

2023–2024 Continuing Approval Review Report

240 Certification

INTRODUCTION

Texas Education Agency (TEA) Education Specialist, Vanessa Alba conducted a five-year Continuing Approval Review of the 240 Certification Educator Preparation Program (EPP) from February 20-March 7, 2024. 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...”. Scott Rozell, Chief Executive Officer, was identified as the program Legal Authority, and Lara Cavin, Director of Certification and Compliance and Backup Legal Authority was identified as the primary EPP contact for the review process. The EPP was approved as an EPP on November 3, 2006, as Educators of Excellence, and became 240 Certification on April 3, 2021, when the current Legal Authority purchased the program. At the time of the review, the EPP was rated Accredited. The risk level was Stage Insert 3 (low). The EPP reported 15 finishers for the 2021-2022 reporting year and 46 finishers for 2022-2023.

At the time of the review, the 240 Certification EPP was approved to certify candidates in the Teacher class. The EPP is approved to prepare and recommend candidates for certification in the alternative certification (ALT) route.

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 the 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 “Desk Review” format where EPP staff submitted requested documents to TEA for review.

The scope of this review included:

- 1) verifying compliance with requirements for EPPs as applicable to the certification class and certification route offered by the EPP using a standardized rubric aligned to the Texas Administrative Code and Texas Education Code; and
- 2) developing a corrective action plan for compliance and quality improvement based on review data, performance indicators identified in 19 TAC §229.4, and self-reported EPP information provided in the Status Report.

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 30, 2024. Additional EPP documents, including records for seven candidates, were submitted on February 15, 2024. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence.

“Findings” reflect EPP compliance with the TAC requirement(s) in a component. Determinations of non-compliance are supported by “Evidence” collected during the review process. Where a “Corrective Action” is required, the program should consult the TAC and/or TEC, complete the corrective action to bring the EPP into compliance and submit the required evidence of corrective action to TEA by the identified Due Date.

Corrective actions that are planned but have not been implemented must include an implementation date.

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“Recommendations” are suggestions for general program improvement or reminders of important information for the EPP and no follow-up is required.

GOVERNANCE (COMPONENTS 1 & 5)

Oversight of the EPP and ongoing evaluation of the effectiveness of the EPP were reviewed. Following are the findings:

FINDINGS

1. The EPP has established an advisory committee that provides guidance and input on matters of program design, delivery, evaluation, and major policy decisions of each program within the EPP. [19 TAC §228.20(b)]
2. The advisory committee has been consistently trained in their roles and responsibilities. [19 TAC §228.20(b)]
3. The EPP has established evaluative tools and processes for continuous improvement of the EPP and has engaged the advisory committee in the evaluation and continuous improvement process. [19 TAC §228.40(e)]
4. The governing body of the EPP has provided sufficient support to enable the EPP to meet all standards set by the SBEC. [19 TAC §228.20(c)]
5. The EPP has notified TEA of program amendments. On June 7, 2021, the EPP moved to an online format and was seeking Quality Matters certification for its online coursework. [19 TAC §228.20(e) & (f)]
6. The EPP has established a calendar of program activities that allows adequate time for admission, coursework, training, and field-based experience requirements prior to a clinical teaching or internship experience for each program in the EPP. [19 TAC §228.20(g)]
7. The EPP has published an exit policy that is reviewed & signed by each candidate at admission. [19 TAC §228.20(h)]
8. The EPP has not added new program locations since the last 5-year review. [19 TAC §228.10(e)]
9. The EPP is approved to offer clinical teaching. [19 TAC §228.10(c)]
10. The EPP has qualified instructors for each certificate category offered. [19 TAC §228.10(d)(1)]
11. The EPP notified TEA staff of the change of ownership in writing within ten days of the change as required. [19 TAC §228.17(a)]
12. The EPP has consistently retained candidate and EPP records per the records retention requirement in [19 TAC §228.40(f) & §228.10(b)(2)]

CORRECTIVE ACTION REQUIRED

None

REQUIRED NOTIFICATIONS (COMPONENTS 2 & 7)

Candidate records, the EPP website, and other EPP documents were reviewed for evidence the EPP has published the required notifications for applicants and candidates. Following are the findings:

