### **INTRODUCTION**

Texas Education Agency (TEA) Education Specialists, Rebecca Bunting, Jennifer Gonzalez, and Keena Sandlin, conducted a five-year Continuing Approval Review of the Texas State University educator preparation program (EPP) on March 17-April 11, 2025. Per 19 Texas Administrative Code (TAC) §228.13(a), "an educator preparation program (EPP) ...shall be reviewed at least once every five years...". The review was completed as part of the CAR Pilot facilitated by Teacher Preparation Inspection-US (TPI-US) as allowed in 19 TAC §228.13(g). Dr. Michael O'Malley, Dean of the College of Education, was identified as the program's Legal Authority. Dr. Patricia Rocha, Director of the Office of Educator Preparation and Backup Legal Authority, was the primary EPP contact for the review process. The Texas State University EPP was approved by the State Board for Educator Certification (SBEC) on May 5, 1969. On June 28, 2024, the EPP was notified of the review. At that time, the EPP was rated Accredited with a risk level that was Stage 3 (low). At the time of the review, the EPP was rated Accredited. The EPP reported 652 finishers for the 2022-2023 reporting year and 632 finishers for 2023-2024.

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

The TEA administers TAC required by the Texas legislature for the regulation of all EPPs in the state. (See the complete <u>TAC</u> for details.) The five-year Continuing Approval Review was conducted in a "Desk Review" format where EPP staff submitted requested documents to TEA for review.

The scope of the compliance portion of the review included:

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

Information concerning compliance with TAC governing EPPs was collected from a variety of sources:

- EPP documents, including records for five candidates from the active certificate class and route.
- Interviews with EPP staff members.
- Data collected by the TPI-US review team.

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" is important new information and reminders provided to EPP staff during the review.



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

Following are the findings of the review.

### **GOVERNANCE**

Oversight of the EPP and ongoing evaluation of effectiveness of the programs within the EPP were reviewed. Following are the findings:

### **FINDINGS**

- 1. The EPP has established an advisory committee that:
  - provides guidance and input on matters of program design, delivery, evaluation, and major policy decisions of each program within the EPP; and
  - is composed of a variety of collaborators including representation from at least three of these
    areas: public schools accredited by the Texas Education Agency (TEA) and/or TEA-recognized
    private schools; regional education service centers; institutions of higher education; and/or
    business and community interests; and
  - meets at least one time per year. [19 TAC §228.20(b)] [Effective September 1, 2024: 19 TAC §228.25(b)]
- 2. The EPP has not published an exit policy that is reviewed & signed by each candidate at admission. [19 TAC §228.20(h)] [Effective September 1, 2024: 19 TAC §228.31(b)] Evidence: There was no evidence of a signed exit policy in any of the records reviewed, and no exit policy was found on the EPP website or other applicant materials.
- 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: Teacher, Principal, and Superintendent candidate records reviewed were missing screens and rubrics. Two out of five alternative certification Teacher candidate records reviewed were missing post-observation documents. Non-teacher candidate records reviewed were missing evidence of site supervisor and field supervisor qualifications and training.

### CORRECTIVE ACTION REQUIRED

The EPP must correct the deficiencies identified by August, 11, 2025:

- 1. 19 TAC §228.31(b) Exit Policy: The EPP must update and implement an exit policy that includes the current TAC requirements effective September 1, 2024 and ensure it is reviewed and signed by candidates upon admission. The EPP must also retain evidence in the candidate's record per the records retention requirement in 19 TAC §228.13(h) and §228.31(i).
- 2. 19 TAC §228.31(i) & §228.13(h) Records Retention: The EPP must update and implement a records retention process to retain records relating to candidate admission and completion of preparation requirements for at least five years from the date the candidate leaves the program or finishes the program. The records retention method must ensure information security. The process must also



include the retention of EPP records (e.g., advisory committee activities, field supervisor qualifications and training, etc.).

