

# 2023–2024 Continuing Approval Review Report

## Concordia University

### INTRODUCTION

Texas Education Agency (TEA) Education Specialists, Rebecca Bunting and Vanessa Alba, conducted a five-year Continuing Approval Review of the Concordia University educator preparation program (EPP) on March 18-April 24, 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...”. Dr. Stephanie Hartzell, Interim Senior Director, was the program Legal Authority and the primary EPP contact for the review process. The EPP at Concordia University was approved as an EPP on January 20, 1984. At the time of the review, the EPP was rated Accredited. The risk level was Stage 3 (low). The EPP reported 12 finishers for the 2021-2022 reporting year and 29 finishers for 2022-2023.

At the time of the review, the Concordia University EPP was approved to certify candidates in the following classes: Teacher, Principal, Superintendent, and Reading Specialist. The Reading Specialist program is currently inactive. The EPP is approved to prepare and recommend candidates for certification in the undergraduate (U) and post-baccalaureate (PB) routes.

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 “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 all certification classes in all certification routes offered by the EPP using a standardized rubric aligned to 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 March 1, 2024. Additional EPP documents, including records for fifteen candidates, were submitted on March 12, 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.**

“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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Following are the areas where the EPP and one or more of its programs were found to exceed requirements in TAC.

### FINDING: EXCEEDS ADMISSION GPA

The EPP exceeds requirements in 19 TAC §227.10(a)(3) by consistently requiring an admission GPA of 2.75 for all their teacher candidates and 3.00 for all their principal and superintendent candidates.

#### EVIDENCE

1. Published admission requirements on the website require a minimum 2.75 GPA for teacher candidates and a minimum of 3.00 GPA for principal and superintendent candidates.
2. Transcripts reviewed showed that all five teacher candidates exceeded the published admission requirements with a GPA range at admission of 3.20-3.77 and all five superintendent candidates reviewed also exceeded the published admission requirements with a GPA range of 3.83-4.00.

### FINDING: EXCEEDS OBSERVATIONS

The EPP exceeds requirements in 19 TAC §228.35(h)(2) by consistently requiring all formal observations for non-teacher candidates to be conducted in-person.

#### EVIDENCE

1. Observation documentation reviewed by TEA reflected that formal observations conducted by the field supervisors for all principal and superintendent candidates were conducted in-person.

Following are additional findings from the review.

### GOVERNANCE (COMPONENTS 1 & 5)

Oversight of the EPP and ongoing evaluation of effectiveness of the programs within 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 informed of their roles and responsibilities. [19 TAC §228.20(b)]

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3. The EPP has established evaluative tools and processes for continuous improvement of the programs within 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 not had any program amendments since the last five-year review. [19 TAC §228.20(e) & (f)]
6. The EPP has not 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)]  
Evidence: There was no evidence of a deadline for accepting candidates into a program cycle for the principal and superintendent programs.
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 five-year review. [19 TAC §228.10(e)]
9. The EPP does not provide preparation to teachers through the Post-Baccalaureate or Alternative Certification Program route and therefore does not need approval to offer clinical teaching. [19 TAC §228.10(c)]
10. The EPP has qualified instructors for the Teacher, Principal, and Superintendent certificate classes offered. [19 TAC §228.10(d)(1)]
11. The EPP has not had a change of ownership since the last five-year review. [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

The EPP must correct the deficiencies identified by August 5, 2024:

1. **19 TAC §228.20(g) Governance: Program Calendar**

The EPP must update the program calendar for the Principal and Superintendent programs to include a deadline for accepting candidates into a program cycle. Note that the new program calendar requirements, effective September 1, 2024, are in 19 TAC §228.31(a).

### 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:

### FINDINGS

1. The EPP has published information about the required criminal history background checks for clinical teaching and for 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 each program in the EPP. [19 TAC §227.1(c)(1)]

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4. The EPP has published the completion requirements for each program in 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 not published information about the effect of supply and demand forces on the educator workforce in Texas. [19 TAC §227.1(c)(3)(A)]  
Evidence: The effect of supply and demand forces on the educator workforce in Texas was not posted on the program’s website, nor was there evidence of it in orientation or admission material provided.
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

The EPP must publish the required information in a location transparent to applicants and/or candidates (as applicable) for all programs within the EPP as required by August 5, 2024.

1. **19 TAC §227.1(c) Notifications: EPP and Program Information**

The EPP must update language on the website or other place, such as the admission application, which is transparently available to applicants about the effect of supply and demand forces on the educator workforce in this state.

