



2020 – 2021 Continuing Approval Review Report The University of St. Thomas

PURPOSE

Texas Education Agency (TEA) Program Specialists, Vanessa Alba, Emily Newton, and Guiomar Andujar conducted a five-year Continuing Approval Review of the educator preparation program (EPP) at the University of St. Thomas on February 9-11, 2021. 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...". Dr. Ana-Lisa Gonzalez, Interim Dean and Chair of Teacher Education and Curriculum & Instruction Department was identified as the program Legal Authority, and Dr. Juan Cooper, Certification Officer and Director of School Counseling was identified as the primary EPP contact for the review process. The University of St. Thomas was approved as an EPP on July 10, 1971. At the time of the review, for 2018-2019 the EPP was rated Accredited-Probation (Year One) and for 2019-2020 the EPP was rated Not Rated: Declared State of Disaster due to the pandemic. The risk level was Stage 1 (high). The EPP reported 248 finishers for the 2018-2019 reporting year and 151 finishers for 2019-2020.

At the time of the review, the University of St. Thomas was approved to certify candidates in the following classes: Teacher, Principal, Superintendent, School Counselor, Educational Diagnostician, and Reading Specialist. The EPP is approved to offer the undergraduate (UG) and post-baccalaureate (PB) routes to certification.

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 five-year Continuing Approval Review was conducted in a "Virtual On-site" format where EPP staff submitted requested documents to TEA for review.

The scope of this review included: 1) verifying compliance with Texas Administrative Code and Texas Education Code as applicable to all certification classes in all certification routes offered by the EPP; and 2) developing a plan for improvement based on review data, performance indicators identified in 19 TAC §229.4, and self-reported EPP information provided in the Status Report. A Compliance Plan was developed to address plans for quality improvement. Evidence of compliance was measured using a rubric aligned to TAC.

It was noted that the University of St. Thomas was last reviewed in 2014-2015. TEA provided the EPP staff a copy of the last EPP review report prior to the review so that the EPP was aware of the issues at that time. Many of the findings that were compliance items during that review resurfaced as compliance items during the current review.

EPP staff participating in the review at various stages were: Dr. Ana-Lisa Gonzalez, Interim Dean; Dr. Lachanda Landry, Assistant Dean of Graduate Learning; Dr. Virginia Leiker, Chair of Leadership; Dr. Juan Cooper, Certification Officer and Director of School Counseling; Dr. Jean Kiekel, Director of Field Experiences; Dr. Rick Krustchinsky, Field Supervisor and Professor; Dr. Anne Gichuri, Director of Research; and Dr. Tera Torres, Director of Educational Diagnostician.



DATA ANALYSIS

Information concerning compliance with TAC governing EPPs was collected by a variety of means. A Status Report and related program documents were submitted to TEA on January 9, 2021. Additional EPP documents, including records for 39 candidates, were submitted on February 1, 2021. 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. If the program is “not in compliance” with any identified component, the program should consult the TAC and correct the issue immediately. A “Compliance Plan” or “Next Steps” may be drafted during the review that identifies compliance issues to be addressed and a timeline for completion.

“Recommendations” are suggestions for general program improvement and no follow-up is required.

COMPONENT I: GOVERNANCE – 19 TAC Chapter 228

Findings

- It was reported that the advisory committee membership, input provided by members, training provided to members, and meeting frequency met requirements. It was noted in the Status Report that the EPP continues to work toward having more members from business/community on the advisory committee. This was a compliance item at the last review. [19 TAC §228.20(b)]
- The governing body has provided sufficient support and resources to the University of St. Thomas (UST) programs within the Education Department. The legal authority’s participation in all aspects of the review served as evidence of compliance. [19 TAC §228.20(c)]
- TEA discovered prior to the review that the Principal program had a PB route operating as an ACP route. The EPP disclosed a list of several candidates in that situation. TEA provided the EPP with the Program Amendment application to add the ACP route for the Principal program and any other program that has a PB program but was operating as an ACP program. The EPP may amend its program, but because it is not currently rated Accredited, the EPP must inform TEA of the amendment 120 days prior to implementing the program as an ACP. [19 TAC §228.20(f)]
- UST has added additional locations in Houston ISD, Sugarland ISD, and Pasadena ISD. The Sugarland ISD and Pasadena ISD locations were added in 2010. TEA was notified of the additional locations during the EPP Review. The program met the requirement as prescribed. [19 TAC §228.10(e)]
- UST did not have a published calendar of activities for each of its programs. Evidence in the form of a calendar was not found. The program did not meet the requirement as prescribed. [19 TAC §228.20(g)]



- UST submitted the Status Report for the EPP Review on January 19, 2021, as required. [19 TAC §228.10(b)(1)]
- UST has met the requirements to offer clinical teaching. The program was approved to offer clinical teaching on July 10, 1971. The application is on file with TEA. [19 TAC §228.10(c)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §228.20(g) UST must develop and implement a calendar of program activities that must include a deadline for accepting candidates into a program cycle to assure adequate time for admission, coursework, training, and field-based experience requirements prior to a clinical teaching or internship experience. If an EPP accepts candidates after the deadline, the EPP must develop and implement a calendar of program activities to assure adequate time for admission, coursework, training, and field-based experience requirements prior to a clinical teaching experience or prior to or during an internship experience.
Action: Provide the specific link where the calendar of activities information can be found on the website or candidate handbook for each program within UST.

Recommendations:

- Place all required items on one central landing page on the UST website for the EPP so all applicants and candidates can access them.
- Continue to ensure that the Advisory Committee is a representative group consisting of members from at least three out of four groups (ESCs, public/private schools, institutions of Higher Education, and business/community).
- Consider using the TEA PowerPoint Advisory Committee training to train members on their roles/responsibilities each year and retain a dated record of their participation in the training, such as a sign-in sheet or read receipt that the PowerPoint was reviewed, for auditing purposes.
- Consider conducting the Advisory Committee meetings virtually and send notifications with read receipt and retain evidence of those in attendance.
- Provide an incentive to the members of the Advisory Committee for their involvement and assistance with the University of St. Thomas EPP by providing Continuing Professional Education (CPE) credit to members who need CPE hours for the renewal of their standard Texas certificates.

Based on the evidence presented, the University of St. Thomas was not in compliance with 19 TAC Chapter 228 – Governance of Educator Preparation Programs.

COMPONENT II: ADMISSION - 19 TAC Chapter 227

Findings

- The University of St. Thomas has informed the UG teacher applicants of the required background check information prior to employment or prior to clinical teaching. The Teacher, Principal, Superintendent, School Counselor, Educational Diagnostician, and Reading Specialist candidates in the PB program were not notified of the requirement.



The EPP met the requirement as prescribed for the UG Teacher program but did not meet the requirement for any other program. [19 TAC §227.1(b)]

- An EPP is required to inform all applicants in writing of the admission requirements, the requirements for program completion, the effects of supply and demand forces on the educator workforce in this state, and the performance of the EPP over time for the past five years. While UST had the requirements posted on the website for the UG teacher program, with the exception of the performance of the EPP over time, no other information was found for any other program within the EPP. The EPP met the requirement as prescribed for the UG teacher program but did not meet the requirement as prescribed for any other program. [19 TAC §227.1(c)(1-3)(A-B)]
- UST has informed the UG teacher applicants and candidates about the required information regarding criminal history. The information was found on the website for the UG teacher program. It was not found for any other program within the EPP. The program met the requirement for the UG teacher program but did not meet the requirement for any other program as prescribed. [19 TAC §227.1(d)]
- A total of 34 files were reviewed for admission requirements. They included five undergraduate (UG) teacher files, four post-baccalaureate (PB) teacher files, five PB principal files, five PB superintendent files, five PB reading specialist files, five PB school counselor files, and five PB educational diagnostician files.
- Every applicant must be enrolled in an EPP if they are a UG applicant or hold a minimum of a bachelor's degree at the time of admission.
 - All of the teacher candidates met the required institution of higher education (IHE) enrollment or degree requirements. The five undergraduates were enrolled at the time of admission and the four PB teacher candidates held a degree at the time of admission. The teacher programs met the requirement as prescribed. [19 TAC §227.10(a)(1-2)]
 - The five principal candidates held the minimum of a bachelor's degree at the time of admission, but the transcripts could not be read for one file reviewed. The principal program was 80% compliant and met the requirement as prescribed. [19 TAC §227.10(a)(2)]
 - Superintendent applicants must hold a master's degree at the time of admission. The review of the superintendent candidate files revealed that two out of five (40%) held a master's degree at the time of admission. The third file reviewed contained only a bachelor's degree and the last two files contained unofficial transcripts. The superintendent program did not meet the requirement as prescribed. [19 TAC §227.10(a)(2); 19 TAC §242.5]
 - Three of the school counselor files contained unofficial transcripts, one file contained no records, and one file contained official transcripts that reflected the candidate had a bachelor's degree at the time of admission. The program was 20% compliant. The school counselor program did not meet the requirement as prescribed. [19 TAC §227.10(a)(2)]
 - In the educational diagnostician program, three of the five files reviewed (60%) contained evidence of a bachelor's degree at the time of admission. Two files contained no records, and the degree information was collected from the Educator Certification Online System (ECOS) only. The educational



diagnostician program was 60% compliant and did not meet the requirement as prescribed. [19 TAC §227.10(a)(2)]

- The review of records in the reading specialist program revealed that two out of five (40%) contained official transcripts reflecting a bachelor's degree conferred. Two files contained no evidence and one file contained unofficial transcripts. The reading specialist program was 40% compliant and did not meet the requirement as prescribed. [19 TAC §227.10(a)(2)]
- To be eligible for admission to an undergraduate, ACP, or PB program, an applicant must have a GPA of at least 2.5. Candidates in the UG teacher program had a GPA range of 2.75-3.92. Transcripts for the five candidates reviewed provided evidence of compliance. In the PB teacher program, the GPA range was 2.71-3.75. Transcripts for four candidates reviewed served as evidence of compliance. Candidates in the teacher programs have met the minimum GPA requirement for admission as prescribed. The non-teacher PB principal GPA range was 2.81-3.77. The GPAs were provided in transcripts for three out of five (60%) files and the other two were obtained from ASEP and GPA spreadsheets. The principal program did not meet the requirement as prescribed because transcripts were not provided for all candidates. The EPP provided files for five PB superintendent candidates. The GPA range was 3.73-4.0. The superintendent program met the GPA requirement as prescribed. The EPP provided transcripts for three out of five (60%) school counselor candidates. One file contained no records and TEA staff could not tell which transcript was used for admission. The GPA range in the three files reviewed was 3.0-3.35. Because the EPP did not provide evidence for all files reviewed in the school counselor program, it did not meet the requirement as prescribed. In the educational diagnostician program, the EPP provided transcripts for two out of five (40%) candidates reviewed. The GPA range was 3.48-3.91. Two files contained no transcripts and for the last file, TEA staff could not tell which transcript was used for admission. Because records were not provided for all candidates reviewed, the educational diagnostician program did not meet the GPA requirement as prescribed. The EPP provided transcripts for three out of five (60%) reading specialist candidates. The GPA range was 3.25-3.94. The other two files contained no transcripts. Because records were not provided for all files reviewed, the reading specialist program did not meet the requirement as prescribed. The teacher programs and superintendent programs met the requirement as prescribed, but the principal, school counselor, educational diagnostician, and reading specialist programs did not meet the requirement as prescribed. [19 TAC §227.10(a)(3)(A)]
- Teacher applicants are required to demonstrate content knowledge prior to admission by having 12 hours in the content area for which they are admitted, 15 hours if the content area is math or science at grade 7 or above, or by passing a pre-admission content test (TX PACT). All five of the UG teacher files reviewed (100%) contained transcripts that reflected candidates met the minimum requirement. Three out of four (75%) PB teacher (75%) candidate files reviewed met the minimum requirement per official transcripts reviewed and the last candidate file reviewed met the requirement by passing the exam via the PACT route. The program met the requirement as prescribed. [19 TAC §227.10(a)(4)]



