



Recommendations for Improving Texas Educator Preparation

House Higher Education and Public Education Committees Joint Hearing

September 20, 2022

The Texas Coalition for Educator Preparation (TCEP) is a collaboration of PK-12 and educator preparation program (EPP) professional organizations working towards a goal of identifying issues and solutions in educator preparation. As stated in its mission, TCEP seeks to advance and raise the profile of the education profession by supporting the continuous improvement of educator recruitment, preparation, and certification practices, as well as by promoting ongoing professional growth and support. While TCEP is still growing its membership, core stakeholders involved offer the following input as a starting point for future discussions about pinpointing specific ways to improve educator preparation:

The various EPP pathways in Texas (institution of higher education (IHE), alternative certification program (ACP), post-baccalaureate) have resulted in inconsistency in teacher preparedness. It is faster, cheaper, and easier to become certified via ACP, but according to Texas Education Agency (TEA) data, alternatively certified teachers have lower retention rates than those who are IHE-prepared. Most new Texas teachers are prepared through an ACP, and the majority of those were prepared through A+ Texas Teachers, which is currently on probation for rule violations such as failing to assign mentors to candidates. There are many ACPs in Texas that produce well-prepared teachers, and there are some IHE-based EPPs that are lacking in effectiveness.

Each EPP pathway is sequenced very differently in terms of how much training a candidate has before entering the classroom. For example, 40% of new teachers are full-time teachers on an intern certificate. The one-year intern certificate, which is almost exclusively earned through the ACP route, is provided to candidates who pass a content exam and complete 150 hours of coursework and at least 30 hours of field-based experience (19 TAC 228.35(b)). State law only requires a minimum of 15 hours of field-based experience (TEC 21.051(b)), but state rules go above this minimum to require at least 30 hours. Those on an intern certificate can be hired by a school district as a full-time teacher and must be assigned a mentor teacher, but these interns, who are still learning, often have limited hands-on experience with instructional skills, including classroom management. In contrast, aspiring teachers who go through university programs complete clinical teaching as student teachers in their final semesters, are not required to hold an intern or probationary certificate, and are assigned a cooperating teacher in the school district (19 TAC 229.35(e)(2)(A)).

Inconsistent training combined with other exceptions to proper preparation and certification (e.g., exemptions from certification statutes claimed by Districts of Innovation, school district teaching permits, and certification waivers) has resulted in a patchwork of educator effectiveness. For example, the “late hire provision” in rule (TEC 21.051(d), 19 TAC 228.35(d)) allows candidates who enroll in an EPP 45 days before the first day of instruction to be hired without completing any other program

requirements aside from passing a content exam. The candidate then has 90 days, essentially a semester, to complete the waived requirements (150 hours of coursework and at least 30 hours of field observation, half of which (15) can be virtual).

EPPs should have the flexibility to innovate and meet local needs but should not be so unregulated and unaccountable that candidates miss acquiring the basic skills necessary to be successful in the classroom, which harms both teacher and student. Likewise, it is crucial that EPPs and school districts work in concert to ensure candidates are well-prepared and well-supported in meeting the demands of today's classrooms.

The State Board for Educator Certification (SBEC) is the main regulatory body that has a direct impact on the functionality of educator preparation in Texas. SBEC is currently working towards an "Effective Educator Preparation Framework" that aims to outline best practices in educator preparation, including P-12 partnerships. SBEC also oversees EPP approval and renewal in Texas (TEC 21.0443) and is statutorily bound to a discrete list of accountability metrics used for EPP accreditation (TEC 21.045) and the Accountability System for Educator Preparation Programs (ASEP). If SBEC were to adopt additional training requirements to raise the rigor or consistency of preparation (TEC 21.044(a)(2)), it is possible that TEA would not be able to factor this data into any of the available metrics in TEC 21.045. However, SBEC has the authority (TEC 21.045(b)(5)) to require EPPs to submit any information necessary to determine EPP effectiveness and could therefore require data related to the quality of additional training requirements—data that can be included in the EPP's annual performance report. SBEC also has the authority (TEC 21.0451(a)(4)(B)) to set procedures to change the accreditation status of an EPP that violates state law or rules and the authority (TEC 21.0451(a)) to establish rules to sanction EPPs that are out of compliance. In addition to ASEP and accreditation, SBEC holds EPPs accountable through a complaint process (19 TAC 228.70) and five-year continuing review of EPPs, which TEA can also conduct at their discretion at any time (19 TAC 228.10(b)).

With this background and issues in mind, TCEP offers the following solutions for improving educator preparation and recruitment in Texas:

Issue: Texas has created the "Wild West" of educator preparation and incentivized aspiring educators to choose a preparation route that is often less effective.

Recommendation: Examine the barriers to completing educator certification while earning a bachelor's degree, such as cost and time to add the necessary education credits on top of the degree requirements (especially for STEM majors) and the need to gain employment quickly. Offset these through compensation for clinical teachers, the establishment of a Registered Apprenticeship Program (below), and expansion of financial assistance (also below).

