

# 2024–2025 Continuing Approval Review Report

## American College of Education

### INTRODUCTION

Texas Education Agency (TEA) Education Specialist Vanessa Alba conducted a five-year Continuing Approval Review of the American College of Education educator preparation program (EPP) on February 11-25, 2025. Per 19 Texas Administrative Code (TAC) §228.13(a), “an educator preparation program (EPP) ...shall be reviewed at least once every five years...”. Dr. Thomas Brouwer, Director of Regulatory Affairs and Compliance, was identified as the program’s Legal Authority. Ms. Stephie Guptill, Regulatory Compliance Manager, Backup Legal Authority, and Certification Officer, was the primary EPP contact for the review process. The American College of Education EPP was approved by the State Board for Educator Certification (SBEC) on February 6, 2009. On June 28, 2024, the EPP was notified of the review. At that time, the EPP was rated Accredited with a risk level that was Stage 3 (low). At the time of the review, the EPP was rated Accredited. The EPP reported 18 finishers for the 2022-2023 reporting year and 28 finishers for 2023-2024.

At the time of the review, the American College of Education EPP was approved to prepare and recommend candidates for certification in the Principal class in the post-baccalaureate (PB) and alternative certification (ALT) routes.

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 routes 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. The EPP submitted a Status Report and related program documents to TEA on January 27, 2025. Additional EPP documents, including records for five candidates in the PB and ACP routes, were submitted by the EPP on February 7, 2025. 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 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.**

“Advisement” is important new information and reminders provided to EPP staff during the review.

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

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The following are the findings of the review.

### GOVERNANCE

Oversight of the EPP and ongoing evaluation of the effectiveness of the programs within the EPP were reviewed. The following are the findings:

### FINDINGS

1. The EPP has established an advisory committee that
  - meets at least one time per year. [19 TAC §228.20(b)] [Effective September 1, 2024: 19 TAC §228.25(b)]
2. The EPP has not established an advisory committee that
  - provides guidance and input on matters of program design, delivery, evaluation, and major policy decisions of the EPP; and
  - is composed of a variety of collaborators including representation from at least three of the five groups: public schools accredited by the Texas Education Agency (TEA) and/or TEA-recognized private schools; regional education service centers; institutions of higher education; and/or business and community interests.

Evidence: While the EPP does meet yearly, as evidenced by agendas & minutes, only the most recent meeting covered the upcoming Texas EPP review. All other meeting agendas & minutes were focused on the Council for Accreditation of Educator Preparation (CAEP) standards & requirements or Florida standards. The EPP provided evidence that it has three advisory committee members that represent Texas. Two members represent Texas public schools, and one member represents an Education Service Center. The EPP did not provide evidence that it had membership from three of the five groups.

3. The EPP has published an exit policy that was reviewed & signed by each candidate at admission. [19 TAC §228.20(h)] [Effective September 1, 2024: 19 TAC §228.31(b)]
4. The EPP has not consistently retained candidate and EPP records per the records retention requirement in [19 TAC §228.10(b)(2) & §228.40(f)] [Effective September 1, 2024: 19 TAC §228.13(h) & §228.31(i)]

Evidence: Missing documentation included recommendations that candidates should be recommended for standard certification from the site supervisor & field supervisor and informal observations & coaching.

### CORRECTIVE ACTION REQUIRED

The EPP must correct the deficiencies identified by **5:00 PM CST on Friday, June 27, 2025**.

**1. 19 TAC §228.25(a)-(b) Governance: Advisory Committee**

Update Advisory Committee (AC) requirements so that the EPP is composed of at least 3 of the 5 groups identified as collaborators (public schools accredited by TEA and/or TEA-recognized private schools, regional education service centers, institutions of higher education, and/or business and community interests) and discusses the design, delivery, evaluation, and major policy decisions of the programs within the EPP. Retain evidence per records retention requirements in 19 TAC §228.31(i) & §228.13(h).

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### 2. 19 TAC §228.31(i) & §228.13(h) Records Retention

Update and implement a records retention process to retain records relating to candidate admission and completion of preparation requirements for at least five years from the date the candidate leaves the program or finishes the program. The records retention method must ensure information security.

