



March 19, 2020

Dear Commissioner Morath and TEA Staff:

TACTE (Texas Association of Colleges of Teacher Education) recognizes and values the experience all clinical teachers and practicum students gain from full placements. However, given the uncertainty facing schools and Educator Preparation Programs (EPPs) during the COVID-19 health crisis, we are presented with unique challenges.

In response to the COVID-19 pandemic, every university and college in the State of Texas has been required to adapt all courses to remote or online learning for a significant period of time, many for the remainder of the semester. Some universities have also made the decision to close their campus' physical facilities, meaning that candidates might not live in the same geographic area where they spent the first half of the semester. In addition, Local Education Agencies (LEAs) across the State have also closed for significant periods of time, many through mid-April. It remains to be seen if these dates will be extended in light of updated information from federal, state, and local government bodies as well as the Center for Disease Control or others.

Given that this is a dynamic situation that requires decisive leadership, TACTE requests that a decision be made quickly so that candidates of all types may be informed and prepared for the modified requirements needed for degree/certificate completion and success. Much like our PK-12 counterparts, EPP candidates and their parents/families are vocally concerned about the impact of state level policies and decisions regarding the completion of degrees, graduation, certification, and potential employment. Approximately 4,000 teacher candidates are student teaching, 12,000 teacher interns are serving as teachers of record, and countless professional certification candidates (Superintendents, Principals, Educational Diagnosticians, Reading Specialists, School Counselors, and School Librarians) are completing practicum experiences. Should provisions not be quickly put in place to allow these candidates to become certified, the educator workforce across Texas will be drastically impacted.

These mitigating factors, including but not limited to extended school closures and online delivery of learning, are all well outside the control of EPPs, and create an urgent need for action for all types of education candidates. TACTE respectfully makes the following formal requests for consideration:

1. Clinical teaching requirements

While school districts are closed, teacher candidates do not have access to continue or complete required clinical field experiences, especially clinical teaching. While TAC 228.1(d) allows the



Commissioner to reduce these requirements by up to 20% during a state of emergency, resulting in 56 required days rather than 70, current school district closures will still not allow sufficient time for most candidates across the state to have access to clinical settings to successfully meet these requirements. The capacity of clinical teachers to engage in and complete required clinical experience is severely limited, with no opportunity for remedy.

Thus, TACTE formally requests relief beyond the 20% waiver in clinical teaching requirements for AY 2020. Specifically, TACTE requests that the minimum number of required days for clinical teaching be reduced to no more than 30, or the number of days completed by March 13, 2020, and relief from formal observations required for days in which clinical settings are inaccessible. Summative evaluations will be based on clinical hours already completed. In lieu of the additional required days and observations, candidates will be responsible for completing all required EPP coursework and each EPP will provide supplemental activity to replace unavailable clinical settings; these activities will be required and formally evaluated and may include case studies, simulated, remote, virtual, or video classroom experiences and reflection.

## 2. Teacher internship requirements

Teacher interns in post-baccalaureate and alternative certification programs are required to complete 180 days of instruction before receiving their standard certificate. The 20% reduction narrows this requirement to 144 days; however, with current school closures most interns have reached a maximum of 125 days. If school closures are extended, interns will be unable to fulfill even the modified requirement. Thus, TACTE requests relief to lower internship requirements for this year to 120 days or the ability to formally count days spent providing remote instructional support to students. TACTE also requests relief from the required number of formal observations for these candidates. During this time, teachers across the state have been creating and delivering instructional support remotely.

## 3. Professional certification internships

Practicum candidates are required to complete 160 hours, or 128 hours with the 20% reduction. Many candidates completing practicum this semester will not have reached even the reduced requirement prior to school closures. TAC 228.35(e)(8) specifies that for candidates seeking professional certifications, a practicum experience must take place in an actual school setting rather than a distance learning lab or virtual school setting. TACTE requests flexibility for these experiences to take place in non-school settings if needed due to school closures. Further, TACTE requests relief from specific practicum requirements that are not accessible outside of school settings.



#### 4. EPP Accountability

TACTE also requests that AY 2020 be designated a “reporting only” year for ASEP/accountability for all performance indicators (i.e., PPR pass rates and non-PPR pass rates based on 2nd attempts, including professional certification exams, evidence/data that candidates completed the required amount of clock hours in the field plus evidence of the quantity and quality of field supervision/observations; principal survey of first year teachers, teacher satisfaction survey). All of these indicators are impacted by the extended school closures, testing center closures, and other reactions to the COVID-19 crisis.

We sincerely appreciate your timely consideration of these urgent requests.

Sincerely,

Glenda Ballard, TACTE President  
Lisa Huffman, TACTE President-Elect  
Stacey Edmonson, TACTE Past-President  
Kylah Clark-Goff, TACTE Secretary

Denise Staudt, TACTE Treasurer  
Matthew Capps, TACTE ASCR  
Representative  
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#### **Representative Universities:**

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Angelo State University  
Austin College  
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