



2019 – 2020 Continuing Approval Review Report

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BACKGROUND

Texas Education Agency (TEA) Program Specialists, Lorrie Ayers and Guiomar Andujar, conducted a five-year Continuing Approval Review of the Sul Ross State University-RGC educator preparation program (EPP) on January 7-9, 2020. Per 19 Texas Administrative Code (TAC) §228.10(b), "...An entity approved by the SBEC under this chapter shall be reviewed at least once every five years...". Sul Ross-RGC was approved as an EPP on July 19, 1985. At the time of the review, Dr. Gina Stocks was the program Legal Authority and the accreditation status of the EPP was Accredited-Probation (Year 1).

Sul Ross-RGC is approved to certify candidates in the Classroom Teacher, Principal, Reading Specialist, School Counselor, and Superintendent classes. The EPP reported 96 finishers in 2017-2018 and 71 finishers in 2018-2019.

Per 19 TAC §228.1(c), "all educator preparation programs are subject to the same standards of accountability, as required under Chapter 229 of this title." The TEA administers TAC required by the Texas legislature for the regulation of all EPPs in the state. (See the complete [TAC](#) for details.) The risk assessment model identified Sul Ross-RGC as a Level 1 risk due to the accreditation status.

The risk assessment, including the lowered accreditation status, determined that the five-year Continuing Approval Review was conducted in an on-site format where TEA staff reviewed documents and records on-site at the Sul Ross-RGC campus located at 2623 Garner Field Road, Uvalde, Texas 78891.

The scope of this review included verifying compliance with TAC and Texas Education Code (TEC) as applicable to all certification classes actively offered by the EPP. A Compliance Plan containing details of next steps for the EPP was developed collaboratively with EPP staff prior to the close of the review.

EPP staff participating at various points in the review were Dr. Gina Stocks, Dr. Monica Gutierrez, Susan Land, George Hernandez, Patricia Nicosia, Tim Wilson, Maria Gear, and Miriam Muniz.

DATA ANALYSIS

Information concerning compliance with TAC governing EPPs was collected by a variety of means. A Status Report and related program documents prepared by the EPP were received at TEA on January 2, 2020. Records for five (5) candidates were randomly selected from each of these programs: Teacher Undergraduate (U), Teacher Post-Baccalaureate/Alternative



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(PB/ALT), Principal, Reading Specialist, and School Counselor. No records were selected from the Superintendent program because the program had not been active in three (3) or more years. Candidate and EPP records were reviewed to determine compliance with requirements for candidate preparation and certification and for compliance with state reporting requirements and governance. The scope of the review included the reporting years 2017-2018 through 2019-2020. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence.

FINDINGS, COMPLIANCE ISSUES, and RECOMMENDATIONS

“Findings” indicate evidence collected during the review process. “Compliance Issues” are areas that are not compliant with requirements in TAC and must be corrected by the agreed date identified in the Compliance Plan. “Recommendations” are suggestions for general program improvement and no follow up is required.

COMPONENT I: GOVERNANCE – 19 TAC Chapter 228

Findings

The Sul Ross-RGC campus appears to be accredited by the Southern Association of Colleges and Schools Commission of Colleges (SACSCOC) through the Sul Ross-Alpine location. Degrees are granted from Sul Ross-Alpine. [19 TAC §228.10(f)]

Sul Ross-RGC has expanded and amended the program to include multiple teaching sites and online delivery. The EPP has two satellite locations, one in Del Rio and one in Eagle Pass. There are no letters on file notifying TEA of the addition of sites or altering the mode of delivery to an online format which does not meet requirements in 19 TAC §228.10(e) or §228.20(e) for notifying the TEA of program changes.

The EPP has partnerships with three (3) school districts, Eagle Pass Independent School District (ISD), San Felipe Del Rio Consolidated ISD, and Uvalde Consolidated ISD which are in the areas of each of the teaching sites.

The facilities in which the Sul Ross-RGC program resides appear to offer acceptable resources and support for candidates in the EPP programs. EPP staff and faculty were engaged in the review process at all points of the review. [19 TAC §228.20(c)]

The advisory committee is composed of members representing the Sul Ross-RGC EPP and the partner districts. Minutes from meetings reflect that advisory committee activity appears to focus on design, delivery, evaluation, and major policy decisions pertaining to the teacher programs



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with limited reference to the non-teacher programs. EPP staff were encouraged to broaden membership to include members from a regional education service center and/or business partners and to include the business of the non-teacher programs in advisory committee activities. The advisory committee has not met consistently for the last three (3) years. EPP staff were advised the committee must meet a minimum of one time per year. [19 TAC §228.20(b)]

Information provided on the EPP website, with candidate records and data in the Educator Certification Online System (ECOS) and in the Accountability System for Educator Preparation programs (ASEP), provide evidence that candidates are certified in these routes: Teacher program (U, PB, ALT), Principal program (PB, ALT), School Counselor program (PB, ALT), and Reading Specialist (PB, ALT).

