

## **PROPOSAL FOR IMPLEMENTATION OF TEXAS ADMINISTRATIVE CODE §228.35 (4)**

With specific reference to out of state school placements - sections (C) and (D)

A strategy for implementing §228.35 (4) that fulfills the intent of the regulation and encourages Texas teacher preparation programs to provide beneficial out of state educational experiences for their students submitted by Dr. Craig Kissock to the Texas Education Agency Austin, Texas, 78701 for consideration and approval June, 2011.

### **Texas Administrative Code §228.35 (4)**

(4) Subject to all the requirements of this section, the TEA may approve a school that is not a public school accredited by the TEA as a site for field-based experience, internship, student teaching, clinical teaching, and/or practicum.

(A) All Department of Defense Education Activity (DoDEA) schools, wherever located, and all schools accredited by the Texas Private School Accreditation Commission (TEPSAC) are approved by the TEA for purposes of field-based experience, internship, student teaching, clinical teaching, and/or practicum.

(B) An educator preparation program may file an application with the TEA for approval, subject to periodic review, of a public school, a private school, or a school system located within any state or territory of the United States, as a site for field-based experience, or for video or other technology-based depiction of a school setting. The application shall be in a form developed by the TEA staff and shall include, at a minimum, evidence showing that the instructional standards of the school or school system align with those of the applicable Texas Essential Knowledge and Skills (TEKS) and State Board for Educator Certification (SBEC) certification standards. To prevent unnecessary duplication of such applications, the TEA shall maintain a list of the schools, school systems, videos, and other technology-based transmissions that have been approved by the TEA for field-based experience.

(C) An educator preparation program may file an application with the TEA for approval, subject to periodic review, of a public or private school located within any state or territory of the United States, as a site for an internship, student teaching, clinical teaching, and/or practicum required by this chapter. The application shall be in a form developed by the TEA staff and shall include, at a minimum:

- (i) the accreditation(s) held by the school;
- (ii) a crosswalk comparison of the alignment of the instructional standards of the school with those of the applicable TEKS and SBEC certification standards;
- (iii) the certification, credentials, and training of the field supervisor(s) who will supervise candidates in the school; and
- (iv) the measures that will be taken by the educator preparation program to ensure that the candidate's experience will be equivalent to that of a candidate in a Texas public school accredited by the TEA.

(D) An educator preparation program may file an application with the SBEC for approval, subject to periodic review, of a public or private school located outside the United States, as a site for student teaching or clinical teaching required by this chapter. The application shall be in a form developed by the TEA staff and shall include, at a minimum, the same elements required in subparagraph (C) of this paragraph for schools located within any state or territory of the United States, with the addition of a description of the on-site program personnel and program support that will be provided and a description of the school's recognition by the U.S. State Department Office of Overseas Schools.

(e) Campus Mentors and Cooperating Teachers. In order to support a new educator and to increase teacher retention, an educator preparation program shall collaborate with the campus administrator to assign each candidate a campus mentor during his or her internship or assign a cooperating teacher during the candidate's student teaching or clinical teaching experience. The educator preparation program is responsible for providing mentor and/or cooperating teacher training that relies on scientifically-based research, but the program may allow the training to be provided by a school district, if properly documented.

(f) On-Going Educator Preparation Program Support. Supervision of each candidate shall be conducted with the structured guidance and regular ongoing support of an experienced educator who has been trained as a field supervisor. The initial contact, which may be made by telephone, email, or other electronic communication, with the assigned candidate must occur within the first three weeks of assignment. The field supervisor shall document instructional practices observed, provide written feedback through an interactive conference with the candidate, and provide a copy of the written feedback to the candidate's campus administrator. Informal observations and coaching shall be provided by the field supervisor as appropriate.

- (1) Each observation must be at least 45 minutes in duration and must be conducted by the field supervisor.

- (2) An educator preparation program must provide the first observation within the first six weeks of all assignments.
- (3) For an internship, an educator preparation program must provide a minimum of two formal observations during the first semester and one formal observation during the second semester.
- (4) For student teaching and clinical teaching, an educator preparation program must provide a minimum of three observations during the assignment, which is a minimum of 12 weeks.
- (5) For a practicum, an educator preparation program must provide a minimum of three observations during the term of the practicum.
- (g) Exemption. Under the Texas Education Code (TEC), §21.050(c), a candidate who receives a baccalaureate degree required for a teaching certificate on the basis of higher education coursework completed while receiving an exemption from tuition and fees under the TEC, §54.214, is exempt from the requirements of this chapter relating to field-based experience or internship consisting of student teaching.

