



December 8, 2021

Dear Members of the State Board for Educator Certification:

On behalf of four Texas teacher organizations, we ask members of the State Board for Educator Certification (SBEC) to provide an opportunity for Board members and the public to learn more about the Educator Preparation Program (EPP) application from International Leadership of Texas (IL Texas) that is on the consent agenda for approval at the meeting held December 10, 2021.

The only document currently available for review is the two-page Executive Summary of the application which provides little detail about the operation and execution of the program and raises questions that warrant additional consideration. Given the record of the applicant, including a teacher turnover rate that is double the state average, we have questions and concerns about the qualifications of IL Texas to serve as an effective EPP that we believe compel due diligence by SBEC.

To that end, we recommend that the Board postpone a vote on the IL Texas proposal until Board members and the public have adequate time to conduct a thorough review of the full application and be given an opportunity for comment before a vote by SBEC.

We would ask for consideration of the following questions:

How will IL Texas ramp up its program to certify 500 teachers in its first year of operation?

According to the Executive Summary of the application, IL Texas plans to accept and train 500 candidates each year starting in the first year of operation. **We are concerned that this figure is incredibly ambitious for a start-up program, especially given the unique requirement that candidates must currently be employed by the charter school.** According to the Texas PK-16 Public Education Information Resource, this figure is well above average even for longstanding programs.

Currently only two alternative certification programs certify more than 500 teachers annually. Of the alternative programs that certify more than 100, most either are currently or have been rated accredited-warned or accredited-probation. Only a handful of experienced traditional programs that have been in operation for over a hundred years certify at or near this number.

Additional questions remain about the candidates served by the IL Texas program:

- Will IL Texas hire 500 new teachers every year to participate in the EPP, or will the candidates be both new hires as well as existing teachers? If so, how will teachers balance their classroom

duties against the requirements of the EPP, including fulfilling the required internship and field-based training hours?

- What conditions will IL Texas place on candidates? For example, will candidates be required to remain employed with IL Texas until they finish the program?
- If a candidate accepts employment elsewhere, will they lose their coursework progress?
- Is it a conflict of interest to have only candidates who are employed in the school district or charter?
- How is IL Texas ensuring a diverse pool of candidates?

How will IL Texas educator preparation practices align with best practice standards in educating English learners and emergent bilinguals?

The Executive Summary indicates a particular commitment to preparing and credentialing teachers to serve emergent bilinguals in Texas schools. We agree there is a need to increase the number of certified bilingual educators, but **it is critical that they are prepared to meet the needs of emergent bilinguals in all school settings.**

- What “scientifically based research practices” will IL Texas incorporate into its curriculum?
- Will the curriculum align with the Teaching English to Speakers of Other Languages standards, the preeminent standards for bilingual education preparation programs?
- What is the experience and qualifications of the trainers/instructors?

How will internships and field-based training be structured to ensure a strong foundation in practical classroom skills?

One of the most important things we can do to improve teacher preparation in Texas is to increase the opportunity for candidates to engage in high-quality clinical experiences. According to the Council for the Accreditation of Educator Preparation (CAEP), high-quality clinical practice offers candidates experiences in different settings and modalities, as well as with diverse schools and communities. According to the Executive Summary, **IL Texas only intends to require the minimum 30 hours of field experience**, which is less than one full work week.

- How will field experience be structured if all candidates are teachers of record?
- Will IL Texas implement school partnerships to align with the CAEP field experience standards?
- What are best practices of EPP models that are district- or charter school-based?

The educator data for IL Texas Charter School is below state average in every category. How will IL Texas EPP address this issue in its educator training policies and practices?¹

- IL Texas teachers have an average of just 2 years of experience, compared with the state average of 7.2 years.
- 70 percent of teachers have five years of experience or less, and 14 percent are first year teachers.
- IL Texas has only 2.1 percent special education teachers while serving 6 percent special education students, compared to 9.4 percent for the state.

¹ Texas Academic Performance Report, https://tea.texas.gov/perfreport/tapr/tapr_srch.html

- 23 percent of teachers left IL Texas in 2021 compared to 14 percent for the state, almost 1 in 4 teachers. The turnover rate was even higher in previous years: 28.5 percent in 2020 and 32.9 percent in 2019.

How does the performance of IL Texas on STAAR factor into consideration of its EPP application?²

- IL Texas scored 15 points below the state average on the 2021 STAAR results for all students/all subjects, and 20 points below the state average in mathematics.
- 25 percent of IL Texas campuses were rated D or F in the most recent state ratings, and 64.5 percent are rated C or below.

How will IL Texas ensure that 500 candidates each year have access to experienced mentors and coaches?

- What level of experience and qualifications will the mentors and coaches be required to have to ensure that each candidate has a high-quality learning experience?
- What training will IL Texas provide to mentors and coaches?

As organizations that represent Texas teachers, we support processes that train, recruit, and retain new teachers in a systematic and thoughtful way. We recognize that high-quality non-traditional pathways meet the unique needs of some candidates, but it is imperative that SBEC ensure that every EPP approved has the requisite experience and capacity to be an effective teacher certification program.

Thank you for your consideration.

Respectfully,

Texas State Teachers Association (TSTA)

Association of Texas Professional Educators (ATPE)

Texas American Federation of Teachers (Texas AFT)

Texas Classroom Teachers Association (TCTA)

² <https://txschools.gov/districts/057848/student-achievement>