

# 2024–2025 Continuing Approval Review Report

## Harris County Department of Education

### INTRODUCTION

Texas Education Agency (TEA) Education Specialists Rebecca Bunting and Jennifer Gonzalez and Director Lorrie Ayers conducted a five-year Continuing Approval Review of the Harris County Department of Education educator preparation program (EPP) on January 7-10, 2025. Per 19 Texas Administrative Code (TAC) §228.13(a), "an educator preparation program (EPP) ...shall be reviewed at least once every five years...". James Colbert, Superintendent, was identified as the program's Legal Authority. Dr. Andrea Segraves, Director of the Center for Educator Success, was the primary contact for the EPP and the review process. The Harris County Department of Education EPP was approved by the State Board for Educator Certification (SBEC) on December 10, 2004. On June 28, 2024, the EPP was notified of the review. At that time, the EPP was rated Accredited-Warning with a risk level that was Stage 1 (high). At the time of the review, the EPP was rated Accredited-Warning. The EPP reported eighteen finishers for the 2022-2023 reporting year and seven finishers for 2023-2024.

At the time of the review, the Harris County Department of Education EPP was approved to prepare and recommend candidates for certification in the Teacher, Principal, and Superintendent classes in the alternative certification (ALT) route.

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 an "Onsite Review" format where TEA and EPP staff worked collaboratively on-site at the EPP.

The scope of this review included:

- 1) verifying compliance with requirements for EPPs as applicable to the certification classes and 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. The EPP submitted a Status Report and related program documents to TEA on December 17, 2024. Additional EPP documents, including records for five candidates from the Teacher and Principal class, were reviewed at the EPP site. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. The Superintendent program was not reviewed because the EPP submitted a written request to TEA to close the program.

"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.**

"Advisement" was provided to EPP staff regarding important new information and reminders.

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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.

Following are the findings of the review.

### GOVERNANCE

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; and
  - is composed of a variety of collaborators, including representation from at least three of these areas: 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; and
  - 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 published an exit policy that is reviewed & signed by each candidate at admission. [19 TAC §228.20(h)] [Effective September 1, 2024: 19 TAC §228.31(b)]  
Evidence: The EPP had evidence of an exit policy located on the EPP website and in the Teacher and Principal handbooks that are provided to candidates at the EPP’s orientation, but the exit policies in the handbooks did not match the exit policy posted on the website. Three out of five teacher records reviewed contained a signed exit policy from the teacher candidate handbook.
3. 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: The teacher records reviewed were missing documentation to support field-based experience hours completed. The EPP no longer had access to some candidate records that were needed for the review from the 2021-2022 school year.

### CORRECTIVE ACTION REQUIRED

The EPP must correct the deficiencies identified by May 12, 2025:

1. **19 TAC §228.31(b) Exit Policy:** The EPP must update and implement an exit policy that includes the current TAC requirements effective 9/1/2024 and ensure candidates review and sign it upon admission. Retain evidence in the candidate's record per the records retention requirement.
2. **19 TAC §228.31(i) & §228.13(h) Records Retention:** The EPP must 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. The process must also

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include the retention of EPP records (e.g., evidence of mentor teacher and field supervisor qualifications, pre-post conference notes).

### REQUIRED NOTIFICATIONS

Candidate records, the EPP website, and candidate handbooks were reviewed for evidence the EPP has communicated the required notifications to applicants and candidates. Following are the findings:

### FINDINGS

1. The EPP has not informed applicants to all programs about the required criminal history background checks for clinical teaching and for employment as an educator in Texas. [19 TAC §227.1(b)]  
Evidence: The EPP website contained incomplete information about the background check requirement. The information was included on the Teacher program website but not the Principal program website.
2. The EPP has notified applicants and candidates in all programs 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 and completion requirements of each program in the EPP. [19 TAC §227.1(c)(1) & (2)]
4. The EPP has not informed applicants in all 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)]  
Evidence: While the EPP website did include the effect of supply and demand forces on the educator workforce in Texas, the EPP performance over time only referred to the EPP's test pass rates and did not include any other EPP performance over time information for the past five years.
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

The EPP must publish the required information in a location transparent to applicants and/or candidates (as applicable to the requirement in the rule) for all programs within the EPP by May 12, 2025.

