INTRODUCTION

Texas Education Agency (TEA) Education Specialist, Vanessa Alba, conducted a five-year Continuing Approval Review of the iteachTEXAS educator preparation program (EPP) from April 1, 2024, through May 2, 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. Diann Huber, Founder, was identified as the program's Legal Authority and primary EPP contact for the review process. The iteachTEXAS EPP was approved as an EPP on January 10, 2003. At the time of the review, the EPP was rated Accredited The risk level was Stage 3 (low). The EPP reported 1945 finishers for the 2021-2022 reporting year and 1860 finishers for 2022-2023.

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

Per 19 TAC §228.1(c), "all educator preparation programs are subject to the same standards of accountability, as required under Chapter 229 of this title." The TEA administers the TAC required by the Texas legislature for the regulation of all EPPs in the state. (See the complete <u>TAC</u> for details.) The five-year Continuing Approval Review was conducted in a "Desk Review" format where EPP staff submitted requested documents to TEA for review.

The scope of this review included:

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

Information concerning compliance with TAC governing EPPs was collected by a variety of means. A Status Report and related program documents were submitted to TEA on March 18, 2024. Additional EPP documents, including records for ten candidates, were submitted on March 29, 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.



GOVERNANCE (COMPONENTS 1 & 5)

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. [19 TAC §228.20(b)]
- 2. The advisory committee has been consistently informed of their roles and responsibilities. [19 TAC §228.20(b)]
- 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 within the past five years. [19 TAC §228.20(e)]
- 6. The EPP has established a calendar of program activities that allows adequate time for admission, coursework, training, and field-based experience requirements prior to the clinical experience for each program in the EPP. [19 TAC §228.20(g)]
- 7. The EPP has published an exit policy that is reviewed & signed by each candidate at admission. [19 TAC §228.20(h)]
- 8. The EPP has not added new program locations since the last five-year review. [19 TAC §228.10(e)]
- 9. The EPP is approved to offer clinical teaching effective June 30, 2004, per the application material on file with TEA. [19 TAC §228.10(c)]
- 10. The EPP has qualified instructors for each certificate category and class offered. [19 TAC §228.10(d)(1)]
- 11. The EPP has not had a change of ownership. [19 TAC §228.17(a)]
- 12. The EPP has not consistently retained candidate and EPP records per the records retention requirement in [19 TAC §228.40(f) & §228.10(b)(2)]

Evidence: In the Teacher program, the following documents were not retained:

- Evidence of field-based experiences (FBE) while serving as a permanent substitute (service records).
- Mentor qualifications.
- Evidence of reasons for using a non-qualified mentor in the Teacher class.
- Mentor training.
- Statewide field supervisor training.

In the Principal program, the following documents were not retained:

- Site Supervisor qualifications.
- Site supervisor training.
- Statewide field supervisor training.
- Formal observation instruments were not created/retained.



CORRECTIVE ACTION REQUIRED

The EPP must correct the deficiencies identified by 5:00 PM CST on September 6, 2024.

1. 19 TAC §228.40(f) Records Retention

Develop and implement a process for records retention that ensures a) evidence of candidate admission and completion of program requirements; and b) evidence of EPP activity, is retained securely. Retain evidence of the following that was missing during the review:

Teacher Class:

- Evidence of FBE while serving as a substitute (service records).
- Mentor qualifications.
- Evidence of reasons for using a non-qualified mentor.
- Mentor training.
- Statewide field supervisor training.

Principal Class:

- Site Supervisor qualifications.
- Site supervisor training.
- Statewide field supervisor training.
- All formal observation instruments.

Note: Effective 9/1/2024, the EPP must meet the new records retention requirement in 19 TAC §228.31(i).

