

2023–2024 Continuing Approval Review Report

Texas Woman's University

INTRODUCTION

Texas Education Agency (TEA) Education Specialists, Vanessa Alba and Irene Chacon conducted a five-year Continuing Approval Review of the Texas Woman’s University (TWU) educator preparation program (EPP) from January 8, 2024, through February 8, 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. Lisa Huffman, Dean, was identified as the program Legal Authority, and Dr. Gina Anderson, Associate Dean and Backup Legal Authority was identified as the primary EPP contact for the review process. TWU was approved as an EPP on January 6, 1969. At the time of the review, the EPP was rated Accredited The risk level was Stage 3 (low). The EPP reported 304 finishers for the 2021-2022 reporting year and 284 finishers for 2022-2023.

At the time of the review, the TWU EPP was approved to certify candidates in the following classes: Teacher, Principal, Superintendent, School Counselor, Educational Diagnostician, Reading Specialist, and School Librarian. The EPP is approved to prepare and recommend candidates for certification in the undergraduate (U), post-baccalaureate (PB), and alternative certification (ALT) routes.

Per 19 TAC §228.1(c), “all educator preparation programs are subject to the same standards of accountability, as required under Chapter 229 of this title.” The TEA administers 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 a “Desk Review” format where EPP staff submitted requested documents to TEA for review.

The scope of this review included:

- 1) verifying compliance with requirements for EPPs as applicable to all certification classes in all certification routes offered by the EPP using a standardized rubric aligned to the Texas Administrative Code (TAC) and Texas Education Code (TEC); 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 December 1, 2023. Additional EPP documents, including records for 64 candidates, were submitted on December 29, 2023. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence.

“Findings” reflect EPP compliance with the TAC requirement(s) in a component. Determinations of non-compliance are supported by “Evidence” collected during the review process. Where a “Corrective Action” is required, the program should consult the TAC and/or TEC, complete the corrective action to bring the EPP into compliance, and submit the required evidence of corrective action to TEA by the identified Due Date.

Corrective actions that are planned but have not been implemented must include an implementation date.

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

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

FINDING: PROFESSIONAL CONDUCT

The EPP exceeds requirements in 19 TAC §228.50 Ethical Candidates.

EVIDENCE

1. In addition to requiring the [Professional Dispositions](#) Policy to be signed for acknowledging, understanding, and abiding by the Educator Code of Ethics at admission, all candidates in all certification classes are evaluated during coursework to ensure they are upholding ethical standards.

The following are additional findings from the review:

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 a clinical teaching or internship 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. [19 TAC §228.10(e)]
9. The EPP has not allowed clinical teaching without prior TEA approval to offer clinical teaching. [19 TAC §228.10(c)]
10. The EPP has qualified instructors for all certificate categories and classes offered. [19 TAC §228.10(d)(1)]
11. 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)]

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Evidence: In the PB Reading Specialist program, the EPP retained all records in two of the five (40%) files reviewed. The other two files were missing the candidates' required trainings and the last file reviewed was for a candidate that had not started. In the ACP Program, the EPP did not consistently retain all records in three of the files reviewed.

CORRECTIVE ACTION REQUIRED

The EPP must correct the deficiencies identified by 5:00 PM CST on June 21, 2024.

1. 19 TAC §228.40(f) Records Retention:

For the Reading Specialist program, 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 moving forward: All records as identified as missing throughout the report for ACP Reading Specialist candidates and required training evidence for PB Reading Specialist candidates. Retain all records for a period of five years after a candidate completes, withdraws from, or is discharged or released from the program as required in [19 TAC §228.40\(f\)](#).

REQUIRED NOTIFICATIONS (COMPONENTS 2 & 7)

Candidate records, the EPP website, and other EPP documents were reviewed for evidence the EPP has published the required notifications for applicants and candidates. Following are the findings:

FINDINGS

1. The EPP has published information about the required criminal history background checks for clinical teaching and for employment as an educator in Texas. [19 TAC §227.1(b)]
2. The EPP has published information about the potential impact of criminal history on candidate certification and the right to request a Preliminary Criminal History Evaluation from TEA. [19 TAC §227.1(d)]
3. The EPP has published the admission requirements of each program in the EPP. [19 TAC §227.1(c)(1)]
4. The EPP has published the completion requirements for each program in the EPP. [19 TAC §227.1(c)(2)]
5. The EPP has published Information about the EPP performance over time for the past five years. [19 TAC §227.1(c)(3)(B)]
6. The EPP has published information about the effect 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 & CONTINGENCY ADMISSION (COMPONENT 2)