- An applicant must demonstrate basic skills in reading, written communication, and mathematics. All UG teacher files reviewed met the requirement through coursework prior to admission and all PB teacher files met the requirement per official transcripts noting the degree conferred. The teacher programs (100%) met the requirement as prescribed. It was noted in the 2014-2015 EPP Review that all teacher files reviewed at that time contained evidence of basic skills met in the files. Non-teacher files were not reviewed in 2014-2015. In the principal program, all five candidate files reviewed met the requirement with a degree conferred. In the superintendent program, all five candidate files reviewed met the requirement, but one file reviewed only contained evidence of a bachelor's degree. The superintendent program was 80% compliant. In the school counselor program, four out of five candidate files (80%) reviewed contained evidence of a bachelor's degree and the fifth file reviewed did not contain records. The school counselor program was 80% compliant. In the educational diagnostician program, four out of five candidate files (80%) reviewed contained evidence of a bachelor's degree and the fifth file reviewed did not contain records. The educational diagnostician program was 80% compliant. In the reading specialist program, three out of five candidate files reviewed (60%) contained evidence of a bachelor's degree conferred. There were no records provided for the last two candidate files reviewed. The reading specialist program was 60% compliant. The teacher programs, principal, superintendent, school counselor, and educational diagnostician programs met the requirement as prescribed, but the reading specialist program did not meet the requirement as prescribed. [19 TAC §227.10(a)(6)]
- An applicant must demonstrate English language proficiency requirements prior to admission. All five UG teacher files reviewed met the university requirement. Three out of four (75%) of the PB teacher candidate files reviewed met the requirement with degrees from the United States (US). The fourth candidate file contained an out-of-country degree and did not contain the required evidence of official TOEFL scores. In the principal program, three out of five candidate files (60%) contained US degrees, one transcript could not be read, and one contained an out-of-country degree and did not contain evidence of the required official TOEFL scores. In the superintendent program, all five candidate files (100%) contained US degrees. In the counseling program, for the candidate files provided the US degrees were provided as evidence of English language proficiency, but one was admitted "with limited standing" without evidence of official TOEFL scores as evidence of English language proficiency. In the educational diagnostician files reviewed, all had US degrees. In the reading specialist files reviewed, all had US degrees. The UG teacher and superintendent programs met the requirement as prescribed, but the PB teacher, principal, school counselor, educational diagnostician, and reading specialist programs did not meet the requirement as prescribed. [19 TAC §227.10(a)(7)]
- An EPP may admit an applicant who has met the minimum academic criteria through credentials from outside the United States. One PB teacher candidate file reviewed had a degree from outside of the United States. A transcript evaluation was not provided for that candidate. One principal file reviewed contained evidence of an out-of-country transcript. The evaluation service used was Span Tran and met the requirement as prescribed. One school counselor file reviewed contained evidence of an out-of-country



transcript. No transcript evaluation was provided. One out of three candidate files reviewed (33%) met the requirement. The program did not meet the requirement as prescribed. [19 TAC §227.10(f)]

- An applicant must submit an application. All nine UG and PB teacher files reviewed (100%) contained a completed application. All five principal files reviewed (100%) contained a completed application. All five superintendent files reviewed (100%) contained a completed application. Four out of five (80%) of school counselor files reviewed contained a completed application. Four out of five (80%) of educational diagnostician files reviewed contained a completed application. Three out of five (60%) of the reading specialist files reviewed contained a completed application. The UG and PB teacher, principal, superintendent, school counselor, and educational diagnostician programs met the requirement as prescribed, but the reading specialist program did not meet the requirement as prescribed. [19 TAC §227.10(a)(8)]
- An applicant must also participate in either an interview or other screening instrument to determine if the EPP applicant's knowledge, experience, skills, and aptitude are appropriate for the certificate sought. Principal and superintendent applicants are required to participate in two or more screens. The five UG teacher files reviewed contained evidence of an interview. It was noted that there was no cut score for admission. The PB teacher program files reviewed did not contain any evidence. The five principal files reviewed did not contain any evidence. The five superintendent files contained evidence of a writing prompt with an associated rubric, but there was not a second screen for any file reviewed. In the school counselor files reviewed, one out of five files (20%) contained an essay on career goals, but there was no rubric associated with the essay. The five educational diagnostician files reviewed contained no evidence. The five reading specialist files reviewed contained no evidence. It was noted that at the last EPP Review in 2014-2015 when only teacher files were reviewed, the evidence of the interview was not retained and there were no specific criteria for the interview, such as standard questions, a rubric, or a cut score to determine who is admitted and who is not. The UG teacher program met the requirement as prescribed. The PB teacher program and all non-teacher programs did not meet the requirement as prescribed. [19 TAC §227.10(a)(8)]
- An EPP may adopt additional requirements in addition to and not in conflict with those requirements in this section. During the 2014-2015 EPP Review, it was found that letters of recommendation and a completed reference form were required for the teacher UG and PB programs. That was no longer a requirement in 2020-2021. The school counselor program requires an essay. There was no evidence of an essay in the five files reviewed. The educational diagnostician program requires two letters of recommendation. There was no evidence of letters of recommendation in the five files reviewed. The other programs at UST did not have any additional requirements. The school counselor and educational diagnostician programs did not meet the requirement as prescribed. [19 TAC §227.10(b)]
- An EPP may not admit an applicant who has been reported as completing all EPP requirements by another EPP in the same class or category unless the applicant only needs certification exam approval. An EPP may also not admit an applicant who has been employed for three years in a public school under a permit or probationary



certificate unless the applicant is seeking clinical teaching that may lead to the issuance of an initial standard certificate. UST had one school counselor file that was a finisher at UST but was also listed as “other enrolled” at another EPP as a school counselor. While the program met the requirement because UST did not admit a finisher from another EPP, they were advised about admitting finishers from other EPPs. The program met the requirement as prescribed. [19 TAC §227.10(c)]

- An applicant may be accepted into an alternative certification program (ACP) or PB program on a contingency basis pending receipt of an official transcript provided that the applicant is currently enrolled and expects to complete the courses and other requirements for obtaining, at a minimum a bachelor’s degree at the end of the semester in which admission to the program is sought; all other admission requirements have been met; the EPP must notify the applicant of the offer of contingency admission in writing by mail, personal delivery, facsimile, email, or electronic notification; and the applicant must accept the offer of contingency admission in writing by mail, personal delivery, facsimile, email, or electronic notification. While there were no candidates admitted to UST as contingency admits, the program did admit one school counselor candidate as a “conditional” admit. The “conditional” admit information for the candidate was listed as “admission with limited standing” pending TOEFL/Transcript evaluation. The program was advised that there are only two types of admission, formal or contingency admission, and was advised of the requirements of each. [19 TAC §227.15(a)]
- Effective March 1, 2016, all applicants are required to be formally admitted. The program was advised of the future implementation of the requirements at the time of the last review in 2014-2015. For the UG teacher program, all five (100%) candidates were formally admitted. The written formal offer of admission and written dated formal admission acceptance letters served as evidence of compliance. There was no evidence of a formal admission process for PB teachers, principals, superintendents, or educational diagnosticians. For the school counselor program, one out of five (20%) candidates were formally admitted. The written formal offer of admission with the effective date and the candidate’s dated written acceptance letter served as evidence. Four of the five reading specialists were admitted after the implementation date of the formal admission process. There was no evidence the process had been implemented for the reading specialist candidates. The UG teacher program met the requirement as prescribed, but the PB teacher program and the non-teacher programs did not meet the requirement as prescribed. [19 TAC §227.17]
- Effective January 1, 2017, the effective date of formal admission must be included in the formal offer of admission. For the five UG teacher program candidates, the admission date was not clear. There was no admission date provided for the four PB teacher candidate files reviewed. There was no admission date for the five principal candidate files reviewed. There was no admission date for the five superintendent files reviewed. The date of admission was provided in the formal offer of admission for one out of five (20%) of the school counselor files reviewed. There was no admission date provided for the five educational diagnostician files reviewed. There was no admission date provided for the five reading specialist files reviewed. The program did not meet the requirement as prescribed. [19 TAC §227.17(d)]



- Effective January 1, 2017, an EPP must notify TEA of a candidate's admission within seven calendar days of the formal date of admission. Five out of nine UG and PB teacher candidates were required to be uploaded within seven days because they were admitted after the implementation of the requirement and all five (100%) met the requirement. Of the five principal files reviewed, three were required to be uploaded within seven days because they were admitted after the implementation of the requirement. One out of three (34%) met the requirement. Of the five superintendent files reviewed, three were required to be uploaded within seven days and all three (100%) met the requirement. All five school counselor files were required to be uploaded within seven days because they were admitted after the implementation of the requirement. Three out of five (60%) met the requirement. All five of the educational diagnostician files were required to be uploaded within seven days because they were admitted after the implementation of the requirement. Four out of five (80%) met the requirement. Four of the five reading specialist files reviewed were required to be uploaded within seven days. Three out of four (75%) met the requirement. TEA used the ECOS system to verify admissions reported. The UG and PB teacher, superintendent, and educational diagnostician programs met the requirement as prescribed, but the principal, school counselor, and reading specialist programs did not meet the requirement as prescribed. [19 TAC §227.17(e)]
- Effective March 1, 2016, a program may not provide any coursework, training, and/or exam approval prior to formal admission. All candidates in all programs were admitted prior to being provided with coursework, training, and/or test approval. The program met the requirement as prescribed. [19 TAC §227.17(f)]
- Effective March 1, 2016, the overall GPA of each incoming class admitted between September 1 and August 31 of each year by an EPP may not be less than 3.00 on a four-point scale. Per TEA, UST met the requirement as prescribed. [19 TAC §227.19(a)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §227.1(b) UST shall inform all applicants that pursuant to the Texas Education Code (TEC), §22.083, candidates must undergo a criminal history background check prior to employment as an educator.
Action: Inform all applicants of the requirement. Provide the specific link where the required information is posted on the website.
- 19 TAC §227.1(c) UST shall inform all applicants, in writing of the following: (1) the admission requirements as specified in this chapter; (2) the requirements for program completion as specified in 19 TAC Chapter 228 (relating to Requirements for Educator Preparation Programs); and (3) in accordance with TEC, §21.044(e)(3): (A) the effect of supply and demand forces on the educator workforce in this state; and (B) the performance over time of the EPP for the past five years.
Action: Provide the specific link where the required information is posted on the website for all programs, except the UG teacher program which is already posted on the website.
- 19 TAC §227.1(d) UST shall notify, in writing by mail, personal delivery, facsimile, email, or electronic notification, each applicant to and enrollee in the EPP of the following regardless of whether the applicant or enrollee has been convicted of an offense: (1) the



potential ineligibility of an individual who has been convicted of an offense for issuance of a certificate on completion of the EPP; (2) the current SBEC rules prescribed in 19 TAC §249.16 and (3) the right to request a criminal history evaluation letter as provided in 19 TAC Chapter 227, Subchapter B.

Action: Provide the specific link where the required information is posted on the website for all programs, except for the UG teacher program, which is already posted on the website.

- 19 TAC §227.10(a)(1-2) Require of all applicants seeking initial certification in any class of certificate unless specified otherwise, prior to admission to the program: (1) For an undergraduate university program, an applicant shall be enrolled in an accredited IHE and (2) For an alternative certification program or post-baccalaureate program, an applicant shall have, at a minimum, a bachelor's degree earned from and conferred by an accredited IHE.

Action: Require all applicants to be enrolled in the undergrad program prior to admission and require all ACP and PB candidates to hold a bachelor's degree at the time of admission. For all non-teacher classes (principal, school counselor, educational diagnostician, and reading specialist) provide the official degree used for admission. Retain the evidence in each candidate file for auditing purposes.

- 19 TAC §242.5(a) Prior to admission to an educator preparation program leading to the Superintendent Certificate, an individual must hold, at a minimum, a master's degree from an accredited institution of higher education

Action: Require superintendent applicants to submit official transcripts directly to the EPP so that the EPP can verify the master's degree conferred. Retain the evidence in each candidate file for auditing purposes.

- 19 TAC §227.10(a)(3)(A) For an undergraduate university program, alternative certification program, or post-baccalaureate program, to be eligible for admission into an EPP, an applicant shall have a grade point average (GPA) of at least 2.5 before admission.

Action: Require applicants to submit official transcripts directly to the EPP so that the EPP can review the GPA to make a determination about admission. Retain the evidence in each candidate file for auditing purposes.

- 19 TAC §227.10(a)(6) An applicant must demonstrate basic skills in reading, written communication, and mathematics by meeting the requirements of the Texas Success Initiative under the rules established by the Texas Higher Education Coordinating Board (THECB) in Part 1, 19 TAC Chapter 4, Subchapter C, including one of the requirements established by 19 TAC §4.54.

Action: Require all applicants to meet basic skills requirements prior to admission. Retain the evidence of the requirement met in each candidate file for auditing purposes.

- 19 TAC §227.10(a)(7) An applicant must demonstrate the English language proficiency skills as specified in 19 TAC §230.11. (B) An applicant to a university undergraduate program that leads to a bachelor's degree may satisfy the English language proficiency



requirement by meeting the English language proficiency requirement of the accredited IHE at which the applicant is enrolled.

Action: Do not admit any candidates if they are from out-of-country until the EPP has received official TOEFL scores that meet the requirements. Retain the evidence in each candidate file for auditing purposes.

