



Input on Agenda Item 19: Criteria for an Alternative Performance-Based Pedagogy Examination

April 29, 2022

The Association of Texas Professional Educators (ATPE) offers the following input to the State Board for Educator Certification (SBEC) on Item 19, which is a discussion of alternative performance-based pedagogy examinations for certification and related draft rule text.

In February, during a vote to propose the replacement of the state's PPR exam with edTPA, Chair Kelly pressed SBEC to "develop an alternative [to edTPA] that is less expensive and **that is given an equal playing field.**" Kelly directed Texas Education Agency (TEA) staff to "**develop an alternative with the same timelines in mind as for the implementation of EdTPA,**" and to, "**find ways to devote a budget to that item, since budget has been given thus far to only the EdTPA route.**" Kelly also pointed to an independent pilot program conducted by Sam Houston State University that utilized the T-TESS for performance assessment. Referring to the T-TESS pilot, Dr. Kelly said, "**To me, a real viable alternative, I commend Sam Houston State University.** I think their work has been outstanding and I'm hoping that it will continue and develop into the alternative that I, personally at least, would seek."

ATPE appreciates SBEC's determination in exploring alternatives to edTPA, which reflects not only the request by former Chair Kelly, but also stakeholder feedback. During a Feb. 2022 meeting, Educator Preparation Advisory Committee (EPAC) members, including ATPE, engaged in a feedback session with TEA staff and worked in groups to create summary recommendations of criteria for a performance assessment (**see Attachment A**).

Overwhelmingly, these included that the assessment be aligned with T-TESS and Texas standards, including the Educators' Code of Ethics in 19 TAC 247.2, and include iterative, formative assessments during coursework and clinical experience. There was disagreement about whether video should be required, and one group suggested that a performance assessment could be standardized for certification purposes.

The draft rule text shared by TEA in Agenda Item 19 does not reflect the EPAC feedback or Dr. Kelly's request for the following reasons:

1. In draft language for Rule 230.27(a)(1), proposed examinations are not required to align with the Code of Ethics in 19 TAC 247.2, contrary to EPAC recommendations.
2. In draft Rule 230.27(a)(2), the requirement that proposed examinations demonstrate a positive connection to student academic performance is laudable but was not similarly required in the RFP that led to the proposed adoption of edTPA, so the rationale for this addition is unclear. EPAC also did not suggest this.
3. Drafted Rule 230.27(a)(2) also requires that the proposed exam be subject- and grade-specific, which would exclude the T-TESS pilot, contrary to Dr. Kelly's stated intent.
4. In draft language for Rule 230.27(a)(9) and (12), applicants must independently fund the development of their examination, which is contrary to Dr. Kelly's request.
5. Drafted Rule 230.27(a)(7) requires bi-monthly training for EPP and local education agency faculty and staff, which is prohibitive for smaller operations such as the T-TESS pilot.
6. If SBEC adopts the immediate three-year rollout of edTPA, it is unlikely that any proposed alternative examination would feasibly run along the same timeline, as it would take two to three years for an alternative to become operational.

To address these concerns, ATPE is recommending changes to the draft rule language in Item 19. ATPE also recommends that the draft text in 230.27(b) be revised to require that SBEC approve additional requirements for proposed exams, to ensure transparency and opportunity for public input. See our specific recommendations in **Attachment B** that follows.

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 for any additional information.

ATTACHMENT A

Result of EPAC Padlet Activity on Feb. 25, 2022

After initial individual brainstorming, EPAC members organized into random breakout rooms to condense their individual reflections into broader categories as described below.

Small Group Reflection: Trends Observed

Small Group 1

Alignment with educator standards. Content--Demonstration of Differentiation, Evidence of Culturally Responsive Teaching Practice
— REBECCA HAMPTON

Specific language to include ESL and address ELPS. Consider inclusion of ELPS — REBECCA HAMPTON

Alignment to TTESS — REBECCA HAMPTON

Code of Ethics — REBECCA HAMPTON

Unpacking Student Expectations — REBECCA HAMPTON

Structure---Video is Valuable and should be included; Concern with Permission Process; Filming from Back of the Classroom; Access to Resources to Record; — REBECCA HAMPTON

Structure: need for timely feedback and iterative nature of process. Connecting feedback and ongoing coaching. — ANONYMOUS

incorporate accommodations and modifications for all special populations — ANONYMOUS

Small Group 4

Content - aligned to T-TESS so that it is aligned to what principals are looking for as to what constitutes day-one ready. Alignment to principal surveys. — ANONYMOUS

Structure - performance assessment is best used as a formative assessment. The portfolios and artifacts and other components of the assessment should be gathered during the progression of the candidate through their program, rather than in a short time-window at the end. Should not be a one-shot deal. Video does not work for communities with vulnerable populations, should not be required. It is also difficult to get a representative video of a candidate. — ANONYMOUS

Should be aligned to Texas educator standards, include code of ethics. — ANONYMOUS