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

FINDINGS

1. Applicants who were admitted met all admission requirements. [19 TAC §227.17(a)]
2. The formal written offer of admission was consistently found in candidates' records. [19 TAC §227.17(b)]
3. Applicants were consistently required to accept the offer of admission in writing. [19 TAC §227.17(c)]
4. The formal date of admission was consistently included in the written offer of admission. [19 TAC §227.17(d)]
5. The ECOS audit trail revealed candidate admission records were consistently created in the ECOS within the seven calendar days required. [19 TAC §227.17(e)]
6. Candidates were provided with coursework & training, and test approval prior to formal admission. [19 TAC §227.17(f)]
Evidence: All files reviewed in all classes and routes contained evidence that candidates took digital literacy training prior to admission as a part of an admission requirement.

CORRECTIVE ACTION REQUIRED

The EPP must implement the formal and contingency admission process(es) for all classes as required by 5:00 PM CST on June 21, 2024.

1. **19 TAC §227.17(f) Formal Admission: No Coursework or Training Prior to Admission**
Update and implement a process that ensures with fidelity that the EPP will not provide any coursework or training prior to admission.

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, 239, 241, and 242. Following are the findings:

FINDINGS

1. The EPP consistently requires applicants to meet requirements for GPA. [19 TAC §227.10(a)(3)]
2. The EPP does not consistently require applicants to Teacher programs to meet requirements for subject-specific semester credit hours. [19 TAC §227.10(a)(4)]
Evidence: Eight out of 15 (53%) Teacher files reviewed contained evidence in transcripts that they met the subject-specific semester-credit hours for admission. For seven out of fifteen files (47%) reviewed, the EPP did not capture evidence of subject-specific semester credit hours in the transcripts reviewed.
3. The EPP consistently requires applicants to complete an application for admission. [19 TAC §227.10(a)(8)]
4. The EPP does not use one or more appropriate screening devices to evaluate the applicant's appropriateness for the certificate sought. [19 TAC §227.10(a)(8), §241.5(c), and §242.5(c)]
Evidence: The Principal and Superintendent programs only required one screen which was an interview that was found in the 16 files reviewed. There was not a rubric associated with the screen.

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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. The EPP did not have any non-teacher candidates who had deficiencies in certification requirements at admission. [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, 241, and 242 by 5:00 PM CST on June 21, 2024.

1. **19 TAC §227.10(a)(4) Admission Requirements: Minimum Subject-Specific Content Hours**
Update and implement a process that includes requiring the EPP to identify minimum subject-specific content hours, 12 semester hours, or 15 semester hours if the content area is mathematics or science at grade seven or above. If a pre-admission content test (TX PACT) is required, identify, and report any hours the applicant has earned when entering the subject-specific content hours, even if the hours are less than the requirement. Train staff that review transcripts at admission and enter the data into the Educator Certification Online System (ECOS) in the requirement.
2. **19 TAC §227.10(a)(8) Admission Requirements: Screens**
Update admissions processes for the Principal and Superintendent programs to require applicants to participate in more than one screening activity which could include an interview or other screening instrument to determine if the EPP applicant's knowledge, experience, skills, and aptitude are appropriate for the certification sought. The screens must be scored using an aligned rubric based on a coherent set of criteria. For Principal and Superintendent applicants, two or more screens must be implemented. Retain the screens and rubrics completed in that candidate's file per the records retention requirement in [19 TAC §228.40\(f\)](#).

STANDARDS-BASED COURSEWORK (COMPONENTS 3 & 4)

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

FINDINGS

1. Candidates were consistently required to complete the minimum number of hours of coursework and training prior to completing the EPP. [19 TAC §228.35(b) & (c)]
2. Required standards were identified in coursework. [19 TAC §228.30]
3. Evidence of performance assessments was found, and assessments were aligned to standards. [19 TAC §228.35(a)(2) & §228.40(a)]

CORRECTIVE ACTION REQUIRED

None

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REQUIRED CURRICULUM TOPICS (COMPONENT 3)