### 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 or contingency admission process as required in 19 TAC §227.17 and §227.15. Following are the findings:

### FINDINGS

1. Applicants who were admitted met all admission requirements. [19 TAC §227.17(a)]
2. The formal written offer of admission was consistently found in candidates records. [19 TAC §227.17(b) & (c)]
3. Applicants were consistently required to accept the offer of admission in writing. [19 TAC §227.17 (c)]
4. The formal date of admission was consistently included in the written offer of admission. [19 TAC §227.17(d)]
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)]
6. Candidates were not provided coursework, training, or test approval prior to formal admission. [19 TAC §227.17(f) or §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 programs within the EPP qualify applicants for admission as required in 19 TAC Chapters 227, 241, and 242. 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 the Teacher program 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 one or more appropriate screening devices to evaluate the applicant’s appropriateness for the certificate sought. The Principal and Superintendent programs required two screens. [19 TAC §227.10(a)(8), §241.5(c), and §242.5(c)]
5. The EPP consistently collects all additional requirements for admission and verifies candidates meet all additional requirements for admission for Teacher and Principal candidates. [19 TAC §227.10(a)(9) and §227.10(b)]
6. The EPP has consistently verified English language proficiency. [19 TAC §227.10(a)(7)]
7. The EPP consistently notifies non-teacher candidates of deficiencies in certification requirements at time of admission. [19 TAC §227.10(a)(5)]

#### CORRECTIVE ACTION REQUIRED

None.

### STANDARDS-BASED COURSEWORK (COMPONENTS 3 & 4)

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 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) & (c)]
2. Required standards were identified in coursework. TEA reviewed the Principal as Instructional Leader (PIL) EC-12 certificate class for the 5-year review. [19 TAC §228.30 & 19 TAC § 241.15]
3. Evidence of performance assessments was found, and assessments were aligned to standards. [19 TAC §228.35(a)(2) & §228.40(a)]

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### CORRECTIVE ACTION REQUIRED

None.

### REQUIRED CURRICULUM TOPICS (COMPONENT 3)

Syllabi, published degree plans, 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 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 and was provided by an approved provider. [19 TAC §228.30(c)(3)]
4. Instruction in the skills educators is required to possess, the responsibilities educators are required to accept, and the high expectations for students in Texas was apparent in coursework provided to candidates. [19 TAC §228.30(c)(4)]
5. The importance of building strong classroom management skills was identified in coursework provided to candidates. [19 TAC §228.30(c)(5)]
6. Information about the framework for teacher and principal evaluation in Texas was not provided to candidates. [19 TAC §228.30(c)(6)]  
Evidence: Candidates in the principal program only receive instruction in the framework for teacher evaluation.
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 was 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)]
10. Instruction regarding students with disabilities, the use of proactive instructional planning techniques, and evidence-based inclusive instructional practices was provided to candidates. [19 TAC §228.30(c)(9)]

### CORRECTIVE ACTION REQUIRED

The EPP must revise coursework to include instruction in the missing curriculum areas to meet requirements in 19 TAC §228.30 by August 5, 2024.

1. **19 TAC §228.30(c)(6) Teacher & Principal Evaluation Framework**

The EPP must require all candidates in the principal program to receive training in the Teacher and Principal Evaluation framework. Note that the new training requirements, effective September 1, 2024, are in 19 TAC §228.57(c)(6).

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### PRE-SERVICE REQUIREMENTS FOR TEACHER CANDIDATES (COMPONENT 4)

Syllabi, degree plans, benchmark documents and other candidate records, and published information was 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 inconsistently meet all requirements for completing FBE. [19 TAC §228.35(e)(1)]  
Evidence: For all teacher candidates, evidence of active engagement in K-12 classrooms was missing.
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

The EPP must revise the structure and activities required in pre-service coursework to ensure Teacher candidates complete preservice requirements and demonstrate proficiency in the identified pedagogical areas prior to authorizing the supervised clinical experience as required in 19 TAC §228.35(b) and §228.35(e)(1) by August 5, 2024.

1. **19 TAC §228.35(e)(1)(A) FBE: Interactive Hours**

The EPP must update the FBE requirements and documentation process to capture evidence of at least 15 hours of interactive FBE. The EPP must retain the documentation in candidates' records per the records retention requirement in 19 TAC §228.40. Note that the new FBE requirements, effective September 1, 2024, are in 19 TAC §228.43(a-d).