### **§228.35 (4) Obstacle or Opportunity**

§228.35 (4) of Texas Administrative Code has been interpreted by some teacher preparation institutions as creating a barrier to offering pre-service education students access to professional development opportunities outside of Texas and thus they choose to limit their students to school based placements in their local area.

It appears that the primary barrier, other than not valuing out of area placements, is a belief that the Code is designed to limit such placements and thus it would be a time consuming and potentially futile exercise to seek approval under these provisions.

On careful reading of this Code, and considering my 20+ year experience working with colleges in several states to offer out of area school based placements, I conclude that §228.35 (4) actually presents an opportunity to expand the range of placement sites available in countries around the world for pre-service educators. I base this conclusion on the wording in, and interpretation of the intent of, §228.35 (4).

### **Wording Affirming Opportunity**

Specific statements in this section of the Code very explicitly support use of out of state school placements by:

- Authorizing approval of schools outside the state, 'TEA may approve a school that is not a public school accredited by the TEA as a site for field-based experience, internship, student teaching, clinical teaching, and/or practicum.'
- Presenting a process through which out of state school systems can be approved, 'An educator preparation program may file an application with the TEA for approval.'
- Including prior approval of a wide variety of schools around the world, 'All Department of Defense Education Activity (DoDEA) schools'; 'all schools accredited by the Texas Private School Accreditation Commission (TEPSAC)'; and all schools recognized 'by the U.S. State Department Office of Overseas Schools'.

Note, while authorization is given for use of both public and private schools in any location:

- Placements in other states and territories of the USA are, 'for purposes of field-based experience, internship, student teaching, clinical teaching, and/or practicum.'
- Placements in other countries are limited to, 'student teaching or clinical teaching'

### **Intent Affirming Opportunity**

A careful reading of §228.35 (4) sections (B), (C), and (D) demonstrates the intention to affirm the value, and support the use, of out of area placements for pre-service educators while seeking to:

- Respond to concerns from past experience due to the uncommon actions of a small minority of teacher education institutions. Examples, that may have influenced wording, include:
  - Allowing students to create their own out of area placements without confirming they are appropriate for the student's certification requirements - e.g. correct age/grade level, teaching subject, hours of instructional contact.
  - Contacting a school, making a placement, and then not providing any communication or offering any guidance or support to the school or student once the placement was made.
  - Creating placement opportunities for students based on a faculty member's desire to visit specific locations in the world, charging the student to cover faculty member travel costs (over and above program/tuition costs), and visiting the school for a few minutes on one day to justify their travel.

- Unnecessarily hiding, from government program authorizing agencies and accreditation bodies, the fact that out of country placements are being used in conjunction with local placement options in certification/licensure programs.
- Not providing adequate professional development support for students or accurate reporting of achievements and areas of needed improvement during and/or at the conclusion of the placement.
- Assure that out of state school based placements offer legitimate educational experiences that are supportive of each participant's professional development and personal well being and result in sound assessments of their readiness to enter the global teaching profession through certification as a teacher by the Texas Education Authority.

This assurance is sought through implementation of program approval criteria that focus on the authorization of placement school systems, the qualifications and expectations of supervisors, program support, and equivalence of experience (C i-iv) & (D).

Assurance of the value and legitimacy of domestic and international out of area cross-cultural school based placements is also available through a long and well documented history of professionally managed, educationally legitimate, and successful placements by teacher education institutions in and outside the USA for their own students and by providers serving multiple institutions. Examples of successful programs in the USA that have roots back to the 1960's include:

- EducatorsAbroad Ltd.
- Indiana University: Cultural Immersion Projects
- Consortium for Overseas Student Teaching
- University of Northern Iowa: International Student Teaching

By building on the experience of successful programs, use of a program approval process that focuses on provision of student professional development, and program monitoring that assures high professional and ethical standards are maintained, the intent of §228.35 (4) can be fulfilled.