The EPP has published a calendar of activities in the “Handbook for Clinical Teachers, Cooperating Teachers, and University Supervisors” that reflects the university semester calendar in effect during the clinical teaching semester but does not reflect EPP requirements from admission through completion of the program. To meet requirements in 19 TAC §228.20(g), the EPP will need to develop a calendar to reflect EPP requirements.

Compliance Issues (per Compliance Plan)

1. The EPP must notify TEA, in writing, of the two satellite branches and, in future, if accredited, must notify TEA 60 days prior to opening any additional sites. [19 TAC §228.10(e)]
2. The EPP must notify TEA in writing 120 days in advance of any program amendment. Changing delivery from face-to-face to an online format is an amendment. [19 TAC §228.20(e)]
3. Diversity of membership on the advisory committee must be increased to include members from the business and community and/or service center. Sign-in sheets reflecting attendance at the meetings must be retained in EPP records. [19 TAC §228.20(b)]
4. The advisory committee must meet, at minimum, one time per year with meeting minutes of each meeting retained in EPP records. [19 TAC §228.20(b)]
5. Develop a calendar of EPP requirements that reflect admission deadlines and adequate time for completion of coursework and training requirements. [19 TAC §228.20(g)]



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Recommendations

1. Continue to send staff to relevant training offered by TEA and other entities for the purpose of continuous improvements to the EPP and to stay in step with changes and updates in educator preparation requirements in TAC and TEC.
2. Remove approved certificates from inventory that are not supported by enrollment or approved curriculum.
3. Because the Sul Ross-Alpine site holds the accreditation and grants the degrees, consider merging into the Sul Ross-Alpine EPP and operating under the Sul Ross-Alpine EPP county/district number (CDN)

Based on the evidence presented, Sul Ross-RGC has not met requirements for governance as identified in 19 TAC Chapter 228.

COMPONENT II: ADMISSION - 19 TAC Chapters 227 & 241

Findings

A review of the EPP website revealed the EPP has posted the following required information for applicants and candidates in all programs [19 TAC §227.1]:

- A link to the TEA website for information about requesting a Preliminary Criminal History Evaluation (PCHE) from TEA;

The following required information was not posted on the EPP website [19 TAC §227.1]:

- Information about required fingerprint background checks;
- The performance of the EPP over time; and
- The supply and demand of teachers in the workforce.

In the information that was posted on the EPP website, there was not a clear relationship identified between the idea that a candidate would have to pass a fingerprint background check prior to being certified and that a criminal history could potentially prevent the individual from achieving certification. Additionally, the PCHE would provide the individual with an idea of whether, or not, the criminal history would prevent future certification. EPP staff were advised to post this information clearly for all applicants and candidates seeking certification in any certificate class. [19 TAC §227.1]



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EPP admission and completion requirements per 19 TAC §227.1, were posted for Teacher programs but not for non-teacher programs. Degree plans were posted as requirements to earn graduate degrees but were not specific to completion requirements for the EPP and certification.

Published admission requirements for the Teacher (U) program are:

- Must have applied and received an official degree plan from the Education Department;
- Must have met minimum Academic Admission Requirements;
- Must have all General Education Requirements complete and grades must be posted;
- Must have completed 12 hours in English coursework (to include ENGL 3312) with a GPA of 2.5 on a 4.0 scale;
- Must have completed ENGL 3312 with no grade lower than a “B”;
- Must have a minimum cumulative (all university coursework) GPA of 2.5 on a 4.0 scale.
- Must have a minimum Academic Support Area GPA of 2.5 on a 4.0 scale; and
- Must have completed a minimum of 21 hours in Academic Support Area with NO GRADE LOWER THAN A “C”.

Per EPP policy, an applicant that had a grade of A or B in *ENGL 3312 met the basic skills requirement of the Texas Success Initiative under rules established by the THECB, Part 1, Chapter4. [19 TAC §227.10(a)(6)]

Admission requirements for the Teacher (PB/ALT) program include three (3) semester credit-hours of coursework completed in each computer competency and English oral proficiency; 12-24 semester credit-hours completed in Elementary specialization or Professional education coursework as applicable to the intended certificate; and 6-12 semester credit-hours of English coursework, depending on whether the applicant is seeking elementary or secondary certification. Admission requirements for secondary certification identify the applicant must have completed six semester credit-hours of student teaching and passed the TExES exam for the intended certificate area. The program was advised to review these requirements to determine if the six semester credit-hours of student teaching requirement is accurate and to update the requirement for a passed TExES exam as a result of the changing requirements regarding a Pre-Admission Content Test (PACT) effective January 27, 2020.

