are fully certified.³

[Direct TEA staff to draft rule text for Chapter 228.40 that requires teacher candidates to successfully complete a locally scored performance assessment \(which could include edTPA\) prior to recommending standard, intern, or probationary certification. Suggested rule text is included as an addendum to this letter.](#)

Implementing this alternative rule text would:

- Require all teachers to be assessed for day-one readiness prior to entering the classroom, rather than at the licensure stage, when most candidates are already teaching
- Better prepare educators through a statewide support-and-growth model

¹ Goldhaber, Cowan, and Theobald, 2017; Marder & Rhodes, 2018; Chung & Zho, 2021

² Chung, 2020; Chung & Zho, 2021; Marder & Rhodes, 2018; Greenblatt & O'Hara, 2015

³ Van Overschelde, 2022

- Allow for external evaluation of teacher candidates
- Allow EPPs the option to select edTPA as the performance assessment for the Chapter 228.40 requirement
- Better reflect the intended use of the edTPA instrument as a formative assessment rather than a high-stakes licensure exam
- Keep the door open for developing improved certification exams in Texas

These requests are not in opposition to the use of edTPA, but rather seek to ensure the proper placement of a performance assessment in the teacher preparation process. **To ensure the greatest benefit to educators and students, performance assessments should be used formatively within a preparation program, NOT as a certification exam.**

Together, we the undersigned have a vested interest in creating systems that prepare educators for day-one readiness, and we agree that a performance assessment has a critical place in teacher preparation as a tool to grow and develop novice teachers. We believe the implementation of a performance assessment as a certification exam required for licensure would be an inappropriate and potentially harmful use of a valuable method for assessing teacher candidate readiness for the classroom. Moreover, given an alarming and growing number of staffing shortages impacting classrooms across the state, as most recently underscored by the Governor's urgent letter, it is incumbent on this board to act responsibly in the moment.

Respectfully submitted on behalf of the undersigned,

TAC 228.40

(a) To ensure that a candidate for educator certification is prepared to receive a standard certificate, the educator preparation program (EPP) shall establish benchmarks and structured assessments of the candidate's progress throughout the EPP. Each educator preparation program that provides training to candidates seeking certification as a classroom teacher shall create or select a performance assessment for use under this section.

The performance assessment must:

(1) engage the staff of a candidate's EPP, school personnel, and other stakeholders in the assessment process.

(2) be valid and reliable, including establishing and monitoring inter-rater reliability with no less than 10% of performance assessments evaluated externally;

(3) evaluate the candidate in the areas of planning, instruction, assessment, and professional practices and responsibilities, including adherence to the Texas Educator Code of Ethics (TAC 247);

(4) measure the candidate's skills and knowledge related to the Texas teacher standards (TAC 235);

(5) include:

(A) demonstrations of instructional practice, submission of student artifacts, and submission of assessments that the teacher uses to measure student learning.

(B) evidence of, through video or other means, the teacher's ability to implement and use specific content pedagogy and research-based instructional strategies to positively impact student learning.

(C) a progression of formative tasks focused on growth and feedback, which leads to a summative task; and

(D) a self-reflection of the candidate's instructional practices;

(5) include scoring criteria and feedback that:

(A) observes the candidate's instruction of students in the content and grade band of the certification the candidate is seeking;

(B) analyses of the teacher's decision-making processes and the ability of the teacher to appropriately identify rigorous, aligned content and instruct students in the teacher's content area/grade level assignment.

(C) analyses of the ability of the teacher to adjust instruction to meet the needs of students based on contextual factors, knowledge of students, and data. and

(D) reviews artifacts in the candidate's portfolio including lesson plans, student work samples, and feedback samples;

(6) provide specific and targeted feedback to improve the candidate's instructional practices; and

(7) require a minimum satisfactory level of performance, determined by the Educator Preparation Program, for the candidate to be recommended for an intern, probationary, or standard teacher certificate.

(A) If the candidate qualifies as a late hire under TAC 228.2, the performance assessment must be successfully completed within the first 30 school days after the assignment begins.

(8) include scoring criteria and feedback that allows a candidate to resubmit components of the performance assessment.

(b) An EPP is responsible for ensuring that each candidate is adequately prepared to pass the appropriate content pedagogy examination(s) required for certification, unless that content pedagogy test is used for admission purposes.

(c) Upon the written request of the candidate, an EPP may prepare a candidate and grant test approval for a classroom teacher certificate category other than the category for which the candidate was initially admitted to the EPP.

(d) An EPP shall determine the readiness of each candidate to take the appropriate certification examination of content, pedagogy, and professional responsibilities, including professional ethics and standards of conduct. An EPP shall not grant test approval for a certification examination until a candidate has met all of the requirements for admission to the EPP and has been contingently or formally admitted into the EPP. An EPP may make test approval contingent on a candidate completing additional coursework and/or training to show that the candidate is prepared to pass the test if the candidate is seeking test approval from the EPP in an area where the standards and/or test changed since the candidate completed the EPP or if the candidate has returned to the EPP for test approval five or more years following the academic year of completion.

(e) For the purposes of EPP improvement, an entity shall continuously evaluate the design and delivery of the EPP components based on performance data, scientifically-based research practices, and the results of internal and external feedback and assessments.

(f) An EPP shall retain documents that evidence a candidate's eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after a candidate completes, withdraws from, or is discharged or released from the program.