### **Pre-approved School Systems**

A wide range of school systems and schools (size, type, philosophy, effectiveness, form of registration and accreditation, and level of respect in which they are held within their community), in many locations around the world, have been pre-approved through §228.35 (4) - DoDEA, TEPSAC, and U.S. State Department schools. This includes approximately 120 DoDEA and 1,300 State Department schools and schools around the world accredited by fourteen accrediting bodies monitored and approved by the Texas Private School Accreditation Commission (TEPSAC) under the Texas requirement, 'that a child may be exempt from attending public schools if he or she attends a private or parochial school that teaches good citizenship' (<http://www.tepsac.org/faqs.cfm>).

Further, As outlined in §153.CC. Commissioner's Rules on Creditable Years of Service Page 2 December 2010 Update, Texas recognizes the work of the following accrediting agencies:

'(15) Regional accrediting agency--The recognized regional accrediting agencies are:

- (A) Southern Association of Colleges and Schools;
- (B) Middle States Association of Colleges and Schools
- (C) North Central Association of Colleges and Schools;
- (D) New England Association of Schools and Colleges;
- (E) Western Association of Schools and Colleges;
- (F) Northwest Association of Schools and Colleges;
- (G) Commission on International and Trans-regional Accreditation;
- (H) International Baccalaureate Organization;
- (I) European Council of International Schools/Council of International Schools; and
- (J) National Council for Private School Accreditation.'

While many of the pre-approved schools, and schools accredited by recognized agencies, may be able to offer excellent professional development for pre-service educators some, as can be the case in the local area of the teacher education institution, may not be appropriate for use in teacher preparation or available at a particular point in time and/or for a particular certification. Equally there are schools around the world that offer an excellent education for its students that, though not accredited by an accrediting agency are authorized by the relevant government authority as a certified and legitimate educational institution and provide very effective pre-service professional development for prospective teachers.

### **School System Outcomes and Teacher Education Standards**

**School System Outcomes:** All schools and school systems around the world continually reflect on, revise, and determine desired outcomes of instruction. Whether through the involvement of national associations in the USA defining Common Core State Standards for adoption by states (since 2010 forty-two states and the District of Columbia have adopted these standards) or by teams of teachers in schools restructuring their curriculum through textbook selection and/or choice of topics for instruction, the process of re-definition and revision is on-going resulting in educators restructuring their teaching and thus the outcomes of student learning.

In Texas, the State Board of Education has approved several hundred Texas Essential Knowledge and Skills (TEKS) statements that outline expectations for what primary through secondary students should know and be able to do as a result of their education by certified teachers in the state. As with other school systems around the world these standards are regularly revised in light of current knowledge and beliefs about abilities young people should have as educated citizens.

Efforts to compare standards across schools or school systems to determine equivalency present an interesting intellectual exercise for scholars that are looking for a snapshot, this moment in time, perspective on internationally desired educational outcomes. A better use of educational outcome statements is when policy makers review outcomes written by others as a way of guiding consideration of expectations they should have of students for whom they are responsible.

Pre-service educators in Texas learn about expected outcomes of instruction in the state for the subject area and age/grade level for which they are seeking certification, pass state mandated tests to prove their understanding, and are provided opportunity to observe and participate in the process of teaching to these goals in schools. Throughout this process they are learning about standards that can be - and often are - applied in any educational setting anywhere while working with a few selected standards that are the focus of instruction during their field-based placements.

Ultimately, statements of educational expectations are designed to guide the work of practitioners - the teachers - who must be able to understand the content of standards they are responsible for and have the ability to translate this understanding into instruction that results in student achievement of those standards.

Coming to a clear understanding of the 'outcomes to instruction' process and demonstrating the ability to guide student learning to achieve defined outcomes - regardless of the specific standards that are the current focus of instruction - is a desired outcome of teacher education and field-based placements for pre-service teachers. This ability can be effectively developed and demonstrated in any school setting anywhere in the world, while using statements of standards listed in the Texas Essential Knowledge and Skills.

**Teacher Education Standards:** To paraphrase the conclusion of a multi-national comparison of national standards for prospective teachers, 'there is more that is similar than different and the differences are minimal'. This conclusion is confirmed by the actions of nations by accepting teaching qualifications earned in other settings such as throughout the European Union and a recent statement by UK Education Secretary Michael Gove that UK schools, 'can employ teachers from the European Economic Area and will be able to employ qualified teachers from America, Canada, Australia and New Zealand and other Commonwealth countries like South Africa, Jamaica and Singapore automatically without further training and assessment from early 2012'.