The admission requirements for the non-teacher (PB and ALT) certification programs were not found on the EPP website. There are admission requirements published for graduate school. EPP staff were advised that admission requirements must be published in a place accessible by applicants to meet requirements in 19 TAC §227.1(c)(1) that identifies “the EPP shall inform all applicants, in writing, of the admission requirements”. It was noted that some graduate school requirements that were posted suggested that an applicant needed to have completed at least



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12 semester credit-hours of graduate coursework to be admitted into graduate school. EPP staff were encouraged to review and update this requirement as applicable because, as written, an individual could only enter the graduate school if transferring in from another graduate school after completing 12 hours of coursework.

The website identifies the English language proficiency (ELP) requirements for candidates admitted from out of country may be met by one of the following:

- A TOEFL score of 520; or
- Twenty-four hours of undergraduate work with a C average at an accredited U.S. college or university, or 12 graduate hours with a B average at an accredited U.S. college or university; or
- A bachelor's or master's degree from an accredited U.S. college or university; or
- An interview with the dean, the Department Chair, and one graduate faculty member from the department in which the student is tested orally and judged to meet the requirements of English language proficiency necessary to do satisfactory work in the program. The results of the interview will be filed in the Office of Admissions and Records by the dean.

Per 19 TAC §227.10(a)(7)(B), the ELP requirements are acceptable for applicants seeking admission into the Teacher (U) program; however, per 19 TAC §227.10(a)(7), for applicants seeking admission into PB or ALT programs the requirements must be updated to reflect the requirements for ELP identified in 19 TAC §230.11(b)(5).

Admission requirements were met as published except:

- The formal admission process has not been implemented as required in 19 TAC §227.17. Records for seven of the ten teacher candidates did not contain evidence of the formal admission process. Admission into the EPP for non-teacher candidates appears to be concurrent with admission into the university graduate school. The Apply Texas application is used and a letter is sent to admitted candidates with details about graduate school admission. The letter includes the admission semester however does not provide a requirement for the candidate to accept in writing. EPP staff were encouraged to identify an appropriate admission point into each program and from there, to develop and implement the formal admission process.
- A screening interview, with a rubric and cut score, was presented for the Teacher programs; however, there was no evidence in the records for six of the ten teacher candidates that the screen had been applied. There was no evidence that non-teacher



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programs have implemented one or more admission screens. [19 TAC §227.10(8) and 19 TAC §241.5(c)]

Compliance Issues (per Compliance Plan)

1. For all programs, the website, or other written material accessible to applicants and candidates, must be updated to reflect the required information [19 TAC §227.1(b), §227.1(c), and §227.1(d)]
2. The formal admission process must be implemented for all programs. Documentation must be retained in each candidate's record. [19 TAC §227.17]
3. Admission screens must be implemented for all programs. Two or more screens are required for the Principal program. Documentation must be retained in each candidate's record. [19 TAC §227.10(8), §239.5(a)(2), §239.91(a)(2), and §241.5(c)]
4. The ELP requirements for PB and ALT candidates that are posted on the website must be updated to reflect current requirements in 19 TAC §230.11(b)(5).
5. Nonteacher programs must review and set admission requirements and then equitably apply those requirements to all applicants. [19 TAC §227.10(a)(9)]

Recommendations

1. The PACT test will change effective at the end of January 2020. Plan to update admission requirements for Teacher programs as needed. The TExES content pedagogy exams cannot be used for admission purposes after 1/27/2020 but may be used for certification purposes. The new PACT, TxPACT, may not be used for certification purposes.
2. Review the GPA calculation used to determine admission GPA and ensure it meets options in 19 TAC §227.10(a)(3).
3. Review and revise, if necessary, published graduate school admission requirements.

Based on the evidence presented, Sul Ross-RGC has not met minimum requirements for admissions as identified in 19 TAC §227.10, §239.5, and §241.5.



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COMPONENT III: CURRICULUM – 19 TAC §228.30

Findings

The coursework was evaluated to verify that all candidates in all programs received instruction in the required areas identified in 19 TAC §228.30. Coursework for the Core Subjects EC-6 certificate area was reviewed as representative that curriculum meets minimum requirements for being standards-based, performance-based, research-based, rigorous, interactive, and overall would lead to the preparation of a candidate to be effective in the classroom as required in 19 TAC §228.35(a)(1) and (2). The Core Subjects EC-6 certificate area was the focus of the curriculum review because it was identified as the subject area that is the lowest-performing but prepares the largest number of candidates.