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FINDINGS

1. The EPP has published information about the required criminal history background checks for clinical teaching and employment as an educator in Texas. [19 TAC §227.1(b)]
2. The EPP has published information about the potential impact of criminal history on candidate certification and the right to request a Preliminary Criminal History Evaluation from TEA. [19 TAC §227.1(d)]
3. The EPP has published the admission requirements of the EPP. [19 TAC §227.1(c)(1)]
4. The EPP has published the completion requirements of the EPP. [19 TAC §227.1(c)(2)]
5. The EPP has published Information about the EPP performance over time for the past five years. [19 TAC §227.1(c)(3)(B)]
6. The EPP has published information about the effect of supply and demand forces on the educator workforce in Texas. [19 TAC §227.1(c)(3)(A)]
7. The EPP has published a complaints process that provides a link to the TEA complaints process. [19 TAC §228.70(b)]

CORRECTIVE ACTION REQUIRED

None

FORMAL & CONTINGENCY ADMISSION (COMPONENT 2)

Candidate records and records in the Educator Certification Online System (ECOS) were reviewed to verify the EPP has implemented a formal and contingency admission process as required in 19 TAC §227.17 and §227.15. Following are the findings:

FINDINGS

1. Candidates reviewed who met all admission requirements were formally or contingently admitted. [19 TAC §227.17(a) & §227.15(a)(1)-(2)]
2. The formal or contingency written offer of admission was consistently found in candidates' records. [19 TAC §227.17(b) & (c) and §227.15(a)(3)-(4)]
3. Applicants were consistently required to accept the offer of admission in writing. [19 TAC §227.17 (c) & §227.15(a)(4)]
4. The formal or contingency date of admission was consistently included in the written offer of admission. [19 TAC §227.17(d) & §227.15(b)]
5. The ECOS audit trail revealed candidate admission records were consistently created in the ECOS within the seven calendar days required. [19 TAC §227.17(e) & §227.15(c)]
6. Candidates were not provided coursework, training, or test approval prior to formal or contingency admission. [19 TAC §227.17(f) & §228.40(d)]

CORRECTIVE ACTION REQUIRED

None

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ADMISSION REQUIREMENTS (COMPONENT 2)

Candidate records including applications, transcripts, screening rubrics, and other documentation were reviewed to verify the EPP qualifies applicants for admission as required in 19 TAC Chapters 227. Following are the findings:

FINDINGS

1. The EPP consistently requires applicants to meet requirements for GPA. [19 TAC §227.10(a)(3)]
2. The EPP consistently requires applicants to meet requirements for subject-specific semester credit hours. [19 TAC §227.10(a)(4)]
3. The EPP consistently requires applicants to complete an application for admission. [19 TAC §227.10(a)(8)]
4. The EPP consistently uses appropriate screening devices to evaluate the applicant’s appropriateness for the certificate sought. [19 TAC §227.10(a)(8)]
5. The EPP consistently collects all additional requirements for admission and verifies candidates meet all additional requirements for admission. [19 TAC §227.10(b)]
6. The EPP has consistently verified English language proficiency. [19 TAC §227.10(a)(7)]

CORRECTIVE ACTION REQUIRED

None

STANDARDS-BASED COURSEWORK (COMPONENTS 3 & 4)

Syllabi, performance assessments, standards alignment charts, and information provided by the EPP in the Status Report, were reviewed as evidence the EPP provides the required standards-based coursework in each certificate class offered. Following are the findings:

FINDINGS

1. Candidates were consistently required to complete the minimum number of hours of coursework and training prior to completing the EPP. [19 TAC §228.35(b)]
2. Required standards were not identified in coursework. [19 TAC §228.30]
Evidence: The EPP curriculum was based on test preparation and candidates were being prepared to pass the exams.
3. Evidence of performance assessments was provided but assessments were not aligned to standards or based on current research. [19 TAC §228.35(a)(2) & §228.40(a)]
Evidence: The EPP provided assessment materials for ED 5801 course which was an Early Childhood Education (ECE) running record assessment for a 2nd grade student with a written description of the process used to evaluate the student. There was no rubric associated with the assessment to evaluate the candidate’s performance. The EPP also provided an STR running record assessment that had a rubric with levels of proficiency. Running records are not aligned with the Science of Teaching Reading (STR) standards. Leveled reading running records, in general, analyze “reading behaviors” to determine whether the student is using meaning, syntax, or visual cues to understand reading, is not aligned with STR standards, and was not accepted.