Similarly, the state of Texas acknowledges the effectiveness of teacher preparation and certification programs in other locations by granting individuals who received their teaching qualification in another state or country 'a One Year Certificate to teach in Texas based on a determination of eligibility through review of their credentials'. And, by completing 'all appropriate tests', they can continue to teach in the state.

Through Texas Administrative Code Title 19, Part 7 the State Board for Educator Certification sets certification standards and accountability requirements for teacher preparation programs in the state, the graduates of whom are accepted for employment in schools around the world. These standards and requirements are monitored through a program approval process and publication of accreditation status of educator preparation programs.

In that teacher education standards are generally consistent worldwide, that Texas accepts qualifications earned by educators through other certification bodies, and that education programs in Texas are regularly monitored (including TEA §228.35 (4) out of state field-based experience requirements), there is reason for confidence that out of state

placements in most any school will effectively prepare educators for certification in line with Texas requirements.

### **Placement Realities**

All field-based experience, internship, student teaching, clinical teaching, and/or practicum placements have common purposes including assuring:

- Participants further develop their ability to guide the learning of others and demonstrate their readiness to assume all responsibilities associated with being a certified teacher capable of educating any child from, or living, anywhere in the world for the next 30+ years.
- The outcome is a well prepared professional educator who has demonstrated the ability to effectively guide the learning of others as a member of the global profession of teaching.

All field-based experience, internship, student teaching, clinical teaching, and/or practicum placements have common characteristics including:

- They are each unique - no two field-based experiences are ever identical. Even if two students, from the same institution, with the same subject specialty are placed in the same elementary or secondary school with students at the same age/grade level, for the same dates, and with the same university supervisor their experiences will be significantly different.  
This is because they will each be at different points in their professional development needing to focus on different aspects of the teaching learning process, will be working with different students with various learning styles, and with teachers who bring their unique professional experience to achieving instructional goals.
- Fulfilling responsibilities of a pre-service teacher in a field-based placement is challenging. Candidates must effectively manage time and relationships with cooperating teachers and field supervisors, fulfill responsibilities for guiding student learning, complete all requirements of their teacher education institution, while both developing and demonstrating their personal and professional talents.

All teacher education faculty and staff - in Texas or anywhere in the world - who are responsible for arranging appropriate field-based experience, internship, student teaching, clinical teaching, and/or practicum placements for teacher education students often face significant challenges for the following, among other, reasons:

- Schools, not teacher education institutions, control whether a pre-service candidate will be offered opportunity for professional development in their school.
- Schools can easily reject requests for placements from teacher education institutions for a variety of reasons including:
  - Professional development of prospective educators is a secondary or lesser concern for the school.
  - Recognizing the work involved in the professional development of a prospective educator and being reluctant to become involved.
  - Wrong time - new administration, upcoming accreditation visit, financial constraints, personnel and/or community issues, negative experiences with previous students from the same or other teacher education institution, etc.
  - Belief they have no responsibility for the development of the teaching profession and that being involved in pre-service educator professional development would negatively affect the achievement of their students and reputation of their school.
- Even if a well qualified school is willing to host a candidate in a field-based experience a placement may not be offered, because, among other reasons:
  - Recent turnover in teachers in the subject area leaving no teacher currently ready to guide professional development of another educator.
  - Not offering the required classes (e.g. special education) or offer enough class hours of the subject in a week (e.g. foreign language) for a satisfactory professional development experience.
  - Prior commitment to serve students from neighboring teacher preparation institutions.
  - Having filled their self determined quota of placement opportunities they will offer.
- Schools, not teacher preparation institutions, have control over the nature of placements in their buildings.

Besides only being able to request placements, teacher educators must adapt their needs to the needs of the school whose primary responsibility is to the students in their classrooms and the parents and citizens in their communities.

Placement personnel have no alternative but to look elsewhere if a school rejects their placement request and often must contact multiple schools before a suitable placement is located. [Note: Often the greatest challenges are in

seeking secondary school placements, but even at the primary level there can be challenges as recently fourteen elementary schools in a large city rejected a placement request for a well qualified applicant.]

