



Input to SBEC Regarding Item 19: Proposed Amendments to 19 TAC Chapter 228

December 10, 2021

The **Association of Texas Professional Educators (ATPE)** offers the following comments to the State Board for Educator Certification (SBEC) regarding Item 19 of the Dec. 2021 agenda and proposed amendments to 19 TAC Chapter 228, Requirements for Educator Preparation Programs, §228.2, Definitions, §228.10, Approval Process, §228.30, Educator Preparation Curriculum, and §228.35, Preparation Program Coursework and/or Training.

The proposed amendments to Chapter 228 implement bills passed during the 87th Legislature's Regular Session, including Senate Bill (SB) 1590, which requires SBEC to propose rules that allow educator preparation programs (EPPs) the flexibility to use a virtual observation method that is "equivalent in rigor" to in-person observation.

At its Oct. 2021 meeting, SBEC discussed how to implement SB 1590, which sets a floor for the number and combination of virtual and in-person observations SBEC can require of EPPs. At the meeting, ATPE supported the Texas Education Agency (TEA) staff's interpretation of the bill to allow programs to substitute two virtual observations for up to one in-person observation. Since then, TEA has graciously worked with ATPE and other stakeholders to generate a new proposal that conforms to SB 1590 but eliminates the requirement that EPPs conduct an additional virtual observation if they choose to use such a hybrid method.

The proposed language gives EPPs the flexibility to conduct virtual observations while maintaining that candidates will never receive a majority of their observations virtually. It is crucial that candidates receive as many observations in-person as possible, as these are the gold standard for providing field supervisors a full understanding of candidates' skills and the ability to give candidates rich feedback. ATPE believes the proposed language is a good starting point and offers two further recommendations:

1. ATPE believes the proposed rule could be further aligned with statute by requiring EPPs to include in their virtual observations elements that mirror the benefits of in-person observation. In-person observations enable field supervisors to fully observe, move around, and interact within the classroom environment. These aspects of high-quality observation allow for a deep understanding of the teacher's effectiveness, and EPPs should be required to mirror them for virtual observations. This could include requirements for multiple vantage points, video/audio of candidate-student interactions, student feedback, and student artifacts. These requirements would bolster the benefits provided by video observation, such as pausing the video to leave specific feedback and the ability for candidates to engage in self-observation and reflection. The Dec. 2021 SBEC board book estimates that EPPs will save \$50 for every virtual observation that is conducted in place of an in-person observation. ATPE suggests that EPPs should reinvest these savings into ensuring the rigor of virtual observations and that SBEC should incorporate best practices for virtual observations into the rule.

2. ATPE stresses that no candidate should be forced to undergo a virtual observation if they are unable to gain the necessary permissions or technology or if the logistics of completing a virtual observation are onerous. ATPE suggests SBEC include a provision within the rule allowing for candidates to substitute an in-person observation when a virtual observation is not practical or available.

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.