- 19 TAC §227.10(f) An EPP may admit an applicant who has met the minimum academic criteria through credentials from outside the United States that are determined to be equivalent to those required by this section using the procedures and standards specified in 19 TAC Chapter 245. An EPP at an entity that is accredited by an accrediting organization recognized by the THECB may use its own foreign credential evaluation service to meet the requirement described in 19 TAC §245.10(a)(2) if the entity is in good standing with its accrediting organization.
Action: Require all applicants from out of country that meet the requirements above to have their transcripts evaluated by an approved transcript evaluation service to ensure that the transcripts are equivalent to a bachelor's degree prior to admission. Do not admit any candidates from out-of-country that require a transcript evaluation until an official one is received at the EPP. Retain the transcript evaluation in each applicable candidate file for auditing purposes.
- 19 TAC §227.10(a)(8) All applicants must submit an application.
Action: Require applicants to every program at the EPP to submit an application. Retain the evidence in each candidate's file for auditing purposes.
- 19 TAC §227.10(a)(8) An applicant must participate in either an interview or other screening instrument to determine if the EPP applicant's knowledge, experience, skills, and aptitude are appropriate for the certification sought. Principal & superintendent applicants are required to have two or more screens per 19 TAC §241.5 & §242.5.
Action: Require all applicants to participate in an interview or other screening instrument. Utilize a rubric with a cut score required for admission. Retain the evidence in each candidate file for auditing purposes. Identify the two screens used to admit principal and superintendent candidates. Utilize a rubric with a cut score for each screen. Retain evidence in each candidate file.
- 19 TAC §227.10(b) An EPP may adopt requirements in addition to and not in conflict with those required in this section.
Action: Require all applicants to meet any additional admission requirements prior to admission. Place the additional requirements for admission on the EPP webpage for the specific applicable program that has additional requirements for admission. Retain evidence in each candidate file for auditing purposes.
- 19 TAC §227.10(a-d) For an applicant to be formally admitted to an educator preparation program (EPP), the applicant must meet all the admission requirements. For an applicant to be formally admitted to an EPP, the EPP must notify the applicant of the offer of formal admission in writing by mail, personal delivery, facsimile, email, or electronic notification. For an applicant to be considered formally admitted to the EPP,



the applicant must accept the offer of formal admission in writing by mail, personal delivery, facsimile, email, or an electronic notification. The effective date of formal admission must be included in the offer of formal admission.

Action: Put a process in place to ensure that candidates are formally admitted. Provide admission records for one file each that shows that candidates were formally admitted that includes the following: notification in writing, acceptance by the applicant, and the effective date for which the candidate is to be admitted for each: principal, superintendent, school counselor, educational diagnostician, reading specialist, and teacher PB.

- 19 TAC §227.10(e) UST must notify the Texas Education Agency (TEA) within seven calendar days of a candidate's formal admission.
Action: Review the UST internal procedures and entire formal admission process to select a formal admission date that will allow the EPP ample time to report the candidate to ASEP within 7 days. Provide one file each with formal admission documentation for a principal, school counselor, and reading specialist candidate that was formally admitted. TEA will verify that the candidate was uploaded into the ECOS system within 7 calendar days.

Recommendations:

- Place all required items on one central landing page on the UST College of Education website for the EPP so all applicants and candidates can easily access the information.
- Review the admission requirements on the website, the application, and any other documents that are published to ensure that they are aligned and there is no question about requirements for admission.
- Place the master's degree requirement on the superintendent website "Requirements for Admission" page so all applicants/candidates can see the requirement.
- Require applicants to submit official transcripts directly to the EPP.
- Implement a process to verify that each applicant has the required GPA prior to admission.
- Consider placing a question on the application for admission to the EPP that asks if the applicant has been admitted to or completed all requirements for certification at another EPP.

Based on the evidence presented, the University of St. Thomas is not in compliance with 19 TAC Chapter 227 - Admission Criteria.

COMPONENT III: CURRICULUM – 19 TAC §228.30

Findings

- TEA reviewed the Core Subjects with Science of Teaching Reading (STR) EC-6 curriculum documents and reviewed self-reported information contained within the Status Report to determine compliance with all other certificate areas.
- The UST Core Subjects EC-6 / STR curriculum is not standards-based, and the Texas Essential Knowledge and Skills (TEKS) are not the basis for the curriculum. UST



reported that the curriculum is based on Core Subjects EC-6 educator standards and addresses the relevant Texas Essential Knowledge and Skills (TEKS) within the coursework identified in the Status Report, but sufficient evidence was not found. The courses identified as being Core Subjects EC-6 identified and used the Generalist EC-6 standards for the certificate. The TEKS were identified as being taught in EDUC 3304, RDGED 3305, 4325, 3303, BIEDL 4330, MS 4331, 4333, and 4335. However, there was mention of TEKS in only one course, EDUC 3304, but the lesson plans developed by candidates as a part of their coursework were not aligned to TEKS. The program did not meet the requirement as prescribed. [19 TAC §228.30(a)]

- The UST curriculum is not research-based. There was no clear evidence found of a research-based curriculum in the Core EC-6 syllabi reviewed. The program did not meet the requirement as prescribed. [19 TAC §228.30(b)]
- The Code of Ethics instruction was identified within the Status Report as being taught to UG candidates in EDUC 3102, 4360, and 4370, but the evidence that it was taught was not found. PB teacher candidates receive instruction in EDUC 4338 and 5311. Principal and superintendent candidates receive the instruction in EDUC 5292, 5310, 6335, and 6336. School counselor candidates receive the instruction in COUN 5304, 6302, 5310, 5318, and 5368. Educational diagnostician candidates receive instruction in EDUC 5320, 5345, 5322, 6307, 5327, 5341, 5342, 5343, and 5344. Reading specialist candidates receive instruction in EDUC 6304. The program did not meet the requirement as prescribed for the UG teacher class but did meet the requirement in the PB teacher class, principal, superintendent, school counselor, educational diagnostician, and reading specialist classes of certification. [19 TAC §228.30(c)(1)(A-C)]
- Dyslexia instruction was identified as being taught to UG teacher candidates in EDUC 3102, RDGED 3303, 3305, and 4325. A review of the syllabi reflected that it was not taught. Only one certificate of completion provided as a result of training by the Education Service Center was provided as evidence for one candidate file reviewed. Dyslexia instruction was taught in EDUC 5352 to principal and superintendent candidates. Dyslexia instruction was taught in EDUC 5327, 5325, and 5341 to educational diagnostician candidates. Dyslexia instruction was taught in COUN 5318 and 5335 to school counselor candidates. Dyslexia instruction was taught in EDUC 5370, 5377, 5380, 5325, and 6308 to reading specialist candidates. The program did not meet the requirement as prescribed for the UG teacher class but did meet the requirement in the PB teacher class, principal, superintendent, school counselor, educational diagnostician, and reading specialist classes of certification. [19 TAC §228.30(c)(2)]
- Instruction regarding mental health, substance abuse, and youth suicide is required. The program identified the training as being taught in EDUC 3102 and 3306. One certificate of completion was provided for an undergraduate candidate who completed the training through ESC 4 and Substance Abuse and Mental Health Services (SAMHSA), both approved providers. Mental health, substance abuse, and youth suicide training is not provided to educational diagnostician or reading specialist candidates, as was self-reported in the Status Report. Principal and superintendent candidates receive instruction in EDUC 5391. School counselor candidates receive instruction in COUN 5304, 5335, 5339, 6302, 5310, 5312, 5316, and 5318. There was no evidence provided



that all UG candidates completed the training. The UG and PB teacher classes, educational diagnosticians, and reading specialists did not meet the requirement as prescribed, but the principal, superintendent, and school counselor programs did meet the requirement as prescribed. [19 TAC §228.30(c)(3)]

- The skills that educators are required to possess, responsibilities they are required to accept, and the high expectations for students in the state are required to be taught to all candidates. While the Status Report identified that these topics were taught in the UG teacher program in EDUC 3304, RDGED 4325, and EDUC 3102, there was insufficient evidence that the required topics were included in those courses. Additionally, there was no evidence that the required topics were taught to candidates in the superintendent program. In the PB teacher program, the requirement was identified as being taught in EDUC 3100, 3101, and 3102. In the principal program, the requirement was taught in EDUC 6335, 6336, 5352, and 5310. In the school counselor program, the requirement was taught in COUN 5304, 5335, 5339, 5366, 5367, 6302, 5310, 5312, 5318, 5314, 5316, and 5368. In the educational diagnostician program, the requirement was taught in EDUC 5320, 5345, 5322, 6307, 5341, 5342, 5327, 5343, and 5344. In the reading specialist program, the requirement was taught in EDUC 5370, 5377, 5380, 5325, 6308, and 6304. The program did not meet the requirement in the UG teacher or superintendent programs but did meet the requirement in the principal, school counselor, educational diagnostician, and reading specialist programs. [19 TAC §228.30(c)(4)]
- The importance of building strong classroom management skills is required to be taught to all candidates. For the UG teacher program, it was reported in the Status Report that the requirement was taught in EDUC 4338 and 3306 but there was insufficient evidence to support that UG teacher candidates received this instruction. It was also reported that the requirement was not taught in the superintendent or educational diagnostician programs. The requirement is taught in the PB teacher program in EDUC 4338 and 5311. In the principal program, the requirement is taught in EDUC 5310, 6335, and 6336. In the school counselor program, the requirement is taught in COUN 5318. In the reading specialist program, the requirement is taught in EDUC 5370, 5380, and 6304. The program did not meet the requirement as prescribed in the UG teacher, superintendent, or educational diagnostician programs, but did meet the requirement in the principal, school counselor, and reading specialist programs. [19 TAC §228.30(c)(5)]
- The framework for teacher and principal evaluation is required to be taught to all candidates. In the UG teacher program, the requirement was identified as being taught in EDUC 3102, but the evidence was not found. In the PB teacher program, the requirement is taught in EDUC 3100, 3101, and 3102. In the principal program, the requirement is taught in EDUC 6335 and 6336. In the reading specialist program, the requirement is taught in EDUC 6304. The program did not meet the requirement for the UG teacher, superintendent, school counselor, or educational diagnostician programs, but did meet the requirement in the PB teacher, principal, and reading specialist programs. [19 TAC §228.30(c)(6)]
- Instruction in the appropriate relationship, boundaries, and communications between educators and students is required to be taught to all candidates. In the UG teacher program, the requirement was identified as being taught in EDUC 3102 and 3306, but sufficient evidence was not found. Evidence was also not found in the PB teacher,



superintendent, or reading specialist programs. The requirement was identified as being taught in the principal program in EDUC 6335, 6336, and 5391. In the school counselor program, the requirement was identified as being taught in COUN 5366, 5316, and 5368. The program did not meet the requirement in the UG or PB teacher, superintendent, or reading specialist programs, but did meet the requirement in the principal, school counselor, and educational diagnostician programs. [19 TAC §228.30(c)(7)]

- Instruction in digital learning, including a digital literacy evaluation followed by a prescribed digital learning curriculum, is required to be taught to all candidates in all certification categories and classes. The program identified that the requirement was taught in the UG and PB teacher programs in EDUC 3313. Evidence was not found in the syllabus that was provided. Evidence was also not found that the requirement was taught in the superintendent or educational diagnostician programs. The program reported that the requirement is taught in the principal program in EDUC 6335 and 6336. The program reported that the requirement is taught in the school counselor program in COUN 5318 and 5368. In the reading specialist program, the program reported that the requirement is taught in EDUC 5370 and 5380. The program did not meet the requirement in the teacher, superintendent, or educational diagnostician programs, but did meet the requirement in the principal, school counselor, and reading specialist programs. [19 TAC §228.30(c)(8)]
- Instruction in the relevant TEKS, including the English Language Proficiency Standards (ELPS), is required to be taught to all teacher candidates. The program identified that the requirement was taught in the UG teacher program in EDUC 3304, RDGED 3305, 4325, 3303, BIEDL 4330, MS 4331, 4333, and 4335. This was verified in the coursework and syllabi reviewed. [19 TAC §228.30(d)(1)]
- Reading instruction, including instruction that improves students' content-area literacy, is required of all teacher candidates. The program identified that in the UG teacher program, the requirement is taught in RDGED 3303, 3304, 3305, and 4325. The requirement was verified in the coursework and syllabi reviewed. The program met the requirement as prescribed. [19 TAC §228.30(d)(2)]
- For certificates that include early childhood and prekindergarten, the Prekindergarten Guidelines are required to be taught. The program identified that in the teacher UG program, the requirement was taught in EDUC 3304, RDGED 3304, 3305, 4325, and BIEDL 4330. Evidence was not found. The program did not meet the requirement as prescribed. [19 TAC §228.30(d)(3)]
- Teacher standards, in Chapter 149, Standards 1-6 were identified as being taught in coursework. However, sufficient evidence was not found in each discreet standard indicator. The program did not meet the requirement as prescribed. [19 TAC §228.30(d)(4)]
 - Standard I Instructional planning and delivery are taught in EDUC 3304 and 3306. There was insufficient evidence of performance-based activities/assessments. There were no textbooks for the courses. There were several discussion topics, activities, and a final exam, The program did not meet the requirement as prescribed. [19 TAC §228.30(d)(4)(A)]