Small Group 2

Performance-based assessments includes both formative assessments in coursework/clinical experience and a standardized assessment to show proficiency for licensure. — ANONYMOUS

Small Group 5

T-TESS should be the baseline. Should be part of the performance assessment — ANONYMOUS

Should have artifacts with clear rubric — ANONYMOUS

Allowed to be an iterative process, not based on one time performance — ANONYMOUS

Performance assessment should lead into T-TESS evaluations, not something that is not fully aligned. — ANONYMOUS

Small Group 3

Content: alignment with TX educator standards and TTESS — ANONYMOUS

Structure: Disagreement on need for videos (copyright issues) — ANONYMOUS

Structure: Portfolio gathered over the course of the year rather than incremental deadlines — ANONYMOUS

Small Group 6

ATTACHMENT B

ATPE Recommendations for Draft Rule Text Regarding Alternative Performance Assessment Criteria

ATPE respectfully submits the following recommendations to modify the draft rule text shared by TEA in Item 19 of the April 2022 SBEC agenda.

Rule Text	Rationale
<p><u>§230.27 Requirements for Prospective Performance-Based Pedagogy Examinations.</u></p> <p>(a) On a vote of the SBEC to identify performance-based pedagogy examinations for educator certification that the SBEC may consider adopting in addition to the performance-based pedagogy examinations already required in §230.21(e), TEA staff will issue a Request for Proposal in accordance with Texas Government Code Chapter 2155. The Request for Proposal for performance-based pedagogy examinations must require that the examination program proposed in response:</p> <p>(1) Aligns with the Texas teacher standards as prescribed in §235 Classroom Teacher Certification Standards, §149.1001 Teacher Standards, <u>§247.2 Code of Ethics and Standard Practices for Texas Educators</u>, and, as applicable, the Texas Essential Knowledge and Skills (TEKS), and Prekindergarten Guidelines;</p> <p>(2) Demonstrates teacher candidates' effective teaching <u>that can raise students' academic performance, including grade-band and subject specific requirements aligned to Chapter 233 of this title, Categories of Classroom Teaching Certificates</u>, and the collection and evaluation of authentic evidence of teacher practice with evidence of planning, instruction, and assessment in a classroom setting;</p> <p>[...]</p>	<p>During the February 25, 2022, EPAC discussion of alternative examination criteria, members advised that an alternative should assess the Texas Educators' Code of Ethics. Texas educators can receive sanctions for not following the code, and the original RFP that led to edTPA also required this component.</p> <p>It goes without saying that effective teaching leads to increased student outcomes. However, in the original RFP that led to edTPA, there was no requirement that the proposed exam demonstrate candidates' teaching in this specific way, nor did the EPAC suggest this criterion. Furthermore, as per Dr. Kelly's directive, if the SHSU T-TESS pilot is to be treated as "a viable alternative," requiring grade-band and subject-specific requirements must be eliminated. The T-TESS is not a grade-band or subject-specific rubric. EPAC also did not suggest grade-band or subject-specificity.</p>

	<p><u>(7) Supports approved educator preparation programs in the incorporation of the performance assessment into their curricula, including providing a preparation manual and examination implementation guides, in person and virtual training on the examination at least bi-monthly that is accessible to all educator preparation program faculty and staff and local education agency (LEA) staff, and ongoing technical assistance support for the educator preparation programs;</u></p> <p>[...]</p>	Requiring bi-monthly training is an inequitable requirement that smaller test developers will not be able to satisfy due to financial and logistical constraints. Rather, requiring a baseline of monthly training is a reasonable request.
	<p><u>(9) Provides a plan to convene performance standard-setting committees to advise TEA that includes proposer contacting and corresponding with committee members and other project participants, organizing all meeting arrangements <u>and funding all committee-related expenses</u>, and actively recruiting and maintaining a comprehensive and searchable database of potential committee members who are public school and preparation program educators, approved by TEA or SBEC, with recent, relevant campus/district experience and demonstrated track records of improving student outcomes, who represent diversity in demographic, experience, location in Texas, and other relevant factors;</u></p> <p>[...]</p>	Requiring that test developers fund all committee-related expenses is inequitable, especially if the requirement for grade- and subject-specific exams remains in the criteria. This would require extensive resources that smaller test developers may not have.
	<p><u>(12) Provides a <u>cost estimate for guarantee that TEA will not bear any</u> expenses associated with the examination, including but not limited to the preparation, registration, administration and scoring of the proposed examination(s).</u></p>	In directing staff, Dr. Kelly asked that an alternative to edTPA be funded. The expectation that any alternative is independently funded is inequitable. SBEC members should be able to examine the cost estimates of each proposed alternative and determine funding.
(b)	<p><u>Additional requirements identified by TEA staff may be added to the Request for Proposal, as approved by the SBEC.</u></p> <p>[...]</p>	SBEC and EPAC should have a say in any additional requirements that could determine the options available to EPPs.