### **Conclusions**

- 1) As outlined above, TEA §228.35 (4) affirms the value of out of state field-based experiences, includes pre-approval of school systems, and seeks to assure these experiences offer legitimate professional development opportunities for prospective educators.
- 2) While sharing many of the same fundamental characteristics, every school has its own unique culture - whether in Texas or other part of the world - and thus has the potential to provide a sound professional development opportunity for candidates seeking teacher certification.
- 3) The decision concerning the appropriate field-based placement for each individual student ultimately depends on the professional judgment of the faculty member responsible for making the placement and their ability to locate and convince a school to accept their applicant within the realities of placement processes.
- 4) As with placements in the local area of the teacher education institution, the appropriateness of out of state and international placements can be monitored through presentation of evidence that each placement fulfilled §228.35 (4) requirements.

### **Reconciling §228.35 (4) Criteria, Pre-Approved School Systems, School and Teacher Education Outcomes, Placement Realities, and Placement Procedures for Out of State Field-Based Experiences**

The following offers procedures for monitoring compliance by institutions seeking to offer out of state placements in line with criteria specified in §228.35 (4) (C) & (D). 'The application shall be in a form developed by the TEA staff and shall include, at a minimum...:

#### **(i) the accreditation(s) held by the school**

Premise: the criteria for selecting a school for pre-service professional development, whether in or outside Texas, should be fundamentally the same. For example, as determined by the authorized teacher education placement person:

- The school must offer sufficient hours of instruction and be expected to provide an effective professional development opportunity in the subject area/teaching specialty and grade/age level in which the candidate is seeking Texas certification.
- There must be adequate support available from suitably experienced classroom mentors, cooperating teachers and school administration to meet the professional development needs of the candidate.

Monitoring Compliance: Placement personnel will maintain evidence demonstrating that out of state schools and school systems used for field-based placements were valid educational providers capable of providing appropriate professional development for pre-service educators. Evidence, such as the following, can be used to confirm the appropriateness of schools/school systems selected for placements:

#### **Required Evidence**

- That the school/school system is authorized by the relevant government authority (state, province, national, or equivalent) as an educational institution and provides instruction in the subject area/teaching specialty and at the age/grade level for which each placement was arranged.

#### **Supplemental Evidence**

- Description of school/school system accreditation by a recognized national or international accreditation agency (minimally equivalent to TEPSAC accreditation agencies).
- Status as a known and viable school in the community as attested to by independent educators living and working in the area of the school.
- Indication that the school/school system is comparable to one on the pre-approved list of DoDEA, TEPSAC, and U.S. State Department schools and/or school/school system used for placements in the geographic area of the teacher education institution.
- Student assessment of the value of their placement and professional development experience in the school/school system.

**(ii) a crosswalk comparison of the alignment of the instructional standards of the school with those of the applicable TEKS and SBEC certification standards**

Premise: Any student seeking to complete field-based experience requirements outside of Texas must receive approval from their teacher education institution to do so based in part on demonstrating understanding of the Texas Education Knowledge and Skills for their teaching specialty and the ability to link planning and instruction to assure student learning of specific knowledge and skills.

Monitoring compliance: Placement personnel will maintain evidence demonstrating that students who were approved for an out of state field-based experience had:

- Met all requirements for completing the same requirement in a school in the local area.
- Passed all required pedagogy test(s) [Texas Examinations of Educator Standards (TExES) and/or Examinations for the Certification of Educators in Texas (ExCET)].
- Demonstrated the ability to guide student learning that achieved defined outcomes selected from the Texas Essential Knowledge and Skills statements for the appropriate subject and age/grade level.

Required Evidence:

- Institutional policy statement outlining pre-conditions for approval of applicants for field-based placements outside Texas.
- Pedagogy test scores for participating students.
- Minimum of three lesson plans prepared and used by the student during their field-based experience in which selected Texas Essential Knowledge and Skills statements were integrated into learning objectives and used to guide instruction. And, a report written by the student presenting evidence that his/her students achieved the objectives as a result of their instruction along with written reflections on the effectiveness of each lesson.

**(iii) the certification, credentials, and training of the field supervisor(s) who will supervise candidates in the school**

Premise: The qualifications for field supervisors for out of state placements is minimally equal to that required of supervisors of students in the area of the teacher education program.

