

# 2024–2025 Continuing Approval Review Report

## Texas Southern University

### INTRODUCTION

Texas Education Agency (TEA) Education Specialists Keena Sandlin, Becca Bunting, and Director Lorrie Ayers conducted a five-year Continuing Approval Review of the Texas Southern University educator preparation program (EPP) on October 8-11, 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. Jafus Cavil, Interim Dean and Executive Director of the College of Education Doctoral Center, was identified as the program's Legal Authority. Dr. Ingrid Haynes, Department Chairperson, was the primary EPP contact for the review process. The Texas Southern University EPP was approved by the State Board for Educator Certification (SBEC) on September 12, 1970. 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 of Stage 1 (high). At the time of the review, the EPP was rated Accredited-Probation (Year 1). The EPP reported 26 finishers for the 2022-2023 reporting year and 31 finishers for 2023-2024.

At the time of the review, Texas Southern University EPP was approved to prepare and recommend candidates for certification in the Teacher, Principal, Superintendent, and School Counselor classes in the undergraduate (U) and post-baccalaureate (PB) routes.

The TEA administers the TAC required by the Texas legislature for the regulation of all EPPs in the state. (See the complete [TAC](#) for details.) The five-year Continuing Approval Review was conducted in 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 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 September 23, 2024. Additional EPP documents, including records for five candidates from each certificate class and route, 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.

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

The following is the area where the EPP or one of its programs exceeded TAC requirements.

### FINDING: CLINICAL TEACHING OBSERVATIONS

The EPP exceeds requirements in Legacy 19 TAC §228.35(g)(8) to align with Revised 19 TAC §228.107(b) by completing four or more observations for candidates in clinical teaching instead of the three required.

#### EVIDENCE

1. All five teacher candidate records included at least four observations, with the majority containing five observations.

Following are the additional 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 not 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 3 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)]

Evidence: Although meeting records revealed that the EPP met at least once per year and discussed program design and policy, there was no evidence that these meetings occurred after 2019. EPP attendance records did not reflect a diversity in membership. This is based on member signatures without representation and roles identified on sign-in sheets.

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: While the EPP posted an exit policy on its website, there was no evidence that applicants and candidates signed and dated a document acknowledging their understanding of this policy. The records lacking signed exit policies included those from Teacher, Principal, Superintendent, and School Counselor candidates.

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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: Several documents, including admission records, clinical experience files, and verification of supervisor qualifications and training expected by the TEA for review, were not provided.

### CORRECTIVE ACTION REQUIRED

The EPP must correct the deficiencies identified by February 11, 2025.

1. **19 TAC §228.25(a)-(c) Governance: Advisory Committee:** Hold at least annual advisory committee meetings to discuss the design, delivery, evaluation, and major policy decisions of each of the programs within the EPP. Ensure diversity in membership by including members representative of at least three of the identified groups, including 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. Retain evidence of advisory committee activity, including minutes and member sign-in sheets, in EPP records per the records retention requirement.
2. **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 9/1/2019 and 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.
3. **19 TAC §228.31(i) & §228.13(h) Records Retention:** Update and implement a records retention process to retain records relating to candidate admission and completion of preparation requirements for at least five years from the date the candidate leaves the program or finishes the program. The records retention method must ensure information security. The process must also include retention of EPP records (e.g., evidence of advisory committee activity, training materials, and evidence of training provided to field supervisors, site supervisors, and cooperating teachers etc.).

### REQUIRED NOTIFICATIONS

Candidate records, the EPP website, orientation materials, and candidate handbooks were reviewed for evidence that 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 employment as an educator in Texas. [19 TAC §227.1(b)]  
Evidence: The notification regarding the required criminal history background checks was present in the candidate handbook; however, it was not clearly communicated to applicants in a transparent location. There was no evidence of this notification on the EPPs website.
2. The EPP has not 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)]

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Evidence: The notification about the right to a Preliminary Criminal History Evaluation was clearly stated in the EPP application. However, there was not enough evidence to show that applicants were informed about the potential impact on their certification. Specifically, this missing evidence pertains to all applicants in the Principal and Superintendent programs, as well as three out of five Teacher candidates whose records were reviewed.

3. The EPP has not informed applicants about the admission requirements and completion requirements of each program in the EPP. [19 TAC §227.1(c)(1) & (2)]

Evidence: While the EPP Checklist document and Admissions Handbook included information on admission and completion requirements, they were not clearly communicated to applicants for each program, along with specific program requirements.