1. **19 TAC §227.1(b) Notifications: Required Background Check:** The EPP must update the EPP website, applications, and other locations transparently accessible by applicants to notify them about the required criminal history background checks:
  - for clinical teaching and
  - for employment as an educator in Texas.
2. **19 TAC §227.1(c)(3)(A) & (B) w/ TEC §21.044(g) Notifications: EPP and Program Information:** The EPP must update the EPP website to inform applicants in writing about the EPP performance over time for the past five years.

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### 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. Following are the findings:

#### FINDINGS

1. There is sufficient evidence the EPP verifies that candidates hold the required degree at admission. [19 TAC §227.10(a)(1) & (2)]
2. There is sufficient evidence the EPP requires applicants to all programs to meet the minimum 2.50 GPA requirement. [19 TAC §227.10(a)(3)]
3. There is sufficient evidence the Teacher program requires applicants to meet the requirement for subject-specific semester credit hours or have a passing score on the appropriate pre-admission content test (TX PACT) at admission. [19 TAC §227.10(a)(4)]
4. Candidates consistently demonstrate English language proficiency prior to admission. [19 TAC §227.10(a)(7)]
5. Candidates do not consistently participate in one or more admission screen(s) to evaluate the candidate's appropriateness for the certificate sought. There is insufficient evidence that screens are scored using a rubric with a set of coherent criteria. [19 TAC §227.10(a)(8), §241.5(c), and/or §242.5(c)]  
Evidence: No Principal candidate records reviewed contained evidence that candidates received two screens. Screening tools were not consistent across candidates. Not all the screens in candidate records had rubrics.
6. 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

The EPP must implement processes to appropriately qualify applicants for admission into each program offered as required in 19 TAC Chapters 227, 239, and 241 by May 12, 2025.

1. **19 TAC §227.10(a)(8) Admission Requirements: Screen:** The EPP must update the formal admission process for the Principal program to include two screening instruments evaluated with rubrics that include descriptions of levels of performance quality based on a coherent set of criteria and with cut scores identified. Retain evidence in the candidate's record per the records retention requirement.

### FORMAL & CONTINGENCY ADMISSION

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

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### FINDINGS

1. There is insufficient 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)]  
Evidence: Four out of five Principal candidates had a letter of admission with an effective start date that the candidate did not sign.
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) & §227.15(c)]
3. Candidates are not provided coursework, training, or test approval prior to admission. [19 TAC §227.17(f) & §227.15(e)]

### CORRECTIVE ACTION REQUIRED

The EPP must implement the formal and/or contingency admission process(es) for all classes as required by May 12, 2025.

1. **19 TAC §227.17 Formal Admission:** The EPP must update the formal admission process for the Principal program to include collecting and retaining a signed and dated acceptance of the offer of admission by the candidate. Retain evidence in the candidate's record per the records retention requirement.

### STANDARDS-BASED COURSEWORK

Syllabi, performance assessments, standards alignment charts, conversations with EPP staff members, 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 Core Subjects w/STR EC-6 as a focus area representative of overall quality of standards-based coursework offered by the EPP. Following are the findings:

### FINDINGS

1. There is insufficient 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(b) & (c)] [Effective September 1, 2024: 19 TAC §228.37(a) & §228.53(b)]  
Evidence: After viewing alignment charts, scope and sequence documents, and candidate records, there was insufficient evidence to verify the number of hours of coursework and training that Teacher candidates are required to complete.
2. The following required standards were identified in coursework:
  - The educator standards for the certificate(s) sought; and
  - The Texas Essential Knowledge and Skills (TEKS); and
  - English Language Proficiency Standards (Teacher programs); and
  - Pre-Kindergarten Guidelines (Teacher programs, as applicable); and
  - The skills and competencies captured in the Texas teacher standards (Teacher programs); and