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

FINDINGS

1. Training in Ethics was found in coursework provided to candidates. [19 TAC §228.30(c)(1)]
2. Training in educating students with Dyslexia was found in coursework provided to candidates and was provided by the approved provider. [19 TAC §228.30(c)(2)]
3. Training in Mental Health, Substance Abuse, & Youth Suicide was consistently provided to candidates 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 provided to candidates. [19 TAC §228.30(c)(6)]
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 consistently provided to candidates. [19 TAC §228.30(c)(8)]
9. The Digital Literacy evaluation and the related prescribed curriculum were provided to candidates. [19 TAC §228.30(c)(8)]
10. Instruction regarding students with disabilities, the use of proactive instructional planning techniques, and evidence-based inclusive instructional practices was provided to candidates. [19 TAC §228.30(c)(9)]

CORRECTIVE ACTION REQUIRED

None

PRE-SERVICE REQUIREMENTS FOR TEACHER CANDIDATES (COMPONENT 4)

Syllabi, degree plans, 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 sufficient evidence that candidates consistently complete the field-based experience (FBE) hours as required. [19 TAC §228.35(b)(1) & §228.35(e)(1)]
2. FBE assignments and activities consistently meet the requirements for completing FBE. [19 TAC §228.35(e)(1)]

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3. Candidates consistently complete pre-service coursework and training as required prior to beginning the supervised clinical experience. [19 TAC §228.35(b)(2)]
4. The structure of pre-service coursework and training allowed the EPP to consistently capture candidate proficiency in the identified pedagogical areas. [19 TAC §228.35(b)(2)]

CORRECTIVE ACTION REQUIRED

None

SUPERVISED CLINICAL EXPERIENCE (COMPONENT 4)

Syllabi, degree plans, 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:

FINDINGS

1. There is sufficient evidence that candidates consistently complete the required duration for the supervised clinical experience. [19 TAC §228.35(e)(2)(A)-(B) & §228.35(e)(8)]
2. Candidates were consistently placed in an approved supervised clinical experience assignment. [19 TAC §228.35(e)(2)(A) & (B), §228.35(e)(8)(A)-(D)]
3. There is sufficient evidence that candidates consistently engage with the educator standards for the certificate sought during the supervised clinical experience. [19 TAC §228.35(e)(2)(A)(iii), §228.35(e)(2)(B)(ix), & §228.35(e)(8)]
4. Candidates were consistently assigned appropriate qualified campus personnel to support them during the supervised clinical experience. [19 TAC §228.35(f)]
5. Qualifications of campus personnel supporting candidates in the supervised clinical experience were not consistently verified by the EPP. [19 TAC §228.2(33)]

Evidence: In the Superintendent program for four out of six candidates that reached the point of practicum, the qualifications were verified by district HR staff in two files (50%) reviewed and the other two files reviewed (50%) contained evidence that the field supervisor and not the district HR staff verified qualifications for the site supervisor. In the School Librarian program, eight out of ten candidates reached the point of practicum. Five out of eight (63%) were qualified per campus administration verification and three out of eight (37%) were either self-verified or not provided. In the Reading Specialist program, seven out of eight candidates reached the point of practicum. For five out of seven (71%) qualifications were verified by campus administration, in the sixth file reviewed qualifications were self-verified, and the seventh file reviewed contained no evidence.

6. Training was not consistently provided as required to campus personnel supporting candidates in the supervised clinical experience. [19 TAC §228.2(33)]
Evidence: In the Reading Specialist program, four out of seven files (57%) reviewed contained a dated attestation and handbook that the site supervisor was trained as required and no evidence was found in three out of seven files (43%) reviewed.

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7. Candidates were consistently assigned a field supervisor to provide support and feedback to the candidate and EPP during the supervised clinical experience. [19 TAC §228.35(g) & (h)]
8. There was sufficient evidence that field supervisors supporting candidates in the clinical experience met qualification requirements. [19 TAC §228.2(18)]
9. Training was not consistently provided as required to field supervisors supporting candidates in the clinical experience. [19 TAC §228.35(h)]

Evidence: In the School Counselor program, the EPP provided evidence that TEA-approved coaching training was provided to the field supervisors assigned to the five candidates reviewed. There was no evidence that local training was provided to the field supervisors. In the School Librarian program, in the seven files reviewed, there was evidence of TEA-approved field supervisor training. There was no evidence of local training.
10. There was insufficient evidence that field supervisors conducted the first observation within the required time frame. [19 TAC §228.35(h)]