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: Information about the EPP's performance over time and the effect of supply and demand was found on the EPP's website; however, the data provided was outdated.

5. The EPP has not 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)]

Evidence: Although the complaint policy was accessible online and at the physical location, it was outdated, featuring dates prior to the amended guidelines from May 20, 2017. Furthermore, the online policy link had a misspelling, resulting in misleading access.

### 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 February 11, 2025.

1. **19 TAC §227.1(b) Notifications: Required Background Check:** Update the EPP website, applications, or another location that is transparently accessible by applicants and candidates in all programs within the EPP to reflect the required criminal history background check for clinical teaching and employment as an educator. The information must be available so that applicants and candidates in all programs understand the information and requirements that apply to them.
2. **19 TAC §227.1(d)(1)-(3) Notifications: Preliminary Criminal History Evaluation:** Update the EPP website, applications, or another location that is transparently accessible by applicants and candidates in all programs within the EPP, notifying them, in writing, of the potential impact of criminal history on certification and their right to request a Preliminary Criminal History Evaluation from TEA. The information must be available so that applicants and candidates in all programs understand the information and requirements that apply to them.
3. **19 TAC §227.1(c)(1) & (2) Notifications: EPP and Program Requirements:** Update the EPP website, applications, or another location transparently accessible by applicants in all programs within the EPP to be notified of the program admission and completion requirements. The information must be available so that applicants understand the information and requirements that apply to them.
4. **19 TAC §227.1(c)(3)(A) & (B) w/ TEC §21.044(g) Notifications: EPP and Program Information:** Update the EPP website, applications, or another location transparently accessible by applicants in all programs within the EPP to notify readers of program performance over time for the past 5 years and the effect of supply and demand on the educator workforce in Texas. The information must be

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available so that applicants to all programs understand the information and requirements that apply to them.

5. **19 TAC §228.123(a)-(d)] Published Complaints Process:** Update the EPP website so that the complaints process is transparently accessible to applicants and candidates in all programs within the EPP. The published process must contain a link to the TEA complaints process.

### ADMISSION REQUIREMENTS

Candidate records, including applications, transcripts, and screening rubrics, were reviewed to verify that the programs within the EPP qualify applicants for admission as required in 19 TAC Chapters 227, 239, 241, and 242. Following are the findings:

#### FINDINGS

1. There is insufficient evidence the EPP verifies that candidates hold the required degree at admission. [19 TAC §227.10(a)(1) & (2)]  
Evidence: All five records from School Counselors lacked official transcripts, which meant there was no evidence that the program verified a conferred degree.
2. There is insufficient evidence the EPP requires applicants to all programs to meet the minimum 2.50 GPA requirement or meet requirements for the 10% exception to the GPA requirement. [19 TAC §227.10(a)(3)]  
Evidence: All five records from School Counselors lacked official transcripts, which meant there was no evidence that the program verified a minimum 2.50 GPA.
3. There is sufficient evidence the Teacher programs require 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 do not consistently demonstrate English language proficiency prior to admission. [19 TAC §227.10(a)(7)]  
Evidence: All five records from School Counselors lacked official transcripts or submitted TOEFL scores, which meant there was no evidence that the program verified a demonstration of English Language Proficiency.
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 §242.5(c)]  
Evidence: A screening device and the scoring rubric were not found for all candidates in the Teacher program. In the School Counselor program, only one out of five candidate records included the screening device and the rubric. Additionally, the required two screening devices and scoring rubrics for the Principal and Superintendent programs were absent from all candidate records.
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)]

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### 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, 241, and 242 by February 11, 2025.

1. **19 TAC §227.10(a)(1) & (2) Admission Requirements: Degree:** Update admissions processes to collect transcripts from all applicants to verify the degree conferred before admission. Retain the documents in the candidate's records per the records retention requirement.
2. **19 TAC §227.10(a)(3)(A) Admission Requirements: GPA:** Update admissions processes to collect transcripts from all applicants to verify admission GPA meets requirements. Retain the documents in the candidate's records per the records retention requirement.
3. **19 TAC §227.10(a)(7) Admission Requirements: English Language Proficiency:** For one candidate with TEA ID from the School Counselor program, provide admission documents that must include a transcript reflecting the candidate met English Language Proficiency requirements as shown in U.S degree or TOEFL scores.
4. **19 TAC §227.10(a)(8) Admission Requirements: Screen:** For one candidate with TEA ID from the Teacher and School Counselor programs, provide the completed screening and the rubric scored by the EPP staff. For one candidate with TEAID from the Principal and Superintendent programs, provide two completed screenings and the rubrics scored by the EPP staff.