### REQUIRED NOTIFICATIONS

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

### **FINDINGS**

- 1. The EPP has informed applicants to all programs about the required criminal history background checks for clinical teaching and for employment as an educator in Texas. [19 TAC §227.1(b)]
- 2. The EPP has notified applicants and candidates in all programs about
  - the potential impact of criminal history on candidate certification; and
  - the right to request a Preliminary Criminal History Evaluation from TEA. [19 TAC §227.1(d)]
- 3. The EPP has informed applicants about the admission requirements and completion requirements of each program in the EPP. [19 TAC §227.1(c)(1) & (2)]
- 4. The EPP has not informed applicants in all programs about
  - the EPP performance over time for the past five years; and
  - the effect of supply and demand forces on the educator workforce in Texas. [19 TAC §227.1(c)(3)(A) & (B)]

Evidence: The EPP Teacher preparation website's section on EPP performance over time only referred to the EPP's test pass rates and did not include any other EPP performance over time information for the past five years, and it was missing notification of the effect of supply and demand forces on the educator workforce in Texas. The EPP non-teacher preparation websites did not have either notification posted.

5. The EPP has published a complaints process that includes a link to the TEA complaints process. [19 TAC §228.123 (a)-(d)]

#### **CORRECTIVE ACTION REQUIRED**

The EPP must publish the required information in a location transparent to applicants and candidates (as applicable to the requirement in the rule) for all programs within the EPP by August 11, 2025.

1. 19 TAC §227.1(c)(3)(A) & (B) w/ TEC §21.044(g) Notifications: EPP and Program Information: The EPP must update the EPP website, 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 current and must be available so that applicants to all programs understand the information and requirements that apply to them.



### **ADMISSION REQUIREMENTS**

Candidate records including applications, transcripts, screening rubrics, and information collected from staff interviews were reviewed to verify the EPP qualifies applicants for admission as required in 19 TAC Chapters 227, 239, 241, and 242. Following are the findings:

#### **FINDINGS**

- 1. There is sufficient evidence that the EPP verifies that candidates hold the required degree at admission. [19 TAC §227.10(a)(1) & (2)]
- 2. There is sufficient evidence that 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)]
- 3. There is sufficient evidence that 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)]
- Candidates consistently demonstrate English language proficiency prior to admission. [19 TAC §227.10(a)(7)]
- 5. Candidates do not consistently participate in one or more admission screen(s) to evaluate the candidate's appropriateness for the certificate sought. There is insufficient evidence that screens are scored using a rubric with a set of coherent criteria. [19 TAC §227.10(a)(8), §241.5(c), and §242.5(c)] Evidence: There were no screens or rubrics provided in the Teacher, Principal, and Superintendent records reviewed.
- 6. The EPP has maintained an overall GPA of 3.0 or higher for each incoming class since the last five-year review. [19 TAC §227.19(a)]

### **CORRECTIVE ACTION REQUIRED**

The EPP must implement processes to appropriately qualify applicants for admission into each program offered as required in 19 TAC Chapters 227, 239, 241, and 242 by August 11, 2025.

1. 19 TAC §227.10(a)(8) Admission Requirements: Screen: The EPP must update admissions processes for the Teacher, Principal, and Superintendent programs to require applicants to participate in one or more screening activities (Principal and Superintendent programs must have two or more screening activities) evaluated with a rubric(s) that includes descriptions of levels of performance quality based on a coherent set of criteria and with a cut score identified. The EPP must also retain admission documents in the candidate's record per the records retention requirement in 19 TAC §228.13(h) and §228.31(i).



### **FORMAL & CONTINGENCY ADMISSION**

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

#### **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: While written offers of admission were found in all candidate records reviewed, candidates in non-teacher programs had not signed the offer accepting admission.
- 2. Candidates that are contingently admitted consistently sign a written offer of admission, and the offer of admission consistently reflects the admission date. [19 TAC §227.15(a) & (b)]
- 3. There is sufficient evidence that candidates who are contingently admitted meet all requirements except the required conferred degree, and the program verifies the degree has conferred within the semester of contingency admission. [19 TAC §227.15(a) & (f)]
- 4. The EPP inconsistently creates admission records for formally and contingently admitted candidates in the ECOS within seven calendar days of the date of admission identified in the offer letter. [19 TAC §227.17(e) & §227.15(c)]
  - Evidence: Admission records were created in ECOS within seven calendar days of the offer letter date for six of 15 Teacher candidates, two of five Principal candidates, one of five School Counselor candidates, and one of five Reading Specialist candidates.
- 5. Except as allowed for contingency admission, candidates are not provided coursework, training, or test approval prior to admission. [19 TAC §227.17(f) & §227.15(e)]

### CORRECTIVE ACTION REQUIRED

The EPP must implement the formal and/or contingency admission process(es) for all classes as required by August 11, 2025.