Based on curriculum alignment charts, syllabi, and samples of activities and assessments in some courses, the curriculum appears to be based on the approved educator standards as required in 19 TAC §228.30(a) except there was limited evidence that data-driven instruction is effectively addressed as required in the Teacher Standards. [19 TAC §228.30(d)(4) and §149.1001(b)(5)]

The curriculum addresses TEKS but lacks depth in TEKS instruction including unpacking TEKS, developing lesson objectives based on TEKS, and assessing mastery of TEKS. [19 TAC §228.30(a)]

A review of syllabi and coursework revealed that candidates are assessed in a variety of ways including quizzes, exams, final exams, and projects. EPP staff were encouraged to update the curriculum to include more performance assessments where appropriate to the standards taught. [19 TAC §228.40(a)]

Bibliographies posted on Blackboard and in syllabi provided evidence that the curriculum is research-based. [19 TAC §228.30(b)]

Evidence of instruction in the following areas, as required in 19 TAC §228.30, was identified in syllabi and or coursework:

- The Educator's Code of Ethics;
- Detection and education of students with dyslexia;
- The skills that educators are required to possess, the responsibilities that educators are required to accept, and the high expectations for students in this state;
- The importance of building strong classroom management skills;
- The framework in this state for teacher and principal evaluation;
- The English Language Proficiency Standards (ELPS);



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- Reading instruction, including instruction that improves students' content-area literacy;
- For certificates that include early childhood and prekindergarten, the Prekindergarten Guidelines; and
- The skills and competencies captured in the Texas teacher standards in 19 Chapter 149, Subchapter AA (except for data-driven practice).

Coursework for candidates in all classes is lacking instruction in

- Appropriate relationships, boundaries, and communications between educators and students;
- Instruction in digital learning, including a digital literacy assessment; and
- Instruction regarding mental health, substance abuse, and youth suicide that is provided by an approved provider.

Compliance Issues (per Compliance Plan)

1. The Core Subjects EC-6 coursework and coursework for all other applicable certificate areas must be updated to add depth in TEKS instruction and data-driven practice. [19 TAC §228.30(a) and §228.30(d) / §149.1001(b)(5)]
2. The required subject matter including appropriate relationships and boundaries; evaluation and instruction in digital literacy; and the required mental health, substance abuse, and youth suicide training must be added to coursework for candidates in all certification classes. [19 TAC §228.30(c)]

Recommendations

1. Update curriculum to include more instruction in the ELPS.
2. The PACT test will change effective at the end of January 2020. Ensure the curriculum for teacher programs has been updated as necessary to meet requirements for instruction in content-specific pedagogy and test preparation. The TExES content pedagogy exams cannot be used for admission purposes after 1/27/2020 but may be used for certification purposes. The new PACT, TxPACT, may not be used for certification purposes.
3. The Application A, used to add new certificate areas to EPP inventory, has changed – staff in Teacher programs should plan to review requirements in the updated application in advance of preparing to add new certificates.



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4. Develop and implement more performance assessments for all certificates offered. Evidence of performance assessments will be a requirement for adding new certificates using the updated Application A.
5. The Science of Teaching Reading (STR) will impact the renewal of Core Subjects EC-6, Core Subjects 4-8, ELAR 4-8, and ELAR /Social Studies 4-8 certificates, effective January 1, 2021. Programs that are not able to demonstrate an updated curriculum that addresses the standards, domains, and competencies of the STR, will not be able to offer these certificates after January 2021. To prevent a lapse in service for candidates in these areas, teacher programs are encouraged to plan ahead by updating the curriculum and submitting the required documentation to TEA well in advance of the January 1, 2021 implementation date.

Based on the evidence presented, Sul Ross-RGC has not met minimum requirements for curriculum as identified in 19 TAC §228.30.

COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT – 19 TAC §228.35

Findings

Except for the curriculum areas that need to be updated as identified in Component III, the Scope and Sequence document created by EPP staff for the 5-year review, syllabi for various courses, and published degree plans reveal that the EPP appears to provide candidates with adequate preparation and training as required in 19 TAC §228.35(a)(1). Undergraduate teacher candidates seeking certification at elementary or middle school levels complete a Bachelor of Science degree in Interdisciplinary Studies. Candidates seeking certification at the secondary level (grades 6-12) or certificates that are all-level, earn a degree in the content area of specialization.

Teacher candidates receive 300 or more clock-hours of coursework and training as required in 19 TAC §228.35(b) and those in the Teacher (U) program receive multiple opportunities to interact with students in a K-12 classroom throughout the course of preparation and prior to clinical teaching. There was limited evidence, however, that candidates in the Teacher (PB/ALT) program consistently complete a minimum of 30 hours of early field-based experiences (FBE) as required in 19 TAC §228.35(b)(1). Candidates do not complete early FBE through electronic transmission.

Candidates in non-teacher programs complete 200 or more clock-hours of coursework concurrent with a Master's degree as required in 19 TAC §228.35(c).



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- Principal program candidates complete a 36 hour Master's degree in School Administration. The degree plan requires candidates to complete 9-semester credit-hours of Core classes, 21 credit hours of coursework related to the Principal certificate, and two (2) practicum classes.
- School Counselor program candidates complete a 60 hour Master's degree in Counseling.
- The EPP website identifies that Reading Specialist program candidates complete a 36 hour Master's degree in Education with Reading Specialist certification. The EPP requires candidates in this program to hold a teaching certificate. The degree plan requires a candidate to complete 15 semester credit-hours of Core requirements, 15 credit-hours of courses related to the Reading Specialist certificate, a 3 credit-hour practicum class, and a 3 credit-hour elective.

