



Public Comment on Item 12-Chapter 230
State Board for Educator Certification Meeting
December 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.

We would like to express support for the updated definition of pilot exam to be inclusive of new instruments adopted by the board. Additionally, we would like to thank staff and the board for their commitment to ensuring that all certification exam options are available for implementation at the same time, ensuring that preparation programs and teacher candidates have a choice of which certification instrument will best meet their programmatic needs.

However, we also have some concerns.

1. TCEP has always maintained that a performance assessment of any kind is not appropriate as a certification exam and rather belongs in Chapter 228 in the educator preparation curriculum as a formative evaluation tool.
2. TCEP does not support proposed new §230.39 that would allow the issuance of an enhanced certificate without the pedagogy certification exam required of every other candidate for a standard certificate. As with any other profession, certification and licensure is the final step, no matter what pathway is taken into the profession. A doctor must still pass state board exams regardless of where she went to medical school or what hospital she conducted her residency. Likewise, all teacher candidates should be required to demonstrate mastery of skills via the same mechanisms as the final step toward receiving a certificate, regardless of if they are a resident from a university program, a post baccalaureate, or a career-change candidate with an ACP. The board has continuously reinforced that part of the need for the edTPA exam was to hold programs accountable for the effectiveness of their teacher preparation. This proposed rule is antithetical to all those previous assertions.
3. Finally, we are concerned that the rule making for the proposed new certification exam is overlapping with the procurement process for the new exam. The RFP

process opened simultaneously with your last meeting, and due to an extension in the due date, the window did not close until November 27. Those familiar with state procurement practices know this effectively walls off the process from public view as well as further discussion in this body until the contract award has been made. Though staff has assured us that an award will be made by the time your rules are adopted, the lack of certainty of the outcome of that process overlaid with the public comment period for your rules, is not fully transparent with stakeholders and the public. At minimum we'd like to request a delay in the adoption of Chapter 230 to allow for a full public comment period after the contract award has been made.

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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