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 employment as an educator in Texas. [19 TAC §227.1(b)]
- 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)]
- 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 published information about the effects of supply and demand forces on the educator workforce in Texas. [19 TAC §227.1(c)(3)(A)]
- 7. The EPP has published a complaints process that provides a link to the TEA complaints process. [19 TAC §228.70(b)]

CORRECTIVE ACTION REQUIRED

None



FORMAL ADMISSION (COMPONENT 2)

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

- The formal written offer of admission was consistently found in candidates' records. [19 TAC §227.17(b)]
- 2. Applicants were consistently required to accept the offer of admission in writing. [19 TAC §227.17(c)]
- The formal date of admission was consistently included in the written offer of admission. [19 TAC §227.17(d)]
- 4. 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)]
- 5. Candidates were not provided coursework, training, or test approval prior to formal admission. [19 TAC §227.17(f) & §228.40(d)]

CORRECTIVE ACTION REQUIRED

None

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 and 241. Following are the 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 does not consistently use appropriate screening instrument(s) to evaluate each applicant's appropriateness for the certificate sought. [19 TAC §227.10(a)(8) & §241.5(c)] Evidence: In the Principal program, the EPP required only one interview screen with a cut score of 80 to be admitted. All five records reviewed contained evidence of that screen with a score range of 81-93. There was no other screen for Principal candidates.
- 5. The EPP consistently collects all additional requirements for admission and verifies candidates meet all additional requirements for admission. [19 TAC §227.10(b)]
- 6. The EPP has consistently verified English language proficiency. [19 TAC §227.10(a)(7)]
- 7. Principal candidates met the minimum certification, degree, and experience requirements for issuance of a standard certificate prior to admission so there were no deficiency letters expected or found in their records. [19 TAC §227.10(a)(5)]



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 and 241 by 5:00 PM CST on September 6, 2024.

1. 19 TAC §227.10(a)(8) Admission Requirements: Screens

Update admissions processes for the Principal program to require applicants to participate in two or more screening activities to determine if the EPP applicant's knowledge, experience, skills, and aptitude are appropriate for the certification sought. The screen must be scored using an aligned rubric based on a coherent set of criteria. Retain the screens and rubrics completed by the candidate in that candidate's file per the records retention requirement in 19 TAC §228.40(f).

Note: Effective 9/1/2024, the EPP must meet the new records retention requirement in 19 TAC §228.31(i).

STANDARDS-BASED COURSEWORK (COMPONENTS 3 & 4)

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

- 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. [19 TAC §228.30]
- 3. Evidence of performance assessments was found but assessments were not aligned to standards. [19 TAC §228.35(a)(2) & §228.40(a)]
 - Evidence: In the Teacher program, the EPP provided two assessments used to measure candidate proficiency in the Core Subjects w/STR EC-6 certificate area. The first was a Science of Teaching Reading (STR) family reading practice activity promoting reading outside of the classroom and a rubric with a cut score of eight required. The family reading activity was to be used at home and was not STR-focused. It was not an assessment and did not meet requirements. The second assessment was a candidate reflection required in Course 5300. It was based on three aspects: knowledge of students, lesson planning, and analysis of teaching effectiveness. The rubric had levels of proficiency, was aligned to the task, and the cut score was a nine. The Principal program met the requirement with a performance-based assessment from the Principal as Instructional Leader (PIL) certificate transition.
- 4. The EPP provided insufficient evidence that the quality of online coursework has met or is making progress toward meeting criteria set for accreditation, quality assurance, and compliance with program design and teaching support certification. [19 TAC §228.35(a)(6)((A-B))] Evidence: The EPP provided courses 5100 Learning Environments, 5300 Planning for Instruction & Assessment, and 5400 21st Century Instruction certified by a Quality Matters (QM) Master Reviewer as identified in a QM Letter provided for the review. The EPP also provided a Distance Education Accrediting Commission (DEAC) Letter dated June 30, 2023, identifying the following courses as offered online: 5000–The Road to Certification; 5100 I Learning Environments; 5200–Learner Development; 5300– Planning for Instruction and Assessment; 5400 Literacy, 21st Century Instruction, Pedagogical Content Knowledge; 5500–Learner Differences and Adaptations for Students



with Disabilities; and 5600—Diverse Populations, English Learners, Bilingual Learners. The letter stated, "The AQC status does not in any way convey that DEAC accreditation status is granted to any portion of iteachTEXAS' curriculum or coursework. DEAC will list iteachTEXAS on its website as an AQC provider and list the courses that DEAC determined meet AQC requirements. iteachTEXAS may apply to DEAC for additional course reviews by contacting DEAC staff." The Principal program has not been QM or DEAC accredited and no evidence was provided for review.

