

State Board for Educator Certification
October 9, 2020

Agenda Item 16. Discussion of Proposed Amendments to 19 TAC Chapter 230. Professional Educator Preparation and Certification. Subchapter H. Texas Educator Certificates Based on Certification and College Credentials from Other States or Territories of the United States.

The Texas Counseling Association has some concerns about the proposed change to §230.113 (b). It is our understanding that this new rule would allow someone trained outside of Texas, with no educator experience, to work in Texas schools on a one-year provisional certificate – without any assessment of their skill level.

While TCA recognizes that the experience requirements for educators in Texas may be a burden for those who completed their training outside of Texas, we do not agree that Texas should minimize its standards to accommodate them. It is my observation of this board that your decisions are grounded to protect Texas students. Adoption of this rule would be a unique and unfortunate change in that practice.

The issue here appears to be requirements to take certification exams. These exams are essential to ensure that all educators in Texas are well qualified, meet Texas standards, and are familiar with Texas statutes and rules. It is not only illogical to allow some educators to work in our schools without passing our certification exams, it could be very dangerous. You have nothing on which to vet the ability of these individuals other than a certificate from another state.

Adoption of this rule change is profoundly unfair to Texas residents who work hard and incur significant expense to achieve Texas certification. Texas has determined an appropriate career path for educators who seek Student Service Certificates. Why would you let others completely bypass that process?

There is already a path for those who have worked in educational settings outside Texas to become certified without the mandatory 2-year teaching experience requirement. Even those individuals are required to pass their certification exams. Why would you waive not only the teaching requirement but also the certification exam for individuals with no educational experience?

Speaking specifically for school counselors, those certification standards include completion of a 48 hours masters degree in counseling – with a focus on the *Texas Model for Comprehensive School Counseling Programs*. Graduate school outside Texas do not teach to this Model. How will you insure, as you place these inexperienced school counselors in our schools, that they will be competent to align their comprehensive school counseling programs with Texas standards? Is there a process in place to ensure that the certification standards in those other states completely align with ours?

If the issue of people attempting to work in Texas without meeting our standards is significant – and I am not sure it is – this rule is not the way to address it. I encourage you to direct staff to go back to the drawing board to come up with a solution that honors Texas educators and how hard they work to earn their certificates, and that includes the rigor we need to be confident that Texas school children will be protected.

I will end where I started. I have never seen this body take action that places the interests of an educator, especially a hopeful educator, over the best interests of Texas school children. Please don't start now.