



**University of North Texas-Dallas
2019 – 2020 Continuing Approval Review Report**

BACKGROUND

Texas Education Agency (TEA) Program Specialists, Lorrie Ayers, Guiomar Andujar, and Jennifer Perez, conducted a five-year Continuing Approval Review of the University of North Texas-Dallas (UNT-Dallas) educator preparation program (EPP) on November 5-7, 2019. 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...". UNT-Dallas was approved as an EPP on September 15, 1989. At the time of the review, Dr. Lisa Hobson was the program Legal Authority and the accreditation status of the EPP was Accredited-Probation (Year 1).

UNT-Dallas is approved to certify candidates in the Classroom Teacher, Principal, and School Counselor classes. The EPP reported 110 finishers in 2017-2018 and 107 finishers in 2018-2019.

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 TAC required by the Texas legislature for the regulation of all EPPs in the state. (See the complete [TAC](#) for details.) The risk assessment model identified UNT-Dallas as a Level 1 risk due to the accreditation status.

The risk assessment, including the lowered accreditation status, determined the five-year Continuing Approval Review was conducted in an on-site format where TEA staff reviewed documents and records on-site at UNT-Dallas located at 7300 University Hills Blvd., Dallas, Texas 75241.

The scope of this review included verifying compliance with TAC and Texas Education Code (TEC) as applicable to all certification classes actively offered by the EPP. A Compliance Plan containing details of next steps for the EPP was developed collaboratively with EPP staff prior to the close of the review.

EPP staff participating at various points in the review were: Dr. Lisa Hobson, Dr. Constance Lacy, Dr. Shelley Jackson, Dr. Marco Strappeck, Dr. Betty Stewart, Dr. Judith Nix, Dr. Jessica Arceneaux-Jones, Dr. Paulette Walter, Dr. Patsy Sosa-Sanchez, Dr. Eric Creeger, Dr. Jerry Burkett, Dr. Mychelle H. Smith, Dr. Tanisha S. Bell, Dr. Cynthia Rodriguez, and Dr. Khiandra Woods.

DATA ANALYSIS

Information concerning compliance with TAC governing EPPs was collected by a variety of means. A Status Report and related program documents were submitted by the EPP to TEA on



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November 3, 2019, two (2) days prior to the review. Records for five (5) candidates were randomly selected from each of these programs: Teacher undergraduate (U), Teacher Post-Baccalaureate/Alternative (PB/ALT), Principal, and School Counselor. Candidate and EPP records were reviewed to determine compliance with requirements for candidate preparation and certification and for compliance with state reporting requirements and governance. The scope of the review included the reporting years 2017-2018 through 2019-2020. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence.

FINDINGS, COMPLIANCE ISSUES, and RECOMMENDATIONS

“Findings” indicate evidence collected during the review process. “Compliance Issues” are areas that are not compliant with requirements in TAC and must be corrected by the agreed date identified in the Compliance Plan. “Recommendations” are suggestions for general program improvement and no follow up is required.

COMPONENT I: GOVERNANCE – 19 TAC §228

Findings

UNT-Dallas is accredited by the Southern Association of Colleges and Schools Commission of Colleges (SACSCOC).

The facilities in which the UNT-Dallas EPP resides appear to be new and appear to offer acceptable resources and support for candidates in the EPP programs. EPP staff and faculty were engaged in the review process at all points of the review.

The counseling program at UNT-Dallas is accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP) effective January 13, 2016 through October 31, 2025.

Information provided on the EPP website, with candidate records and data in the Educator Certification Online System (ECOS) and in the Accountability System for Educator Preparation programs (ASEP), provide evidence that candidates are certified in these routes: Teacher program (U, PB, ALT), Principal program (PB, ALT), and School Counselor program (PB, ALT).

The website informs interested individuals that teacher candidates seek a degree in Interdisciplinary Studies with certification options in elementary, middle school and high



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school certificate areas. The EPP is currently approved to certify candidates in 31 certificate categories and 4 supplemental areas.

At the time of the review, School Counselor program staff were evaluating and updating program processes and requirements. As the review progressed, program staff were making updates to the program handbook and other process. An Internship Agreement document was updated to capture the candidate's agreement of understanding and abiding the Educators Code of Ethics (ECOЕ). Another update required the candidate preparing to complete a practicum to provide the EPP with a resume and School Counselor certificate for the site supervisor as evidence the assigned site supervisor, meets qualification requirements in TAC.