None of the candidates whose records were reviewed were allowed to substitute prior coursework or training in lieu of the Sul Ross-RGC requirements and it was noted that the programs within the Sul Ross-RGC did not have policies about whether, or not, prior coursework and training may be substituted for program requirements other than university policy regarding transfer coursework. None of the Teacher (PB/ALT) candidates were Late Hires so there was no evidence in candidates' records that the EPP allows 50 hours of school district professional development in lieu of program coursework.

Multiple courses appear to be offered online. Per 19 TAC §228.35(a)(6), if offering coursework in an online delivery format, the EPP must pursue quality certification through one of the options in 19 TAC §228.35(a)(6). Documentation the EPP has secured quality certification of online coursework was missing from EPP records.

Degree plans for Teacher programs provide evidence that all required courses are completed prior to clinical teaching. Teacher candidate records contained evidence that candidates complete the required preservice hours with these exceptions:

- One (1) Teacher (U) candidate completed FBE hours while completing clinical teaching;
- Two (2) Teacher (PB/ALT) candidates did not complete the minimum 30 hours of FBE; and
- Candidates did not receive the required instruction in using student progress data.

The EPP is approved to offer clinical teaching and internships to teacher candidates in both the (U) and (PB/ALT) routes. Fourteen weeks (70 days) of clinical teaching is required per the "Handbook for Clinical Teachers, Cooperating Teachers, and University Supervisors" that is



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published by the EPP. In addition to supervision provided by university field supervisors, cooperating teachers complete mid-term and final evaluations of clinical teachers. Clinical teachers provide formal feedback to the EPP on their clinical experience. At the time of the review, four (4) of the five (5) Teacher (U) candidates and one (1) of the five (5) Teacher (PB/ALT) candidates had completed 70 or more days of clinical teaching as required in 19 TAC §228.35(e)(2)(A). Two (2) of the five (5) Teacher (PB/ALT) candidates had completed an internship of one full school year as required in 19 TAC §228.35(e)(2)(B) and one (1) candidate was in process of completing an internship. One (1) candidate from each Teacher program had not reached the point of clinical teaching or internship. One (1) candidate received the aide exemption so clinical teaching was waived for that candidate as allowed in 19 TAC §228.35(l)(1). Documentation was found in the records for that candidate.

Candidates completing clinical teaching or internship do not consistently experience the professional responsibilities relating to the first 15 days of the instructional year so the EPP was advised to update processes and timelines so that teacher candidates consistently have the first of year experiences as required in 19 TAC §228.35(e)(4).

In the Status Report, EPP staff identified that the non-teacher programs do not issue Intern or Probationary certificates to their candidates; however, the website lists requirements for issuance of Probationary certificates to Principal candidates. There was evidence in candidates' records that candidates in all non-teacher programs are required to complete a standards-based practicum; however, documentation was inconsistent. [19 TAC §228.35(e)(8)]

- For candidates in the Principal program, the practicum is completed across two (2) semesters. Practicum logs were evidence that two (2) of the three (3) candidates who had completed a practicum completed more than the 160 hours required. There was no practicum log for one (1) candidate.
- School Counselor candidates and Reading Specialist candidates complete a portfolio of activities and accomplishments during the practicum.
- Of the three (3) School Counselor candidates that completed a practicum, only one (1) record contained a practicum log verifying hours completed.
- Three (3) of the five Reading Specialist candidates had completed a practicum and related logs were found in their records. The logs reflected hours completed but in some cases, credit was given for activities that were not standards-based such as participation in test preparation, and logs were not verified by a site supervisor signature.



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At the time of the review, there were no candidates completing clinical teaching, internship, or practicum in out of state placements. [19 TAC §228.35(e)(9)]

Observation documentation and/or signed mentor agreements were evidence that teacher candidates placed in clinical teaching or internship, and Principal candidates completing a practicum, were assigned a cooperating teacher, mentor, or site supervisor as applicable. There was limited evidence that School Counselor candidates and Reading Specialist candidates are consistently assigned a site supervisor during practicum. [19 TAC §228.35(f)]

When cooperating teachers, mentors, and site supervisors were assigned to candidates, the EPP had retained evidence that each had met the qualification requirements of certification and years of experience, but had not yet implemented a process to collect documentation about the accomplishments of these campus personnel. Additionally, evidence that training has been developed by the EPP for these individuals was present in EPP records; however, there was no documentation to support that cooperating teachers, mentors, or site supervisors had completed the training. [19 TAC §228.2(12), §228.2(24), §228.2(31), and §228.35(f)]

Observation documentation and signatures on placement documents were evidence that Teacher candidates completing clinical teaching or internships, and Principal candidates completing a practicum, are assigned field supervisors by the EPP. The limited documentation in records for School Counselor and Reading Specialist candidates did not support that these candidates were consistently assigned field supervisors. [19 TAC §228.35(g) and §228.35(h)]

Evidence in EPP and candidate records revealed that field supervisors are currently certified and experienced; however, the EPP has not implemented a process to collect documentation of the accomplishments of the individuals serving as field supervisors. Additionally, there is evidence the EPP provides training and updates to field supervisors; however, there is limited evidence that field supervisors have attended the EPP training. Certificates of completion were evidence that field supervisors completed the TEA-approved observation and/or coaching training. [19 TAC §228.2(16), §228.35(g), and §228.35(h)]

EPP and candidate records were reviewed to evaluate the level of support and supervision provided to candidates during clinical teaching, internship, or practicum.