1. 19 TAC §227.17 Formal Admission: The EPP must update the admissions process for each program to include formally admitting applicants. The formal process must include a written offer that the candidate accepts in writing. The formal date of admission must be embedded in the written offer. The admission record for the candidate must be created in ECOS within seven calendar days of the formal date of admission embedded in the offer letter. The EPP must also retain admission documents in the candidate's record per the records retention requirement in 19 TAC §228.13(h) and §228.31(i).

### STANDARDS-BASED COURSEWORK

Syllabi, performance assessments, standards alignment charts, and information collected through interviews with EPP staff were reviewed as evidence that the EPP provides the required standards-based coursework. Evidence was reviewed for the Core Subjects with the Science of Teaching Reading EC-6 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:
  - Texas Essential Knowledge and Skills (TEKS); and
  - English Language Proficiency Standards (Teacher programs); and
  - Pre-Kindergarten Guidelines (Teacher programs, as applicable); and
  - The skills and competencies captured in the Texas teacher standards (Teacher programs). [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. [19 TAC §228.30(e)] [Effective September 1, 2024: 19 TAC §228.57(f)]

Evidence: Syllabi reviewed for the School Counselor program indicated that the CACREP standards were taught instead of the educator standards that are the basis for the School Counselor certificate.

- There is sufficient evidence that 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)]
- 6. Coursework and training are offered partially or fully online for one or more programs. The online training meets the criteria set for accreditation, quality assurance, and/or compliance with the following:
  - 19 TAC Part 1, Chapter 2, Subchapter J, Rule §2.204 (relating to Approval of Distance Education Courses and Programs for Public Institutions); or

#### 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 August, 11, 2025.

 19 TAC §228.57 Standards-based Curriculum: The EPP must review and revise the School Counselor curriculum where needed to ensure all standards required for the certificate are taught.

### **REQUIRED CURRICULUM TOPICS**

Syllabi, transcripts, certificates of completion in candidate records, and information collected through interviews with EPP staff were reviewed to verify the EPP provides instruction in the additional curriculum areas required in Texas Administrative Code and/or Texas Education Code. Following are the findings:



### **FINDINGS**

- There is insufficient evidence that candidates receive the required training in the Educators' Code of Ethics and in appropriate relationships, boundaries, and communications between educators and students. [19 TAC §228.30(c)(1) & (7)] [Effective September 1, 2024: 19 TAC §228.57(c)(1) & (7)] Evidence: Instruction in the Educator Code of Ethics was not found in the syllabi provided for the Teacher, School Counselor, and Reading Specialist classes. Conversations with EPP staff also did not support that this instruction was provided.
- 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: The EPP did not provide certificates of completion for candidates reviewed in the Teacher, Principal, Superintendent, and School Counselor programs, and reference to instruction provided by TEA Learn, the approved provider, could not be found in the syllabi provided for those classes.
- 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: The syllabi provided by the EPP for the Teacher, Principal, Superintendent, and Reading Specialist programs did not contain evidence of instruction in Mental Health, Substance Abuse, & Youth Suicide. Conversations with EPP staff also did not support that this instruction was provided in the Reading Specialist program.
- 4. There is insufficient evidence that candidates in all programs receive Instruction in

Conversations with EPP staff also did not support that this instruction was provided.

- 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)]

Evidence: The syllabi provided by the EPP for the Teacher, Principal, Superintendent, and Reading Specialist programs did not contain evidence of the required instruction. Conversations with EPP staff also did not support that this instruction was provided.

- 5. There is insufficient evidence that candidates in all programs receive the required Instruction in digital learning, virtual instruction, and virtual learning. [Effective September 1, 2024: 19 TAC §228.57(c)(8)] Evidence: Information in the syllabi provided for the Teacher program was reflected this instruction except for instruction in virtual learning. The Syllabi provided for the Principal program only referred to digital citizenship. It was missing instruction in the ISTE standards, digital learning, virtual learning, and virtual instruction. Syllabi for the Superintendent, Reading Specialist, and School Counselor programs did not reflect the required instruction. Conversations with EPP staff also did not support that this instruction was provided.
- 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 syllabi provided for all programs were missing evidence of a Digital Literacy evaluation and prescribed curriculum. Conversations with EPP staff also did not support that this instruction was provided.