## REQUIRED NOTIFICATIONS

Candidate records and the EPP website were reviewed for evidence the EPP has communicated the required notifications to applicants and candidates. The following are the findings:

### FINDINGS

1. The EPP has informed applicants to both programs about the required criminal history background checks for employment as an educator in Texas. [19 TAC §227.1(b)]
2. The EPP has notified applicants and candidates 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 informed applicants about the admission requirements and completion requirements of the EPP. [19 TAC §227.1(c)(1) & (2)]
4. The EPP has informed applicants in both programs about
  - the EPP performance over time for the past five years; and
  - the effect of supply and demand forces on the educator workforce in Texas. [19 TAC §227.1(c)(3)(A) & (B)]
5. The EPP has published a complaints process that includes a link to the TEA complaints process. [19 TAC §228.70(b)] [Effective September 1, 2024: 19 TAC §228.123 (a)-(d)]

### CORRECTIVE ACTION REQUIRED

None

## ADMISSION REQUIREMENTS

Candidate records, including applications, transcripts, and screening rubrics, were reviewed to verify the programs within the EPP qualify applicants for admission as required in 19 TAC Chapters 227 and 241. The following are the findings:

### FINDINGS

1. There is sufficient evidence that the EPP verifies that candidates hold the required degree at admission. [19 TAC §227.10(a)(1) & (2)]
2. There is sufficient evidence that the EPP requires applicants to meet the minimum 2.50 GPA requirement or meet requirements for the 10% exception to the GPA requirement. [19 TAC §227.10(a)(3)]

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3. Candidates consistently demonstrate English language proficiency prior to admission. [19 TAC §227.10(a)(7)]
4. Candidates consistently participate in two admission screens to evaluate the candidate's appropriateness for the certificate sought. There is sufficient evidence that screens are scored using a rubric with a set of coherent criteria. [19 TAC §227.10(a)(8) & §241.5(c)]
5. The EPP has maintained an overall GPA of 3.0 or higher for each incoming class since the last five-year review. [19 TAC §227.19(a)]

### CORRECTIVE ACTION REQUIRED

None

### FORMAL ADMISSION

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

### FINDINGS

1. There is sufficient evidence that the EPP consistently provides a written offer of admission reflecting a transparent admission date, and ensures the offer is signed by candidates. [19 TAC §227.17(b)-(d)]
2. The EPP consistently creates admission records for formally admitted candidates in the ECOS within seven calendar days of the date of admission identified in the offer letter. [19 TAC §227.17(e)]
3. Except as allowed for contingency admission, candidates are not provided coursework, training, or test approval prior to admission. [19 TAC §227.17(f)]

### CORRECTIVE ACTION REQUIRED

None

### STANDARDS-BASED COURSEWORK

Syllabi, performance assessments, published degree plans, 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. Evidence was reviewed for the Principal as Instructional Leader EC-12 certificate as the focus area representative of the overall quality of standards-based coursework offered by the EPP. The following are the findings:

### FINDINGS

1. There is sufficient evidence that candidates are consistently required to complete at least the minimum number of hours of coursework and training prior to completing the EPP. [19 TAC §228.35(c)] [Effective September 1, 2024: 19 TAC §228.57(a)]
2. The following required standards were not identified in coursework:

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- The educator standards for the Principal certificate;
- the Texas Essential Knowledge and Skills (TEKS); and
- The Texas administrator standards (Principal program). [19 TAC §228.30(e)] [Effective September 1, 2024: 19 TAC §228.57]

Evidence: Of the 11 syllabi presented for review, only one ELX5983 TX Practicum was aligned with the standards required for the certificate. The remaining courses were aligned with CAEP, National Policy Board for Educational Administration (NELP), and Professional Standards for Educational Leaders (PSEL) standards. The EPP provided the scope & sequence, standards alignment chart, test framework, and the Texas administrator standards for the Principal as Instructional Leader EC-12 certificate, but because the courses identified within the scope & sequence, alignment charts, and syllabi were aligned to CAEP, NAEP, and PSEL standards, alignment to Texas standards could not be determined.

3. There is sufficient evidence that the curriculum provided to candidates is research-based. [19 TAC §228.30(b)] [Effective September 1, 2024: 19 TAC §228.57(b)]
4. There is insufficient evidence that the coursework provided to candidates is performance-based and provides opportunities for candidates to practice skills. [19 TAC §228.35(a)(2) & §228.40(a)] [Effective September 1, 2024: 19 TAC §228.57(b)]

Evidence: The performance-based assessments and rubrics provided for review were aligned to CAEP, NELP, and PSEL standards but not to the Texas standards required for Principal as Instructional Leader EC-12 certification. All except for the performance-based assessments and rubric for the Texas Practicum course were aligned to CAEP, NELP, and PSEL standards.