- Standard II Knowledge of students and student learning is taught in MA 4338/EDUC 5338, BIEDL 4330, and SPED 4320. There was not sufficient evidence that the required content was taught. There were several discussion topics, discussion starters, article synopses, a book report/analysis, field observations, and final exams. [19 TAC §228.30(d)(4)(B)]
- Standard III Content knowledge and expertise was not identified as being taught in any course and evidence was not found. [19 TAC §228.30(d)(4)(C)]
- Standard IV Learning environment instruction was not identified as being taught in any course and evidence was not found. The program did not meet the requirement as prescribed. [19 TAC §228.30(d)(4)(D)]
- Standard V Data-driven practice was not identified as being taught in any course and evidence was not found. [19 TAC §228.30(d)(4)(E)]
- Standard VI Professional practices and responsibilities are taught in EDUC 3304 and 3306. While candidates participated in various discussion topics, wrote an “Effective Teacher reflection paper”, wrote a lesson plan with analysis, completed various assignments/activities, and completed a final exam, there was insufficient evidence found that there were performance-based activities or assessments. There was not a textbook for the courses. The program did not meet the requirement as prescribed. [19 TAC §228.30(d)(4)(F)]
- The administrator standards as identified in 19 TAC Chapter 149 must be taught to candidates seeking principal certification. Evidence was found that the requirement was met as reviewed in coursework on the candidate transcripts for the files reviewed. The program met the requirement as prescribed. [19 TAC §228.30(e)]
- For certificates that include early childhood education and prekindergarten, the PK Guidelines were identified in the Status Report as being taught in EDUC 3304, RDGED 3304, 3305, 4325, and BIEDL 4330. Evidence to support the information provided was not found that the requirement was addressed. The program was advised that all teacher certificates that include Early Childhood (EC) must have the required training. The program did not meet the requirement as prescribed. [19 TAC §228.30(d)(3)]
- At the time of the last review, the program was directed as a part of the Compliance Plan, to conduct an alignment of the EC-6 curriculum to ensure that it was based on educator standards, addressed the relevant Texas Essential Knowledge and Skills (TEKS), required instruction in the Code of Ethics, required candidates to complete structured assessments throughout the EPP, and relied on scientifically-based research to ensure teacher effectiveness. The program was also required to ensure that the coursework and training was sustained, interactive, student-focused, and performance-based. That was not corrected, even though the program identified that it was corrected.

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §228.30(a-b) The educator standards adopted by the State Board for Educator Certification shall be the curricular basis for all educator preparation and, for each certificate, address the relevant TEKS. The curriculum for each educator preparation program shall rely on scientifically based research to ensure educator effectiveness. Action: Require the educator standards and TEKS to be the curricular basis for all educator preparation. Submit an Application A for the Core Subjects w/STR EC-6 certificate area in the UG program that reflects the educator standards are the curricular



basis for the certificate and addresses the TEKS that are relevant to the Core Subjects w/STR EC-6 certificate. Within the Application A and syllabi submitted, identify the scientifically based research used to ensure educator effectiveness.

- 19 TAC §228.30(c)(1)(A-C) The code of ethics and standard practices for Texas educators, pursuant to 19 TAC Chapter 247, which include: Professional ethical conduct, practices, and performance; Ethical conduct toward professional colleagues; and Ethical conduct toward students are required to be taught to all candidates.
Action: Require all candidates in all certification categories and classes to receive instruction in the Educators' Code of Ethics. Identify within the Application A submitted for Core Subjects EC-6 information in which courses the code of ethics is taught in the UG program. Consider using the Code of Ethics training provided by the ESC to meet the requirement for that training for candidates in all classes and retain the dated certificates with hours earned as evidence of compliance in each candidate file.
- 19 TAC §228.30(c)(2) Provide instruction in detection and education of students with dyslexia, as indicated in the Texas Education Code (TEC), §21.044(b), to all candidates in all programs.
Action: Review and revise coursework as needed so that all candidates in all certification categories and classes receive instruction in dyslexia. Identify within the Application A submitted for the Core Subjects w/STR EC-6 certificate area information on in which courses dyslexia training is taught in the UG program. Consider utilizing the ESC for dyslexia training for all candidates in all programs and retain the dated certificates of completion as evidence of compliance in each candidate file.
- 19 TAC §228.30(c)(3) Provide instruction regarding mental health, substance abuse, and youth suicide, as required in the TEC, §21.044(c-1).
Action: Review and revise coursework as needed so that all candidates in all certification categories and classes receive the required instruction in mental health, substance abuse, and youth suicide. Identify within the Application A submitted for the Core Subjects w/STR EC-6 certificate area information on in which courses the requirement is taught in the UG program. Provide a dated certificate of completion from an approved provider for one educational diagnostician and reading specialist candidate or the specific syllabi that identify where the requirement is taught if it is taught by the EPP.
- 19 TAC §228.30(c)(4) Provide training in 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.
Action: Review and revise coursework as needed so that all candidates in all certification categories and classes receive instruction as prescribed. Identify within the Application A submitted for the Core Subjects w/STR EC-6 certificate area information on in which courses the requirement is taught in the UG program. Provide the course syllabus for the superintendent program that reflects where the required topics are taught.



- 19 TAC §228.30(c)(5) Provide training in the importance of building strong classroom management skills.
Action: Review and revise coursework as needed so that all candidates in all certification categories and classes receive instruction as prescribed. Identify within the Application A submitted for the Core Subjects w/STR EC-6 certificate area information on in which courses the requirement is taught in the UG program. Provide the course syllabi for the superintendent and educational diagnostician programs that reflect where the requirement is taught.
- 19 TAC §228.30(c)(6) Provide training on the framework in this state for teacher and principal evaluation.
Action: Review and revise coursework as needed so that all candidates in all certification categories and classes receive instruction as prescribed. Identify within the Application A submitted for the Core Subjects w/STR EC-6 certificate area information on in which courses the requirement is taught in the UG program. Provide the course syllabi for the superintendent and educational diagnostician programs that reflect where the requirement is taught.
- 19 TAC §228.30(c)(7) Provide training in appropriate relationships, boundaries, and communications between educators and students.
Action: Review and revise coursework as needed so that all candidates in all certification categories and classes receive instruction as prescribed. Identify within the Application A submitted for the Core Subjects w/STR EC-6 certificate area information on in which courses the requirement is taught in the UG program. Provide the course syllabi for the PB teacher, superintendent, and reading specialist programs that reflect where the requirement is taught.
- 19 TAC §228.30(c)(8) Provide instruction in digital learning that is aligned with the ISTE Standards, including a digital literacy evaluation followed by a prescribed digital learning curriculum and addresses any deficiencies identified by the digital literacy evaluation.
Action: Ensure that all candidates in all programs are receiving the instruction as prescribed that includes a digital literacy evaluation, prescribed curriculum, and as needed, a remediation plan. Review and revise coursework as needed so that all candidates in all certification categories and classes receive instruction as prescribed. Identify within the Application A submitted for the Core Subjects w/STR EC-6 certificate area information on in which courses the requirement is taught in the UG program. Provide the course syllabi for the superintendent and educational diagnostician programs that reflect where the requirement is taught.
- 19 TAC §228.30(d)(3) Provide instruction in the Prekindergarten Guidelines to teacher candidates in certificate areas that include early childhood.
Action: Review and revise coursework as needed so that all candidates in all certification categories that include EC receive instruction as prescribed. Identify within the Application A submitted for the Core Subjects w/STR EC-6 certificate area information on in which courses the requirement is taught in the UG program.



- 19 TAC §228.30(d)(4) Include in coursework the skills and competencies as prescribed in 19 TAC Chapter 235 (relating to Classroom Teacher Certification Standards) and captured in the Texas teacher standards in 19 TAC Chapter 149, Subchapter AA. Action: Review and revise coursework as needed so that all candidates in all certification routes/categories receive instruction in the teacher standards. Identify within the Application A submitted for the Core Subjects w/STR EC-6 certificate area information on in which courses the requirement is taught in the UG program.

Recommendations:

- Revise the syllabi where the teacher standards are addressed to use the actual verbiage from TAC regarding the teacher standards so that candidates clearly understand the instruction they are receiving.

Based on the evidence presented, the University of St. Thomas is not in compliance with 19 TAC §228.30-Curriculum.

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

Findings

- The University of St. Thomas provides candidates with adequate preparation and training that is sustained, rigorous, and interactive. The program provided a Scope and Sequence for the UG teacher program identifying 45 semester hours and another Scope and Sequence for the PB/ACP programs identifying 30 semester hours. The program provided a degree plan identifying 36 semester hours for the principal and superintendent programs. A degree plan reflecting 45 semester hours for the school counselor program was provided and it was noted that in the current school counselor admit documents reference that 48 semester hours are required. The school counselor program is currently aligned with the 48-hour master's degree required in counseling for the certificate. The Scope and Sequence document provided for the educational diagnostician program and the degree plan identified that 36 semester hours are required. A degree plan for the reading specialist program was provided. The program meets the requirement as prescribed. [19 TAC §228.35(a)(1-2)]
- All coursework shall be completed prior to standard certification. Two UG and one PB teacher candidates reached the point of standard certification. One principal candidate reached the point of standard certification. One superintendent candidate reached the point of standard certification. Two school counselor candidates reached the point of standard certification. Two educational diagnostician candidates reached the point of standard certification. None of the reading specialist candidates reached the point of standard certification. All files contained program benchmarks, degree plans, and transcripts as evidence that coursework was completed prior to standard certification. The program met the requirement as prescribed. [19 TAC §228.35(a)(3)]
- UST has procedures for allowing relevant military experiences. The program provided the link to the website where the information is contained. The program met the requirement as prescribed. [19 TAC §228.35(a)(5)(A)]



- UST does not have procedures for allowing prior experience, education, or training for candidates who are not military service members or veterans. The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(5)(B)]
- UST offers some coursework online in the various certification fields and classes. The program provided The Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) accreditation letter that identified that the master's programs in educational leadership, special education, bilingual education, and dual-language are approved for 50% to be offered online beginning in Fall 2010 through a Title V grant for low-income and Hispanic Americans completing an advanced degree. According to the letter, adding subsequent percentages of programs offered online requires advance notification only if there are significant departures from the originally approved program. The program met the requirement as prescribed. [19 TAC §228.35(a)(6)(B-C)]
- Coursework and training for candidates seeking initial teacher certification in the UG and PB programs exceed 300 clock-hours of required coursework and training. The UG teacher program identifying 45 semester hours and the PB/ACP programs identifying 30 semester hours. Five UG and four PB teacher degree plans and transcripts were reviewed as evidence. The program met the requirement as prescribed. [19 TAC §228.35(b)]
- Coursework and training for candidates seeking initial certification in the non-teacher classes of certification exceeded 200 clock-hours. The program provided a degree plan identifying 36 semester hours for the principal and superintendent programs. A degree plan reflecting 45 semester hours for the school counselor program was provided and it was noted that in the current school counselor admit documents reference that 48 semester hours are required. The school counselor program is currently aligned with the 48-hour master's degree required in counseling for the certificate. The Scope and Sequence document provided for the educational diagnostician program and the degree plan identified that 36 semester hours are required. A degree plan for the reading specialist program was provided. Degree plans and transcripts for candidates seeking principal, superintendent, school counselor, educational diagnostician, and reading specialist certification were reviewed. The program met the requirement as prescribed. [19 TAC §228.35(c)]
- Unless a candidate qualifies as a late-hire. A candidate must complete 150 clock-hours of prescribed coursework and/or training that allows candidates to demonstrate proficiency in the identified standards prior to clinical teaching or internship. All of the UG and PB files reviewed exceeded 150 clock-hours of coursework and training. Transcripts for five UG and four PB teacher candidates denoting hours earned served as evidence of compliance. The program met the requirement as prescribed. [19 TAC §228.35(b)(2)(A-J)]
- All teacher candidates are required to complete a minimum of 30-clock-hours of field-based experiences (FBEs) prior to clinical teaching or internship unless they qualify as a late-hire. One out of five (20%) of UG teacher candidates met the requirement and the remaining four files reviewed contained insufficient evidence. One out of four (25%) of PB teacher candidates met the requirement and the remaining three files contained insufficient evidence. FBEs are required to occur in a variety of settings with diverse student populations, including observations, modeling, and demonstration of effective



practices to improve student learning. One out of five (20%) of UG candidates met the requirement and the remaining four contained insufficient evidence. One out of four (25%) of PB candidates had two different settings and the remaining three contained insufficient evidence. The EPP provided transcript documentation, start dates of clinical teaching/internship, and FBE logs as evidence. FBEs must include 15 clock-hours in which the candidate is actively engaged with students. None of the UG or PB candidate files reviewed contained evidence of interactive FBEs. The program did not meet the requirement as prescribed. [19 TAC §228.35(b)(1); 19 TAC §228.35(b)(2); 19 TAC §228.35(e)(1)(A-B)]