### FORMAL ADMISSION

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

### 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: Although there was evidence that the EPP has a process in place to provide written offers of admission and acceptance, sending the offers and collecting the acceptance signatures for all applicants was inconsistent across all programs. All candidate records from the Principal, Superintendent, and School Counselor records were missing the written offer along with the applicant's acceptance. Two out of five Teacher records contained the written offer but failed to obtain the applicant acceptance indicator.
2. The EPP inconsistently 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)]  
Evidence: All records from Principal and Superintendent programs were not created in ECOS within seven calendar days. Two out of five School Counselor records were not made in ECOS within seven calendar days.
3. Candidates have not been provided coursework/training/test approval prior to formal admission. [19 TAC §227.17(f)]



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### CORRECTIVE ACTION REQUIRED

The EPP must implement the formal admission process for all classes as required by February 11, 2025.

1. **19 TAC §227.17(b)-(d) Written and Accepted Formal Admission:** Update the formal admission process to include a written offer letter that the candidate accepts in writing. The formal date of admission must be embedded in the written offer.
2. **19 TAC §227.17(e) Formal Admission Entered Within 7 Calendar Days:** Update the formal admission process to include data submission entered in ECOS within seven calendar days of the formal admission date embedded in the offer letter.

### 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 that the EPP provides the required standards-based coursework. Evidence was reviewed for the Core Subjects EC-6 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:
  - English Language Proficiency Standards (Teacher programs); and
  - Pre-Kindergarten Guidelines (Teacher programs, as applicable); and
  - The Texas administrator standards (Principal programs). [19 TAC §228.30(e)] [Effective September 1, 2024: 19 TAC §228.57(f)]
3. The following required standards were not identified in coursework:
  - The educator standards for the certificate(s) sought; and
  - The Texas Essential Knowledge and Skills (TEKS); and
  - The skills and competencies captured in the Texas teacher standards (Teacher programs).Evidence: Coursework and training provided to candidates in the teacher standards were not consistently found in all syllabi and PBA/rubrics submitted for evidence. Core Subjects EC-6 PE and Health, Art and Music, Language Arts and Math, Science and Social Studies, and Theatre Arts alignment charts were not provided. Because of this, there was not enough evidence to confidently determine that coursework and training in the educator standards found in 19 TAC §228.57(d)(4) / 19 TAC §149.1001 were consistently implemented.
4. 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)]
5. 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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6. Coursework and training are offered partially or fully online for one or more programs. The online training meets the criteria set for accreditation with 19 TAC Part 1, Chapter 4, Subchapter Q (relating to approval of off-campus and self-supporting courses and programs for public institutions).

### 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, 239, 241, and 242 by February 11, 2025.

1. **19 TAC §228.57 Standards-based Curriculum:** Review and revise the curriculum where needed to ensure all standards required for the certificate are taught.

### 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 that 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 that candidates receive the required training in the Educators' Code of Ethics and appropriate relationships, boundaries, and communications between educators and students. [19 TAC §228.30(c)(1) & (7)] [Effective September 1, 2024: 19 TAC §228.57(c)(1) & (7)]
2. There is insufficient evidence that training in educating students with Dyslexia is consistently provided to candidates in all programs and is provided by the approved provider. [19 TAC §228.30(c)(2)] [Effective September 1, 2024: 19 TAC §228.57(c)(2)]  
Evidence: There was enough evidence to indicate that the TEA-approved provider, TEA Learn, is used for Dyslexia training. However, the completion certificates were missing from all candidates' records in the Principal, Superintendent, and School Counselor programs. Additionally, three out of the five candidates' records from the Teacher program were also missing their certificates.
3. There is insufficient evidence that training in Mental Health, Substance Abuse, & Youth Suicide is consistently provided to candidates in all programs and is provided by an approved provider. [19 TAC §228.30(c)(3)] [Effective September 1, 2024: 19 TAC §228.57(c)(3)]  
Evidence: There was enough evidence to indicate that the TEA-approved providers are used for training in Mental Health, Substance Abuse, & Youth Suicide. However, the completion certificates were missing from all candidates' records in the Principal, Superintendent, and School Counselor programs. Additionally, three out of the five candidates' records from the Teacher program were also missing their certificates.
4. There is insufficient evidence that candidates in all 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)]



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Evidence: Evidence was reviewed for Core Subjects EC-6 with STR as the basis for curriculum compliance in the other certificate areas offered. The teacher evaluation framework was present in the coursework syllabi; however, the principal evaluation framework was absent from the coursework documents and syllabi.

