

The State Board for Educator Certification (SBEC) adopts the review of Title 19, Texas Administrative Code (TAC), Chapter 230, Professional Educator Preparation and Certification, pursuant to the Texas Government Code (TGC), §2001.039. The SBEC proposed the review of 19 TAC Chapter 230 in the October 25, 2019 issue of the *Texas Register* (44 TexReg 6381).

Relating to the review of 19 TAC Chapter 230, the SBEC finds that the reasons for the adoption continue to exist and readopts the rules. The SBEC received comments relating to the review of Chapter 230. The following is a summary of the public comments received and the responses.

**Comment:** Texas Tech University (TTU) commented that the SBEC should consider a change to the language in §230.21(b) that states a candidate may take the appropriate certification examinations when approved by the educator preparation program (EPP) or upon successful completion of the EPP, whichever comes first. In addition, TTU stated that EPPs would like to be able to require students to take coursework or to require a study program before authorizing the student to take an exam that did not exist at the time of their completion of the program.

**Response:** The SBEC agrees, but it is beyond the scope of the proposed amendments to 19 TAC Chapter 230 being considered as a separate action item in the December 6, 2019 SBEC agenda. The SBEC believes Texas Education Agency should obtain additional stakeholder feedback to propose rules at a future opportunity that would address issues raised by EPPs and certification candidates.

**Comment:** iteachTEXAS commented that the Science of Teaching Reading (STR) test should be required for issuance of the standard classroom teacher certification. iteachTEXAS stated that requiring the STR for issuance of an intern and/or probationary certificate exceeds what statute intends.

**Response:** The SBEC disagrees. The TEC, §21.048(a-2), states, "to teach any grade level from prekindergarten through grade six a person must demonstrate proficiency in the science of teaching reading." The requirement to complete the STR test applies to any educator teaching reading at any grade level under any type of certification. Exempting probationary and intern certificates from the STR test requirement would allow an educator to teach reading for up to three years without demonstrating proficiency in the science of teaching reading. This would thoroughly undermine the legislative intent that all reading teachers in all classes from prekindergarten to sixth grade be proficient in the science of teaching reading.

**Comment:** An elementary teacher with 30 years of experience and a reading specialist certification commented that while there is a close alignment of competencies for the STR and the reading specialist examinations, the reading specialist certification was only awarded to experienced teachers with real classroom experience—experience deemed useful, if not essential, to mastering the science of teaching reading. The commenter expressed concern that upon initial certification, new teacher candidates will be unable to demonstrate the same level of proficiency on the STR examination as that of more experienced educators.

**Response:** The SBEC disagrees. The SBEC has no discretion to delay the STR examination until an educator has attained years of experience because the Texas Legislature has determined that a teacher must learn to teach reading prior to entering a classroom. TEC, §21.048(a-2), states, "to teach any grade level from prekindergarten through grade six a person must demonstrate proficiency in the science of teaching reading." The requirement to complete the STR test applies to any educator teaching reading at any grade level under any type of certification. While time in a classroom is undoubtedly useful to perfecting the skill of teaching reading, it is vital that teachers understand how to teach reading before they enter the classroom so that all Texas students have the benefit of a teacher who knows how to teach reading.

This concludes the review of 19 TAC Chapter 230.