- All five UG teacher candidates had reached the point of clinical teaching and were either in the process of completing or have completed the requirement. Two out of four PB candidates had completed an internship and one PB candidate was in process of completing clinical teaching. TEA was unable to verify clinical teaching for one PB candidate. Placement documentation was provided for all five (100%) of the UG clinical teachers and one PB clinical teacher. [19 TAC §228.35(e)(2); 19 TAC §228.35(e)(2)(A)]
- Clinical teaching must be a minimum of 14-weeks or 28-weeks half day. For the two UG and the one PB candidates that had completed clinical teaching, the total days completed could not be verified due to lack of documentation. The remaining three UG candidates were in process of completing clinical teaching. There was insufficient evidence to support that the program met the requirement for the clinical teaching duration. [19 TAC §228.35(e)(2)(A)(i)]
- A candidate in clinical teaching must have a clinical teaching assignment for each subject area in which the candidate is seeking initial certification. Two out of five (40%) UG teacher candidates and one out of four (25%) PB teacher candidates had two different assignments. The program provided clinical teaching placement lists for the candidates as evidence. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(A)(ii)]
- Clinical teaching is successful when the candidate demonstrates proficiency in each of the educator standards for the assignment. Two out of five UG candidate files reviewed did not contain evidence that proficiency in the standards was captured. The remaining three UG candidates were in process and proficiency was captured in the documentation provided. The PB candidate file contained evidence that proficiency in the standards for the assignment was captured. In all, the program was 67% compliant in terms of capturing the candidate's demonstration of proficiency during clinical teaching. Clinical teaching is successful when the field supervisor and cooperating teacher recommend to the EPP that a candidate should be recommended for standard certification. Two UG and one PB candidate had reached the point of standard certification. Only one candidate in the UG program received the recommendations. The other UG candidate and the PB candidate did not. The program did not meet the requirements as prescribed. [19 TAC §228.35(e)(2)(A)(iii)]
- An internship must be for a minimum of one full school year and the beginning date for an internship for the purpose of field supervision is the first day of instruction with students in the school or district where the internship takes place. The internship assignment must match the certification category or categories for which the candidate is prepared by the EPP. An internship assignment shall not be less than an average of



four hours each day in the subject area and grade level of the certification sought. Two out of four PB candidates completed an internship. Both completed the full year in an assignment that matched the area for which the candidates were certified, and the assignments met the average of four hours per day. The statements of eligibility (SOE), internship placement lists, and records of coursework completed served as evidence. The program met the requirements as prescribed. [19 TAC §228.35(e)(2)(B); 19 TAC §228.35(e)(2)(B)(ii); 19 TAC §228.35(e)(2)(B)(iii)]

- A candidate must hold an intern or probationary certificate while participating in an internship. Of the two intern candidates, one was not issued an intern or a probationary certificate. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(2)(B)(iv)]
- An internship is successful when the candidate demonstrates proficiency in each of the educator standards required for the assignment. Observation documents with levels of proficiency identified served as evidence. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(B)(vii)]
- An internship is successful when the field supervisor and campus supervisor recommend to the EPP that the candidate should be recommended for a standard certificate. Neither of the two candidates received a recommendation from the field supervisor or campus supervisor. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(2)(B)(vii)]
- Candidates participating in an internship or a clinical teaching assignment need to experience a full range of professional responsibilities that shall include the start of the year. The start of the school year is defined as the first 15 instructional days of the school year. If these experiences cannot be provided through clinical teaching or an internship, they must be provided through field-based experiences. For the UG and PB clinical teachers, the requirement was not identified as having been completed. Clinical teaching was in the Spring semester for the clinical teaching candidates and the requirement was not identified as having been met during FBEs. For the PB teacher candidates that completed an internship year, the requirement was met during the first 15 days of school. The program did not meet the requirement as prescribed. [19 TAC §228.35(4)]
- An internship or clinical teaching experience must take place in an actual school setting. Four out of five (80%) clinical teaching assignments took place in an actual school setting and the placement could not be identified for the fifth clinical teacher. Three out of four PB clinical teaching/internship assignments took place in an actual school setting. In all, seven out of nine, 78%, met the requirement. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(6)]
- An internship or clinical teaching experience shall not take place in a setting where the candidate has an administrative role over the mentor/cooperating teacher or is related to the field supervisor, mentor, or cooperating teacher. All teacher candidates in the UG and PB route did not have an administrative role over the mentor/cooperating teacher and were not related to the field supervisor, mentor, or cooperating teacher. Placement lists served as evidence of compliance. The program met the requirement as prescribed. [19 TAC §228.35(e)(7)]



- For certification in a class other than the classroom teacher, each EPP shall provide a practicum for a minimum of 160 clock-hours. Practicum logs served as evidence for all files reviewed.
 - Three out of five principal candidates reached the point of practicum. The hours completed were 101, 106, and 243. One out of three (33%) met the requirement. The principal program did not meet the requirement as prescribed. [19 TAC §228.35(e)(8)]
 - Four out of five superintendent candidates reached the point of practicum. Total hours completed ranged from 80-137. None of the candidates met the requirement. The superintendent program did not meet the requirement as prescribed. [19 TAC §228.35(e)(8)]
 - One out of four counselor candidates reached the point of practicum. The practicum was completed during the pandemic. The hours were reduced by 20% and met the requirement. The school counselor program met the requirement as prescribed. [19 TAC §228.35(e)(8)]
 - Three out of five educational diagnostician candidates reached the point of practicum. Practicum hours ranged from 138-204 hours. One out of three (33%) candidates met the requirement. The fourth file reviewed contained no records and the fifth file reviewed was for a candidate that had not reached the point of practicum. The educational diagnostician program did not meet the requirement as prescribed. [19 TAC §228.35(e)(8)]
 - None of the reading specialist candidates had reached the point of practicum. [19 TAC §228.35(e)(8)]
- A candidate must demonstrate proficiency in each of the educator standards for the certificate class being sought. Field supervisor observation instruments were used as evidence to determine compliance.
 - All principal candidates completed a standards-based practicum. The observation documents provided by the field supervisor served as evidence. The principal program met the requirement as prescribed. [19 TAC §228.35(e)(8)]
 - There were no observation instrument documents provided as evidence of a standards-based practicum for the superintendent, school counselor, or educational diagnostician programs. These programs did not meet the requirement as prescribed. [19 TAC §228.35(e)(8)]
 - None of the reading specialist candidates had reached the point of practicum at the time of the review. [19 TAC §228.35(e)(8)]
 - A practicum experience must take place in an actual school setting rather than a distance learning lab or virtual school setting. A practicum shall not take place in a setting where the candidate has an administrative role over the site supervisor or is related to the field supervisor or site supervisor. All candidates in the non-teacher practicum assignments completed the assignment in public schools. None of the candidates had an administrative role over the site supervisor or were related to the site supervisor or field supervisor. Practicum assignment documentation served as evidence for all programs except the reading specialist program where the candidates selected for review had not yet reached the point of practicum. The program met the requirement as prescribed. [19 TAC §228.35(e)(8)(A); 19 TAC §228.35(e)(8)(B)(i-ii)]



- A practicum is successful when the field supervisor and site supervisor recommend to the EPP that the candidate should be recommended for a standard certificate. If either the field supervisor or site supervisor does not recommend the person who does not recommend the candidate must provide documentation supporting the lack of recommendation.
 - In the principal, superintendent, and educational diagnostician programs, the required recommendations were not provided for the candidates whose files were reviewed. Each program had three candidates that reached the point of standard certification. The principal, superintendent, and educational diagnostician programs did not meet the requirement as prescribed. [19 TAC §228.35(e)(8)(D)]
 - The school counselor program had one candidate that reached the point of standard certification. That file contained a signed and dated recommendation from the site supervisor and field supervisor. The school counselor program met the requirement as prescribed. [19 TAC §228.35(e)(8)(D)]
 - The reading specialist program did not have any candidates that reached the point of standard certification. [19 TAC §228.35(e)(8)(D)]
- An EPP shall collaborate with the campus or district administrator to assign each candidate a mentor, cooperating teacher, or site supervisor during the candidate's internship, clinical teaching, or practicum experience. Eight out of nine (88%) of UG and PB teacher candidates were assigned a mentor or cooperating teacher during the internship or clinical teaching. All three principal candidates, four superintendent candidates, one school counselor candidate, and the three educational diagnostician candidates were assigned a site supervisor. There were no reading specialist candidates that reached the point of practicum. Candidate placement documentation served as evidence for all files reviewed. The program met the requirement as prescribed. [19 TAC §228.35(f)]
- Cooperating teachers, mentors, and site supervisors must be qualified. For a clinical teacher candidate and a candidate in an internship, the cooperating teacher or mentor is an educator who has at least three years of teaching experience; who is an accomplished educator as shown by student learning; and who is currently certified in the certification category for the clinical teaching assignment for which the clinical teacher candidate is seeking certification. For a practicum candidate, the site supervisor is an educator who has at least three years of experience in the aspect(s) of the certification class being pursued by the candidate; who is currently certified in the certification class in which the practicum candidate is seeking certification; and who is an accomplished educator as shown by student learning. The program was not able to provide qualifications in any class of certification for cooperating teachers, mentors, or site supervisors assigned to candidates. The program did provide a superintendent certificate for a site supervisor assigned to two superintendent candidates and an educational diagnostician certificate for site supervisors assigned to three educational diagnostician candidates, but no other evidence was provided. The EPP did not meet the requirement as prescribed. [19 TAC §228.2(14); 19 TAC §228.2(26); 19 TAC §228.2(33)]



- The EPP is responsible for providing mentor, cooperating teacher, and/or site supervisor training that relies on scientifically-based research, but the program may allow the training to be provided by a school, district, or regional education service center if properly documented. The training must include training in how to coach and mentor candidates. The training must occur within three weeks of assignment to the candidate. The program was unable to provide evidence of training for cooperating teachers, mentors, or site supervisors. The EPP did not meet the requirement as prescribed. [19 TAC § 228.2(14); 19 TAC §228.2(26); 19 TAC §228.2(33)]
- 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. All five (100%) UG teacher candidates were provided a field supervisor who had been trained. Three out of four PB teacher candidates were provided a field supervisor and the fourth file reviewed contained no evidence. There was no evidence that the PB teacher field supervisors were trained. All three principal candidates were provided a field supervisor, but there was no evidence the field supervisor had been trained. All four superintendent candidates were provided with a field supervisor, but there was no evidence the field supervisor had been trained. The school counselor candidate was provided with a field supervisor, but there was no evidence the field supervisor had been trained. All three educational diagnostician candidates were provided with a field supervisor, but there was no evidence the field supervisor had been trained. None of the reading specialist candidates reached the point of field supervision. The program did not meet the requirement as prescribed. [19 TAC §228.35(g); 19 TAC §228.35(h)]
- A field supervisor is required to be qualified. The field supervisor is required to hold credentials appropriate for the candidate(s) supervised. A field supervisor is a currently certified educator, who preferably has advanced credentials, shall have at least three years of experience and current certification in the class in which supervision is provided. A field supervisor shall be an accomplished educator as shown by student learning. The program provided one resume each for one out of five UG candidate field supervisors and one out of four PB candidate field supervisors in the teacher program. No evidence of qualified field supervisors was provided for the principal program candidates. For the superintendent program, two field supervisors were certified as a superintendent, one was certified as a principal, and one was certified as a teacher, but no other qualifications were provided. The field supervisor for the school counselor candidate held a school counselor certificate, but no other qualifications were provided. No evidence of qualified field supervisors was provided for the educational diagnostician program. The program did not meet the requirement as prescribed. [19 TAC §228.2(18)]
- A field supervisor shall not be employed by the same school where a candidate being supervised is completing clinical teaching, internship, or practicum. A mentor, cooperating teacher, or site supervisor may not also serve as a candidate's field supervisor. Candidate placement documentation served as evidence. All teacher and non-teacher field supervisors assigned to candidates met the requirement. The program met the requirement as prescribed. [19 TAC §228.2(18)]
- A field supervisor is required to be trained as a field supervisor. Supervision provided on or after September 1, 2017, must be provided by a field supervisor who has completed