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4. The EPP is making progress toward meeting the criteria set for accreditation, quality assurance, and compliance with Program Design and Teaching Support Certification by [Quality Matters](#). [19 TAC §228.35(a)(6)(A-D)]

CORRECTIVE ACTION REQUIRED

The EPP must revise coursework to ensure candidates are provided at least the minimum number of hours of standards-based coursework and assessments to meet requirements in 19 TAC §228.30, §228.35, and §228.40 by 5:00 PM CST on July 8, 2024.

1. **19 TAC §228.30(a) Standards-based Curriculum**

Review and revise the curriculum provided to candidates in each certificate category so that the educator standards for the certificate are the basis for the curriculum and that instruction is not reliant upon test preparation.

2. **19 TAC §228.35(a)(2) Coursework & Training: Quality of Coursework & 19 TAC §228.40(a) Candidate Assessment**

Review and revise the curriculum provided to candidates in each certificate field so that the performance-based assessments are based on the educator standards for each certificate, are not reliant upon test preparation, and are relevant to current research.

REQUIRED CURRICULUM TOPICS (COMPONENT 3)

Syllabi, benchmark documents, candidate records, and information provided by the EPP in the Status Report were reviewed to verify the EPP provides instruction in the additional curriculum areas required in the Texas Administrative Code and/or Texas Education Code. Following are the findings:

FINDINGS

1. Training in Ethics was found in coursework provided to candidates. [19 TAC §228.30(c)(1)]
2. Training in educating students with Dyslexia was found in coursework provided to candidates and was provided by the approved provider. [19 TAC §228.30(c)(2)]
3. Training in Mental Health, Substance Abuse, & Youth Suicide was consistently provided to candidates by an approved provider. [19 TAC §228.30(c)(3)]
4. Instruction in the skills educators are required to possess, the responsibilities educators are required to accept, and the high expectations for students in Texas were apparent in the coursework provided to candidates. [19 TAC §228.30(c)(4)]
5. The importance of building strong classroom management skills was identified in the coursework provided to candidates. [19 TAC §228.30(c)(5)]
6. Information about the framework for teacher and principal evaluation in Texas was provided to candidates. [19 TAC §228.30(c)(6)]
7. Training in appropriate relationships, boundaries, and communications with students was consistently provided to candidates. [19 TAC §228.30(c)(7)]
8. Instruction in digital learning, virtual instruction, and virtual learning were consistently provided to candidates. [19 TAC §228.30(c)(8)]
9. The Digital Literacy evaluation and the related prescribed curriculum were provided to candidates. [19 TAC §228.30(c)(8)]

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10. Instruction regarding students with disabilities, the use of proactive instructional planning techniques, and evidence-based inclusive instructional practices were provided to candidates. [19 TAC §228.30(c)(9)]
11. Instruction in the Prekindergarten guidelines was not consistently provided to candidates. [19 TAC §228.30(d)]
Evidence: The EPP provided syllabi for the ED 5100 Educator Foundations and ED 5300 Advanced Instructional Design and Planning courses as evidence. There was no evidence within these syllabi that candidates were instructed in the topic. The Prekindergarten guidelines were only provided as a reference and test preparation was identified as the coursework in the syllabi.

CORRECTIVE ACTION REQUIRED

The EPP must revise coursework to ensure candidates are provided at least the minimum number of hours of standards-based coursework and assessments to meet requirements in 19 TAC §228.30, §228.35, and §228.40 by 5:00 PM CST on July 8, 2024.

1. **19 TAC §228.30(d) Prekindergarten Guidelines**

Review and revise the curriculum provided to candidates in each certificate field that includes early childhood to reflect that candidates are instructed in the prekindergarten guidelines. The instruction cannot be reliant upon test preparation.

PRE-SERVICE REQUIREMENTS FOR TEACHER CANDIDATES (COMPONENT 4)

Syllabi, benchmark documents, other candidate records, and published information were reviewed for evidence the EPP requires Teacher candidates to complete pre-service requirements (coursework and field-based experiences) as identified in 19 TAC §228.35(b) and §228.35(e)(1). Following are the findings:

FINDINGS

1. There is sufficient evidence that candidates consistently complete the field-based experience (FBE) hours as required. [19 TAC §228.35(b)(1) & §228.35(e)(1)]
2. FBE assignments and activities consistently meet the requirements for completing FBE. [19 TAC §228.35(e)(1)]
3. Candidates consistently complete pre-service coursework and training as required prior to beginning the supervised clinical experience. [19 TAC §228.35(b)(2)]
4. The structure of pre-service coursework and training allowed the EPP to consistently capture candidate proficiency in one or more of the identified pedagogical areas. [19 TAC §228.35(b)(2)]