Evidence: In the Superintendent program, four out of six candidates reached the point of practicum. All four did not have a first observation within the first quarter of the assignment as required per observation documents reviewed for each.
11. Candidates did not consistently receive the required number and duration of formal observations during the clinical experience. [19 TAC §228.35(h)]

Evidence: In the School Counselor program, four out of five candidates completed the practicum and the fifth candidate is still in process. Two out of four (50%) files reviewed contained evidence of three formal observations totaling 135 minutes in duration as required. The other two out of four (50%) contained evidence in the observation instruments provided that the formal observations were less than 135 minutes across three observations. For one of the two that did not meet requirements, the EPP did not provide evidence of the first formal observation.
12. There was sufficient evidence that field supervisors consistently conduct observations through a POP cycle which includes a pre-conference and a post-conference for each formal observation. [19 TAC §228.35(g) & (h)]
13. Field supervisors consistently captured educational practices observed but did not provide sufficient evidence of each candidate's demonstration of proficiency in the standards in the supervised clinical experience. [19 TAC §228.35(h) & §228.35(e)(2)(B)(ix)]

Evidence: In the Principal, Superintendent, School Librarian, and Reading Specialist programs the observation instruments did not include the standards. TEA reviewed observation documents for ten Principal, four Superintendent, eight Librarian, and seven Reading Specialist candidates that reached the point of practicum.
14. There was insufficient evidence provided that the supervised clinical experience was successful. [19 TAC §228.35(e)(8)(E)]

Evidence: In the School Librarian program, successful practicum recommendations from the field supervisor and site supervisor were found in six out of eight (75%) files reviewed. In the Reading Specialist program, the EPP provided successful practicum recommendations from the field supervisor and site supervisor in four out of seven (57%) files reviewed.
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

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The EPP must revise the structure and requirements in the supervised clinical experiences as needed to ensure candidates are placed in appropriate assignments where they are able to complete the experiences with appropriate supervision and support, and that candidate proficiency is accurately captured by the EPP as required in 19 TAC §228.35(e) by 5:00 PM CST on June 21, 2024.

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

Update the clinical experience processes to include verifying, prior to the start of each candidate's clinical experience, the site supervisor assigned to support each candidate meets qualification requirements.

Retain evidence of the site supervisors' qualifications in each candidate's or EPP records per the records retention requirement in 19 TAC §228.40.

2. 19 TAC §228.35(f) Campus Supervision: Training Site Supervisors

Require site supervisors assigned to Reading Specialist candidates to be trained within three weeks of assignment to the Reading Specialist candidate. Revise the training, as applicable, to ensure that provided to site supervisors includes training in coaching and mentoring. Update the clinical experience processes to include providing training to site supervisors as required. Retain evidence of the training in the candidates' or EPP records per the records retention requirement in 19 TAC §228.40.

3. 19 TAC §228.35(h) Field Supervision: Field Supervisor Training-School Counselor and Librarian Programs

Update the clinical experience processes to include 1) EPP-specific training provided to field supervisors; and 2) TEA-approved observation 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.

4. 19 TAC §228.35(h) Field Supervision Field Supervisor Initial Contact-Superintendent Program

Update the clinical experience processes to ensure and verify that field supervisors make initial contact with each candidate within the first quarter of the start of the candidate's clinical experience. Train field supervisors on the requirements/responsibilities.

Retain evidence of the training in the candidates' or EPP records per the records retention requirement in 19 TAC §228.40.

5. 19 TAC §228.35(h) Field Supervision: Practicum-Formal Observation Duration-School Counselor Program

Require formal observations by the field supervisor to be at least 135 minutes in duration in total throughout the practicum. Train field supervisors about the requirements during local training. Retain evidence per the records retention requirement in 19 TAC §228.40.

6. 19 TAC §228.35(h)(3) Field Supervision: Practicum-Observation Number & Frequency

Update processes to require formal observations by the field supervisor to occur as follows: a minimum of one formal observation within the first third of the practicum, one formal observation within the second third of the practicum, and one formal observation within the final third of the practicum. Train field supervisors about the requirements during local training. Retain evidence per records retention requirement in 19 TAC §228.40.

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

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the candidate's supervised clinical experience as required in 19 TAC §228.35(g) & (h). Following are the findings:

FINDINGS

1. 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 insufficient evidence the field supervisor makes initial contact with the candidate as required during the supervised clinical experience. [19 TAC §228.35(h)]
Evidence: In the Superintendent program, the EPP provided evidence that the field supervisor made initial contact within the first quarter of the assignment as required in three out of four (75%) files reviewed.
3. There is sufficient 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(g) & (h)]

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 June 21, 2024.

