

2024–2025 Continuing Approval Review Report

Howard Payne University

INTRODUCTION

Texas Education Agency (TEA) Education Specialists Keena Sandlin and Rebecca Bunting conducted a five-year Continuing Approval Review of the Howard Payne University educator preparation program (EPP) on October 29–November 1, 2024. Per 19 Texas Administrative Code (TAC) §228.13(a), “an educator preparation program (EPP) ...shall be reviewed at least once every five years...”. Dr. Michael Rosato, Dean of Education, was identified as the program Legal Authority, and Ms. Susan Sharp, Certification Officer and Backup Legal Authority, was the primary EPP contact for the review process. The Howard Payne University EPP was approved by the State Board for Educator Certification (SBEC) on January 8, 1972. On June 28, 2024, the EPP was notified of the review. At that time, the EPP was rated Accredited-Probation (Year 1) with a risk level that was Stage 1-high. At the time of the review, the EPP was rated Accredited-Probation (Year 1). The EPP reported 30 finishers for the 2022-2023 reporting year and 17 finishers for 2023-2024.

At the time of the review, the Howard Payne University EPP was approved to prepare and recommend candidates for certification in the Teacher class in the undergraduate (U) and post-baccalaureate (PB) routes. The PB program was inactive and was not included in the review.

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 an “On-site 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 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 October 8, 2024. Additional EPP documents, including records for five candidates, 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.

“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.

“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 findings of the review.

GOVERNANCE

Oversight of the EPP and ongoing evaluation of the 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: None of the five records contained evidence of a signed and dated exit policy.
3. The EPP has 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)]

CORRECTIVE ACTION REQUIRED

The EPP must correct the deficiencies identified by March 3, 2025.

1. **19 TAC §228.31(b) Exit Policy:** Update and implement an exit policy that all candidates review and sign upon admission. The exit policy must be published. Retain the signed documents in the candidate's records per the records retention requirement. The exit policy must meet new requirements effective September 1, 2024. It must identify a point of dismissal for inactive candidates after no more than two years of inactivity, or, as a university-based EPP, you may adopt your institution's policy. An inactive candidate is no longer completing coursework, training, and testing requirements with an EPP and is not a completer of the EPP.
 - EPP corrected the item for the current cohort and provided evidence during the review.

REQUIRED NOTIFICATIONS

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

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FINDINGS

1. The EPP has informed applicants 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 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 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 EPP qualifies applicants for admission as required in 19 TAC Chapter 227. 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 meet the minimum 2.50 GPA requirement or meet requirements for the 10% exception to the GPA requirement. [19 TAC §227.10(a)(3)]
3. There is sufficient evidence the EPP 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 consistently participate in one admission screen to evaluate the candidate's appropriateness for the certificate sought. There is sufficient evidence that the screen is scored using a rubric with a set of coherent criteria. [19 TAC §227.10(a)(8)]
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

None

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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. 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 7 calendar days of the admission date identified in the offer letter. [19 TAC §227.17(e)]
3. Candidates have not been provided coursework/training/test approval prior to formal 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 EC-6 Core Subjects with STR as a focus area representative of the overall quality of standards-based coursework offered by the EPP. 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(b) & (c)] [Effective September 1, 2024: 19 TAC §228.37(a) & §228.53(b)]
2. The following required standards were identified in coursework:
 - The educator standards for the certificate(s); and
 - The Texas Essential Knowledge and Skills (TEKS); and
 - English Language Proficiency Standards;
 - Pre-Kindergarten Guidelines; and
 - The skills and competencies captured in the Texas teacher standards.[19 TAC §228.30(e)] [Effective September 1, 2024: 19 TAC §228.57(d)]
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 that 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)]

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CORRECTIVE ACTION REQUIRED

None

REQUIRED CURRICULUM TOPICS

Syllabi, published degree plans, transcripts, certificates of completion in candidate records, and information provided by the EPP in the Status Report were reviewed to verify the EPP provides instruction in the additional curriculum areas required in the Texas Administrative Code and/or Texas Education Code. Following are the findings:

FINDINGS

1. 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 sufficient 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)]
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 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 the EPP provides 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 as required under TEC §21.044(b)(1)-(2). [19 TAC §228.11(a)(1)(J)] [Effective September 1, 2024: 19 TAC §228.11(a)(1)(J)]
9. There is sufficient evidence that 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)]