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- There was not enough evidence to determine if field supervisors make the first contact with candidates within the first three (3) weeks of the assignment as required in 19 TAC §228.35(g) and §228.35(h).
- Observation documentation in candidates' records was evidence that Teacher candidates received the required number and duration of observations. Two (2) of the five (5) Principal candidates received observations but the number of observations and/or the duration did not meet requirements in TAC. There was no other observation documentation in records for Principal, School Counselor, or Reading Specialist candidates. [19 TAC §228.35(g) and §228.35(h)]
- When observing Teacher candidates, field supervisors captured instructional strategies observed and the level of proficiency demonstrated by the candidate during the observation. There was evidence that field supervisors also complete pre- and post-conferences with Teacher candidates before and after each observation, providing written feedback to the candidate and the supervising campus personnel. The lack of documentation related to field supervision limited the ability of the review team to determine if observations, conferencing, feedback, and ongoing coaching and support are completed as required for candidates completing practicums in the non-teacher programs. [19 TAC §228.35(g) and §228.35(h)]
- The EPP has not yet implemented a process to secure a recommendation from campus personnel and the field supervisor regarding candidate success in an internship, clinical teaching, or a practicum as required in 19 TAC §228.35(e)(2)(A)(iii), §228.35(e)(2)(B)(vii), or §228.35(e)(8)(D).

Compliance Issues (per Compliance Plan)

1. Develop and equitably apply a policy for accepting prior coursework and training from applicants. [19 TAC §228.35(a)(5)]
2. Shared online courses and any other courses offered in the online format must meet quality standards. [19 TAC §228.35(a)(6)]
3. Implement a process to ensure Teacher candidates consistently complete the required hours of FBE prior to clinical teaching or internship. [19 TAC §228.35(b)(1)]
4. Add instruction in data-driven practice to courses taken prior to clinical teaching or internship to ensure candidates can demonstrate proficiency in using student data to inform instruction. [19 TAC §228.35(b)(2)]



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5. Update training requirements for Teacher candidates to ensure they have experiences that include the start of the school year. [19 TAC §228.35(4)]
6. Update training requirements and document retention processes to ensure and verify that candidates seeking certification in a class other than classroom teacher consistently complete a 160 clock-hour, standards-based practicum. Retain documentation in candidates' records. [19 TAC §228.35(e)(8)]
7. Non-teacher programs must update processes to ensure site supervisors are assigned to candidates completing a practicum. Documentation must be retained in each candidate's record. [19 TAC §228.35(f)]
8. Update practicum requirements and processes to ensure candidates in non-teacher programs are consistently assigned to qualified field supervisors. Retain documentation in candidates' records. [19 TAC §228.35(h)]
9. For all certificate classes, update processes, documents, and/or training to capture evidence that field supervisors make the required initial contact with candidates. Retain evidence in candidates' records. [19 TAC §228.35(g) and (h)]
10. Ensure field supervisors capture non-teacher candidates' demonstration of proficiency in the educator standards during practicum. Retain evidence in candidates' records. [19 TAC §228.35(e)(8)]
11. Implement a process to collect and retain evidence of the qualifications of cooperating teachers, mentors, site supervisors, and field supervisors as required in 19 TAC §228.2(12), §228.2 (24), §228.2(31), and §228.2(16).
12. Implement a process to provide training to cooperating teachers, mentors, and site supervisors within the first 3 weeks of assignment to a candidate and a process to retain evidence of the training. [19 TAC §228.2(12), §228.2(24), §228.2(31), §228.35(f)]
13. Implement a process to ensure field supervisors supporting candidates in all certificate classes have received EPP training. Retain evidence in EPP records. [19 TAC §228.35(g) and (h)]
14. Update and/or implement field supervision requirements for non-teacher programs to ensure the field supervisor conducts observations according to requirements, including 1) capturing educational practices observed during each observation; 2) holding pre- and post-observation conferences with the candidate observed; and 3) providing written



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feedback to the candidate and site supervisor after each observation. Retain observation documentation in candidates' records. [19 TAC §228.35(h)]

15. Update and implement field supervision requirements for non-teacher programs to ensure the field supervisor conducts observations according to requirements for duration, frequency, and format. Retain completed observation documentation in candidates' records. [19 TAC §228.35(h)(1-3)]
16. Develop and implement a process for all programs to collect agreement from field supervisors and cooperating teachers, campus supervisors, or site supervisors that candidates are ready for standard certification following clinical teaching, internship, or practicum. Retain documentation in candidates' records. [19 TAC §228.35(e)(2)(A)(iii), §228.35(e)(2)(B)(vii), or 19 TAC §228.35(e)(8)(D)]
17. Update field supervision requirements to capture evidence that candidates consistently receive informal observations and ongoing coaching from field supervisors as appropriate during practicum. Retain evidence in candidates' records. [19 TAC §228.35(g) and §228.35(h)]

Recommendations

None

Based on the evidence presented, Sul Ross-RGC has not met minimum requirements for program delivery as identified in 19 TAC §228.35.