5. Coursework and training are offered entirely online for the Principal program. The online training meets the criteria set for accreditation, quality assurance, and compliance with the following:
  - 19 TAC Part 1, Chapter 7 (relating to Degree Granting Colleges and Universities Other than Texas Public Institutions). [19 TAC §228.35(a)(6)] [Effective September 1, 2024: 19 TAC § 228.33(d)]

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### 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 Chapters 228 and 241 by **5:00 PM CST on Friday, June 27, 2025**.

1. **19 TAC §228.57 Standards-based Curriculum**

Review and revise the curriculum to ensure all standards and Commissioner's Administrator standards required for the Principal as Instructional Leader EC-12 certificate are taught.

2. **19 TAC §228.57(b) Performance-based**

Develop and implement:

- Standards-based performance assessments; and
- Rubrics aligned to the standards addressed in the related performance assessment.

Retain evidence of all structured assessments in the candidates' records per the records retention requirement in 19 TAC §228.31(i) & 19 TAC §228.13(h).

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### REQUIRED CURRICULUM TOPICS

Syllabi, published degree plans, transcripts, 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 the Texas Education Code. The following are the findings:

### FINDINGS

1. There is sufficient evidence candidates receive the required training in the Educators' Code of Ethics and in appropriate relationships, boundaries, and communications between educators and students. [19 TAC §228.30(c)(1) & (7)] [Effective September 1, 2024: 19 TAC §228.57(c)(1) & (7)]
2. There is insufficient evidence that training in educating students with Dyslexia is consistently provided to candidates and is provided by the approved provider. [19 TAC §228.30(c)(2)] [Effective September 1, 2024: 19 TAC §228.57(c)(2)]  
Evidence: The EPP has used the Region 10 dyslexia training as found in the ELX5983 syllabus. Region 10 is no longer the approved provider for dyslexia training.
3. There is sufficient evidence that training in Mental Health, Substance Abuse, & Youth Suicide is consistently provided to candidates and is provided by an approved provider. [19 TAC §228.30(c)(3)] [Effective September 1, 2024: 19 TAC §228.57(c)(3)]
4. There is sufficient evidence that candidates receive Instruction in
  - the skills educators are required to possess; and
  - the responsibilities educators are required to accept; and
  - the high expectations for all students in Texas; and
  - the importance of building strong classroom management skills; and
  - the framework in Texas for teacher and principal evaluation. [19 TAC §228.30(c)(4)-(6)] [Effective September 1, 2024: 19 TAC §228.57(c)(4)-(6)]
5. There is sufficient evidence that candidates receive the required Instruction in digital learning, virtual instruction, and virtual learning. [19 TAC §228.30(c)(8)] [Effective September 1, 2024: 19 TAC §228.57(c)(8)]
6. The Digital Literacy evaluation and the related prescribed curriculum have been provided to candidates. [19 TAC §228.30(c)(8)] [Effective September 1, 2024: 19 TAC §228.57(c)(8)]
7. There is sufficient evidence that the EPP provides candidates opportunities for candidates to demonstrate competency in instruction regarding students with disabilities, the use of proactive instructional planning techniques, and evidence-based inclusive instructional practices, as required under TEC §21.044(a-1)(1)-(3). [19 TAC §228.30(c)(9)] [Effective September 1, 2024: 19 TAC §228.57(c)(9)]
8. There is sufficient evidence that the EPP integrates inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies throughout coursework for candidates as required under TEC §21.0443(b)(1)-(2). [19 TAC §228.11(a)(1)(J)] [Effective September 1, 2024: 19 TAC §228.11(a)(1)(J)]

### CORRECTIVE ACTION REQUIRED

The EPP must revise coursework to include the required instruction as needed to meet requirements in 19 TAC §228.57 by 5:00 PM CST on Friday, June 27, 2025.

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### 1. **19 TAC §228.57(c)(2) / TEC §21.044(b) Required Instruction-Dyslexia**

Require all candidates to receive instruction in Dyslexia from the TEA-approved provider [TEALearn](#). Retain evidence of Dyslexia training in the candidates' records per the records retention requirement in 19 TAC §228.31(i) & 19 TAC §228.13(h).