CORRECTIVE ACTION REQUIRED

The EPP must revise coursework to ensure candidates are provided at least the minimum number of hours of standards-based coursework and assessments to meet requirements in 19 TAC §228.30, §228.35, and §228.40 by 5:00 PM CST on September 6, 2024.

1. 19 TAC §228.40(a) Candidate Assessment

For each certificate the EPP is approved to offer, develop and implement:

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

Retain evidence of all structured assessments in the candidates' records per the records retention requirement in 19 TAC §228.40.

Note: Effective 9/1/2024, the EPP must meet the requirements regarding performance tasks in 19 TAC §228.33(b) and the new records retention requirement in 19 TAC §228.31(i).

19 TAC §228.35(a)(6) Coursework & Training: Quality of Online Coursework
 Seek online accreditation through the Distance Education Accrediting Commission (DEAC) or Quality (QM) Matters for the Principal Program.

Note: Effective 9/1/2024, the EPP must meet the new requirements for online coursework in 19 TAC §228.33(d)(1-4).

REQUIRED CURRICULUM TOPICS (COMPONENT 3)

Syllabi, 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:

- 1. Training in Ethics was found in coursework provided to candidates. [19 TAC §228.30(c)(1)]
- 2. Training in educating students with Dyslexia was found in coursework provided to candidates and was provided by the approved provider. [19 TAC §228.30(c)(2)]
- 3. Training in Mental Health, Substance Abuse, & Youth Suicide was consistently provided to candidates by an approved provider. [19 TAC §228.30(c)(3)]
- 4. Instruction in the skills educators are required to possess, the responsibilities educators are required to accept, and the high expectations for students in Texas were apparent in the coursework provided to candidates. [19 TAC §228.30(c)(4)]
- 5. The importance of building strong classroom management skills was identified in the coursework provided to candidates. [19 TAC §228.30(c)(5)]
- 6. Information about the framework for teacher and principal evaluation in Texas was not provided to candidates. [19 TAC §228.30(c)(6)]



Evidence: In the Teacher program, the TCTX 5700 You're Hired course only addresses the teacher framework and not the principal framework. In the Principal program, the PAIL 1000 Introduction to Online Coursework course addresses both the teacher & principal framework and the Field Experience course addresses the principal framework.

- 7. Training in appropriate relationships, boundaries, and communications with students was consistently provided to candidates. [19 TAC §228.30(c)(7)]
- 8. Instruction in digital learning, virtual instruction, and virtual learning were not consistently provided to candidates and the Digital Literacy evaluation and the related prescribed curriculum were not provided to candidates.[19 TAC §228.30(c)(8)]
 - Evidence: In the Teacher and Principal programs, the EPP provided two courses TCTX 5400 Literacy, 21st Century Instruction, and Principal 1001 Critical Issues in Education. The EPP provided a Digital Skills Self-Assessment as an optional activity. and a prescribed curriculum and resources to address deficiencies were not found in the syllabi provided for review.
- Instruction regarding students with disabilities, the use of proactive instructional planning techniques, and evidence-based inclusive instructional practices were provided to candidates. [19 TAC §228.30(c)(9)]

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 5:00 PM CST on September 6, 2024.

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

Update and implement coursework so that all Teacher candidates receive instruction in the framework for Teacher and Principal evaluation. Revise the syllabus for the updated course to include that candidates will receive instruction in the framework for both teacher and principal evaluation. Retain evidence per records retention requirements in 19 TAC §228.40.

Note: Effective 9/1/2024, the EPP must meet the new training requirements in 19 TAC §228.57(c)(6) and must meet the new records retention requirement in 19 TAC §228.31(i).

2. 19 TAC §228.30(c)(9) Digital Literacy

Update and implement coursework so that all candidates seeking Teacher and Principal certification receive instruction in digital learning, virtual instruction, and virtual learning as defined in TEC, §21.001, including a digital literacy evaluation followed by a prescribed digital learning curriculum. Instruction must:

- be aligned with the latest version of the <u>International Society for Technology in Education's (ISTE)</u> standards as appears on the ISTE website;
- provide effective, evidence-based strategies to determine a person's degree of digital literacy; and
- include resources to address any deficiencies identified by the digital literacy evaluation.