1. **19 TAC §228.35(h) Field Supervision: Field Supervisor Initial Contact Superintendent program**
Update the clinical experience processes to ensure and verify that field supervisors make initial contact with each candidate within the first quarter of the start of the candidate's clinical experience. Train field supervisors on the requirements/responsibilities.
Retain evidence of the training in the candidates' or EPP records per the records retention requirement in 19 TAC §228.40.

CERTIFICATION (COMPONENT 8)

Candidate records such as 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. Teacher candidates who were recommended for certification inconsistently met the degree required for the certificate sought. [19 TAC §230.11, §230.36(b)(1), & §230.37(b)(1)]
Evidence: In the Teacher program, ten out of fifteen candidates reached the point of standard certification. Of the ten candidates, six (60%) were standard certified before the degree was conferred. The effective dates on the certificates and the official transcripts with degree conferred dates served as evidence.
2. Non-Teacher candidates who were recommended for certification inconsistently met the degree required for the certificate sought. [19 TAC, §239.60(3), §239.84(3), & §239.93(3)]

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Evidence: In the Educational Diagnostician program, three out of ten candidates whose files were reviewed reached the point of standard certification. For two out of three (67%) candidates, the effective dates on standard certificates were before the master's degree was conferred. In the School Librarian program, eight out of ten candidates reviewed reached the point of standard certification. For three of the eight (38%) the effective dates on the standard certificate were before the master's degree was conferred. In the Reading Specialist program, three out of eight candidates reached the point of standard certification. One of the three (33%) was standard certified before the master's degree was conferred per the effective date on the certificate.

3. 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]
4. Candidates consistently met the English language proficiency requirement prior to being recommended for certificates. [19 TAC §230.11(b)(5)]
5. 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

The EPP must implement processes to verify candidates qualify for certification prior to recommending certificates as required in [19 TAC §228.35(e)(2)(B), §228.36, §228.37, §230.11, & §230.13] by 5:00 PM CST on June 21, 2024.

1. **19 TAC §230.13(a)(1) and (b)(1) Teacher Certification: Degree**

Implement a process for collecting, evaluating, and retaining evidence for all admission and certification requirements met including bachelor's (or master's as applicable) degree with transcripts identifying the degree is conferred prior to standard certification. Train staff who collect the transcripts and make certification recommendations on the process.

2. **19 TAC §239.60(3), §239.84(3), & §239.93(3) Non-Teacher Certification: Degree Educational Diagnostician, Librarian, & Reading Specialist**

Implement a process for collecting, evaluating, and retaining evidence for all admission and certification requirements met including master's degree with transcripts identifying the degree is conferred prior to standard certification. Train staff who collect the transcripts and make certification recommendations on the process.

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

1. Candidates were consistently identified as enrolled in the area in which one or more certificates were issued. [19 TAC §229.3]
2. Candidates were not consistently identified in the correct route for which they were seeking certification. [19 TAC §229.3]

Evidence: In the Superintendent program, three out of five (60%) candidates were correctly identified in the route for which they were seeking certification and two out of five (40%) were incorrectly identified as PB when they were pursuing certification through the alternative certification route.

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3. Admission data were not reported accurately according to information in candidate transcripts and admission letters. [19 TAC §229.3]
Evidence: In the Teacher program the GPA in candidate records did not correspond to the admission GPA reported in eight out of ten (80%) files reviewed. The content hours in candidate records did not correspond to the content hours reported in seven out of ten (70%) files reviewed. In the Educational Diagnostician program, the GPA in candidate records did not correspond to the GPA reported in two out of ten (20%) files reviewed. In the School Librarian program, the GPA in candidate records did not correspond to the GPA reported in two out of ten (20%) files reviewed.
4. Observation dates and durations were not consistently reported as detailed on observation documents and there was inconsistent evidence of supporting documentation for the observations reported. [19 TAC §229.3 & §229.4]
Evidence: In the Principal program, eight out of ten candidates reviewed reached the practicum. Six out of the eight (75%) files contained evidence of observations reported that were not spaced in thirds throughout the practicum and that did not consistently correspond to observation durations in the records. In the Superintendent program, four out of six candidates reached the point of practicum. Two out of the four files, (50%) did not contain observations reported that occurred in thirds, and the other two were not reported. In the School Counselor program, four out of five candidates completed the practicum, and one out of five was in process. Two out of four that completed the practicum contained observations reported that did not total 135 minutes in duration. In the Reading Specialist program, six out of eight candidates reached the point of practicum. Files for three out of six (50%) contained observations reported that did not occur in thirds. Observations in candidate records did not correspond to observations reported and did not total 135 minutes in duration or occur in thirds. All six (100%) contained observations in records that corresponded to observations reported.