## SUPERVISED CLINICAL EXPERIENCE

Syllabi, degree plans, and documentation in candidate records, including placement documents, logs, observation records, site supervisor 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) - (h) [Effective September 1, 2024: 19 TAC Chapter 228, Subchapters E and F].

## FINDINGS

All five candidates whose records were reviewed completed a practicum:

1. There is sufficient evidence that candidates consistently complete a practicum that is at least 160 hours in duration and is completed on an approved campus. [19 TAC §228.35(e)(8)(A)-(C) & §228.35(e)(9)] [Effective September 1, 2024: 19 TAC §228.63 & §228.81]
2. There is sufficient evidence that the candidates completing a practicum are provided support throughout the experience that includes:
  - a. A qualified field supervisor.
3. There is insufficient evidence that the candidates completing a practicum are provided support throughout the experience that includes:
  - a. A qualified and trained site supervisor.
  - b. A trained field supervisor.
  - c. The required number and duration of formal and informal observations provided by the field supervisor.
  - d. Feedback and coaching from the field supervisor are based on pre-and post-observation conferences and educational practices observed. [19 TAC §228.2(33), §228.35(f), & §228.35(h)] [Effective September 1, 2024: 19 TAC §228.99, §228.101, §228.117]

Evidence: The five site supervisors assigned to candidates reviewed and self-verified their qualifications, and EPP staff accepted the site supervisor. There was no evidence provided that site supervisor qualifications were verified by anyone other than the site supervisor. Site supervisors were provided training via video; however, there was no evidence of the date that training was held so it could not be verified that training occurred within the first three weeks of assignment to the candidate. The one field supervisor assigned to the five candidates completed statewide training through the Education Service Center, but there was insufficient evidence provided to determine if the field supervisor had local training. A field supervisor training PowerPoint was provided, but TEA could not determine when the field supervisor took that training. Three out of five records reviewed contained evidence that the candidates were formally observed in thirds across the practicum. The fourth record reviewed contained evidence of only two observations and the fifth record reviewed contained evidence of two observations on the same date and the third observation eight months later. The observation dates inconsistently fell within the start and end dates of the practicum. While



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all five candidates had pre- and post-observation conferences for each formal observation, there was no evidence of ongoing coaching.

4. There is insufficient evidence that candidate proficiency in the implementation of the standards for the certificate sought is consistently captured during the practicum. [19 TAC §228.35(e)(8)] [Effective September 1, 2024: 19 TAC §228.81(a)]  
Evidence: The observation instrument for all candidates was based only on the tested competencies required for Principal certification and not on the standards.
5. The EPP has not integrated inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies in the practicum experience. [19 TAC §228.10(a)(1)(J)] [Effective September 1, 2024: 19 TAC §228.11(a)(1)(J)]  
Evidence: The observation instrument is based on the tested competencies required for Principal certification and did not identify students with disabilities or students with limited English proficiency.
6. There is insufficient evidence that candidates are consistently provided recommendations of a successful practicum experience by the site supervisor and the field supervisor. [19 TAC §228.35(e)(8)(E)] [Effective September 1, 2024: 19 TAC §228.81(e)]  
Evidence: No evidence was provided that candidates received recommendations from the field supervisor and site supervisor that they should be recommended for standard certification.

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### CORRECTIVE ACTION REQUIRED

The EPP must revise the structure and requirements in the supervised clinical experiences as needed to ensure candidates are placed in appropriate assignments where they are able to complete the experiences with appropriate supervision and support, and that candidate proficiency is accurately captured by the EPP by 5:00 PM CST on Friday, June 27, 2025.