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CORRECTIVE ACTION REQUIRED

None

PRE-SERVICE REQUIREMENTS FOR TEACHER CANDIDATES

Syllabi, degree plans, benchmark documents 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 sufficient 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)]
4. FBE assignments and activities meet the requirements for completing FBE. [19 TAC §228.35(e)(1)] [Effective September 1, 2024: 19 TAC §228.43(c) & (d)]

CORRECTIVE ACTION REQUIRED

None

SUPERVISED CLINICAL EXPERIENCE

Syllabi, degree plans, and documentation in candidate records, including placement documents, logs, observation records, cooperating teacher 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

Each of the five candidates whose records were reviewed had completed clinical teaching:

1. There is sufficient evidence that the candidates consistently complete a clinical teaching assignment that is at least 70 days in duration and is completed in the subject area of the certificate sought on an approved campus. [19 TAC §228.35(e)(2)(A)-(B) & §228.35(e)(5)-(7) & (9)] [Effective September 1, 2024: 19 TAC §228.63 & §228.67]
2. There is sufficient evidence that the candidates completing clinical teaching are provided support throughout the clinical teaching experience that includes:

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- A qualified and trained cooperating 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(14), §228.35(f), §228.35(g)] [Effective September 1, 2024: 19 TAC §228.93, §228.101, §228.105, §228.107]
3. There is sufficient evidence that candidate proficiency in implementation of the standards for the certificate sought is captured during clinical teaching. [19 TAC §228.35(e)(2)(A)(iii)] [Effective September 1, 2024: 19 TAC §228.67(e)]
 4. The EPP has not integrated inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies in the clinical teaching experience. [19 TAC §228.10(a)(1)(J)] [Effective September 1, 2024: 19 TAC §228.11(a)(1)(J)]
Evidence: Two out of five candidate records did not show that the field supervisor had captured inclusive practices in observation documents throughout the clinical experience.
 5. There is sufficient evidence that candidates are consistently provided recommendations of a successful clinical experience by the cooperating teacher and the field supervisor. [19 TAC §228.35(e)(2)(A)(iii)] [Effective September 1, 2024: 19 TAC §228.67(e)]

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 March 3, 2025.

1. **19 TAC §228.11(a)(1)(J) / TEC §21.0443(b)(1) & (2): Inclusive Practices Throughout Clinical Experience:** Update the clinical experience process to include capturing candidate proficiency in the requirements of the Texas Education Code (TEC), §21.0443(b)(1) and (2).

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]
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)(2)(B), §230.36, §230.37, §230.11, & §230.13]
2. There is sufficient evidence that the EPP consistently ensures candidates complete all requirements prior to recommendation for the certificate sought. [19 TAC §230, §239, §241, & §242]
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)]

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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. 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 admission dates on letters did not correspond with admission dates 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 been consistently reported in ECOS as detailed on observation documents. [19 TAC §229.3 & §229.4]

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 March 3, 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 individuals as needed that reflects expectations for accurately reporting data.

ADVISEMENT

- Update processes to meet the revised requirements in 19 TAC Chapter 228, effective September 1, 2024.
- Consider adding members of the local ESC or members from other IHEs to gain different perspectives.
- Update the website to include additional program completion details that are transparent to all applicants and candidates.
- Revise the FBE and Clinical Experience process to include the required hours for FBE, observation frequency, co-teaching model training, and documentation of proactive instructional strategies to complete the revised requirements in 19 TAC Chapter 228, effective September 1, 2024.
- Revise course syllabi to clarify required instruction in Dyslexia, Mental Health, and Suicide Prevention, adjusting the overall grade percentage and detailing how this instruction is reflected in the final grade.

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- Curriculum update needed. For candidates admitted on or after September 1, 2024, EPPs must provide instruction in Open Education Resources (OER). Candidates admitted before September 1, 2024, have until August 31, 2026, to complete the requirements in the current curriculum under Legacy 228.
 - [Information about House Bill \(1605\) and OER](#) is found on the TEA website.
 - [Instructional Materials](#) related to OER are found on the TEA website.
 - Plan on attending webinars as they become available for EPPs.
- 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 be approved for the new exams 258, 257, and 331, respectively. To be certified using 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 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, 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 attend one of the required webinars to qualify to add the new Special Education Specialist EC-12 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 the 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.

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CORRECTIVE ACTION COMPLETE

Evidence of Corrective Action received at TEA on November 1, 2024, has been reviewed by TEA staff and meets requirements for compliance with the Texas Education Code and/or Texas Administrative Code.