CORRECTIVE ACTION REQUIRED

None

SUPERVISED CLINICAL EXPERIENCE (COMPONENT 4)

Syllabi, degree plans, and documentation in candidate records such as placement documents, logs, observation records, mentor agreements, and training materials were reviewed as evidence the EPP consistently ensures that candidates complete the supervised clinical experience as required in 19 TAC §228.35(e)-(g). Following are the findings:

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FINDINGS

1. There is sufficient evidence that candidates consistently complete the required duration for the supervised clinical experience. [19 TAC §228.35(e)(2)(A)-(B)]
2. Candidates were consistently placed in an approved supervised clinical experience assignment. [19 TAC §228.35(e)(2)(A) & (B)]
3. There is sufficient evidence that candidates consistently engage with the educator standards for the certificate sought during the supervised clinical experience. [19 TAC §228.35(e)(2)(A)(iii) & §228.35(e)(2)(B)(ix)]
4. Candidates were consistently assigned appropriate qualified campus personnel to support them during the supervised clinical experience. [19 TAC §228.35(f)]
5. The qualifications of campus personnel supporting candidates in the supervised clinical experience were consistently verified by the EPP. [19 TAC §228.2(14) & (26)]
6. Training was consistently provided as required to campus personnel supporting candidates in the supervised clinical experience. [19 TAC §228.2(14) & (26)]
7. Candidates were consistently assigned a field supervisor to provide support and feedback to the candidate and EPP during the supervised clinical experience. [19 TAC §228.35(g)]
8. There was sufficient evidence that field supervisors supporting candidates in the clinical experience met qualification requirements. [19 TAC §228.2(18)]
9. Training was consistently provided as required to field supervisors supporting candidates in the clinical experience. [19 TAC §228.35(g)]
10. There was sufficient evidence that field supervisors conducted the first observation within the required time frame. [19 TAC §228.35(g)]
11. Candidates received the required number and duration of formal observations during the clinical experience. [19 TAC §228.35(g)]
12. There was sufficient evidence that field supervisors consistently conduct observations through a POP cycle which includes a pre-conference and a post-conference for each formal observation. [19 TAC §228.35(g)]
13. Field supervisors consistently capture educational practices observed and evidence of candidate demonstration of proficiency in the supervised clinical experience. [19 TAC §228.35(g), §228.35(e)(2)(A)(iii), & §228.35(e)(2)(B)(ix)]
14. There is sufficient evidence the field supervisor consistently provides ongoing coaching and support to candidates completing the supervised clinical experience. [19 TAC §228.35(g)]

CORRECTIVE ACTION REQUIRED

None

EPP COLLABORATION WITH CAMPUS AND CANDIDATE (COMPONENT 4)

Documentation in candidate records such as logs, observation records, mentor agreements, and training materials was reviewed as evidence the EPP consistently collaborates with the campus and candidate during the candidate's supervised clinical experience as required in 19 TAC §228.35(g). Following are the findings:

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FINDINGS

1. There is sufficient evidence the field supervisor consistently collaborates with the campus personnel assigned to support the candidate during the supervised clinical experience. [19 TAC §228.35(g)]
2. There is sufficient evidence the field supervisor makes initial contact with the candidate as required during the supervised clinical experience. [19 TAC §228.35(g)]
3. There is sufficient evidence the field supervisor provides feedback from the observation to the campus personnel assigned to support the candidate during the clinical experience. [19 TAC §228.35(g)]

CORRECTIVE ACTION REQUIRED

None

CERTIFICATION (COMPONENT 8)

Candidate records such as transcripts, completed benchmark documents, and data reported in ECOS, provided evidence of EPP compliance with certification requirements. [19 TAC §230.11 & §230.13] Following are the findings:

FINDINGS

1. Candidates who were recommended for certification consistently met the degree required for the certificate sought. [19 TAC §230.11 & §230.36(b)(1)]
2. There was sufficient evidence that the EPP consistently ensures candidates complete all requirements prior to recommendation for the certificate sought. [19 TAC §230.11 & §230.36]
3. Candidates consistently met the English language proficiency requirement prior to being recommended for certificates. [19 TAC §230.11(b)(5)]
4. Candidates were consistently recommended for certificates in areas in which they were prepared by the EPP. [19 TAC §228.35(e)(2)(B), §230.36, §230.11, & §230.13]