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- The Texas administrator standards (Principal programs). [19 TAC §228.30(e)] [Effective September 1, 2024: 19 TAC §228.57(f)]
  - 3. There is sufficient evidence 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 sufficient evidence the coursework provided to candidates is performance-based providing opportunities for candidates to practice skills. [19 TAC §228.35(a)(2) & §228.40(a)] [Effective September 1, 2024: 19 TAC §228.57(b)]
  - 5. Coursework and training are offered partially online for the teacher program. The online training does not meet the criteria set for accreditation, quality assurance, and/or compliance with at least one of the following:
    - Accreditation or Certification by the Distance Education accrediting Commission; or
    - Program Design and Teaching Support Certification by Quality Matters; or
    - 19 TAC Part 1, Chapter 4, Subchapter P (relating to approval of Distance Education Courses and Programs for Public Institutions); or
    - 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)]
- Evidence: The EPP provided an invoice from Quality Matters that shows payment for the CPE Texas Educators Subscription Renewal, which is a renewal of candidacy but does not mean the programs have gone through the process to secure the Quality Matters certification.

### 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 Chapter(s) 228 and 241 by May 12, 2025.

1. **19 TAC §228.37(a), §228.45(a), §228.47, §228.49, §228.51, and §228.53(b) Required Coursework Hours:** The EPP must update coursework provided to Teacher candidates so they receive at least 300 clock hours of standards-based instruction, including the 50 hours of early field-based experiences (FBE).
2. **19 TAC §228.33(d) Coursework & Training: Quality of Online Coursework:** The EPP must secure quality accreditation for all online programs.

### REQUIRED CURRICULUM TOPICS

Syllabi, transcripts, certificates of completion in candidate records, conversations with EPP staff members, 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. 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)]

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2. There is sufficient evidence that training in educating students with Dyslexia is consistently provided to candidates in both programs and is provided by the approved provider. [19 TAC §228.30(c)(2)] [Effective September 1, 2024: 19 TAC §228.57(c)(2)]
3. There is sufficient evidence that training in Mental Health, Substance Abuse, & Youth Suicide is consistently provided to candidates in both programs 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 in both programs 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 insufficient evidence that candidates in both programs 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)]

Evidence: There is no evidence in course syllabi that candidates in either the Teacher or Principal programs are receiving the required instruction. Conversations with EPP staff indicated that this has not been provided to Teacher candidates. Conversations with EPP staff indicated that the required instruction was provided to Principal candidates, but the TEA review team did not find evidence of that in course syllabi or candidate records.
6. The Digital Literacy evaluation, and the related prescribed curriculum, has not been provided to candidates in either program. [19 TAC §228.30(c)(8)] [Effective September 1, 2024: 19 TAC §228.57(c)(8)]

Evidence: There was no evidence of a digital literacy evaluation in the candidate records reviewed in the Teacher and Principal programs. Conversations with EPP staff indicate that the Digital Literacy evaluation is not being provided to candidates.
7. There is sufficient evidence the EPP provides to candidates in both programs, 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 the EPP integrates inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies throughout coursework for candidates in all programs 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)]
9. There is insufficient evidence that Teacher candidates receive reading instruction, including instruction that improves students' content-area literacy. [19 TAC §228.30(d)(2)] [Effective September 1, 2024: 19 TAC §228.57(d)(2)]

Evidence: There was no evidence of reading instruction provided to candidates seeking secondary certificate categories in the Teacher program.



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### CORRECTIVE ACTION REQUIRED

The EPP must revise coursework to include the required instruction as needed to meet requirements in 19 TAC §228.57 by May 12, 2025.

