



Public Comment on Item 9-Chapter 228
State Board for Educator Certification Meeting
December 7-8, 2023

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.

TCEP appreciates the thoughtful process and robust cycles of discussion and feedback that have gone into the revisions of Chapter 228, and we would like to provide the following feedback to this important chapter:

1. The importance of performance tasks is delineated throughout the chapter via a detailed definition and multiple references regarding the need for all programs to integrate authentic performance tasks throughout the curriculum and prior to placing a candidate in a classroom as teacher of record where the influence on student achievement is both immediate and significant. **As cited in 228.33, performance tasks provide candidates with opportunities to practice and apply foundational skills and demonstrate evidence of proficiency in the educator standards and test framework competencies. We strongly support this concept, and we use this opportunity to once again highlight that performance assessment, as defined and referenced in this chapter, belongs in curriculum – it is not appropriate to require performance assessment as a high-stakes certification exam at the conclusion of a program.**
2. Further evidence of the importance and placement of performance tasks and assessments is detailed within 228.65, which provides for EPPs to create a performance-based curriculum and training program for residents. Again, the importance of performance gates and tasks occurring throughout the clinical experience, so as to determine the candidate's mastery of specific task skills and competencies before progressing to the next stage in the experience, is documented as program requirements for the issuance of an enhanced standard certificate. It has also been proposed that the successful completion of these performance gates in a residency would exempt candidates from a pedagogy certification test requirement. It seems that if EPPs with residency programs could utilize authentic, ongoing, progressive performance tasks as sufficient evidence for clearing the certification performance assessment bar, then the same bar could and should be used for all certification programs and pathways. It has been asserted that there is no mechanism for SBEC to hold programs accountable for a curriculum-embedded performance assessment, yet, for residencies, a proposal before you stipulates that TEA staff will score program compliance on

a rubric developed by staff, a draft of which is being shared with you. If this is possible for residencies, we question why it's not possible for all certification routes.

3. The provisions of the chapter are scheduled to become effective on September 1, 2024. Due to time and cost restraints that often impact traditional EPPs, we request explicit clarity regarding the effective date versus the accountability date for these changes. If September 1, 2024 represents both the effective and accountability date for the revisions, we request a later date to allow time to develop and implement these programmatic changes.

TCEP is grateful for the opportunity to share 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.

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