The Texas State Teachers Association offers the following comments to the State Board for Educator Certification (SBEC) regarding agenda item #16: Proposed Amendments to 19 TAC Chapter 232, General Certification Provisions, Subchapter A, Certificate Renewal and Continuing Professional Education Requirements.

Agenda item #16 establishes the educator certificate renewal provisions, including the continuing professional education (CPE) requirements for certificate renewal. TSTA is in full support of the proposed amendments, which are the result of months of dialogue and reflect stakeholder input. We believe the language aligns well with the 86th Texas Legislature’s Senate Committee on Education interim charge, the consensus recommendations of the Texas Teacher Workforce Workgroup, and the legislative intent of Senate Bill (SB) 1267.

In particular, the proposed amendments presented in this agenda item successfully:

- **Preserve space in CPE** — as intended by lawmakers — for educators to self-select training to hone their craft
- **Clarify that information particular to educating students with dyslexia is not an additional or separate training requirement** but is a topic that must be included in the newly required training regarding educating students with disabilities
- **Signal to educators the importance of certain professional development activities** such as educating emergent bilinguals and students suffering grief and trauma without creating duplicative training mandates

### Preserve Space in CPE for Meaningful and Relevant Professional Development

In previous iterations of the proposed amendment, staff offered language that would have continued to require certain trainings in CPE that were stricken by SB 1267. TSTA and other stakeholders who collaborated on the Texas Teacher Workforce Workgroup opposed this recommendation. We were concerned that this would ignore the Legislature’s charge to reduce the number of mandatory CPE topics, would disregard legislative intent of SB 1267, and would go against SBEC precedent to mirror statute in rule.

Staff did an excellent job addressing these concerns and has drafted language in §232.11 (d) that requires in CPE only that which is required by law but includes reference to training topics educators agree are important.

### Clarify that Training Related to Educating Students with Dyslexia is Not an Additional Training Requirement

SB 1267 added mandatory CPE requirements for all educators regarding educating students with disabilities. Although training related to educating students with dyslexia falls under this requirement, the proposed language in §232.11 (c) (1) makes explicit that trainings relating to educating students with disabilities must include
information particular to educating students with dyslexia. The current proposed language makes clear that while dyslexia must be a topic embedded within the required training, educators will not be required to attend additional trainings related to dyslexia separate and apart from the one required by this provision.

TSTA supports stating explicitly that dyslexia topics must be included in the statutory requirement that districts provide CPE training regarding educating students with disabilities, but it is critical that rule text not suggest that dyslexia training must be in addition to training related to educating students with disabilities. TSTA felt that earlier iterations were unclear in this regard, but we support the proposed language and feel it addresses the need to ensure trainings include the important topic of dyslexia while not layering additional and unnecessary trainings.

It is important to understand the distinction between generalized trainings designed to help educators understand and accommodate for multiple disabilities and specialized trainings designed for specialists to gain skills to remediate disabilities. While both types of trainings are important, standalone generalized trainings in dyslexia have historically been misunderstood to be sufficient to serve the needs of dyslexic students. Consequently, students have lacked access to dyslexia therapists and skilled interventionists with hours of specialized training simply because the teachers had participated in some ad hoc dyslexia workshop.

SB 1267 eliminated the requirement that classroom teachers be trained in dyslexia because lawmakers understand this distinction and want to ensure that students are best served by specialists. However, because of the prevalence of dyslexic students in classrooms, TSTA agrees that it will be of ultimate benefit to teachers and students to require the training regarding educating students with disabilities to include information on dyslexia.

**Signal the importance of certain professional development activities**

Finally, the proposed language in §232.11 (l) (5) to (7) clarifies that CPE requirements stricken by SB 1267 are still allowable topics in the remaining 75%. We disagree that may language is necessary because 19 TAC §232.11 (A) (c) makes explicit that professional development activities beyond the required topic shall be related to the certificate being renewed. TEC §21.044, the section describing minimum required provisions of certificate topics, includes education in mental health, substance abuse and suicide prevention. However, TSTA is not opposed to including these suggested topics and agrees that it signals the importance of certain professional development activities such as educating emergent bilinguals and students suffering grief and trauma without creating duplicative training mandates.

Research consistently shows that professional learning has the most impact on student outcomes when educators have greater flexibility to self-select trainings. Every teacher at every level of experience and performance can improve in some way, but when teachers have limited choice in the matter, students ultimately are the ones most deprived.

SB 1267 is smart legislation that will return professional learning requirements to meaningful opportunities relevant to individual needs and classroom assignments. **TSTA is in full support of the proposed amendments.** We believe the language aligns well with the legislative intent of Senate Bill (SB) 1267, preserves space for educator choice in professional development and ensures important topics are covered.