

Texas Public Policy

F O U N D A T I O N

May 14, 2008

Texas Education Agency
Educator Certification and Standards
Attention: Dr. Karen Loonam, Deputy Associate Commissioner
1701 N Congress Avenue
WBT 5-100
Austin, TX 78701-1494

Dear SBEC Member:

Thank you for the opportunity to share our concerns with you regarding the proposed rule changes to 19 TAC Chapter 227 and 228.

We appreciate the difficult task you have in determining appropriate standards for teacher certification to ensure that Texas children have the best teachers possible. We want to share with you some research on teacher quality and certification before we comment on the proposed rule changes.

First of all, research conclusively finds that the most significant factor in raising student achievement is the quality of the teacher. A 2002 study by William Sanders and June Rivers found that a student with a strong teacher for three consecutive years can erase the achievement gap associated with race, ethnicity, and income within three to five years. Thus, strong teachers are extremely important.

What makes for a strong teacher? A 2004 report by the National Council on Teacher Quality (NCTQ) entitled "Increasing the Odds: How Good Policies Can Yield Better Teachers" by Kate Walsh and Christopher Tracy found that **teachers with strong literacy skills** are more likely to make strong teachers and produce large gains in student learning. Literacy skills can be measured by high SAT, ACT, or GRE verbal scores. Their review of research found that a "teacher's level of literacy... affects student achievement more than any other measurable teacher attribute, including certification status, experience, and the amount of professional development that a teacher receives." NCTQ's Walsh and Tracy also found that the selectivity of a teacher's college to be significant. Their review of research found that "**students make greater learning gains if their teachers attended a more selective college.**" In addition, this NCTQ report finds that secondary teachers with **strong subject area preparation** in math or science led to more effective high school math and science teachers.

The 1998 Education Trust report “Good Teaching Matters: How Well-Qualified Teachers Can Close the Gap” by Kati Haycock has similar findings regarding teacher quality. Haycock’s analysis finds that strong verbal and math skills and deep content knowledge (for middle and high school teachers) leads to more effective teachers.

Does pedagogy or certification lead to a more effective teacher? Regarding teaching skill, Haycock writes, “Education courses completed, advanced education degrees, scores on professional knowledge sections of licensure exams, even, interestingly years of experience—none seem to have a clear relationship to student achievement.” Thomas Kane, Jonah Rockoff, and Douglas Staiger examined the effectiveness of teachers who entered the classroom through very different pathways and discuss their findings in the 2007 *Education Next* article “Photo Finish: Certification doesn’t guarantee a winner.” They write, “Simply put, **a teacher’s certification status matters little for student learning.** We find no difference between teaching fellow and traditional certified teachers or between uncertified and traditionally certified teachers in their impact on math achievement.”

Kate Walsh, a former policy analyst at the Abell Foundation and current president of the National Council on Teacher Quality, wrote a 2002 *Education Next* article entitled “Check the Facts: The evidence for traditional teacher certification, reexamined.” She writes, “**The certification process is incapable of providing any insight into an individual’s ability, intellectual curiosity, creativity, affinity for children, and instructional skills.**” Walsh further explains by writing in the same article:

“The theory that teacher certification leads to high-quality teaching is based more on what we think out to be true than on controlled experimentation. It is a leap of faith taken without the benefit of supporting evidence. The evidence, it turns out, is astonishingly deficient.”

Armed with these facts, we hope to share our concern over the proposed rule changes. One of the State Board for Educator Certification’s core principles says, “We believe flexible and accessible certification programs, held to the same standards of accountability are essential.” The proposed rules seem to move in the opposite direction of flexibility and accessibility. The rules seem to take local control and discretion away from human resource directors, principals, and superintendents and instead give more control to the state. The proposed rules also seem focused more on process and inputs than on allowing those at the local level to make hiring decisions that they think are best.

Minimum GPA

Proposed rule changes in Chapter 227.10(a)(4) require every teaching candidate to have at least a 2.5 GPA. This rule change seems to be **a one-size-fits-all approach that does not take into account an individual’s skill level later in life.** Many mid-career candidates may have had poor academic records in college but have gained strong subject matter expertise through years of work experience. Requiring all candidates to meet this minimum requirement without some type of **local discretion for mid-career candidates** will inevitably prevent many well-qualified candidates from entering the teaching

profession. In fact, the 2007 *State Teacher Policy Yearbook: Texas State Summary* by the National Council on Teacher Quality which recommends making alternative certification routes more academically selective by increasing the GPA requirement also states that, **“The state may need to make some accommodation in this GPA standard for mid-career candidates.”**

Coursework

Proposed rule changes in Chapter 228.35(a)(3) require all teacher candidates to complete 300 hours of coursework and training during their first year of teaching. Our research finds that as a whole education coursework is not tied to higher student learning and can actually deter great candidates from teaching. We recommend substantially lowering the 300 hour requirement by cutting it in half and only requiring 150 hours of coursework and training.

The 300 hours includes 30 clock-hours of field-based experience and 80 clock-hours of training to be completed prior to entering the classroom. This could be very problematic for school districts having to fill teacher vacancies at the last minute. We recommend that Chapter 228.35(c) give late hires the flexibility to complete the 30 clock-hours of field-based experience and 80 clock-hours of training by the end of the first year. The National Council on Teacher Quality 2007 *State Teacher Policy Yearbook: Texas State Summary* recommends states limit coursework saying:

“The state should ensure that **the number of credit hours it either requires or allows should be manageable for the new teacher**. Anything more than 12 credit hours of coursework in the first year may be **counterproductive, placing too great a burden on the new teacher**. This calculation is premised on no more than 6 credit hours in the summer, 3 credit hours in the fall and 3 credit hours in the spring.”

Teacher Shortage

The proposed rules also have the possibility of **increasing the teacher shortage problem** in Texas. Texas is not short of talent. Texas is short of individuals with that talent teaching in our classrooms. Texas’ education policies need to encourage not discourage talented individuals from teaching. According to the State Board for Educator Certification “Who Is Teaching” report, during the **2006-2007 school year, out-of-field teaching percentages reveal the following teacher shortages:**

- **Computer Science (66% in middle school, 46% in high school)**
- **Math (28% in middle school, 15% in high school)**
- **Science (26% in middle school, 30% in high school)**

These proposed rules could exacerbate the teacher shortage by shutting out many bright and talented individuals who have an expertise in computers, math or science and want to change careers. Do these rules allow for a current or former NASA engineer or a Dell software designer to enter the classroom and teach their expertise? What if their college GPA was less than a 2.5 or they dropped out of college like Bill Gates? Is there any local discretion to make exceptions for extraordinary talent?

It is also possible that these rule changes will increase the cost of teacher certification since due to the increased training and coursework requirements. This cost will inevitably be passed down to the potential teachers and give them another reason to choose a different career.

In closing, we recommend you heed Kate Walsh's words in her *Education Next* article on teacher certification policies, she says, "**Regulatory policy cannot supplant the need for human judgment.**"

Thank you again for the opportunity to comment on these proposed rule changes. Please feel free to contact me if you have any questions or want copies of the referenced research studies.

Sincerely,

A handwritten signature in cursive script that reads "Brooke Terry". The signature is written in dark ink and is positioned above the typed name.

Brooke Dollens Terry
Education Policy Analyst
Texas Public Policy Foundation