Recommendation: TEA or another well-equipped entity should establish a Registered Apprenticeship Program (RAP) that unlocks state and federal workforce dollars to fund a pathway for new teachers in Texas. Apprenticeship programs allow aspiring educators to gain mentor-supervised practical training before becoming a teacher of record—and while being paid. Tennessee recently implemented the first RAP, which will allow apprentices, including high school seniors and non-certified school staff, to learn how to be a teacher while taking

coursework from partnering IHEs towards a bachelor's degree in early elementary education, all while earning a wage in Tennessee schools as a paraprofessional. More information is available at www.apprenticeship.gov and www.nctq.org/blog/A-new-path-to-the-classroom:-What-could-Registered-Apprenticeship-mean-for-teaching.

Recommendation: Examine expanding the eligibility of existing financial programs that would decrease the financial barrier to completing educator preparation.

- The [Teach for Texas Loan Repayment Assistance Program](#) (TFTLRAP) supports the recruitment and retention of certified classroom teachers in fields and communities that have a shortage of teachers by offering loan repayment awards to eligible, certified, current teachers up to \$2,500 per year for five years. (TEC 56.352, 19 TAC 23, Subchapter B)
 - Temporarily expand the TFTLRAP beyond critical shortage areas, as the entire state faces a critical shortage.
 - Plan to increase the award amount over time, by amount and by number of years the award can be obtained, to cover a greater portion of college costs for shortage areas and incentivize teacher retention.
 - Expand eligibility to those teaching on a probationary or intern certificate, so long as they are making satisfactory progress towards standard certification in a high quality EPP.
- The [Math and Science Scholars Loan Repayment Program](#) (MSSLRP) encourages teachers who have demonstrated high achievement as math or science majors to teach in these subject areas for at least four years in Title I Texas public schools by offering loan repayment assistance up to \$10,000 per year for up to eight years. (TEC 61.9831 - 61.9841, 19 TAC 23, Subchapter J)
 - Expand eligibility to those teaching on an intern certificate, so long as they are making satisfactory progress towards standard certification in a high quality EPP and agree to provide at least three more years of service after standard certification.
- The [Educational Aide Exemption](#) (EAE) encourages certified educational aides, who are currently employed in some capacity by a Texas public school district, to complete IHE teacher certification programs in critical shortage areas by providing need-based exemptions from tuition and certain mandatory fees. (TEC 54.363, 19 TAC 21, Subchapter II)
 - Expand EAE eligibility in TEC 54.363 to those who have served as an educational aide but who do not hold an Educational Aide I, II, or III certificate and to those who have not served as an educational aide but who hold an Educational Aide I, II, or III certificate. This would allow high school students who obtain an Educational Aide certificate through education and training CTE courses, but never serve as an educational aide, to benefit from the exemption and allow those who are not certified as an educational aide but are employed as one to benefit.
 - Clarify the expectation of current employment for those receiving this award by specifying positions school districts could offer to facilitate this requirement

(tutor, part-time aide, etc.) that aim to ease the burden on awardees as they complete their college degree and teacher certification.

Recommendation: Create an endowment to support a loan deferment or scholarship program for aspiring educators who complete high-quality EPPs, to be defined through rulemaking, and who teach for 10 years in Texas public schools.

Issue: There is great inconsistency across EPPs, as some candidates are prepared well while others require the hiring district to fill in the gaps.

Recommendation: Define high-quality EPPs and incentivize participation in these programs (see above ideas). Although “high quality” should be defined by rule with stakeholder input, examples of criteria might include the EPP’s accreditation status history, evidence gathered from the EPP complaint process, and best practices defined by SBEC’s Effective Preparation Framework.

Recommendation: Examine SBEC authority to ensure consistency of quality of training across EPPs and that bad actors are appropriately sanctioned. This includes examining data available to TEA and SBEC regarding EPPs, conducting a research study, and determining if additional data, whether qualitative or quantitative, is needed to assess EPP quality.

Recommendation: Many have commented that some EPPs are not ensuring their candidates know how to write a lesson plan, a key competency for any beginning teacher. SBEC has the authority to set training requirements for candidates and can outline SBEC-approved criteria for a locally-determined EPP-embedded performance assessment, which could be edTPA, that requires candidates to demonstrate their skills before becoming a teacher of record. If SBEC needs additional ASEP indicators to incorporate data related to a performance assessment training requirement, the legislature can make this change.

Recommendation: Examine existing data relating to all variables associated with teacher preparation (preparation route, employing school characteristics, principal years of experience, etc.) to determine key factors impacting outcomes such as retention and student learning.