Revise the syllabus for the course to include that candidates will receive instruction that is aligned with the latest version of the <u>International Society for Technology in Education's (ISTE) standards</u> and includes resources to address any deficiencies identified by the digital literacy evaluation. Retain evidence per records retention requirements in 19 TAC §228.40.

Note: Effective 9/1/2024, the EPP must meet the new requirements for instruction in digital learning in 19 TAC §228.57(c)(8)(A-D) and must meet the new records retention requirement in 19 TAC §228.31(i).



PRE-SERVICE REQUIREMENTS FOR TEACHER CANDIDATES (COMPONENT 4)

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

FINDINGS

- 1. There is insufficient evidence that candidates consistently complete the field-based experience (FBE) hours as required. [19 TAC §228.35(b)(1) & §228.35(e)(1)] Evidence: While Teacher candidates were required to complete FBE, only one in five completed the requirement in a variety of settings. The remaining four candidates completed the requirement in one setting and records for one out of four candidates did not contain evidence of authorized signatures to verify the requirement was met.
- 2. FBE assignments and activities inconsistently meet the requirements for completing FBE. [19 TAC §228.35(e)(1)(A)-(C)]
 Evidence: Records for three out of five Teacher candidates held no evidence of interactive FBE. The fourth candidate completed 30 hours of FBE while serving as a long-term substitute when only 15 hours were allowed. The fifth candidate completed 34 hours of FBE while serving as a substitute but had no employment history as such.
- 3. Candidates consistently complete pre-service coursework and training as required prior to beginning the supervised clinical experience. [19 TAC §228.35(b)(2)]
- The structure of pre-service coursework and training allowed the EPP to consistently capture candidate proficiency in 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 5:00 PM CST on September 6, 2024.

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

Update and implement a field-based experience (FBE) process that meets or exceeds all requirements for completing FBE activities including FBE that are completed in a variety of settings and at least meet the minimum required hours of interactive activity. The process must include that the EPP will not give FBE credit for more than the required clock-hours of electronic FBE. The process must include that the mentor/cooperating teacher signs & dates that the FBE was completed as required. In the event that the EPP has late-hires, update and implement a process to track and follow up with candidates who are late-hires that ensures and documents the candidates complete all pre-service requirements within the first 90 days of the assignment. Retain FBE logs, reflections, and benchmark documents or other evidence that reflects pre-service requirements are completed in candidates' records per the records retention requirement in 19 TAC §228.40.

Note: Effective 9/1/2024, the EPP must meet the new FBE requirements in 19 TAC §228.43(a-d) and must meet the new records retention requirement in 19 TAC §228.31(i).

2. 19 TAC §228.35(e)(1)(C) FBE: Long-Term Substitute Hours

Update and implement a field-based experience (FBE) process that meets or exceeds all requirements for completing FBE activities including FBE that are completed while the candidate serves as a long-



term substitute. The process must include that the EPP will retain evidence of the candidate's service record that identifies that the candidate served as a substitute and meets the 30 consecutive days and the two years before the date that the candidate was admitted to the EPP requirement. Retain the documentation that the EPP collected from the candidate as evidence that the candidate completed FBE while serving as a long-term substitute at an accredited public or private school accredited by the TEA and approved for the purpose.

Note: Effective 9/1/2024, the EPP must meet the new FBE requirements regarding serving as a long-term substitute in 19 TAC §228.43(e) and must meet the new records retention requirement in 19 TAC §228.31(i).