COMPONENT V: ASSESSMENT AND EVALUATION OF CANDIDATES AND EPP – 19 TAC §228.40

Findings

Degree plans were records of candidate benchmarks. [19 TAC §228.40(a)]

Several candidates had moved from one non-teacher program to another. Written documentation of the request and EPP Director approval was found in the candidates' records. [19 TAC §228.40(c)]

Test readiness materials and practice test scores were found in records for Teacher and non-teacher candidates. [(19 TAC §228.40(b) and §228.40(d)]



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Per 19 TAC §228.40(e), the EPP must use data and feedback from a variety of sources to continuously evaluate the design and delivery of the EPP components. Advisory committee minutes provided evidence that EPP staff discuss EPP performance using information and data from TEA, feedback from partner districts, and teacher candidate responses on a survey about the clinical teaching or internship experience.

Compliance Issues (per Compliance Plan)

None

Recommendations

1. Develop a plan to update EPP benchmarks and test readiness requirements for the Teacher (PB/ALT) program, if necessary, to address changes in PACT that will be in effect January 27, 2020.
2. EPP staff expressed concern about the number of candidates that delay testing after finishing program requirements which makes it difficult for program staff to provide effective and timely preparation and make reasonable determinations about candidate readiness for testing. Options for improving testing efficiency were discussed. One option discussed was updating program benchmarks to include testing as a benchmark for progression through the program. Program staff were reminded that success on certification exams should not be a factor in grades or credit earned for a course, or in granting a degree.
3. Update or implement quality control procedures to ensure records of candidate admission and completion of all EPP requirements are retained for candidates in all programs for a minimum of five (5) years as required in 19 TAC §228.40(f).

Based on the evidence presented, Sul Ross-RGC has met minimum requirements for program and candidate evaluation as identified in 19 TAC §228.40.

COMPONENT VI: PROFESSIONAL CONDUCT - 19 TAC §228.50

Findings

19 TAC §228.50 requires that during the period of preparation, the EPP shall ensure that the individuals preparing candidates and the candidates themselves understand and adhere to 19 TAC Chapter 247 (relating to the Educators' Code of Ethics).



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- EPP records did not contain evidence that program staff and others that prepare candidates at Sul Ross-RGC sign an agreement of understanding and abiding the Educators' Code of Ethics (ECOE).
- Records for three (3) of the ten Teacher candidates contained a signed document of 'reading and understanding' the ECOE. None of the records for the candidates seeking certification in non-teacher programs contained evidence that candidates understand and agree to adhere to the ECOE.
- EPP staff were encouraged to strengthen the commitment to the ECOE by updating the wording on the signed document to reflect the individual "understands and agrees to adhere to" the ECOE. This wording is found in 19 TAC §228.50 as well as it ensures program staff and candidates not only read but understand the requirements.

Compliance Issues (per Compliance Plan)

1. Implement a process that captures evidence that the EPP ensures that candidates and those who prepare them understand and agree to adhere to the Educators Code of Ethics. Retain evidence in the record for each candidate. [19 TAC §228.50]

Recommendations

1. Strengthen staff and candidate commitment to the ECOE by updating the wording on the signed agreement to reflect that the individual "understands and agrees to adhere to" the ECOE. This wording is found in 19 TAC §228.50 as well as it ensures program staff and candidates not only read but understand the requirements.

Based on the evidence presented, Sul Ross-RGC has not met minimum requirements for professional conduct as identified in 19 TAC §228.50.

COMPONENT VII: COMPLAINTS PROCESS – 19 TAC §228.70

Findings

Per 19 TAC §228.70(b), the EPP complaints process is on file at TEA; however, the complaints process is not clearly posted on the EPP website, at the physical site, or in writing to be handed to an individual such as on a flier or in a candidate handbook. There is a link to the TEA complaints process from the EPP website.



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Compliance Issues (per Compliance Plan)

1. Post the EPP complaints process in all places as required in 19 TAC §228.70. Note: The required copy is on file at TEA.

Recommendations

None

Based on the evidence presented, Sul Ross-RGC has not met minimum requirements for a complaints process as identified in 19 TAC §228.70.