TEA-approved observation training. There was no evidence that any of the teacher field supervisors or any of the non-teacher field supervisors assigned to candidates were trained locally or completed the TEA-approved statewide training. The EPP did not meet the requirement as prescribed. [19 TAC §228.35(g) & (h)]

- Initial contact must occur within the first three weeks of assignment to a teacher candidate and within the first quarter of assignment for non-teacher candidates. The initial contact may be made by telephone, email, or other electronic communication. One out of five (20%) UG teacher candidates received an initial contact as required. Two out of four (50%) PB teacher candidates received an initial contact as required. Two out of three (66%) principal candidates received an initial contact within the first quarter of assignment. The superintendent, school counselor, and educational diagnostician candidates did not receive an initial contact within the first quarter of assignment. The program did not meet the requirement as prescribed. [19 TAC §228.35(g) & (h)]
- For each formal observation, the field supervisor shall participate in an individualized pre-observation conference with the candidate and provide written feedback through an individualized, synchronous, and interactive post-observation conference with the candidate. Neither the pre-observation conference nor the post-observation conference needs to be onsite. None of the UG teacher candidates contained evidence in their observation documents that the required conferences were conducted. Two out of four (50%) files for PB teacher candidates contained evidence of post-observation conferences and none had pre-observation conferences. None of the principal, school counselor, or educational diagnostician files contained evidence of the required conferences. Three out of four (75%) superintendent candidate files contained evidence of the required conferences and the fourth file only contained evidence of a post-observation conference. The program did not meet the requirement as prescribed. [19 TAC §228.35(g) & (h)]
- For each formal observation, the field supervisor shall document the educational practices observed and provide written feedback to the candidate. Observation documents served as evidence.
 - In the UG program, one out of two files reviewed (50%) contained evidence of educational practices observed and written feedback was provided. Three out of four (75%) PB teacher candidate files contained evidence of educational practices observed and written feedback was provided. The program did not meet the requirement as prescribed. [19 TAC §228.35(g)]
 - All principal files reviewed contained evidence of educational practices observed and written feedback was provided. The principal program met the requirement as prescribed. [19 TAC §228.35(h)]
 - All of the superintendent files reviewed contained evidence of educational practices observed and written feedback provided. Each file only contained one observation and not the three that are required. The superintendent program did not meet the requirement as prescribed. [19 TAC §228.35(h)]
 - The school counselor file reviewed contained educational practices observed and written feedback was provided. This candidate completed the practicum during the pandemic, so field supervision was reduced, and the required number of



- observations was waived. The school counselor program met the requirement as prescribed. [19 TAC §228.35 (h)]
- The educational diagnostician files did not contain evidence of documented observations with educational practices observed or written feedback provided. The educational diagnostician program did not meet the requirement as prescribed. [19 TAC §228.35 (h)]
 - Informal observations and coaching shall be provided by the field supervisor as appropriate. In the UG teacher program, one out of two (50%) of files contained evidence of communications between the field supervisor and candidate. In the PB program, three out of four (75%) files contained evidence of communications between the field supervisor and candidates. There was no evidence of informal observations and coaching found in the principal, superintendent, school counselor, or educational diagnostician files reviewed. The program did not meet the requirement as prescribed. [19 TAC §228.35(g) & (h)]
 - Formal observations conducted by the field supervisor must meet the requirements for duration, frequency, and format.
 - The observations met the duration, format, and frequency for the UG and PB programs. They were all 45 minutes in duration and were all conducted in a face-to-face format. Observation documents served as evidence in the files reviewed. The teacher programs met the requirement as prescribed. [19 TAC §228.35(g)(1-8)]
 - The principal program met the requirement for observation duration, frequency, and format. All were a total of 135 minutes in duration across three observations during the first, second, and final third of the practicum. [19 TAC §228.35(h)(1-3)]
 - The superintendent program did not meet the requirement for observation duration, frequency, and format. Each file reviewed contained only one observation. The duration and format were not noted. The superintendent program did not meet the requirement as prescribed. [19 TAC §228.35(h)(1-3)]
 - The school counselor program did not meet the requirement for observation duration, frequency, and format. While observation documentation was provided in the one file reviewed, the duration and format were not noted on the documentation. This candidate completed the field-supervision requirement during the pandemic and that was taken into consideration. The school counselor program did not meet the requirement as prescribed. [19 TAC §228.35(h)(1-3)]
 - The program did not provide any field supervision documents for the educational diagnostician candidates reviewed. The educational diagnostician program did not meet the requirement as prescribed. [19 TAC §228.35(h)(1-3)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §228.35(a)(5)(B) Each EPP must develop and implement specific criteria and procedures that allow candidates who are not military service members or military veterans to substitute prior or ongoing service, training, or education, provided that the experience, education, or training is not also counted as a part of the internship, clinical teaching, or practicum requirements, was provided by an approved EPP or an



accredited institution of higher education within the past five years and is directly related to the certificate being sought.

Action: Develop and implement specific criteria and procedures that allow candidates to substitute prior or ongoing, service, training, or education as prescribed. Provide the link where this information is posted.

- 19 TAC §228.35(b)(1); 19 TAC §228.35(e)(1)(A)(i-v) Unless a candidate qualifies as a late hire, a candidate shall complete the following prior to any clinical teaching or internship: A minimum of 30 clock-hours of field-based experiences. An EPP shall provide evidence of ongoing and relevant field-based experiences throughout the EPP in a variety of educational settings with diverse student populations, including observation, modeling, and demonstration of effective practices to improve student learning. Field-based experiences must include 15 clock-hours in which the candidate, under the direction of the EPP, is actively engaged in instructional or educational activities that include: (i) authentic school settings in a public school accredited by the TEA or other school approved by the TEA for this purpose; (ii) instruction by content certified teachers; (iii) actual students in classrooms/instructional settings with identity-proof provisions; (iv) content or grade-level specific classrooms/instructional settings; and (v) written reflection of the observation.

Action: Require all field-based experiences (FBEs) completed by all teacher candidates to meet requirements as prescribed. Revise current FBE documentation to only include FBE's. Retain FBE documentation in a central location once collected. Include a location to document if the FBE was interactive or observational. Review internal processes for collecting, verifying, and retaining FBE's and adjust to better align with TAC. For one candidate from each the UG teacher and PB teacher programs, provide FBE documentation that reflects 1) the candidates completed the minimum number of FBE hours, and 2) the appropriate settings in which the FBE were completed; and 3) at least 15 hours of interactive FBE where candidates were actively engaged with students.

- 19 TAC §228.35(e)(2)(A)(i) Clinical teaching must meet one of the following requirements: a minimum of 14 weeks (no fewer than 70 full days), with a full day being 100% of the school day; or a minimum of 28 weeks (no fewer than 140 half days), with a half-day being 50% of the school day.

Action: Require clinical teaching to be a minimum of 14 weeks or 28 weeks half-day as prescribed. Provide documentation of clinical teaching duration for one candidate in each of the following programs: Teacher UG and Teacher PB.

- 19 TAC §228.35(e)(2)(A)(iii) Clinical teaching is successful when the candidate demonstrates proficiency in each of the educator standards for the assignment. Action: Update processes so that all teacher candidates are required to demonstrate proficiency in each of the standards for the assignment. Submit field supervisor observation documents for one candidate in the following class: Teacher UG.

- 19 TAC §228.35(e)(2)(A)(iv) A candidate must hold an intern or probationary certificate while participating in an internship.



Action: Require all candidates completing an internship to hold an intern or probationary certificate, as applicable. For the PB teacher identified, the EPP needs to notify the candidate that the EPP cannot standard certify until an internship (with a probationary or intern certificate) or clinical teaching assignment is completed. Provide TEA the official notifications from the EPP and candidate acknowledgment as evidence.

- 19 TAC §228.35(e)(2)(B)(vii); 19 TAC §228.35(e)(2)(A)(iii) An internship or clinical teaching is successful when the field supervisor and campus supervisor or cooperating teacher recommend to the EPP that the candidate should be recommended for a standard certificate.

Action: Submit evidence of successful clinical teaching or internship per the recommendation from the cooperating teacher and field supervisor for one clinical teacher and from the mentor and field supervisor for one candidate in an internship for each of the following routes: Teacher UG and Teacher PB.

- 19 TAC §228.35(4) Candidates participating in an internship or a clinical teaching assignment need to experience a full range of professional responsibilities that shall include the start of the school year. The start of the school year is defined as the first 15 instructional days of the school year. If these experiences cannot be provided through clinical teaching or an internship, they must be provided through field-based experiences.

Action: Require all teacher candidates to experience the start of the school through clinical teaching, internship, or field-based experiences, as applicable. Submit evidence of the start of the school year experiences (first 15 days) for one candidate in each of the following programs: Teacher UG and Teacher PB.

- 19 TAC §228.35(e)(8) For certification in a class other than the classroom teacher, each EPP shall provide a practicum for a minimum of 160 clock-hours.

Action: Require the practicum for all non-teacher candidates to be a minimum of 160 clock-hours. Provide documentation that shows a completed practicum that was 160 clock-hours or more for one candidate from each of the principal, superintendent, and educational diagnostician programs. Include the start/end dates, district/campus, site-supervisor name, and standards-based activities that the candidate participated in while in the practicum.

- 19 TAC §228.35(e)(8) A candidate must demonstrate proficiency in each of the educator standards for the certificate class being sought.

Action: Implement processes that require all non-teacher candidates to demonstrate proficiency in the standards during the practicum. Provide the observation instruments, signed by the field supervisor and candidate that reflect the level of proficiency demonstrated by one candidate in each of the following classes: superintendent, counselor, and educational diagnostician candidate.

- 19 TAC §228.35(e)(8)(D) A practicum is successful when the field supervisor and the site supervisor recommend to the EPP that the candidate should be recommended for a



standard certificate. If either the field supervisor or site supervisor does not recommend the candidate, the person who does not recommend the candidate must provide documentation supporting the lack of recommendation.

Action: Establish a process to collect the recommendation from the field supervisor and site supervisor. Provide documentation that reflects the dated written documentation from the field supervisor and site supervisor that the candidate completed a successful practicum for one candidate from each of the following certificate classes: principal, superintendent, and educational diagnostician.

- 19 TAC §228.2(14), (26), and (33) Require cooperating teachers, mentors, and site supervisors to be qualified.
Action: Require a minimum of three years of experience in the certification category or class, accomplishment as an educator as shown by student learning, and current certification in the area in which the candidate is seeking certification. Provide one file each for a candidate in the following classes to show that the site supervisor assigned to each candidate was qualified: principal, superintendent, counselor, and educational diagnostician. Provide one file each to show that the cooperating teacher/mentor assigned to the candidates in the UG and PB teacher routes was qualified.
- 19 TAC §228.35(f), 19 TAC §228.2(14), (26), and (33) The EPP is responsible for providing mentor, cooperating teacher, and/or site supervisor training that relies on scientifically-based research, but the program may allow the training to be provided by a school, district, or regional education service center if properly documented. The training must include training in how to coach and mentor candidates.
Action: Develop the appropriate training for mentors, cooperating teachers, and site supervisors and establish processes to deliver the training and to collect and retain evidence the training requirement is met for all. Provide the training material and dated attendance records/certificates of completion for one site supervisor assigned to one candidate from each of the following classes of certification: principal, superintendent, school counselor, educational diagnostician, and reading specialist. Provide the training material and dated attendance records/certificates of completion for one teacher candidate in the UG and PB routes to show that cooperating teacher and mentor have been trained.
- 19 TAC §228.35(g) and (h) 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.
Action: Require all field supervisors to complete training requirements. Collect, verify, and retain field supervisor training records in one central location at the time of employment with the EPP. Collect updated documents as applicable. Provide evidence of training for field supervisors assigned to one candidate from each of the following programs: principal, superintendent, school counselor, educational diagnostician, and reading specialist. The documentation must include candidate placement information showing the date of placement and the field supervisor assigned; or field supervisor logs



reflecting the placement and field supervisor information. Include the dated local and statewide field supervisor training certificates for each field supervisor.