SUPERVISED CLINICAL EXPERIENCE (COMPONENT 4)

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

- 1. There is insufficient evidence that the EPP has developed and implemented specific criteria and procedures that allow for prior coursework for military and non-military candidates because the EPP only provided a military policy for one certificate.
 - Evidence: The EPP provided Word documents for TEA that stated the following: "Trades and Industrial Education: We review military work experience when evaluating for Trades and Industrial Education. We review appropriate military training related to the work experience. We review military years of service and credentials when evaluating for JROTC. Review previous time in the classroom to apply to Field-based Experiences."
- 2. There is insufficient evidence that candidates consistently complete the required duration for the supervised clinical experience. [19 TAC §228.35(e)(8)] Evidence: In the Principal program, candidates complete the practicum during Course 2000. Three out of five (60%) candidates completed 160 or more clock-hours and the other two candidates completed 155 clock-hours as documented on the administrative functions documents provided for review.
- 3. Candidates were consistently placed in an approved supervised clinical experience assignment. [19 TAC §228.35(e)(2)(B) & §228.35(e)(8)(A)-(D)]
- 4. 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)(B)(ix) & §228.35(e)(8)]
- 5. Candidates were consistently assigned appropriate qualified campus personnel to support them during the supervised clinical experience. [19 TAC §228.35(f)]
- 6. Qualifications of campus personnel supporting candidates in the supervised clinical experience were not consistently verified by the EPP. [19 TAC §228.2(26) & (33)]

 Evidence: In the Teacher program, the EPP provided valid teacher certificates for the mentor teachers assigned to the five candidates selected for review. One out of five mentor teachers was assigned to an Agriculture, Food, and Natural Resources 6-12 candidate but was certified as a



Superintendent, Principal, and English Language Arts & Reading 8-12 educator. No evidence for selecting the mentor teacher who was not qualified was provided. The EPP staff provided documentation that they send a qualifications request to the districts where candidates are employed and do not always get them back. No other qualifications were provided for the mentor teachers assigned to the five candidates reviewed. In the Principal program, the qualifications were self-verified by site supervisors assigned to two out of five candidates selected for review. For the other three out of five, the qualifications were verified by campus administrators. The EPP advised TEA that site supervisor qualifications are verified by the district & iteachTEXAS and that the site supervisor is the campus Principal with current Principal certification. The district assigns the site supervisors and iteachTEXAS verifies through the district's website and Field Supervisor's conversation with the campus principal.

- 7. Training was not consistently provided as required to campus personnel supporting candidates in the supervised clinical experience. [19 TAC §228.2(26) & (33)]

 Evidence: In the Teacher program, a letter from the EPP was provided to each mentor teacher but no evidence of training was provided. In the Principal program, the EPP provided district verification that site supervisors assigned to three out of five candidates were trained as required. The remainder self-verified training.
- 8. 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)]
- 9. There was sufficient evidence that field supervisors supporting candidates in the clinical experience met qualification requirements. [19 TAC §228.2(18)]
- 10. Training was not consistently provided as required to field supervisors supporting candidates in the clinical experience. [19 TAC §228.35(g) & (h)] Evidence: In the Teacher program, the field supervisors assigned to the five candidates selected for review self-verified local training, and the EPP provided no evidence of state-wide field supervisor training. In the Principal program, the EPP provided evidence that all field supervisors assigned to five candidates had local training but did not provide evidence of state-wide field supervisor training.
- 11. There was sufficient evidence that field supervisors conducted the first observation within the required time frame. [19 TAC §228.35(g) & (h)]
- 12. Candidates did not receive the required number and duration of formal observations during the clinical experience. [19 TAC §228.35(g) & (h)]

 Evidence: In the Teacher program, in one record reviewed for a candidate on an intern certificate there was evidence that each formal observation was 45 minutes in duration during the internship year. In the remaining four records reviewed for candidates on an intern certificate, there was no duration on each observation instrument for TEA to make a determination about duration. In the Principal program, the EPP provided one summary document with dates and no observation data for four out of five records reviewed and two summary documents with dates and no observation data. All totaled 135 minutes or more in duration but because what was provided for each candidate was not an observation instrument for each formal observation, TEA could not verify that the requirements were met.
- 13. There was insufficient 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)]



Evidence: All Teacher and Principal candidate files contained records that contained evidence of a pre-and post-observation conference at each formal observation. The EPP collected the evidence in its "Salesforce" online platform and provided it for review. In the Teacher program, the EPP provided evidence of a POP cycle for all observations for each candidate reviewed. In the Principal program, the EPP provided only one summary document for four candidates and two summary documents for the fifth candidate. There was no evidence of an actual formal observation on any of the documents provided.