1. **19 TAC §228.99, §228.101, §228.117 Clinical Experience: Non-Teacher Practicum (Candidate Support)**  
Update the structure of the practicum process to include:
  - verifying that site supervisors meet qualification requirements.
  - verifying & documenting the date training is provided to site supervisors.
  - verifying and documenting the date training is provided to field supervisors **by the EPP**.
  - verifying documentation of informal observations at required timeframes
  - notes taken during all pre- and post-conference feedback, including evidence of discussion about standards.Retain evidence in the candidate's record per the records retention requirement in 19 TAC §228.31(i) & 19 TAC §228.13(h)
2. **19 TAC §228.81 Clinical Experience: Non-Teacher Practicum (Candidate Proficiency)**  
Update the structure of the practicum process, including the observation instrument used to evaluate candidate performance in practicum, to include:
  - Evidence that candidates have shown proficiency in the standards captured during the practicum.
  - Evidence that candidates are provided recommendations of a successful clinical experience by the site supervisor and the field supervisor.Retain evidence in the candidate's record per the records retention requirement in 19 TAC §228.31(i) & 19 TAC §228.13(h)



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### CERTIFICATION REQUIREMENTS

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

#### FINDINGS

1. Candidates are consistently recommended for certificates in areas in which they are prepared by and completed the EPP. [19 TAC §228.35(e)(8)(D), §230.11, & §230.13] [Effective September 1, 2024: 19 TAC §228.81(e)]
2. There is sufficient evidence that the EPP consistently ensures candidates complete all requirements prior to recommendation for the certificate sought. [19 TAC §230 & §241]
3. There is sufficient evidence that candidates consistently meet the English language proficiency requirement prior to being recommended for certification. [19 TAC §230.11(b)(5)]

#### CORRECTIVE ACTION REQUIRED

None

### INTEGRITY OF DATA SUBMISSION

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. The following are the findings:

#### FINDINGS

1. Admission data have not been reported accurately according to information in candidate transcripts and admission letters. [19 TAC §229.3]  
Evidence: Two out of five records reviewed contained evidence that the admission date in records corresponded to the admission date reported. The remaining three out of five did not correspond.
2. Candidates are consistently identified as enrolled in the area in which certificates are issued. [19 TAC §229.3]
3. Clinical experience records reported in ECOS do not accurately represent the related data in candidates' records. [19 TAC §229.3]  
Evidence: Only one record reviewed had a clinical experience record (CER) with all observations reported in ECOS and one out of five had a CER with only one observation reported in ECOS. The remaining three out of five records reviewed had no CER or observations reported in ECOS.
4. Observation dates and durations have not been consistently reported in ECOS as detailed on observation documents. [19 TAC §229.3 & §229.4]  
Evidence: Two out of five records reviewed contained observation durations in ECOS that did not correspond to the observation durations in the records. The remaining three out of five records reviewed had no records in ECOS to compare to the records provided for review.

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### CORRECTIVE ACTION REQUIRED

The EPP must revise the process of maintaining records and reporting data so that data reported in ECOS is an accurate representation of data retained in candidates' records to meet requirements in 19 TAC §229.3 and §229.4 by 5:00 PM CST on Friday, June 27, 2025.

**1. 19 TAC §229.3(a), §229.3(f)(1), & related graphic Figure 19 TAC §229.3(f)(1) Data Reported: Accurately**

Establish a process for reporting data in ECOS that ensures all required data is reported and reported accurately as it correlates with EPP and candidate records. Provide training to EPP staff as needed that reflects expectations for accurately reporting data.

### ADVISEMENT

- Update processes to meet the revised requirements in 19 TAC Chapter 228 effective as of September 1, 2024, to reflect the new requirements for supervision.
- Review the American College of Education Texas portion of the website and correct the following:
  - Remove “clinical teaching” as an option in Texas because the EPP does not offer Teacher certification.
  - Update the TOEFL requirements to reflect the most current changes that went into effect on January 7, 2025, and update to the current [19 TAC §230.11\(b\)\(5\)\(A-C\)](#) and change the link to reflect the most current list of countries whose official language is English.

### RECOMMENDATIONS

- Establish a process to add and update records in ECOS as they occur throughout the year. Set short-term goals for ensuring records are updated at least by semester and prior to recommending standard certificates.
- 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, maintain a procedure manual or process documents detailing EPP processes and procedures.
- Align the program's verbiage to the Texas Administrative Code (TAC) [ex. Field supervisor, site supervisor, candidate, practicum, 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 TEA to ensure that the program staff is knowledgeable about current requirements and changes in the Texas Administrative Code, including changes to EPP processes and updates to certificates and related certification exams.
- Continue to maintain communication with the TEA education specialist assigned to the program.

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### **CORRECTIVE ACTION COMPLETE**

Evidence of Corrective Action was received at TEA by 5:00 PM on June 27, 2025, has been reviewed by TEA staff, and meets the requirements for compliance with the Texas Education Code and Texas Administrative Code.