- 7. There is insufficient evidence 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: The syllabi provided for the Principal and Superintendent programs were missing evidence of opportunities for candidates to demonstrate competency in this requirement. Conversations with EPP staff also did not support that this instruction was provided in the Principal and Superintendent programs.
- 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: The syllabi provided for the Principal and Superintendent programs were missing evidence of instruction in this requirement. Conversations with EPP staff also did not support that this instruction was provided in the Principal and Superintendent programs.
- 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)]

### CORRECTIVE ACTION REQUIRED

The EPP must revise coursework to include the required instruction as needed to meet requirements in 19 TAC §228.57 by August 11, 2025.

- 1. 19 TAC §228.57(c)(1) & (7) Required Instruction Educator Code of Ethics: The EPP must update coursework provided to all candidates within the Teacher, School Counselor, and Reading Specialist programs to include instruction in the Educators Code of Ethics and appropriate relationships, boundaries, and communications between educators and students.
- 2. **19 TAC §228.57(c)(2) / TEC §21.044(b) Required Instruction Dyslexia:** Update training requirements for candidates in the Teacher, Principal, Superintendent, and School Counselor programs so that they receive the required instruction in Dyslexia from the approved provider, TEALearn. The EPP must also retain certificates of completion in the candidate's record per the records retention requirement in 19 TAC §228.13(h) and §228.31(i).
- 3. 19 TAC §228.57(c)(3) / TEC §21.044(c-1) Required Instruction Mental Health, Substance Abuse, and Youth Suicide: The EPP must update training requirements for candidates in the Teacher, Principal, Superintendent, and Reading Specialist programs so that they receive the required 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. The EPP must also retain certificates of completion or training sign-in sheets in the candidate's record or update course syllabi to reflect the training provided in a course.
- 4. 19 TAC §228.57(c)(4)-(6) Required Instruction: The EPP must update coursework provided to candidates in all programs to include instruction in the skills that educators are required to possess, the responsibilities educators are required to accept, high expectations for all students, the importance of building strong classroom management skills, and the framework for teacher and principal evaluation.
- 5. **19 TAC §228.57(c)(8) / TEC 21.001 Required Instruction Digital and Virtual Learning:** The EPP must update coursework provided to all candidates within the EPP to include instruction in digital learning,



- virtual learning, and digital literacy, including the digital literacy evaluation and prescribed learning curriculum. The EPP must retain evidence in the candidate's record and/or in EPP records per the records retention requirement in 19 TAC §228.13(h) and §228.31(i).
- 6. 19 TAC §228.57(c)(9) / TEC §21.044(a-1)(1)-(3) Required Instruction Students with Disabilities: The EPP must update coursework so that candidates receive the required instruction in <a href="IEC §21.044(a-1)(1)-(3)">IEC §21.044(a-1)(1)-(3)</a>. Note this overlaps with the Component 10 requirements for the EPP in <a href="IEC §21.0443(b)(1-2)">IEC §21.0443(b)(1-2)</a>.

### PRE-SERVICE REQUIREMENTS FOR TEACHER CANDIDATES

Syllabi, information collected in interviews with staff, 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 §228.41 and §228.43]. Following are the findings:

#### **FINDINGS**

- 1. There is sufficient evidence that candidates consistently complete pre-service coursework and training before beginning the supervised clinical experience. [19 TAC §228.35(b)(2)] [Effective September 1, 2024: 19 TAC §228.41 & §228.43(b)]
- 2. There is sufficient evidence that the structure of pre-service coursework and training allows candidates to complete at least 150 hours of coursework and to demonstrate proficiency in the identified pedagogical areas. [19 TAC §228.35(b)(1) & §228.35(e)(1)] [Effective September 1, 2024: 19 TAC §228.41(2)(A)-(L)]
- 3. There is sufficient evidence that candidates consistently complete the required number of hours of FBE during pre-service coursework and training. [19 TAC §228.35(b)(1) & §228.35(e)(1)] [Effective September 1, 2024: 19 TAC §228.41(1) & §228.43(c)-(d)]
- 4. FBE assignments and activities 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: In 13 out of 15 candidate records, there was not enough evidence to support that candidates completed at least 15 hours of active engagement with students.

#### 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 August 11, 2025.

1. 19 TAC §228.43(c) & (d) Pre-Service Requirements: FBE: The EPP must revise the structure of FBE requirements so that they are integrated into coursework and so that candidates complete at least 25 hours of active engagement in K-12 classrooms in a variety of authentic school settings with diverse student populations, including observation of teachers modeling effective practices to improve student learning and opportunities for candidates to practice skills and receive feedback. The EPP must also retain logs and reflections of FBE activities in candidates' records per the records retention requirement in 19 TAC §228.13(h) and §228.31(i).