- 14. 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)(B)(ix), & §228.35(e)(8)(E)]

 Evidence: For the five teacher candidates reviewed, the EPP provided observation documents reflecting educational practices observed for each formal observation. In the Principal program, the EPP provided a summary document of all observations for all five candidates reviewed. The EPP also provided one summary document with dates listed but no observation documents for five candidates and two summary documents with dates listed but no observation documents for the fifth candidate. There was no evidence of educational practices observed on any of the summary documents provided.
- 15. There is sufficient evidence the field supervisor consistently provides ongoing coaching and support to candidates completing the supervised clinical experience. [19 TAC §228.35(g) & (h)]

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 as required in 19 TAC §228.35(e) – (h) by 5:00 PM CST on September 6, 2024.

- 1. 19 TAC §228.35(a)(5)(A)-(B) Coursework & Training: Prior Coursework Policy-Military & -Non-Military Develop and implement specific criteria and procedures for the EPP military and non-military policies regarding accepting prior coursework. Publish the EPP's Military and Non-Military policies. If the published policies are in the handbook that is posted on the website, additionally update the website to include the EPP's policy for each.
 - Note: Effective 9/1/2024, the EPP must meet the new requirements relating to substitution of applicable experience and training in 19 TAC §228.35(1-2).
- 2. 19 TAC §228.35(e)(8)Skills Implementation: Non-Teacher Practicum

 Update and implement the 160 clock-hour practicum process to clearly identify that each Principal candidate must complete a practicum that is 160 clock-hours. Within the process, ensure that there is a mechanism for the field supervisor to verify that the candidate has met the requirements. Update the local field supervisor training to include norming all field supervisors on the 160 clock-hour practicum documentation on the practicum log so they know what to look for. Retain the documentation that the EPP collected from the candidate as evidence that the candidate completed the 160 clock-hour practicum. Retain evidence per records retention requirements in 19 TAC §228.40.

 Note: Effective 9/1/2024, the EPP must meet the new practicum requirements in 19 TAC §228.61(c) and must meet the new records retention requirement in 19 TAC §228.31(i).
- 3. 19 TAC §228.2 (26) and §228.2(33) Campus Supervision: Qualifications of Mentors & Site Supervisors
 Update the clinical experience processes to include verifying, prior to the start of each candidate's
 clinical experience, that the mentor teacher or site supervisor, as applicable, assigned to support each



candidate meets qualification requirements. The updated process must include how the EPP will select mentors in the Teacher class who do not meet requirements and the specific documentation, which includes the reason for selecting an individual that does not meet the criteria. Retain evidence of the mentors and site supervisor qualifications in the candidates' or EPP records per the records retention requirement in 19 TAC §228.40. Evidence of qualifications includes:

- · Service record and teaching certificate; and
- Evidence of accomplishment as an educator that includes:
 - o Evaluations that include evidence of student learning; or
 - Campus or district reports that include evidence of student learning; or
 - Letters of recommendation that include evidence of student learning.

Or

A form, signed & dated by the campus or district administrator, attesting that the mentors and site supervisors meet requirements for certification, experience, and accomplishment as an educator. Note: Effective 9/1/2024, the EPP must meet the mentor and site supervisor qualifications and responsibilities requirements in 19 TAC §228.97(a)(1-5) and 19 TAC §228.99(a)(1-5) and must meet the new records retention requirement in 19 TAC §228.31(i).

4. 19 TAC §228.35(f); §228.2(26), & §228.2(33) Campus Supervision: Training Mentors and Site Supervisors

Update the clinical experience processes to include providing training to mentors and site supervisors within three weeks of the start of the assigned candidate's clinical experience. The training that is provided to mentors and site supervisors must include training in coaching and mentoring. If the EPP allows the training to be provided by a school, district, or regional education service center, the EPP must retain evidence, such as the campus, district, or service center's dated training certificate, of that training. Retain evidence of the training in the candidates' or EPP records per the records retention requirement in 19 TAC §228.40.