### SUPERVISED CLINICAL EXPERIENCE (COMPONENT 4)

Syllabi, degree plans, and documentation in candidate records including placement documents, logs, observation records, mentor & 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).

#### 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) & §228.35(e)(8)]
2. Candidates were consistently placed in an approved supervised clinical experience assignment. [19 TAC §228.35(e)(2)(A) & (B), §228.35(e)(8)(A)-(D)]

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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), & §228.35(e)(8)]
4. Candidates were consistently assigned appropriate qualified campus personnel to support them during the supervised clinical experience. [19 TAC §228.35(f)]
5. Qualifications of campus personnel supporting candidates in the supervised clinical experience were not consistently verified by the EPP. [19 TAC §228.2(14), (26), & (33)]  
Evidence: In three out of five records reviewed in the superintendent program, regarding the site supervisors assigned to candidates that started clinical experiences, the EPP did not provide evidence of the required years of experience or accomplishment as evidenced by student learning.
6. Training was consistently provided as required to campus personnel supporting candidates in the supervised clinical experience. [19 TAC §228.2(14) & (33)]
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) & (h)]
8. There was insufficient evidence that field supervisors supporting candidates in the clinical experience met qualification requirements. [19 TAC §228.2(18)]  
Evidence: For the field supervisors assigned to the Teacher, Principal, and Superintendent candidates, there was no evidence of accomplishment as shown by student learning. Field supervisors supporting teaching were also missing evidence of the required experience.
9. Training was not consistently provided as required to field supervisors supporting candidates in the clinical experience. [19 TAC §228.35(g) & (h)]  
Evidence: For two out of five Teacher candidate records reviewed, there were no sign in sheets, certificates of completion, or other evidence that the EPP provided local training to their field supervisors during the year in which the candidates completed the clinical experience.
10. There was sufficient evidence that field supervisors conducted the first observation within the required time frame. [19 TAC §228.35(g) & (h)]
11. Candidates received the required number and duration of formal observations during the clinical experience. [19 TAC §228.35(g) & (h)]
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) & (h)]
13. Field supervisors did not consistently capture educational practices observed or evidence of candidate demonstration of proficiency in the supervised clinical experience. [19 TAC §228.35(g), §228.35(h), §228.35(e)(2)(A)(iii), §228.35(e)(2)(B)(ix), & §228.35(e)(8)(E)]  
Evidence: In the Principal and Superintendent programs there were no levels of proficiency or educational practices observed on the observation instruments completed by the field supervisor in four out of five Principal records and three out of five Superintendent records reviewed.
14. There is sufficient evidence that the field supervisor consistently provides ongoing coaching and support to candidates completing the supervised clinical experience. [19 TAC §228.35(g) & (h)]

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CORRECTIVE ACTION REQUIRED



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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 as required in 19 TAC §228.35(e) by August 5, 2024.

**1. 19 TAC §228.2(33) Campus Supervision: Qualifications of Site Supervisors**

The EPP must require all site supervisors to have three or more years of experience in the aspect of the certification class being pursued by the candidate; be an accomplished educator as shown by student learning; and be certified in the certification class for the practicum assignment for which the candidate is seeking certification. Retain evidence in each candidate's record. Note that the Site Supervisor qualification requirements, effective September 1, 2024, will move to 19 TAC §228.99(a).

**2. 19 TAC §228.2(18) Field Supervisor Qualifications**

The EPP must update the process for assigning field supervisors to include verification that they meet the qualification requirements. Note that the Field Supervisor qualification requirements, effective September 1, 2024, will move to 19 TAC §228.101(a). Retain evidence of field supervisor qualifications in EPP records per the records retention requirement in 19 TAC §228.40.

**3. 19 TAC §228.35(g) Field Supervisor Training**

The EPP must update the process for training field supervisors so that training is provided each year to allow field supervisors to remain current on new requirements and to stay normed on the use of the observation instrument used to evaluate candidate performance in the clinical experience. Retain evidence of field supervisor training in EPP records per the records retention requirement in 19 TAC §228.40; and ensure all field supervisors supporting Teacher candidates have completed TEA-approved observation training or are currently certified T-TESS appraisers. Collect certificates of completion of that training or certification and retain in EPP records per the record retention requirement in 19 TAC §228.40. Note that the new Field Supervisor training requirements, effective September 1, 2024, are in 19 TAC §228.101(a)(3) and (5) and 19 TAC §228.101(b)(1).

