



PREPARATION PROGRAM COURSEWORK

The Texas State Teachers Association offers the following comments to the State Board for Educator Certification (SBEC) regarding agenda item #19: Proposed Amendments to 19 TAC Chapter 228, Requirements for Educator Preparation Programs, §228.35. Preparation Program Coursework and/or Training

Senate Bill (SB) 1590, 87th Texas Legislature Regular Session, 2021, requires the State Board for Educator Certification (SBEC) to propose rules that allow for options for candidate observations that provide no fewer than three in-person observations or two in-person observations and two virtual observations “that are equivalent in rigor to in-person observations.” The proposed amendment claims to implement the bill’s rigor equivalence requirement and to have been informed by stakeholder feedback from the August 17 SBEC Educator Preparation Advisory Committee (EPAC).

A virtual setting simply cannot match the rigor of in-person instruction or observation, so implementing the requirement of this legislation is challenging at best. However, at the August EPAC meeting, stakeholders, including the Texas State Teachers Association (TSTA), offered several recommendations that we collectively felt would help support the bill’s goals to the extent possible. The proposed language reflects some, but not all, of these suggestions. **In addition to the proposed language offered in this agenda item, TSTA believes that each formal virtual observation must also:**

- Be followed by a **post-observation conference within 48 hours** of the educational activity
- **Require student work artifacts** to be a component of the post-observation conversation

FORMAL VIRTUAL OBSERVATIONS MUST BE FOLLOWED BY A POST-OBSERVATION CONFERENCE WITHIN 48 HOURS

TSTA agrees that specifying lesson length and including the requirement that the observation be conducted by the field supervisor is necessary. We also agree that adding the requirement to include a post-observation conference provides an added layer of formality, **although we feel 48 hours instead of 72 would serve to add benefit to the learning experience of the pre-service educator.** Meeting nearer in time to the educational activity is especially relevant when the observation is being conducted virtually because of what will invariably be missed by the observer.

FORMAL VIRTUAL OBSERVATIONS MUST REQUIRE STUDENT WORK ARTIFACTS TO BE A COMPONENT OF THE POST-OBSERVATION CONVERSATION

Something the EPAC discussed at great length was the need for student work artifacts to be included in virtual observation requirements, but this recommendation has not been reflected in any of the draft rule iterations. While student work samples may be unnecessary to drive a robust coaching feedback loop when the observation is in-person, **TSTA strongly believes it is critical that rule require student work artifacts to be a component of the post-observation conversation to approximate the rigor equivalence promised by the legislation.**

An educator's effectiveness cannot be correctly measured by watching her on a screen. Students are central to the question of a teacher's efficacy, and in-person observations afford field supervisors the unique advantage to watch the children and the candidate's response to the children, and this is not limited to the children who volunteer. How does the candidate handle the distracted student or the bored student or the one who has been in the bathroom for 15 minutes? How well a teacher instructs is only a very small measure of her potential success. But how well she engages students and identifies and accommodates for their many competing needs is the true measure of success.

In-person observations are more rigorous because of the field supervisor's access to the full picture. Although including student work examples as an element of the virtual observation requirements still cannot match in-person rigor, requiring something tangible to review and discuss in the post-conference was a protection the EPAC felt to be of benefit to the candidate.

It is not possible to have a virtual observation that is equivalent in rigor to an in-person observation. To most closely approximate the rigor equivalence required by the legislation, it is critical that SBEC be as thoughtful as possible in determining candidate and EPP expectations in virtual environments.