- 19 TAC §228.2(18) Field supervisors held the required credentials appropriate for the candidate(s) supervised. A field supervisor is a currently certified educator, who preferably has advanced credentials, shall have at least three years of experience and current certification in the class in which supervision is provided. A field supervisor shall be an accomplished educator as shown by student learning. If an individual is not currently certified, an individual must hold at least a master's degree in the academic area or field related to the certification class for which supervision is being provided and comply with the same number, content, and type of continuing professional education requirements described in 19 TAC §232.11, §232.13, and §232.15
Action: Provide the following documentation for one field supervisor each for the corresponding candidate each for the following classes of certification, teacher UG, teacher PB, principal, superintendent, counselor, educational diagnostician, and reading specialist: Candidate placement information showing date of placement and field supervisor assigned. Provide records of field supervisor certification, degree, experience, and/or continuing professional education. Acceptable evidence includes a resume, service records, or letters of recommendation. Evidence of accomplishment as an educator include evaluations that include evidence of student learning, campus or district reports that include evidence of student learning, or letters of recommendation that include evidence of student learning.
- 19 TAC §228.35(g) & (h) Require field supervisors to conduct an initial contact, which may be made by telephone, email, or other electronic communication, with the assigned candidate. The initial contact must occur within the first three weeks of assignment to a teacher candidate and within the first quarter of assignment for a non-teacher candidate.
Action: Update the field supervision process and train field supervisors to make initial contact with each candidate assigned within the prescribed timeframe. Adjust the Teacher Candidate Communication Log to include initial contact and implement across all teacher and non-teacher classes. Provide evidence such as a field supervisor log or other documentation that the "initial contact" requirement has been implemented. Evidence must be submitted for one candidate from each certificate class as follows: teacher (UG & PB), principal, superintendent, school counselor, educational diagnostician, and reading specialist.
- 19 TAC §228.35(g) & (h) For each formal observation, the field supervisor shall participate in an individualized pre-observation conference with the candidate and provide written feedback through an individualized, synchronous, and interactive post-observation conference with the candidate. Neither the pre-observation conference nor the post-observation conference needs to be onsite. For each formal observation, the field supervisor shall document the educational practices observed. For the initial certification of teachers, a copy of the written feedback must be provided to the



candidate's cooperating teacher or mentor. For the initial certification of non-teachers, a copy of the written feedback must be provided to the candidate's site supervisor.

Action: Require field supervisors to conduct pre- and post-observation conferences with candidates for each formal observation. Provide the pre- and post-observation evidence for one candidate from each of the following programs: Teacher (UG & PB), principal, superintendent, school counselor, educational diagnostician, and reading specialist. Evidence must include documentation verifying pre-conference and individualized post-conference along with the related formal observation documents signed by the candidate and the field supervisor that reflect the observation date, start and stop time, subject area and grade level of the candidate's placement, instructional strategies observed and the written feedback that was provided to the candidate. It is acceptable for pre-and post-observation conferences to be documented on the observation instrument for the related observation.

- 19 TAC §228.35(g) & (h) Informal observations and coaching shall be provided by the field supervisor as appropriate.
Action: Require each field supervisor to conduct informal observations and coaching as prescribed. Provide the following as evidence of informal observations and support: field supervisor logs; or email records with delivery/read receipts; or phone records; or observation forms; or other electronic records of observation and coaching for a teacher candidate (UG & PB), principal candidate, superintendent candidate, counselor candidate, educational diagnostician candidate, and reading specialist candidate.
- 19 TAC §228.35(g) & (h) The field supervisor shall collaborate with the candidate and cooperating teacher, mentor, or site supervisor throughout the clinical teaching, internship, or practicum experience.
Action: Require the field supervisor to collaborate with the identified individuals as prescribed. Provide dated field supervisor logs, email records with delivery/read receipt, phone records, or signed observation forms as evidence of collaboration for one candidate from each of the following programs: teacher (UG & PB), principal, superintendent, and educational diagnostician.
- 19 TAC §228.35(h)(1-3) Formal observations must be at least 135 minutes in duration in total throughout the practicum and must be conducted by the field supervisor. If a formal observation is not conducted on the candidate's site in a face-to-face setting, the formal observation may be provided by the use of electronic transmission or other video or technology-based methods. A formal observation that is not conducted on the candidates' site in a face-to-face setting must include a pre- and post-conference. Regardless of the type of certificate held by a candidate during a practicum, an EPP must provide a minimum of one formal observation within the first third of the practicum, one formal observation within the second third of the practicum, and one formal observation within the final third of the practicum.
Action: Require the field supervisors assigned to non-teacher candidates to conduct formal observations as prescribed. Provide the following for a superintendent and educational diagnostician candidate: Observation forms signed by candidate and field supervisor with date, start and stop time, subject, and grade level with a record of



instructional strategies observed as evidence that the observations meet the requirements as prescribed.

Recommendations:

- Ensure that coursework taught online is only provided in the certificate fields/classes that were approved to be offered online.
- Collect a district calendar for each candidate and document the start/end dates of clinical teaching, and any missed days. This is also recommended for intern candidates and non-teacher candidates and their specific schedules.
- Review and revise internal records retention processes. Current observation documentation for teacher candidates needs minor adjustments to add a pre-conference for teacher candidates and to be used with fidelity.
- Review internal processes for verifying candidate intern placements and implement the use of the Statement of Eligibility (SOE).
- Utilize the candidate recommendation form implemented during the pandemic for all teacher and non-teacher classes. Include a place to recommend/not recommend and a space for justification as required in TAC.
- Document the start of school year experiences through FBE's on Seminar Syllabi as applicable.

Based on the evidence presented, the University of St. Thomas is not in Compliance with 19 TAC §228.35 – Program Delivery and On-Going Support.

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

Findings

- The University of St. Thomas does not have established benchmarks to measure candidate progress. TEA reviewed nine teacher files (UG and PB) and 25 PB non-teacher files for a total of 34 files reviewed and did not find any evidence of benchmarks to measure candidate progress. It was noted that at the last review in 2014-2015, the program did have benchmarks in the teacher candidate files reviewed. The program did not meet the requirement as prescribed. [19 TAC §228.40(a)]
- UST does not have structured assessments to measure candidate progress. The EPP provided a principal as instructional leader (PIL) campus diagnosis and planning paper with the associated rubric and a PIL e-portfolio with an associated rubric as evidence of performance assessments, but the program did not provide a Core w/STR EC-6 performance-based assessment or rubric. This was the area in which TEA was reviewing curriculum and for which a structured assessment was required as evidence of compliance. The program did not meet the requirement as prescribed. [19 TAC §228.40(a)]
- An EPP is responsible for ensuring that each candidate is adequately prepared to pass the appropriate content pedagogy exams required for certification and shall determine the readiness of each candidate to take the appropriate certification exams. UST has processes in place to ensure that candidates are prepared to be successful in their



certification exams for the UG candidates only. Readiness to test documents were identified in two out of five UG files reviewed showing where the candidate was in the process of testing. Two out of five candidates were not granted test approval yet and the last candidate was granted test approval but was missing documentation that evidenced the candidate was ready to test. The UG program was 80% compliant. In the PB teacher program, readiness to test documentation was provided for one out of four candidates. Two candidates were granted test approval but were missing documentation that the candidates were ready to test. The fourth PB candidate was not reported. The PB teacher program was 50% compliant. No documentation was provided for the principal, superintendent, school counselor, educational diagnostician, or reading specialist programs to support that the candidates were adequately prepared to test. The EPP met the requirement as prescribed for the UG teacher program but did not meet the requirement for any other program. [19 TAC §228.40(b); 19 TAC §228.40(d)]

- An EPP shall not grant test approval for a certification exam until a candidate has met all admission requirements and has been contingently or formally admitted. All teacher candidates (UG and PB) and all non-teacher candidates were not granted test approval prior to formal admission. The program met the requirement as prescribed. [19 TAC §228.40(d)]
- For the purposes of EPP improvement, an entity shall continuously evaluate the design and delivery of the EPP components based on performance data, scientifically-based research practices, and the results of internal and external feedback and assessments. UST provided a course evaluation for one course in 2016 as evidence. The EPP also provided a TEA Advisory Committee (AC) PowerPoint (PPT) presentation dated September 1, 2019, as evidence, but it was the TEA PPT that was updated on January 27, 2020, as stated on the first slide and could not have been used for a September 1, 2019 UST AC meeting. AC meeting minutes were provided and were dated March 1, 2019. They included information regarding the Spring Branch partnership, a School of Education and Human Services report, the Educational Leadership program information, a School Counseling program update regarding the 48-hour master's degree requirement, and candidate experiences in the program at UST. The program also provided information about the September 20, 2019 updates regarding the School of Education and Human Services report, certification updates, a discussion of the teacher candidate list, a graduate program update, and an EdTPA discussion. The program also provided advisory committee documentation dated November 15, 2019. That documentation included a School of Education and Human Services report update, a certification update, the undergrad program update, HB3 requirements, STR requirement information, a graduate program update, and information about the UG 120 hr. degree conversation. The program was not able to provide an evaluation plan detailing the activity, timeline, person responsible, data from internal & external sources, or dated evaluation reports to correspond with the advisory committee minutes. It was noted in the 2014-2015 EPP Review that at that time, UST did have the required information regarding program evaluation along with overall pass rates, pass rates by certificate field, candidate exit survey data, and employment information for the 2011-2015 academic years, and a list of current candidates for the 2014-2015 academic year. The program did not meet the requirement as prescribed. [19 TAC §228.40(e)]



- An EPP shall retain documents that evidence a candidate's eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after a candidate completes, withdraws, or is discharged/released from the program. UST was not able to provide all candidate records for review. The program advised TEA that the staff that was previously with the EPP had left for a variety of reasons and that documents were either housed on those computers or not retained at all. It was noted that during the 2014-2015 EPP Review, the EPP records were retained for a period of eight years and that the Registrar maintained an academic file for each candidate indefinitely, but that was not found to be the case in 2020-2021. The program did not meet the requirement as prescribed. [19 TAC §228.40(f)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §228.40(a) To ensure that a candidate for educator certification is prepared to receive a standard certificate, the educator preparation program (EPP) shall establish benchmarks.
Action: Create a common benchmark document to be used for all candidates and utilize it to show the date benchmark has been met and retain the benchmark document in each candidate file. Utilize benchmark documentation for each candidate admitted to the EPP and retain the evidence in each candidate file for auditing purposes.
- 19 TAC §228.40(a) To ensure that a candidate for educator certification is prepared to receive a standard certificate, the educator preparation program (EPP) shall establish structured assessments of the candidate's progress throughout the EPP.
Action: Require that all candidates seeking certification in all classes/categories complete a variety of structured assessments throughout their program. Retain evidence of assessments in each candidate file for auditing purposes.
- 19 TAC §228.40(b) & §228.40(d) An EPP is responsible for ensuring that each candidate is adequately prepared to pass the appropriate content pedagogy examination(s) required for certification unless that content pedagogy test is used for admission purposes. An EPP shall determine the readiness of each candidate to take the appropriate certification examination of content, pedagogy, and professional responsibilities, including professional ethics and standards of conduct.
Action: Implement a process to evaluate candidate preparedness for testing and ensure that all candidates follow that process, including meeting requirements prior to being given approval to test. Require that candidates be adequately prepared for their exams prior to granting test approval. Implement criteria to be met, such as a benchmark, to determine that candidates have met requirements to test prior to granting test approval. Require all candidates to meet the requirements for testing before test approval is granted and retain the documentation in each candidate file for auditing purposes.
- 19 TAC §228.40(e) For the purposes of EPP improvement, an entity shall continuously evaluate the design and delivery of the EPP components based on performance data, scientifically-based research practices, and the results of internal and external feedback and assessments.



Action: Utilize an evaluation plan detailing the activity, timeline, person responsible for the evaluation of the design and delivery of the EPP components. Utilize data results from internal and external sources and dated evaluation reports to drive EPP improvement. Share the information with the Advisory Committee, seek input, and retain the dated agendas, minutes, and sign-in sheets for attendees as evidence of compliance.

- 19 TAC §228.40(f) An EPP shall retain documents that evidence a candidate's eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after a candidate completes, withdraws from, or is discharged or released from the program.

Action: Develop a system that meets requirements to ensure all records are retained for all candidates for a period of five years. Retain all candidate records that evidence eligibility for admission and evidence of all program requirements for a period of five years after a candidate completes, withdraws from, or is discharged or released from the program.

Recommendations:

- Provide all candidates seeking certification in all classes/categories with a variety of performance-based assessments throughout their program.

Based on the evidence presented, the University of St. Thomas is not in compliance with 19 TAC §228.40 – Assessment and Evaluation of Candidates and EPP.

COMPONENT VI: PROFESSIONAL CONDUCT - 19 TAC §228.50

Findings

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

- There was no evidence that the EPP ensures candidates in all programs understand and adhere to the Texas Educator's Code of Ethics. Additionally, UST self-reported in the Status Report that candidates are not required to sign an acknowledgment of understanding and abiding by the Educator Code of Ethics. This was identified as a compliance item in the 2014-2015 EPP Review and was not corrected. The program did not meet the requirement as prescribed. [19 TAC §228.50; 19 TAC §247.2]
- All associated staff and field supervisors signed an acknowledgment of the Texas Educator's Code of Ethics; however, it was noted that in the Status Report, the EPP self-reported that staff does not sign an acknowledgment of understanding and abiding by the Educator Code of Ethics. This was also a compliance item in the 2014-2015 EPP Review. For faculty associated with the EPP, the program met the requirement as prescribed. [19 TAC §228.50; 19 TAC §247.2]



Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §228.50 During the period of preparation, the educator preparation program shall ensure that...the candidates themselves understand and adhere to 19 TAC Chapter 247.