CORRECTIVE ACTION REQUIRED

None

INTEGRITY OF DATA SUBMISSION (COMPONENT 9)

Admission data, enrollment data, and observation data reported in the Educator Certification Online System (ECOS) by the EPP were compared with the data retained in candidates' records. Following are the findings:

FINDINGS

1. Candidates were consistently identified as enrolled in the area in which one or more certificates were issued. [19 TAC §229.3]

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2. Admission data were reported accurately according to information in candidate transcripts and admission letters. [19 TAC §229.3]
3. Observation dates and durations were reported as detailed in observation documents. [19 TAC §229.3 & §229.4]
4. There was supporting documentation for the observations reported. [19 TAC §229.3 & §229.4]

CORRECTIVE ACTION REQUIRED

None

PROACTIVE INSTRUCTIONAL PLANNING TECHNIQUES & INCLUSIVE PRACTICES FOR ALL STUDENTS PROVIDED TO CANDIDATES IN ALL CONTENT AREAS (COMPONENTS 3, 4, & 10)

Syllabi, coursework samples, information in the Status Report, and observation instruments were reviewed for evidence the EPP has implemented the required instruction. Following are the findings:

FINDINGS

1. The EPP incorporates proactive instructional planning techniques throughout coursework and across content areas using a framework that:
 - o provides flexibility in the ways information is presented, students respond or demonstrate knowledge and skills, and students are engaged;
 - o reduces barriers in instruction;
 - o provides appropriate accommodations, supports, and challenges; and
 - o maintains high achievement expectations for all students, including students with disabilities and students of limited English proficiency. [19 TAC §228.10(a)(1)(J) & §228.30(c)(9)]
2. The EPP has integrated instruction in inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies throughout coursework. [19 TAC §228.10(a)(1)(J) & §228.30(c)(9)]
3. The EPP has integrated instruction in inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies throughout the clinical experience. [19 TAC §228.10(a)(1)(J)]
4. As required under TEC 21.044 (a-1), there is sufficient evidence that field supervisors consistently capture candidate demonstration of competency in the use of proactive instructional planning techniques that:
 - o provide flexibility in the ways information is presented, students respond or demonstrate knowledge and skills, and students are engaged;
 - o reduce barriers in instruction;
 - o provide appropriate accommodations, supports, and challenges; and
 - o maintain high achievement expectations for all students, including students with disabilities and students of limited English proficiency. [19 TAC §228.30(c)(9); §228.35(e)(2)(A)(3); §228.35(e)(2)(B)(9); & §228.35(e)(8)]
5. In the supervised clinical experience, there is sufficient evidence that field supervisors consistently capture candidate demonstration of competency in the use of evidence-based inclusive instructional

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practices as required under TEC 21.044 (a-1). [19 TAC §228.30(c)(9); §228.35(e)(2)(A)(3); & §228.35(e)(2)(B)(9)]

CORRECTIVE ACTION REQUIRED

None

RECOMMENDATIONS

- Complete the [Quality Matters](#) process by the end of the identified candidacy period from June 14, 2024, through June 14, 2027.
- Implement a plan to ensure systems are in place for data reporting to verify all candidate observations are entered in the year in which they occur. This is important because data cannot be entered into ASEP for past locked years and the EPP must meet the 95% performance standard.
- The Physical Education EC-12 (158), Health EC-12 (157), and English Language Arts & Reading 7-12 (231) exams will be available until September 1, 2024, and then will be replaced by new exams 258, 257, and 331, respectively. Candidates must apply and be recommended for certification by September 1, 2025, to use exams 158, 157, and 231 for certification. Additional information about the transitions of these certification exams is on the [Educator Testing](#) page on the tea.texas.gov website.
- Establish a process to add clinical experience records and observation records into ECOS as they occur throughout the year.
- Develop and implement more performance assessments for all certificate categories.
- Review all certificate categories that the EPP no longer plans to support and request, in writing, for TEA to remove them from inventory.
- Continue to notify the assigned specialist at TEA promptly when the EPP has staff changes in the roles of Legal Authority, Backup Legal Authority, or Certification Officer or when the EPP has changes in EPP contact information.
- To ensure continuity in record keeping and other related processes, continue to revise the EPP procedure manual documenting EPP processes.
- Align the verbiage of the program to the verbiage of the Texas Administrative Code (TAC) (ex. Field supervisor, cooperating teacher, mentor, candidate, clinical teaching, internship, 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 education specialist assigned to the program.