**4. 19 TAC §228.35(e)(8) Skills Implementation: Candidate Proficiency in Clinical Experience**

The EPP must update the field supervision process for non-teacher programs and the observation instruments used by field supervisors to formally observe candidates in practicums so that candidate proficiency in the standards for the certificate is captured during observation. At minimum, this must be evaluated and documented by the Field Supervisor during the observation. The educational practices observed and documented should be in support of the level of proficiency identified during each formal observation. Retain the evidence in each candidate's record per the records retention requirement in 19 TAC §228.40. Provide training to field supervisors to norm them on the use of a standards-based observation instrument as well as on capturing candidate proficiency in the standards in the candidate's practicum. Note that these requirements, effective September 1, 2024, have moved to 19 TAC §228.81(a)

### EPP COLLABORATION WITH CAMPUS AND CANDIDATE (COMPONENT 4)

Documentation in candidate records such as logs, observation records, mentor agreements, and training materials were 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) & (h). Following are the findings:

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### FINDINGS

1. There is sufficient evidence that the field supervisor consistently collaborates with the campus personnel assigned to support the candidate during the supervised clinical experience. [19 TAC §228.35(g) & (h)]
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) & (h)]
3. There is sufficient evidence that 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) & (h)]

### CORRECTIVE ACTION REQUIRED

None

### CERTIFICATION (COMPONENT 8)

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]  
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), & §230.37(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, & §230.37]
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, §230.37, §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:

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### FINDINGS

1. Candidates were consistently identified as enrolled in the area in which one or more certificates were issued. [19 TAC §229.3]
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 on 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:
  - provides flexibility in the ways information is presented, students respond or demonstrate knowledge and skills, and students are engaged;
  - reduces barriers in instruction;
  - provides appropriate accommodations, supports, and challenges; and
  - maintains high achievement expectations for all students, including students with disabilities and students of limited English proficiency. [19 TAC §228.10(a)(1)(J) and §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) and §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 not sufficient evidence that field supervisors consistently capture candidate demonstration of competency in the use of proactive instructional planning techniques that:

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- provide flexibility in the ways information is presented, students respond or demonstrate knowledge and skills, and students are engaged;
- reduce barriers in instruction;
- provide appropriate accommodations, supports, and challenges; and
- 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); and §228.35(e)(8)]

Evidence: In the Principal and Superintendent programs there were no levels of proficiency or educational practices observed on the observation instruments completed by the field supervisor in four out of five Principal records and three out of five Superintendent records reviewed.

5. In the supervised clinical experience, there is insufficient evidence that field supervisors consistently capture candidate demonstration of competency in the use of evidence-based inclusive instructional 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); and §228.35(e)(8)]

Evidence: In the Principal and Superintendent programs there were no levels of proficiency or educational practices observed on the observation instruments completed by the field supervisor in four out of five Principal records and three out of five Superintendent records reviewed.

### CORRECTIVE ACTION REQUIRED

#### 1. 19 TAC §228.10(a)(1)(J)

The EPP must update the field supervision process for non-teacher programs and the observation instruments used by field supervisors to formally observe candidates in practicums so that candidate proficiency in the use of proactive instructional planning techniques and the use of evidence-based inclusive practices for all students, including students with disabilities, is captured. Retain the evidence in each candidate's record per the records retention requirement in 19 TAC §228.40.

### RECOMMENDATIONS

- Improve data collection for program evaluation to ensure that the EPP intentionally obtains results from candidates, various programs within EPPs (teacher, principal, site supervisors/cooperating teachers, superintendent), campus principals, districts, and EPP staff that train candidates. Share the findings with the Advisory Committee members.
- As you are updating your FBE process, consider updating your FBE log so it more clearly captures active engagement and observation instead of just observation.
- Make policies for accepting prior coursework from military and non-military candidates, more easily accessible for candidates and applicants to find on the EPP website or other locations where anyone can access the information.
- 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

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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 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 in all programs.
- Review all certificate areas that the EPP no longer plans to support and request, in writing, for TEA to remove them from inventory.
- Notify the assigned specialist at TEA promptly when the EPP has staff changes in the roles of Legal Authority, Primary Point of Contact, 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, 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, clinical teaching, internship, 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 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.

### SUMMARY

Evidence of Corrective Action must be received at TEA by 5:00 pm on August 5, 2024.

**I, the legal authority for the Concordia University EPP, have reviewed the contents of the Report and agree that all required corrections will be complete by August 5, 2024.**

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Signature of Legal Authority

Date

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Printed Name of Legal Authority

Date