#### SUPERVISED CLINICAL EXPERIENCE

Syllabi, information gathered through staff interviews, and documentation in candidate records including placement documents, Statements of Eligibility (SOE), 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 Chapter 228, Subchapters E and F].

#### **FINDINGS**

Twelve of 15 Teacher candidates completed clinical teaching:

- 1. There is sufficient 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. The clinical teaching structure includes co-teaching and increased responsibility for the classroom. [19 TAC §228.35(e)(2)(A)-(B) & §228.35(e)(5)-(7) & (9)] [Effective September 1, 2024: 19 TAC §228.63 & §228.67]
- 2. There is sufficient evidence that the candidates completing clinical teaching are provided support throughout the clinical teaching experience that includes:
  - 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. [19 TAC §228.2(14), §228.35(f), §228.35(g)] [Effective September 1, 2024: 19 TAC §228.93, §228.101, §228.105, §228.107]
- 3. There is insufficient evidence that the candidates completing clinical teaching are provided support throughout the clinical teaching experience that includes:
  - 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: Three out of 12 candidate records did not contain evidence of post-observation conferences after formal observations.
- 4. There is sufficient evidence that candidate proficiency in implementation of the standards for the certificate sought is captured during clinical teaching. [19 TAC §228.35(e)(2)(A)(iii)] [Effective September 1, 2024: 19 TAC §228.67(e)]
- 5. The EPP has 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)]
- 6. There is sufficient evidence that candidates are consistently provided recommendations of a successful clinical experience by the cooperating teacher and the field supervisor. [19 TAC §228.35(e)(2)(A)(iii)] [Effective September 1, 2024: 19 TAC §228.67(e)]

Three of 15 Teacher candidates completed an internship:

6. There is sufficient evidence that candidates consistently complete an internship assignment that is at least one full school year in duration with at least an average of four hours per day in the subject area



of the certificate sought and is completed on an approved campus. [19 TAC §228.35(e)(2)(B) & §228.35(e)(5)-(7) & (9)] [Effective September 1, 2024: 19 TAC §228.63 & §228.73(b) & (e)]

- 7. There is sufficient evidence that the EPP ensures the Intern or Probationary certificate is valid during the internship. [19 TAC §228.35(e)(2)(B)(iv)] [Effective September 1, 2024: 19 TAC §228.73(a)]
- 8. There is sufficient evidence that the candidates completing an internship are provided support throughout the internship experience that includes:
  - o A qualified and trained mentor teacher.
  - o A qualified and trained field supervisor.
  - The required number and duration of formal and informal observations provided by the field supervisor. [19 TAC §228.2(26), §228.35(f), §228.35(g)] [Effective September 1, 2024: 19 TAC §228.97, §228.101, §228.105, §228.109]
- 9. There is insufficient evidence that the candidates completing an internship are provided support throughout the internship experience that includes:
  - Feedback and coaching from the field supervisor based on pre- and post-observation conferences and educational practices observed. [19 TAC §228.2(26), §228.35(f), §228.35(g)] [Effective September 1, 2024: 19 TAC §228.97, §228.101, §228.105, §228.109]

Evidence: One out of three candidate records was missing evidence of post-observation conferences after formal observations.

- 10. There is sufficient evidence that candidate proficiency in implementation of the standards for the certificate sought is consistently captured during the candidate's internship. [19 TAC §228.35(e)(2)(B)(ix)] [Effective September 1, 2024: 19 TAC §228.73(j)]
- 11. The EPP has integrated inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies in the internship experience. [19 TAC §228.10(a)(1)(J)] [Effective September 1, 2024: 19 TAC §228.11(a)(1)(J)]
- 12. There is sufficient evidence that candidates are consistently provided recommendations of a successful clinical experience by the campus supervisor and the field supervisor. [19 TAC §228.35(e)(2)(B)(ix)] [Effective September 1, 2024: 19 TAC §228.73(j)]

Nineteen candidates in non-teacher programs completed a practicum:

- 13. 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: Principal and Superintendent practicum logs had not been verified by the site supervisor that the candidate completed 160 hours.
- 14. There is insufficient evidence that the candidates completing a practicum are provided support throughout the experience that includes:
  - o 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: There was no evidence that site supervisors or field supervisors had completed training provided by the EPP. Field supervisors for nine candidates had completed TEA-approved training. Post-observation feedback was provided only to Reading Specialist candidates. Pre-observation conferences and formal observation instruments were missing for the Principal, Superintendent, and School Counselor programs.