1. **19 TAC §228.57(c)(8) / TEC 21.001 Required Instruction – Digital Literacy/Virtual Learning:** The EPP must update coursework provided to all candidates within the EPP to include instruction in digital learning, virtual learning, and digital literacy including the digital literacy evaluation and prescribed learning curriculum. Retain evidence in the candidate's record per the records retention requirement.
2. **19 TAC §228.57(d)(2) Required Instruction – Reading Instruction:** The EPP must update coursework for secondary Teacher candidates to include reading instruction, including instruction that improves students' content area literacy.

### PRE-SERVICE REQUIREMENTS FOR TEACHER CANDIDATES

Syllabi, benchmark documents, transcripts, and FBE logs in candidates' 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 pre-service coursework and training before beginning the supervised clinical experience. [19 TAC §228.35(b)(2)] [Effective September 1, 2024: 19 TAC §228.41 & §228.43(b)]
2. There is sufficient evidence that the structure of pre-service coursework and training allows candidates to complete at least 150 hours of coursework and to demonstrate proficiency in the identified pedagogical areas. [19 TAC §228.35(b)(1) & §228.35(e)(1)] [Effective September 1, 2024: 19 TAC §228.41(2)(A)-(L)]
3. There is insufficient evidence that candidates consistently complete the required number of hours of FBE during pre-service coursework and training. [19 TAC §228.35(b)(1) & §228.35(e)(1)] [Effective September 1, 2024: 19 TAC §228.41(1) & §228.43(c)-(d)]  
Evidence: Three out of five teacher candidate records reviewed contained evidence that fewer than the required number of FBE hours were completed prior to the supervised clinical experience.
4. FBE assignments and activities do not meet requirements for completing FBE. [19 TAC §228.35(e)(1)] [Effective September 1, 2024: 19 TAC §228.43(c) & (d)]  
Evidence: All teacher candidate records reviewed lacked evidence of active engagement with students for the required number of hours. Candidate records indicate that candidates mostly observe the certified teacher, but interacted with students if the opportunity arose. The EPP also had some candidates go into the community and observe various aspects of the community that are relevant to the education of a child, but this is not an approved setting.



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### 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 §228.41, §228.43, and §228.55(a) & (c) by May 12, 2025.

- 1. 19 TAC §228.41(1) & (2)(A)-(L) Pre-Service Requirements: Coursework and 19 TAC §228.43(c) & (d) Pre-Service Requirements: FBE:** The EPP must update the structure of the preservice requirements so that candidates complete the first 150 hours of prescribed curriculum, including assessments that reflect candidate proficiency in the pedagogical requirements, and complete the 50 hours of early field-based experiences (FBE), that meet all requirements in the related TAC currently in effect, before beginning the internship.

### SUPERVISED CLINICAL EXPERIENCE

Syllabi and documentation in candidate records including 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) - (h).

### FINDINGS

Five of five Teacher candidates completed an internship:

1. There is sufficient evidence that candidates consistently complete an internship assignment that is at least one full school year in duration with at least an average of four hours per day in the subject area of the certificate sought and is completed on an approved campus. [19 TAC §228.35(e)(2)(B) & §228.35(e)(5)-(7) & (9)] [Effective September 1, 2024: 19 TAC §228.63 & §228.73(b) & (e)]
2. There is sufficient evidence the EPP ensures the Intern or Probationary certificate is valid during the internship. [19 TAC §228.35(e)(2)(B)(iv)] [Effective September 1, 2024: 19 TAC §228.73(a)]
3. There is insufficient evidence that the candidates completing an internship are provided support throughout the internship experience that includes:
  - A qualified and trained mentor teacher.
  - A qualified and trained field supervisor.
  - The required number and duration of formal and informal observations provided by the field supervisor.
  - Feedback and coaching from the field supervisor based on pre- and post-observation conferences and educational practices observed. [19 TAC §228.2(26), §228.35(f), §228.35(g)] [Effective September 1, 2024: 19 TAC §228.97, §228.101, §228.105, §228.109]

Evidence: Each of the Teacher candidate records reviewed contained evidence that candidates are provided a mentor, but there was no evidence the EPP verified mentor qualifications or provided mentor training. Four out of five candidate records reviewed did not contain evidence of informal observations and ongoing coaching.