Monitoring Compliance: Institutions will provide records that include the qualifications of supervisors they use for in-area and out of state placements when requested by the Texas Education Agency.

**(iv) the measures that will be taken by the educator preparation program to ensure that the candidate's experience will be equivalent to that of a candidate in a Texas public school accredited by the TEA**

Premise: No two field-based experiences are the same, but they can be equivalent to that of other candidates seeking the same certification in terms of the number of assigned weeks and days, and placement in the candidate's subject specialty and age/grade level.

Monitoring Compliance: Institutions will provide a description of the characteristics of each student's placement in terms of time, subject specialty, and age/grade level for in-area and out of state placements when requested by the Texas Education Agency.

**(D) with the addition of:**

1) 'description of the on-site program personnel'

- Premise: The qualifications for on-site program personnel for out of state placements is minimally equal to that required of personnel serving students in the area of the teacher education program.
- Monitoring Compliance: Institutions will provide records that include the qualifications of on-site personnel they use for out of state placements when requested by the Texas Education Agency.

2) 'program support that will be provided'

- Premise: The support required for the professional and personal well being of students placed in locations outside of Texas can be greater than that required for students placed in schools in the local area.
- Monitoring Compliance: Institutions will provide records that include plans and procedures for providing support for students in out of state placements when requested by the Texas Education Agency.

- Required Evidence:
  - Institutional policy statement describing expectations of students, cooperating teachers, and supervisors from admission to the field-based experience through assessment and reporting.
  - Provision of suitable liability, emergency medical, and evacuation insurance coverage for each student placed outside the USA.
  - A record of procedures to be followed in case of any emergency.

3) 'description of the school's recognition by the U.S. State Department Office of Overseas Schools'

Premise: the school must fulfill expectations outlined under premise, monitoring compliance, and required evidence in the previous section titled, '(i) the accreditation(s) held by the school'.

### **Institutional Applications for Authorization to Offer Out of Texas Field-Based Placements**

Texas teacher preparation institutions must submit an application to the Texas Education Agency and gain approval prior to offering their students opportunity to complete field-based school experiences outside the state. The purpose of this approval is to assure, as with placements in the area of the institution, that the experience will offer a legitimate professional development experience for the certification being sought and support for the candidate's well being.

The application should be in narrative format and describe:

- The institution's rationale for providing the option for students to complete field-based experiences in other national or cultural settings.
- Their ability, and allocation of institutional resources, to manage all aspects of the process to assure it provides a legitimate professional development experience for each candidate in line with state expectations for teacher certification.
- A description of precisely how all responsibilities associated with all aspects of each placement (application, admission, placement, supervision, reporting, and emergency and personal support) will be cared for.

The narrative must include a description of how Texas certification requirements will be met through out of state placements, the institution's process for selecting schools and personnel responsible for placements, and procedures for gathering and maintaining evidence demonstrating that placements were completed in line with the wording and intent of Texas Administrative Code §228.35 (4).

### **EducatorsAbroad Ltd. Request**

EducatorsAbroad Ltd. requests the opportunity to be approved as a provider for out of state school based placements in partnership with Texas teacher preparation programs based on our ability to provide placements that fulfill the wording and intent of §228.35 (4). Our confidence in our ability to fulfill Texas Education Agency expectations is based on:

- Our nearly twenty-five year service to 2,600 students from 122 colleges and universities in Canada, England, Russia, and the USA through professional support and supervision in three to eighteen week individualized educator professional development placements in 900 primary and secondary schools in 59 countries.
- Use of a continually evolving global network of highly qualified, experienced, and talented educators who work in countries around the world serving as program directors, host country coordinators, placement directors, and student teaching supervisors.
- Accreditation by the British Accreditation Council
- Being licensed by the UK Border Agency to enroll international students under Tier 4 of the Points Based System as the only provider of school based professional development placements in England for students from other countries.
- Recognition among graduates, host schools, and colleges we serve as being professionally responsible.

Our approach to providing this service will be consistent with interpretations and expectations outlined in this paper.

Complete details of our programs and procedures is available on-line at [www.educatorsabroad.org](http://www.educatorsabroad.org). Print copies of these materials have been forwarded by mail to the Texas Education Agency, Office of Educator Standards, Travis 5-100C, 1701 N. Congress Avenue, Austin, Texas, 78701.