- 15. There is insufficient evidence that candidate proficiency in implementation of the standards for the certificate sought is consistently captured during the practicum. [19 TAC §228.35(e)(8)] [Effective September 1, 2024: 19 TAC §228.81(a)]
  - Evidence: Formal observation instruments were not provided for Reading Specialist candidates. Principal, Superintendent, and School Counselor observation instruments in the records reviewed did not capture candidate proficiency in the standards for the certificate sought.
- 16. The EPP has not integrated inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies in the practicum experience. [19 TAC §228.10(a)(1)(J)] [Effective September 1, 2024: 19 TAC §228.11(a)(1)(J)] Evidence: There was no evidence on observation rubrics that candidate proficiency in this requirement was observed or documented for non-teacher candidates.
- 17. 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: Six of the 19 non-teacher candidate records were missing recommendations of a successful practicum experience by the 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 August 11, 2025.

- 1. 19 TAC §228.43(c) & (d) Pre-Service Requirements FBE: The EPP must revise the structure of FBE requirements so that they are integrated into coursework and so that candidates complete at least 25 hours of active engagement in K-12 classrooms in a variety of authentic school settings with diverse student populations, including observation of teachers modeling effective practices to improve student learning and opportunities for candidates to practice skills and receive feedback. The EPP must also retain logs and reflections of FBE activities in candidates' records per the records retention requirement in 19 TAC §228.13(h) and §228.31(i).
- 2. 19 TAC §228.93, §228.101, §228.105, §228.107 Clinical Experience: Clinical Teaching (Candidate Support) and 19 TAC §228.97, §228.101, §228.105, §228.109 Clinical Experience: Teacher Internship (Candidate Support): The EPP must Update field supervision requirements for clinical teaching and the internship so that field supervisors conduct the required formal observations with pre- and post-conferences for each formal observation (POP), and conduct informal observations, at least 3 per semester, that are informed by written feedback provided during post-observation conferences and include observation and feedback on targeted skills. The EPP must also provide training to field supervisors so they understand what is expected from the observation POP cycle and related informal observations and provide norming to field supervisors so that candidates receive equitable support.



- **3. 19 TAC §228.63 & §228.81 Clinical Experience: Non-Teacher Practicum (Structure):** The EPP must update the structure of the practicum process to include verification that the candidate completed at least 160 hours engaged in standards-based activities.
- 4. 19 TAC §228.99, §228.101, §228.117 Clinical Experience: Non-Teacher Practicum (Candidate Support): The EPP must update the structure of the practicum process to include:
  - Verifying that <u>field supervisors</u> meet qualification requirements.
  - documenting training provided to field supervisors by the EPP.
  - documenting TEA-approved training provided to field supervisors.
  - verifying that <u>site supervisors</u> meet qualification requirements.
  - documenting training provided to site supervisors.
  - documentation of informal observations at required timeframes.
  - notes taken during all pre- and post-conference feedback which includes evidence of engagement with the standards for the certificate.

The EPP must also retain evidence of qualifications, training, and field supervisor support in the candidate's records and/or EPP records per the records retention requirement in 19 TAC §228.13(h) and §228.31(i).

- 5. 19 TAC §228.81 Clinical Experience: Non-Teacher Practicum (Candidate Proficiency): Update the structure of the practicum process, including the observation instrument used to evaluate candidate performance in practicum, to include:
  - Evidence that candidates have shown proficiency in the standards captured during the practicum.
  - Evidence that candidates are provided recommendations of a successful clinical experience by the site supervisor and the field supervisor.

Retain evidence in the candidate's record per the records retention requirement in 19 TAC §228.13(h) and §228.31(i).

### **CERTIFICATION REQUIREMENTS**

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

#### **FINDINGS**

- 1. There is sufficient evidence that candidates holding Intern or Probationary certificates consistently meet the requirements for the certificate recommended. [19 TAC §230, §230.36, & §230.37]
- 2. Candidates are consistently recommended for certificates in areas in which they are prepared by, and completed, the EPP. [19 TAC §228.35(e)(2)(B), §230.36, §230.37, §230.11, & §230.13]
- 3. There is insufficient evidence that the EPP consistently ensures candidates complete all requirements prior to recommendation for the certificate sought. [19 TAC §230, §239, §241, & §242] Evidence: Five Reading Specialist candidate records reviewed were missing service records, so the TEA could not verify that the required years of experience had been met.
- 4. There is sufficient evidence that candidates consistently meet the English language proficiency requirement prior to being recommended for certification. [19 TAC §230.11(b)(5)]



#### CORRECTIVE ACTION REQUIRED

The EPP must implement processes to verify candidates qualify for certification prior to recommending certificates as required in [19 TAC §239] by August 11, 2025.