Action: Implement a process for ensuring all candidates understand and adhere to the educator code of ethics. Require that all candidates receive, read, and acknowledge that they understand and will abide by the Texas Educator Code of Ethics. Maintain a copy of this documentation in each candidate's record. Consider providing the Texas Educators' Code of Ethics in 19 TAC §247.2 to candidates at the time of admission and require that they sign and date their review of the document to ensure that each candidate has read, understands & will abide by the Code of Ethics. Maintain the documentation in each candidate's file.

Recommendations:

- Consider sending the Texas Educators' Code of Ethics to faculty & staff at the beginning of each academic year via email with read receipt and retain the read receipt as evidence to ensure that each person has read, understands & will abide by the Code of Ethics.
- Consider requiring all field supervisors to sign that they will read and abide by the Educators' Code of Ethics at the beginning of the year during local field supervisor training and retain the evidence in each corresponding candidate's file.

Based on the evidence presented, the University of St. Thomas is not in compliance with 19 TAC §228.50 - Professional Conduct.

COMPONENT VII: COMPLAINTS PROCESS – 19 TAC §228.70

Findings

- Per 19 TAC §228.70(b), the EPP complaints process is on file at TEA and lists a timeline for Level One, Level Two, and Level Three processes. Level Three is filing a complaint with TEA. The EPP complaint policy is also posted on the website. The program has the complaint policy posted on-site. The program provided a picture identifying where it is posted on the wall at the University. The EPP meets the requirements as prescribed. [19 TAC §228.70(b)(1-4)]

Compliance Issues to be Addressed:

- None.

Recommendations:

- None.

Based on the evidence presented, the University of St. Thomas is in compliance with 19 TAC §228.70 – Complaints Process.



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

Findings

- Teacher candidates have met degree requirements for certification. Two UG candidates and one PB candidate that reached certification held a degree at the time of standard certification. Transcripts with degrees conferred served as evidence of compliance. The program met the requirement as prescribed. [19 TAC §230.13(a)(1)]
- The two UG and one PB teacher candidate all completed the EPP before the standard certificates were issued. The record of EPP completion and the recommendation dates in ECOS served as evidence that the EPP made the recommendation for each file reviewed. All met the application and issuance deadlines for the certificates awarded. The program met the requirement as prescribed. [19 TAC §230.13(a)(2)]
- One school counselor candidate was standard certified by UST. The candidate held a degree at the time of standard certification. It was noted on the documentation provided that candidates admitted on September 1, 2019, and beyond, that a 48-hour master's in counseling is required. This candidate was admitted prior to the implementation date and held a master's degree at the time of standard certification. TEA also reviewed documentation for a school counselor candidate whose file was selected for review. That candidate was standard certified by another EPP on December 8, 2020, but was listed as a finisher with UST in 2020-2021. The program was advised about how to handle that candidate's record to ensure that if the candidate was not supposed to be enrolled at UST, the candidate should be removed. The program met the requirement as prescribed. [19 TAC §293.3]
- Candidates seeking certification as a principal or as an educational diagnostician must hold a valid teaching certificate. One principal candidate and two educational diagnostician candidates reached the point of standard certification. All held a valid teacher certificate. Copies of the certificates provided by the program served as evidence of compliance. The program met the requirement as prescribed. [19 TAC §241.20(3); 19 TAC §241.60(3); 19 TAC §239.84(4)]
- A superintendent candidate must hold at a minimum, a principal certificate, or have three creditable years of managerial experience in a public school district. One superintendent candidate reached the point of standard certification. That candidate held a valid principal certificate. The program met the requirement as prescribed. [19 TAC §242.20(4-5)]
- Principal, school counselor, and reading specialist candidates must have two years of creditable teaching experience to be eligible for standard certification. A service record was not provided for the principal candidate that reached the point of standard certification. A service record was provided for the school counselor candidate that reached the point of standard certification. The program met the requirement for the school counselor program but did not meet the requirement for the principal program. [19 TAC §241.20(4); 19 TAC §241.60(4); 19 TAC §239.20(4); 19 TAC §239.60(4); 19 TAC §239.93(4)]
- Educational diagnostician candidates must have three years of creditable teaching experience to be eligible for standard certification. Two educational diagnostician candidates reached the point of standard certification. The program provided a service



record noting eight years of experience as a teacher for one candidate and did not provide a service record for the other candidate. The program was 50% compliant. The program did not meet the requirement as prescribed. [19 TAC §239.84(5)]

- All non-teacher candidates must complete an approved EPP to be standard certified. The principal, superintendent, school counselor, and educational diagnosticians that reached the point of standard certification all completed the EPP. Transcripts and a record of EPP completion served as evidence of compliance for each file reviewed. The program met the requirement as prescribed. [19 TAC §241.20(5); 19 TAC §241.60(5); 19 TAC §242.20(2); 19 TAC 239.20(1); 19 TAC §239.60(1); 19 TAC §239.84(1); 19 TAC §239.93(1)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §241.20(4), 19 TAC §241.60(4) To be eligible for standard cert, a principal candidate must have two creditable years of teaching experience as a classroom teacher.
Action: Require a service record with two years of creditable years of experience as a teacher prior to standard certification. Require two years of experience as a classroom teacher at the time of admission to avoid any issues regarding certification at the time of standard certification. Reference [19 TAC §227.10\(a\)\(5\)](#) pertaining to admission requirements for initial certification in a class other than classroom teacher and the EPP responsibility regarding informing the applicant of any deficiency prior to admission.
- 19 §239.84(5) To be eligible for standard cert, an educational diagnostician candidate must have three creditable years of teaching experience as a classroom teacher
Action: Require a service record with three years of creditable years of experience as a teacher prior to standard certification. Require three years of experience as a classroom teacher at the time of admission to avoid any issues regarding certification at the time of standard certification. Reference [19 TAC §227.10\(a\)\(5\)](#) pertaining to admission requirements for initial certification in a class other than classroom teacher and the EPP responsibility regarding informing the applicant of any deficiency prior to admission.

Recommendations:

- None.

Based on the evidence presented, the University of St. Thomas is not in compliance with 19 TAC Chapters 228 and 230 – Certification Procedures.

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

Findings

- The University of St. Thomas has submitted ASEP reports within the timeline required by TEA. The program was required to make corrections during reporting, and they were done within the timeline required by TEA for the 2018-2019 academic year. [19 TAC §229.3(f)(1) and Associated Graphic]



- Five out of 9 (56%) teacher candidate files reviewed contained a formal offer of admission that did not correspond to the admission date in the Accountability System for Educator Preparation (ASEP). The remaining four teacher candidate files reviewed did not contain a formal offer of admission letter. Six out of nine teacher files reviewed included admission records with dates that were required to be uploaded within seven days. The remaining three were admitted prior to the requirement of the effective date. All applicable teacher admission dates were uploaded within seven days as required. [19 TAC §229.3(f)(1)]
- All principal and superintendent files reviewed (10) lacked a formal offer of admission so TEA could not verify the admission dates that were reported for these programs. Three out of five principal candidate files reviewed included admission records with dates that were required to be uploaded within seven days and the other two were admitted prior to the effective date of the requirement. One out of three (33%) were uploaded within seven days as required. Three out of five superintendent candidates were required to be uploaded into ASEP within seven days and the remaining two were admitted prior to the effective date of the requirement. All three (100%) were uploaded within seven days as required. One out of five school counselor files contained a formal offer of admission that corresponded to the admit date in ASEP and the second one did not. The remaining three did not contain a formal offer of admission. Three out of five (60%) school counselor candidates were uploaded within seven days as required. None of the educational diagnostician files contained a formal offer of admission letter to verify if it corresponded to the date of admission reported. Four out of five (80%) educational diagnostician candidates were uploaded into ASEP within seven days as required. One out of five (20%) reading specialist candidates contained a formal offer of admission date in records but was not reported. The remaining four did not have a formal offer of admission letter to verify if it corresponded to what was reported. Four out of five reading specialist candidates were required to be uploaded within seven days and the fifth candidate was admitted prior to the effective date of the requirement. Three out of four (75%) were uploaded within seven days as required. [19 TAC §229.3(f)(1)]
- Four out of nine (45%) teacher candidate files reviewed contained an admission GPA that corresponded to the admission GPA reported to TEA during annual reporting for the year the candidate was admitted. The remaining five files reviewed either did not have a GPA in records, did not have a GPA reported, or did not have a GPA in records that corresponded to the GPA reported. The teacher program was 45% compliant. [19 TAC §229.3(f)(1)(7)]
- Ten out of 25 non-teacher files (40%) contained a GPA that corresponded to the GPA reported. The remaining files either did not contain transcripts to be able to verify GPA reported, did not report the GPA, or the GPA in candidate records did not correspond to the GPA reported. The non-teacher programs were 40% compliant. [19 TAC §229.3(f)(1)(7)]
- All nine teacher candidate files were accurately reported for all certification areas for which they were admitted. The program was 100% compliant.
- Two out of nine teacher candidates completed an internship on an intern or probationary certificate. Both files reviewed contained observation durations uploaded into ASEP that corresponded to the duration documented in candidate records. It was noted that one file



reviewed did not hold an intern or probationary certificate during the internship year. Five out of nine candidates completed clinical teaching. One out of five contained observation durations uploaded into ASEP that corresponded to the duration documented in candidate records. The second file reviewed did not contain observation documents to verify that the observation duration corresponded to what was uploaded into the system for TEA to be able to verify if the observation duration in records corresponded to observation duration in the system. The remaining three out of the five were in process of clinical teaching during Spring 2021 and those observations had not yet been uploaded into the system. [19 TAC §229.3(f)(1)(1)]

- Beginning with the 19-20 academic year, all non-teacher observations were required to be uploaded into ASEP. The EPP did not upload observations as required for 19-20. [19 TAC §229.3(f)(1)(1)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §229.3(f)(1) and [Graphic](#) Report all data accurately in ASEP and related candidate documentation.
- 19 TAC §229.3(f)(1) and [Graphic](#) Begin entering non-teacher observation data into ASEP.

Recommendations:

- Upload candidate observations at the end of each semester to avoid having to do it all at once at the end of each academic year.

Based on the evidence presented, the University of St. Thomas is not in compliance with 19 TAC Chapter 229 – Integrity of Data Reported.

RECOMMENDATIONS AND ADVISEMENT:

- For Teacher preparation programs, the Pre-Admission Content Test (PACT) changed effective January 27, 2020. Ensure curriculum in all teacher certificate areas has been updated to meet requirements for content pedagogy instruction and test preparation. Passing scores on TExES exams cannot be used to meet EPP admission requirements after 1/27/2020 but may be used for certification purposes until the expiration date of the related certificate. The new PACT, or “TX PACT”, is a content-pure assessment that cannot be used for certification purposes.
- Develop a plan to update EPP benchmarks and test readiness requirements for Teacher programs to address changes in PACT, if necessary.
- Application A has changed – plan to review requirements to prepare for adding new certificate areas.
- Develop and implement more performance assessments in all programs. Evidence of performance assessments is a requirement for adding new certificates using the new Application A.
- Review all certificate areas that the EPP no longer plans to support and request, in writing, for TEA to remove them from inventory.



- The transition from the Core Subjects EC-6 test #291 to test #391 is beginning. December 2021 is the last date a candidate can take the 291, and the last date to standard certify candidates using test #291 will be December 2022. EPPS should begin reminding candidates to ensure that they meet all requirements and can be standard certified by the deadline for test #291. EC-6 candidates who have not attempted test #291 should be approved for test #391.
- Intern and Probationary certificate deactivation timelines and requirements have been updated in TAC. Changes include new timelines for requesting 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 assignment.

PROGRAM RECOMMENDATIONS ALL EPPS:

- To ensure continuity in record keeping and other related processes, consider creating a procedure manual documenting EPP processes.
- Align the verbiage of the program to the verbiage of Texas Administrative Code (TAC) (ex. Field supervisor, cooperating teacher, mentor, candidate, etc.);
- 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 the current Texas Administrative Code;
- Continue to participate in training and webinars provided by the Division of Educator Preparation to ensure that the program staff is knowledgeable about current requirements and changes in the Texas Administrative Code;
- Continue to maintain communication with the program specialist assigned to the program.
- Ensure that TEA staff has the most current contact information by sending updates to the assigned program specialist.

SUMMARY

A Compliance Plan was created collaboratively with the University of St. Thomas staff.

“I have reviewed the EPP Report and agree that all required corrections will be made on or before June 25, 2021 at 5:00 PM CST.”

Signature of Legal Authority **Date**

Printed Name of Legal Authority **Date**