5. There is insufficient evidence that candidates in all 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: The evidence was reviewed using course syllabi and degree plan documents. The program stated that digital literacy instruction is included in Course Numbers 210 and 340; however, there is no evidence that these courses are required for the Non-Teacher programs.

6. The Digital Literacy evaluation and the related prescribed curriculum have not been provided to candidates in all programs. [19 TAC §228.30(c)(8)] [Effective September 1, 2024: 19 TAC §228.57(c)(8)]

Evidence: The evidence was reviewed using course syllabi and degree plan documents. The program stated that digital literacy evaluation and prescribed curriculum are included in Course Numbers 210 and 340; however, there is no evidence these courses are required for the Non-Teacher programs.

7. There is insufficient evidence that the EPP provides to candidates in all 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)]

Evidence: Evidence was reviewed for Core Subjects EC-6 with STR as the basis for curriculum compliance in the other certificate areas offered. This was found in the syllabus for SPED 302; however, it was not found in the observation instruments for any of the certification classes reviewed. Candidates did not have the opportunity to show competence in the use of proactive planning techniques and evidence-based inclusive instructional practices, even in the key assignments (PBAs) in the syllabus.

8. There is insufficient evidence that the EPP integrates inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies throughout coursework for candidates 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)]

Evidence: Instruction on inclusive practices was present in the coursework syllabi. However, after conversations with program staff, none of the Teacher candidates had the opportunity to show competence in using proactive planning techniques and evidence-based inclusive instructional practices, even in the key assignments (PBAs) in the syllabus.

9. There is sufficient 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)]

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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 February 11, 2025.

1. **19 TAC §228.57(c)(2) / TEC §21.044(b) Required Instruction: Dyslexia:** Require candidates in all programs to complete instruction in Dyslexia from the TEA-approved provider, TEALearn. Retain evidence in the candidate's record per the records retention requirement.

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2. **19 TAC §228.57(c)(3) / TEC §21.044(c-1) Required Instruction: Mental Health:** Require candidates in all programs to complete instruction in mental health, substance abuse, and youth suicide. Use an approved provider, or the university may provide the training if offered in a course in a degree plan. Retain evidence in the candidate's record per the records retention requirement.
3. **19 TAC §228.57(c)(4)-(6) Required Instruction: Evaluation Frameworks:** Update coursework provided to candidates in all programs to include instruction in the framework for teacher and principal evaluation.
4. **19 TAC §228.57(c)(8) / TEC 21.001 Required Instruction: Digital Literacy:** Update coursework provided to candidates in all non-teacher programs within the EPP to include digital learning, virtual learning, and digital literacy instruction.
5. **19 TAC §228.57(c)(8) / TEC 21.001 Required Instruction: Digital Literacy Evaluation:** Update coursework provided to candidates in all non-teacher programs within the EPP to include the digital literacy evaluation and prescribed learning curriculum.
6. **19 TAC §228.57(c)(9) / TEC §21.044(a-1)(1)-(3) Required Instruction: Instruction for Students with Disabilities:** Update coursework provided to candidates in all classes to meet the requirements in [TEC §21.0443\(b\)\(1-2\)](#).
7. **19 TAC §228.57(c)(9) / TEC §21.044(a-1)(1)-(3) Required Instruction: Demonstration of Competency for Students with Disabilities:** Update coursework provided to candidates in all classes so that candidates meet the requirements in [TEC §21.044\(a-1\)\(1\)-\(3\)](#).