Note: Effective 9/1/2024, the EPP must meet the requirements for cooperating teacher, mentor, and site supervisor training in 19 TAC §228.91(e) and must meet the new records retention requirement in 19 TAC §228.31(i).

5. 19 TAC §228.35(g) & §228.35(h) Field Supervision: Field Supervisor Training
Update the clinical experience processes to include 1) EPP-specific training provided to field

supervisors; and 2) TEA-approved training provided to field supervisors. Retain evidence of the training in the candidates' or EPP records per the records retention requirement in 19 TAC §228.40.

Note: Effective 9/1/2024, the EPP must meet the requirements for field supervisor training in 19 TAC §228.101(b)(1) and the new records retention requirement in 19 TAC §228.31(i).

6. 19 TAC §228.35(h) Field Supervision: Practicum-Formal Observation Duration

Revise the field supervisor observation instrument for the Principal program so that it captures the start and end time of each formal observation, as well as the format (face-to-face or virtual), and the duration of each observation. Update the local field supervisor training to include norming all field supervisors on the use of the revised observation instrument for each formal observation. Retain evidence per records retention requirements in 19 TAC §228.40.

Note: Effective 9/1/2024, the EPP must meet new the formal observation requirements regarding teacher internships in 19 TAC §228.117(b)(1-4)) and the new records retention requirement in 19 TAC §228.31(i).

7. 19 TAC §228.35(h) Field Supervision: Educational Practices Observed & Written Feedback Principal Program



Revise the field supervisor observation instrument so that it captures the educational practices observed and includes written feedback for each formal observation. Update the local field supervisor training to include norming all field supervisors on the use of the revised observation instrument for each formal observation. Retain evidence per records retention requirements in 19 TAC §228.40.

Note: Effective 9/1/2024, the EPP must meet the requirements for non-teacher educational practices observed in 19 TAC §228.117(b)(3)(B) and the new records retention requirement in 19 TAC §228.31(i).

EPP COLLABORATION WITH CAMPUS AND CANDIDATE (COMPONENT 4)

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

FINDINGS

- There is sufficient evidence the field supervisor consistently collaborates with the campus personnel assigned to support the candidate during the supervised clinical experience. [19 TAC §228.35(g) & (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 insufficient evidence the field supervisor provides feedback from the observation to the campus personnel assigned to support the candidate during the clinical experience. [19 TAC §228.35(h)]
 Evidence: For the Principal program, the EPP only provided a summary document with dates of
 - observations for four candidates and two summary documents with dates for a fifth candidate. Because observation instruments were not provided for Principal candidates and no other documents were provided to reflect feedback provided to the site supervisor, it could not be determined if the site supervisor received written feedback at each formal observation.

CORRECTIVE ACTION REQUIRED

The EPP must revise the structure and requirements in the supervised clinical experiences to ensure the EPP staff collaborates with the campus personnel and candidate as needed to support the candidate's success in the supervised clinical experience as required in 19 TAC §228.35(h) by 5:00 PM CST on September 6, 2024.

1. 19 TAC §228.35(h) Field Supervision: Written Feedback Principal Program
Revise the field supervisor observation instrument so that it includes written feedback to both the candidate and site supervisor for each formal observation. Update the local field supervisor training to include norming all field supervisors on the use of the revised observation instrument for each formal observation to include written feedback provided to both the candidate and site supervisor. Retain evidence per records retention requirements in 19 TAC §228.40.

Note: Effective 9/1/2024, the EPP must meet the requirements for non-teacher educational practices observed in 19 TAC §228.117(b)(3)(B) and the new records retention requirement in 19 TAC §228.31(i).