Recommendation: Examine existing data surrounding the Pedagogy and Professional Responsibilities (PPR) exam and determine ways to improve its predictive ability of quality EPPs and readiness to teach. Suggested ways to improve the PPR include grade-banding the exam such that there are multiple PPR exams rather than one EC-12 PPR exam, modifying the exam to include constructed response questions, or raising the cut score of the exam.

Issue: Many new teachers are full-time teachers of record on intern certificates with limited preparation and no demonstrated proficiency in pedagogy or professional responsibilities who need extra support.

Recommendation: Those completing an internship are full time teachers either on an intern or probationary certificate while still completing their EPP without being fully certified. Although probationary certificate holders have passed their PPR exam, those on an intern certificate have not. Those in an internship must be provided a mentor, and it is crucial that the state prioritizes

funding for effective mentor models to ensure interns are supported. The mentor program allotment (MPA) under TEC 48.114 must be flexible and well-funded to ensure districts have the capacity to create effective mentorship models. The state should also examine the allotment to ensure EPPs can fund mentor stipends in addition to state funding through the MPA. Districts have reported that mentors can only receive one source of funding, either from the EPP or the district, which limits the amount mentors are paid.

Recommendation: Establish a set of key competencies that those serving as a teacher of record in an internship must demonstrate. Currently, unless waived by the late hire provision, candidates in an internship must have completed 150 clock hours of coursework and training that allows them to demonstrate proficiency in key areas (19 TAC 228.35(b)(2)). These include lesson planning and analyzing student data, but there is no clear accountability for the quality of this coursework or what the “demonstration” looks like. Aspiring teachers who click through online modules related to this content will not have the same level of preparation as someone who actively practices writing a lesson and gets feedback. EPPs must be held accountable for curriculum quality, which could be done by requiring a curriculum-based performance assessment that meets SBEC-approved criteria and collecting data to be included in ASEP that relates to the quality of implementation of this performance assessment.

Recommendation: State law requires that prior to serving as teacher of record during an internship, a teacher candidate must complete at least 15 hours of field-based experience. However, SBEC rules provide that such candidates must complete at least 30 hours of field-based experience. Given the wealth of research supporting the importance of clinical and field-based experience prior to assuming the role of teacher in terms of success in the classroom, we recommend revising state law to require at least 30 hours of field-based experience prior to becoming teacher of record.

Issue: The “late hire provision” incentivizes EPPs to admit candidates after the late hire deadline in order to waive the pre-service training requirements and field observation for 90 days. Some EPPs advertise the late hire deadline as a quick and easy way to get hired.

Recommendation: Late hires may be essential for districts that are desperately seeking teachers. However, this flexibility should be met with greater supports for the late hire candidate, such as increased site visits by a field supervisor, additional meetings with a mentor teacher, support groups with other new and experienced teachers, and intensive efforts to get the candidate trained on essential practices and responsibilities as soon as possible. Therefore, greater support requirements for EPPs and better coordination between EPPs and school districts should be a required corollary in state law regarding late hires.

Issue: Texas provides many entry points into the teaching profession outside of official teacher certification pathways, including Districts of Innovation, school district teaching permits, and certification waivers. There are no incentives within these entry points for individuals serving as teachers to undergo training in approved EPPs and to become certified. This creates instability for students in classrooms and for the profession.

Recommendation: Not only should efforts be made to put more parameters around these entry points, but a core component should be to facilitate moving these individuals along the pathway to certification.

Issue: Recent issues with stakeholder engagement at SBEC have prompted a discussion about how to improve the feedback cycle between SBEC, TEA, and the field.

Recommendation: Like the negotiated rulemaking that occurs between universities and the Texas Higher Education Coordinating Board (THECB) (TEC 61.0331), it would benefit SBEC to engage with relevant stakeholders in a negotiated rulemaking process, as defined by Texas Government Code Chapter 2008. Members of the negotiated rulemaking committee are directly involved in assisting with the drafting of proposed rules, which would allow those affected by proposed rules to provide critical input regarding the practical impact of rules and promote buy-in from those who would implement proposed rules.

TCEP is grateful for the opportunity to represent the voices of EPPs, teacher and administrator organizations, and others with a special interest in ensuring all students have well-prepared teachers. We welcome feedback and questions and look forward to continuing this conversation. For additional information, please email txcoalition4edprep@gmail.com.



The Texas Coalition for Educator Preparation currently includes 16 organizations (and growing) and seeks to advance and raise the profile of the education profession by supporting the continuous improvement of educator recruitment, preparation, and certification practices as well as promoting ongoing professional growth and support.

Founding members include representatives from the Texas Association of Teacher Educators (TxATE), Associate and Assistant Deans and Directors of Texas (ADoT), Education Deans of Independent Colleges and Universities of Texas (EDICUT), Texas Association of Colleges for Teacher Education (TACTE), Texas Classroom Teachers Association (TCTA), Texas American Federation of Teachers (Texas AFT), Texas State Teachers Association (TSTA), and the Association of Texas Professional Educators (ATPE).