COMPONENT VIII: CERTIFICATION PROCEDURES - 19 TAC Chapters 228 and 230

Findings

EPP and candidate records were reviewed to verify that candidates in all programs met requirements for certification.

- Four (4) of the ten Teacher candidates had achieved standard certification at the time of the review. Eight of the 15 non-teacher candidates had achieved standard certification. Transcripts were evidence that candidates met the appropriate degree requirement for the certificate sought. [19 TAC §230.13(a)(1)]
- Sul Ross-RGC is not approved to offer certification in areas that require licensure and work experience. [19 TAC §230.13(b)(1) and §233.14]
- Degree plans and benchmark documents were evidence that candidates completed EPP requirements prior to certification. [19 TAC §230.13(a)(2)]
- Principal candidates held a valid teaching certificate at the time they were recommended for certification. EPP staff were advised that the School Counselor candidate is not required to hold a valid teaching certificate to qualify for issuance of the standard certificate. [19 TAC §241.20 and §241.60]
- Service records were evidence that Principal, School Counselor, and Reading Specialist candidates met the creditable years of teaching experience required for certification. The EPP was advised that the required number of years of creditable teaching experience, as verified on an official transcript, is two (2) years for each the Principal, School Counselor, and Reading Specialist certificates. [19 TAC §241.20, §241.60, §239.20, and 19 TAC §239.93]



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Recommendations

None

Based on the evidence presented, Sul Ross-RGC has met minimum requirements for certification procedures as identified in 19 TAC §228 and §230.

COMPONENT IX: INTEGRITY OF DATA REPORTED - 19 TAC Chapter 229

Findings

Per 19 TAC §229.3(e), “all required EPP data for an academic year shall be submitted to the TEA staff annually by September 15 following the end of that academic year”. The EPP is required to report admission activities, enrollment data, and observation data. Candidate and EPP records were reviewed to verify self-reported data as identified in the Figure: 19 TAC §229.3(f)(1) and §229.4(a)(4)(A) was accurate as reported to the TEA.

- All data was reported by the established deadlines.
- Admission dates for nine of the ten Teacher candidates and for 13 of the 15 non-teacher candidates were inconsistent with the admission dates in candidates’ records.
- The formal admission process in 19 TAC §227.17(e) requires that an “EPP must notify the Texas Education Agency within seven calendar days of a candidate’s formal admission”. Admission records were created within the required time frame for most candidates; however, admission was not uploaded within the seven days for one (1) of ten Teacher candidates and five (5) of 15 non-teacher candidates.
- Candidate enrollment status is reported as “Completer” or “Finisher” if the candidate finished all program requirements within a specified reporting year, or as “Other Enrolled” if the candidate is still in process of completing program requirements at the end of the reporting year. Candidate enrollment status was reported accurately.
- Observation data reported in the ASEP for three (3) of the ten Teacher candidates was inconsistent with the documentation retained in candidates’ records.

Compliance Issues (per Compliance Plan)

1. Develop and implement a quality control process to ensure admission data and observation data reported are accurate and consistent with documentation found in



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candidates' records. [19 TAC §229.3(f)(1) and related graphic Figure 19 TAC §229.3(f)(1)]

Recommendations

1. Non-teacher programs will be required to report observation data starting with the 2019-2020 reporting year. Programs are encouraged to report data throughout the year, within the reporting year in which the observations occurred. When reporting observation data for a candidate completing a practicum, use the CLIN141 observation code.

Based on the evidence presented, Sul Ross-RGC has not met minimum requirements for the integrity of data reported is identified in 19 TAC Chapter 229.

Additional Items Discussed with EPP Staff

1. Certificate deactivation timelines and requirements changes have been proposed in 19 TAC Chapter 228. If adopted, changes will include new timelines for requesting certificate deactivations and information that must be provided to stakeholders in advance of internship start dates. Field supervisors will need to verify candidate placement information at the beginning of the internship assignment.
2. Additions have been proposed to 19 TAC Chapter 228 to require EPPs to develop exit policies. This is a recommendation even if the TAC is not adopted by the SBEC.
3. EPP staff should continue to stay abreast of changes in educator preparation requirements and make updates to educator preparation processes and/or curriculum as necessary to meet minimum requirements in TAC and TEC.

PROGRAM RECOMMENDATIONS ALL EPPS

- To ensure continuity in record keeping and other related processes, consider creating a procedure manual documenting EPP processes.
- Implement quality control procedures to ensure ASEP reports are submitted accurately and timely during state reporting each year.
- Align the verbiage of the program to the verbiage of Texas Administrative Code (TAC) (ex. Field supervisor, cooperating teacher, mentor, candidate, practicum, internship, etc.);



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- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about current Texas Administrative Code;
- Continue to participate in webinars provided by the Division of Educator Preparation to ensure that the program staff is knowledgeable about current requirements and changes in the TAC;
- Continue to maintain communication with the program specialist assigned to the program.
- Ensure that TEA has the most current contact information by sending updates to the assigned program specialist.