1. 19 TAC Chapter 239 Educator Certification: Requirements: The EPP must update the standard certification process to include collecting and verifying official service records for Reading Specialist candidates, to ensure that candidates have met the requirements for certification. The EPP must also retain evidence in the candidate's record per the records retention requirement in 19 TAC §228.13(h) and §228.31(i).

#### 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: For 11 non-teacher candidates, the reported admission date did not match the admission data in the records.
- Candidates are consistently identified as enrolled in the area in which certificates are issued. [19 TAC §229.3]
- 3. Clinical experience records reported in ECOS accurately represent the related data in candidates' records. [19 TAC §229.3]
- 4. Observation dates and durations have not been consistently reported in ECOS as detailed on observation documents. [19 TAC §229.3 & §229.4]
  - Evidence: For 11 non-teacher candidates, the reported formal observation dates and times did not match those in the records.

#### 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 August 11, 2025.

1. 19 TAC §229.3(a), §229.3(f)(1), & related graphic Figure 19 TAC §229.3(f)(1) Data Reported – Accurately: The EPP must establish a process for reporting data in ECOS that ensures all required data is reported and reported accurately as correlates with EPP and candidate records. The EPP must also provide training to EPP staff as needed, which reflects expectations for accurately reporting data.



### **ADVISEMENT**

- Update processes to meet the revised requirements in 19 TAC Chapter 228, effective September 1, 2024.
- Effective September 1, 2024, include instruction on using Open Education Resources (OER) materials in your coursework. Follow TEA's weekly EPP newsletter for professional development opportunities and note that candidates admitted before September 1, 2024, may complete the Legacy Chapter 228 curriculum by August 31, 2026.
- Evaluate and update as needed the current informal observation process to ensure alignment with new requirements for informal observations in 19 TAC §228.101(b)(5)-(6).
- The Physical Education EC-12 (158), Health EC-12 (157), and English Language Arts & Reading 7-12 (231) exams are no longer available effective September 1, 2024. Candidates pursuing certification in these certificate areas must now be approved for the new exams 258, 257, and 331, respectively. To be certified using passing scores on exams 158, 157, or 231, candidates must apply and be recommended for certification by September 1, 2025. Additional information about the transitions of these certification exams is on the <a href="Educator Testing">Educator Testing</a> page on the tea.texas.gov website.
- The Special Education EC-12 and Special Education Supplemental certificates will expire and will be replaced by the Special Education Specialist EC-12 certificate. The certification exams, 161 and 163, respectively, will not be offered after August 31, 2025. Candidates will have until September 1, 2026 to be certified in the expiring certificate areas. The new Special Education Specialist EC-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 shortterm goals for ensuring records are updated at least by semester and prior to recommending standard certificates.
- Review all certificate areas that the EPP no longer plans to support and request, in writing, for TEA to remove them from inventory.
- Notify the assigned specialist at TEA promptly when the EPP has staff changes in the roles of Legal Authority, Primary Point of Contact, Backup Legal Authority, or Certification Officer or when the EPP has changes in EPP contact information.
- To ensure continuity in record keeping and other related processes, maintain a procedure manual or process documents detailing EPP processes and procedures.
- Align the verbiage of the program to the verbiage of Texas Administrative Code (TAC) (ex. Field supervisor, cooperating teacher, mentor, candidate, clinical teaching, internship, practicum, etc.).
- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about the current Texas Administrative Code.
- Continue to participate in training and webinars provided by TEA to ensure that the program staff is knowledgeable about current requirements and changes in the Texas Administrative Code, including changes to EPP processes and updates to certificates and related certification exams.
- Continue to maintain communication with the TEA education specialist assigned to the program.



### **CORRECTIVE ACTION COMPLETE**

Evidence of Corrective Action, received at TEA on August 11, 2025, has been reviewed by TEA staff and meets requirements for compliance with the Texas Education Code and the Texas Administrative Code.