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4. There is insufficient evidence that candidate proficiency in implementation of the standards for the certificate sought is consistently captured during the candidate's internship. [19 TAC §228.35(e)(2)(B)(ix)] [Effective September 1, 2024: 19 TAC §228.73(j)]  
Evidence: Four out of five Teacher candidate records reviewed did not have proficiency captured on observation instruments or documents.
5. The EPP has not integrated inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies in the internship experience. [19 TAC §228.10(a)(1)(J)] [Effective September 1, 2024: 19 TAC §228.11(a)(1)(J)]  
Evidence: There was no evidence on observation rubrics and documents that candidate proficiency in this requirement was observed or documented for Teacher candidate records reviewed.
6. There is insufficient evidence that candidates are consistently provided recommendations of a successful clinical experience by the campus supervisor and the field supervisor. [19 TAC §228.35(e)(2)(B)(ix)] [Effective September 1, 2024: 19 TAC §228.73(j)]  
Evidence: Written recommendations of a successful internship by the campus supervisor and field supervisor were missing from the five Teacher candidate records reviewed.

Five of five candidates in non-teacher programs completed a practicum:

7. 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]
8. 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 qualified and 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 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: All Principal candidate records reviewed contained evidence that candidates are provided a site supervisor and a field supervisor. However, there was no evidence that The EPP verified their qualifications or provided the required training. There was no evidence that field supervisors provided informal observations or ongoing coaching to Principal candidates. Additionally, the Principal candidate records contained a document with a checkmark and date as evidence that pre- and post-observation conferences took place; however, there were no notes to document feedback to the candidate.

9. There is insufficient evidence that candidate proficiency in 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 used to formally observe the five candidates in practicum was not designed to capture proficiency. Instead, the field supervisor checked that standards were observed during the observations without identifying the level of proficiency of the candidate.

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10. 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: There was no evidence on observation instruments that candidate proficiency in this requirement was observed or documented for Principal candidate records reviewed.
11. 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: Written recommendations of a successful practicum by the site supervisor and field supervisor were not found in the records for the five candidates reviewed.

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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 May 12, 2025.

1. **19 TAC §228.97, §228.101, §228.105, §228.109 Clinical Experience: Teacher Internship (Candidate Support):** The EPP must update the structure of the internship process to include:
  - Verifying that mentors meet qualification requirements.
  - Providing training to mentors by the EPP.
  - Informal observations, at least three per semester, which are informed by written feedback provided during post-observation conferences and include observation and feedback on targeted skills.
2. **19 TAC §228.73 Clinical Experience: Teacher Internship (Candidate Proficiency):** The EPP must update the structure of the internship process, including the observation instrument used to evaluate candidate performance in internship, to include:
  - Evidence that candidates have shown proficiency in the standards captured during the internship.
  - Evidence that candidates are provided recommendations of a successful clinical experience by the campus supervisor and the field supervisor.Retain evidence in the candidate's record per the records retention requirement.
3. **19 TAC §228.99, §228.101, §228.117 Clinical Experience: Non-Teacher Practicum (Candidate Support):** The EPP must update the structure of the practicum process to include:
  - verifying that field supervisors meet qualification requirements.
  - documenting training provided to field supervisors **by the EPP**.
  - documenting **TEA- approved** training provided to field supervisors.
  - verifying that site supervisors meet qualification requirements.
  - documenting training provided to site supervisors.
  - documentation of informal observations at required timeframes.
  - notes taken during all pre- and post-conference feedback which includes evidence of competency.Retain evidence of qualifications, training, and field supervisor support in the candidate's records and/or EPP records per the records retention requirement.
4. **19 TAC §228.81 Clinical Experience: Non-Teacher Practicum (Candidate Proficiency):** The EPP must 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.

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- 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.