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 5:00 PM CST on June 21, 2024.

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

Accurately

Implement a process for reporting data in ECOS that ensures data is entered accurately as it appears in the related candidate records.

Teacher Class require:

- GPA in candidate records corresponds to the GPA reported.
- Admission dates in candidate records correspond to the admission dates reported.

Principal Class require:

- Formal observations are spaced in thirds throughout the practicum.
- Observation duration in records corresponds to the observation duration reported.

Superintendent Class require:

- Candidates correctly identified as post-baccalaureate (PB) if an advanced degree is earned in conjunction with certification or alternative (ACP) if the candidate already holds the advanced degree and is seeking certification only.
- Formal observations occur in thirds throughout the practicum experience and total 135 minutes in duration.

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Counselor Class require:

- Observations total 135 minutes in duration.

Educational Diagnostician Class require:

- GPA in candidate records corresponds to the GPA reported.

Reading Specialist Class require:

- Observations in candidate records correspond to observations reported, occur in thirds across the practicum, and total 135 minutes in duration.

Implement a quality control process to review and revise final data before submission on September 15 that allows time for corrections ahead of the deadline.

PROACTIVE INSTRUCTIONAL PLANNING TECHNIQUES & INCLUSIVE PRACTICES FOR ALL STUDENTS PROVIDED

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

FINDINGS

1. The EPP incorporates proactive instructional planning techniques throughout coursework and across content areas using a framework that:
 - provides flexibility in the ways information is presented, students respond or demonstrate knowledge and skills, and students are engaged;
 - reduces barriers in instruction;
 - provides appropriate accommodations, supports, and challenges; and
 - maintains high achievement expectations for all students, including students with disabilities and students of limited English proficiency. [19 TAC §228.10(a)(1)(J) and §228.30(c)(9)]
2. The EPP has integrated instruction in inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies throughout coursework. [19 TAC §228.10(a)(1)(J) and §228.30(c)(9)]
3. The EPP has integrated instruction in inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies throughout the clinical experience. [19 TAC §228.10(a)(1)(J)]
4. As required under TEC 21.044 (a-1), there is sufficient evidence that field supervisors consistently capture candidate demonstration of competency in the use of proactive instructional planning techniques that:
 - provide flexibility in the ways information is presented, students respond or demonstrate knowledge and skills, and students are engaged;
 - reduce barriers in instruction;
 - provide appropriate accommodations, supports, and challenges; and
 - maintain high achievement expectations for all students, including students with disabilities and students of limited English proficiency. [19 TAC §228.30(c)(9); §228.35(e)(2)(A)(3); §228.35(e)(2)(B)(9); and §228.35(e)(8)]
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

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practices as required under TEC 21.044 (a-1). [19 TAC §228.30(c)(9); §228.35(e)(2)(A)(3); §228.35(e)(2)(B)(9); and §228.35(e)(8)]

Evidence: In the Principal, Superintendent, and School Librarian programs, the observation instruments do not identify the standards and did not capture the demonstration of competency in all standards or the use of evidence-based inclusive instructional practices as required.

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 PM CST on June 21, 2024.

1. 19 TAC §228.35(e)(8) Skills Implementation: Successful Practicum/Clinical Experience-Principal, Superintendent, & School Librarian Programs

Update the clinical experience processes, including revisions to the 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.

RECOMMENDATIONS

- Ensure that advisory committee members advise and do not vote on topics pertaining to educator preparation.
- Retain evidence of all candidate FBEs and not just those that total the required hours.
- Implement a process for Principal and Reading Specialist candidates so they apply for standard certification once all requirements are met to ensure that they are standard certified in a timely manner.
- Strengthen the SUPT ELDR 6303 coursework as it relates to component 10 proactive instructional planning techniques 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.
- Strengthen the Teacher and Reading Specialist formal observation instrument as it relates to component 10 to reflect Special Education and English Language Learner populations more clearly.
- 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.

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- 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, 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.