### PRE-SERVICE REQUIREMENTS FOR TEACHER CANDIDATES

Syllabi, degree plans, benchmark documents, candidates' records, and published information were reviewed for evidence that 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: While course syllabi include FBE during pre-service, there is a lack of evidence regarding the number of FBE hours completed in the records of all Teacher candidates.
4. FBE assignments and activities do not meet the requirements for completing FBE. [19 TAC §228.35(e)(1)] [Effective September 1, 2024: 19 TAC §228.43(c) & (d)]  
Evidence: Course syllabi include FBE during pre-service training, but there was insufficient evidence that the FBE assignments and activities were completed in actual school settings and that all Teacher candidates met the minimum requirement of interactive hours.

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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 February 11, 2025.

1. **19 TAC §228.41(1) & (2)(A)-(L) Pre-Service Requirements: FBE:** Revise the FBE requirements and process to ensure candidates complete at least the required number of hours, including the required hours of active engagement, and that meet all other requirements for FBE. Retain the documents in the candidate's records per the records retention requirement.

### SUPERVISED CLINICAL EXPERIENCE

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

### FINDINGS

Five out of five Teacher candidates completed clinical teaching:

1. There is insufficient evidence that the candidates consistently complete a clinical teaching assignment that is at least 70 days (490 hours) 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]  
Evidence: No evidence was found in the candidate records regarding the duration of Clinical Teaching.
2. There is insufficient evidence that the candidates completing clinical teaching are provided support throughout the clinical teaching experience that includes:
  - **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]Evidence: None of the Teacher candidate records contained evidence of training for Cooperating Teachers. Additionally, the three Field Supervisors assigned to the five candidates lacked documentation of EPP and TEA-approved supervisor training. Two out of five Teacher candidate records did not include evidence of the Cooperating Teacher's accomplishments, and all five of the candidate records lacked proof that the EPP verified the qualifications of the Field Supervisor.
3. There is sufficient evidence that candidate proficiency in the 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)]

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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: All Teacher records included observation documents that lacked evidence of integrating inclusive practices during Clinical Teaching.
5. There is insufficient 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)]  
Evidence: None of the Teacher candidates' records included a cooperating teacher and Field Supervisor recommendation for standard certification.

15 out of 15 candidates in Non-Teacher programs completed a practicum:

6. There is insufficient 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]  
Evidence: Out of five Superintendent candidate records, three were missing practicum documentation needed to verify the duration and assignment setting. Additionally, two of the five records showed a practicum duration of less than 160 hours. No practicum documents were found in the School Counselor records.
7. There is insufficient evidence that the candidates completing a practicum are provided support throughout the experience that includes:
  - **A qualified and trained site supervisor.**
  - **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(33), §228.35(f), & §228.35(h)] [Effective September 1, 2024: 19 TAC §228.99, §228.101, §228.117]  
Evidence: None of the records for the Principal, Superintendent, and School Counselor candidates included proof of qualifications and training for the Site Supervisor and Field Supervisor positions. Additionally, the records for the Principal, Superintendent, and School Counselor candidates did not contain evidence of a pre-and post-conference for each formal observation. Evidence of informal observations was not found in records for Principal, School Counselor, or Superintendent candidates.
8. There is insufficient evidence that candidate proficiency in the implementation of the standards for the certificate sought is consistently captured during the practicum. [19 TAC §228.35(e)(8)] [Effective September 1, 2024: 19 TAC §228.81(a)]  
Evidence: The observation documents provided in two out of five School Counselor records lacked evidence of candidate proficiency in the standards. No observation documents were provided for the Principal and Superintendent programs.
9. 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)]

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Evidence: The observation documents provided in two out of five School Counselor records lacked evidence of integrating inclusive practices during the practicum experience. No observation documents were provided for the Principal and Superintendent programs.

10. 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: None of the Non-Teacher candidate records contained recommendations from their Site Supervisor and Field Supervisor.