### CERTIFICATION REQUIREMENTS

Candidate records including 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. There is sufficient evidence that candidates holding Intern or Probationary certificates consistently meet the requirements for the certificate recommended. [19 TAC §230, §230.36, & §230.37]
2. Candidates are consistently recommended for certificates in areas in which they are prepared by, and completed, the EPP. [19 TAC §228.35(e)(2)(B), §230.36, §230.37, §230.11, & §230.13]
3. There is insufficient evidence that the EPP consistently ensures candidates complete all requirements prior to recommendation for the certificate sought. [19 TAC §230, §239, §241, & §242]  
Evidence: Two out of five Principal candidate records reviewed were missing service records, so the TEA could not verify the required years of experience had been met.
4. 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

The EPP must implement processes to verify candidates qualify for certification prior to recommending certificates as required in [19 TAC §230 & §241] by May 12, 2025.

1. **Certification Requirements: Years of Experience TAC §241.20:** The EPP must update the standard certification process to include collecting official service records for Principal candidates. Review records to ensure candidates have completed at least two credible years of teaching experience as a classroom teacher. Retain evidence in the candidate's record per the records retention requirement.

### 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. 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: In one of the five Teacher candidate records reviewed there was a discrepancy between the admission GPA in the records and the data that was reported in ECOS. In another of the five Teacher

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candidate records reviewed there was a discrepancy between the number of subject-specific content hours in the records and the data that was reported in ECOS.

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 accurately represent the related data in candidates' records. [19 TAC §229.3]
4. Observation dates and durations have not been consistently reported in ECOS as detailed on observation documents. [19 TAC §229.3 & §229.4]

Evidence: In two out of five teacher candidate records reviewed there were discrepancies between observation data in documentation and the observation data that was reported in ECOS. One record was missing supporting documents for two reported observations, and in another record, the duration of the observations was not reported inaccurately.

### 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 May 12, 2025.

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

**Accurately:** The EPP must establish a process for reporting data in ECOS that ensures all required data is reported and reported accurately as correlates with EPP and candidate records and 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.
- Make updates to your handbooks (both programs) to ensure the Exit policy aligns with new TAC. (The exit policy must identify a point of dismissal for inactive candidates after no more than two years of inactivity [19 TAC §228.31(b)].) Ensure all locations that display your exit policy reflect the same policy.
- To be truly transparent to applicants, update the application for admission to include all required notifications and then capture a signature of acknowledgement on the application or an initial on each notification.
- Update the code of ethics policy for the teacher program and faculty to match that of the Principal program so that they sign that they have read, understand, and agree to abide by the Educator's Code of Ethics.
- The Physical Education EC-12 (158), Health EC-12 (157), and English Language Arts & Reading 7-12 (231) exams are no longer available effective September 1, 2024. Candidates pursuing certification in these certificate areas must now be approved for the new exams 258, 257, and 331, respectively. To be certified using passing scores on exams 158, 157, or 231, candidates must apply and be recommended for certification by September 1, 2025. Additional information about the transitions of these certification exams is on the [Educator Testing](#) page on the [tea.texas.gov](http://tea.texas.gov) website.
- The Special Education EC-12 and Special Education Supplemental certificates will expire and will be replaced by the Special Education Specialist EC-12 certificate. The certification exams, 161 and 163, respectively, will not be offered after August 31, 2025. Candidates will have until September 1, 2026,

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to be certified in the expiring certificate areas. The new Special Education Specialist EC-12 exam 186 will be available starting September 2, 2025. Be sure to submit the application materials to add the new Special Education Specialist EC-12 certificate and attend one of the required webinars to qualify to add the new certificate.

### RECOMMENDATIONS

- Establish a process to add and/or 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.
- 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, maintain a procedure manual or process documents detailing EPP processes and procedures.
- 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 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.

### CORRECTIVE ACTION COMPLETE

Evidence of Corrective Action, received at TEA on May 12, 2025, has been reviewed by TEA staff and meets requirements for compliance with the Texas Education Code and the Texas Administrative Code.