CERTIFICATION (COMPONENT 8)

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

FINDINGS

- 1. Candidates who were recommended for certification consistently met the degree required for the certificate sought. [19 TAC §230.11, §230.36(b)(1), & §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]
- 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:

FINDINGS

- Candidates were consistently identified as enrolled in the area in which certificates were issued. [19 TAC §229.3]
- Admission data were reported accurately according to information in candidate transcripts and admission letters. [19 TAC §229.3]
- 3. Observation dates and durations were reported as detailed in observation documents. [19 TAC §229.3 & §229.4]
- 4. There was supporting documentation for the observations reported. [19 TAC §229.3 & §229.4]

CORRECTIVE ACTION REQUIRED

None

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

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



FINDINGS

- 1. The EPP incorporates proactive instructional planning techniques throughout coursework and across content areas using a framework that:
 - o provides flexibility in the ways information is presented, students respond or demonstrate knowledge and skills, and students are engaged;
 - reduces barriers in instruction;
 - o provides appropriate accommodations, supports, and challenges; and
 - o maintains high achievement expectations for all students, including students with disabilities and students of limited English proficiency. [19 TAC §228.10(a)(1)(J) 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 sufficient evidence that field supervisors consistently capture candidate demonstration of competency in the use of proactive instructional planning techniques that:
 - o provide flexibility in the ways information is presented, students respond or demonstrate knowledge and skills, and students are engaged;
 - o reduce barriers in instruction;
 - o provide appropriate accommodations, supports, and challenges; and
 - 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)]
- 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); and §228.35(e)(8)] Evidence: On the observation documents provided for review in the Principal program, there was no evidence of educational practices observed or competency in the use of evidence-based inclusive instructional practices.

CORRECTIVE ACTION REQUIRED

The EPP must update coursework and requirements for the supervised clinical experience to meet the requirements in 19 TAC §228.30(c)(9) and TEC 21.044 (a-1) by 5:00 CST on September 6, 2024.

1. 19 TAC §228.35(e)(8) Skills Implementation: Successful Practicum

Update the clinical experience processes, including revisions to the Principal observation instrument used by field supervisors to evaluate candidates during the clinical experience, so that candidate proficiency in Component 10 and Texas Education Code (TEC), §21.0443(b)(1) and (2) requirements are captured during the clinical experience. Train and norm field supervisors on the requirement/responsibility. Retain evidence per records retention requirements in 19 TAC §228.40.



Note: Effective 9/1/2024, the EPP must meet the requirements regarding instruction regarding students with disabilities and field supervise candidates in the requirement in 19 TAC 228.57(c)(9) and the new records retention requirement in 19 TAC §228.31(i).

RECOMMENDATIONS

- Consider creating documents in Adobe so the information is locked and not editable by anyone once signed.
- Remove references to INTASC standards in all syllabi for Texas certification to ensure that candidates know, understand, and can implement Texas standards required for certification in Texas.
- Review course material for information that is not relevant to the Core Subjects with STR EC-6 certificate or standards required for the certificate in the TCTX 5400 syllabus.
- Remember to update the total number of hours required for Principal program completion in all places that it is published to ensure there is no confusion for anyone seeking Principal certification. If the required hours are 200, then that is what should be published.
- Remember to update the total number of hours required for Teacher program completion in all places
 that it is published to ensure there is no confusion for anyone seeking Teacher certification in Texas. If
 the required hours are 300 or if the required hours are 315, that is what should be published.
- Remove the TEA logo from all Educator Code of Ethics documents used by the EPP.
- Continue to strengthen coursework provided to all candidates to ensure that instructional planning techniques are consistently addressed throughout the coursework for candidates and across content areas and inclusive practices for all students, including students with disabilities, throughout coursework and clinical experience for candidates is addressed.
- The Physical Education EC-12 (158), Health EC-12 (157), and English Language Arts & Reading 7-12 (231) exams will be available until September 1, 2024, and then will be replaced by new exams 258, 257, and 331, respectively. Candidates must apply and be recommended for certification by September 1, 2025, to use exams 158, 157, and 231 for certification. Additional information about the transitions of these certification exams is on the Educator Testing page on the tea.texas.gov website.
- Establish a process to add clinical experience records and observation records into ECOS as they occur throughout the year.
- Develop and implement more performance assessments 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 the Texas Administrative Code (TAC) (ex. Field supervisor, cooperating teacher, mentor, site supervisor 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.

Evidence of Corrective Action must be received at TEA by 5:00 pm on September 6, 2024.	
Signature of Legal Authority	Date
Printed Name of Legal Authority	Date