### 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 February 11, 2025.

1. **19 TAC §228.63 & §228.67 Clinical Experience: Clinical Teaching (Structure):** Revise the Clinical Teaching requirements and process to ensure candidates complete at least 490 hours, including the subject area, approved site, and co-teaching practice. Retain the documents in the candidate's records per the records retention requirement.
2. **19 TAC §228.93, §228.101, §228.105, §228.107 Clinical Experience: Clinical Teaching (Candidate Support) Supervision Qualifications and Training:** Update the clinical teaching structure and processes to include:
  - verifying that cooperating teachers and field supervisors meet qualification requirements and have completed the required training; and
  - ensuring field supervisors conduct the required formal and informal observations and conduct pre- and post-conferences for each formal observation.Retain the documents in the candidate's records per the records retention requirement.
3. **19 TAC §228.11(a)(1)(J) Clinical Experience: Inclusive Practices During Clinical Teaching:** Revise the Clinical Teaching structure and processes to include recording integration of inclusive practices during informal and formal observations.
4. **19 TAC §228.81(e) Clinical Experience: Clinical Teaching (Candidate Proficiency) Recommendations:** Update the clinical teaching structure and processes to include obtaining a standard certification recommendation from the cooperating teacher and the field supervisor. Retain the documents in the candidate's record per the records retention requirement.
5. **19 TAC §228.63 & §228.81 Clinical Experience: Non-Teacher Practicum (Structure):** Update the Practicum structure and processes to include documenting candidates completing at least 160 hours of standards-based activity at an approved site.
6. **19 TAC §228.99, §228.101, §228.117 Clinical Experience: Non-Teacher Practicum (Candidate Support) Supervision Qualifications and Training:** Update the Practicum structure and process to include verifying that site supervisors and field supervisors meet qualification requirements and have completed the required training and ensuring field supervisors conducted the required formal and informal observations and conduct pre- and post-conferences for each formal observation.
7. **19 TAC §228.81 Clinical Experience: Non-Teacher Practicum (Candidate Proficiency):** Revise the Practicum structure and processes to include recording candidates' proficiency during informal and formal observations.

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8. **19 TAC §228.11(a)(1)(J) Non-Teacher Practicum (Candidate Proficiency) Inclusive Practices during Practicum:** Revise the Practicum structure and processes to include recording integration of inclusive practices during informal and formal observations.
9. **19 TAC §228.81(e) Non-Teacher Practicum (Candidate Proficiency) Recommendations:** Update the Practicum structure and processes to include obtaining a standard certification recommendation from the site supervisor and the field supervisor. Retain the documents in the candidate’s record per the records retention requirement.

### 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)]

#### 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: Data on admissions, including dates on admission letters and transcript information such as GPA and subject hours, showed inconsistencies across all candidate records reviewed in both the Teacher and Non-Teacher programs.
2. Candidates are consistently identified as enrolled in the area in which certificates are issued. [19 TAC §229.3]
3. Clinical experience records reported in ECOS do not accurately represent the related data in candidates’ records. [19 TAC §229.3]



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Evidence: The records from the Superintendent program did not include any documentation of clinical experiences.

4. Observation dates and durations have not been consistently reported in ECOS as detailed on observation documents. [19 TAC §229.3 & §229.4]

Evidence: All of the Principal and Superintendent program records lacked observation durations and documentation for verification. Additionally, incorrect data based on the observation documents was reported for two out of five records in both the Teacher and School Counselor programs.

### 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 February 11, 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 that:
  - all required data, including admission and transcripts, is reported, and reported accurately as correlates with EPP and candidate records; and
  - all required information is accurately collected and retained, including clinical experience documentation and observation documents.

This process should align with EPP and candidate records. Provide training to individuals as necessary to clarify expectations for accurate data reporting.

### ADVISEMENT

- Update processes to meet the revised requirements in 19 TAC Chapter 228, effective September 1, 2024.
- Update the EPP website for transparency for all programs offered.
- Curriculum update needed. Candidates admitted on or after September 1, 2024, EPPs must have instruction in Open Education Resources (OER) Candidates admitted before September 1, 2024 have until August 31, 2026, to complete requirements in the current curriculum in Legacy 228.
  - Information about [House Bill \(HB\) 1605](#) and [OER](#) is found on the TEA website.
  - Instructional materials related to OER can be found on the [TEA website](#).
  - Plan on attending webinars as they become available for EPPs.
- Ensure intended updates on Co-Teaching, as stated in the Clinical Practice Handbook, are implemented to meet the new requirement effective September 1, 2024.
- Update the field supervision process and training to conduct and collect documentation for all required informal observations to meet the new requirement effective September 1, 2024.
- 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,

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to be certified in the expiring certificate areas. The new Special Education Specialist EC-6 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.

### CORRECTIVE ACTION COMPLETE

Evidence of Corrective Action received at TEA on February 10, 2025, has been reviewed by TEA staff and meets requirements for compliance with Texas Education Code and/or Texas Administrative Code.