There was no evidence presented of Advisory Committee activity. The School Counselor program presented evidence of frequent staff meetings to discuss School Counselor program business but those meetings did not meet requirements for committee membership diversity because membership did not include representation from K-12 public or private schools, regional education service centers, or business and community. Based on evidence presented, the EPP did not meet the requirements for an advisory committee as identified in 19 TAC §228.20(b).

The EPP has developed and implemented a calendar of activities from admission to completion that coincides with the university semester calendar which meets requirements in 19 TAC §228.20(g).

Compliance Issues (per Compliance Plan)

1. Establish an advisory committee composed of at least three (3) of the four (4) required groups. Ensure the committee meets annually at minimum to discuss the business of all programs within the EPP. Retain documentation that committee members are trained in the roles and responsibilities and retain minutes and member sign-in sheets in EPP records.

Recommendations

1. Continue to send staff to relevant training offered by TEA and other entities for the purpose of continuous improvements to the EPP and to stay in step with changes and updates in educator preparation requirements in TAC and TEC.
2. Remove approved certificates from inventory that are not supported by enrollment or approved curriculum.



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3. The website Accreditation page states the UNT-Dallas “School of Education is accredited by the Texas Education Agency”. To be accurate, this should say the “School of Education is approved by the State Board for Educator Certification to prepare and certify teachers in Texas”. The TEA is not an accrediting agency so that terminology should be corrected where necessary to convey “approved by the TEA” or “approved by the SBEC” as applicable to the approval area.

Based on the evidence presented, the UNT-Dallas EPP has not met requirements for governance as identified in 19 TAC Chapter 228.

COMPONENT II: ADMISSION - 19 TAC §227.10

Findings

A review of the EPP website revealed the EPP had posted the following required information for applicants and candidates on the Resources and Forms page [19 TAC §227.1]:

- The required fingerprint background check and the right to request a Preliminary Criminal History Evaluation (PCHE) from TEA and
- EPP admission requirements.

Required information that was not posted on the website but was found on the application for admission into the Teacher (U) program included [19 TAC §227.1]:

- The performance of the EPP over time
- The supply and demand of teachers in the workforce
- EPP completion requirements

The application for admission into the Teacher (U) program informs applicants that they may not be eligible for a certificate due to criminal history but does not directly identify the applicant will be required to complete a fingerprint background check through TEA or that the applicant has the right to request a PCHE through TEA as required in 19 TAC §227.1(b). While the information about fingerprinting and PCHE was accessible by applicants on the Resources and Forms page on the EPP website, program staff were advised to update verbiage on the Teacher (U) application to reflect the complete required information for consistency in messaging. The Teacher (PB/ALT), Principal, and School Counselor programs must update material provided to applicants to reflect all of the data and information required in 19 TAC §227.1(b)-(d).



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Teacher Programs

Teacher certification is offered through the School of Education. The admission requirements for the Teacher (U) program published on the EPP website are:

- At least 60 completed credit hours on the degree plan;
- A 2.75 GPA or higher [19 TAC §227.10(a)(3)];
- Two math courses completed;
- Two science courses completed;
- A faculty recommendation;
- A professional reference; and
- An interview.

The admission requirements for the Teacher (PB/ALT) programs published on the EPP website are:

- An Application;
- Transcripts;
- Two letters of recommendation; and
- An essay.

The website indicates eligible applicants to the graduate programs must have either a 3.0 GPA in the last 60 hours of undergraduate coursework or a 2.0 GPA on all undergraduate coursework. Program staff were reminded the applicant admitted to graduate school would need to demonstrate a GPA of 2.5 or higher prior to being admitted into the EPP to meet minimum requirements for admission GPA in 19 TAC §227.10(a)(3).

The website states the Pre-Admission Content Test (PACT) must be passed before clinical teaching or internship can begin. The program was advised that testing may only occur in the PACT route prior to admission and testing completed after admission must be approved by the EPP. Candidates may not take a test through the PACT route after they have been admitted into the EPP.

Candidates in the Teacher (U) program met all admission requirements except for the 7-day TEA notification required; however, there was limited evidence that candidates in the Teacher (PB/ALT) program met all admission requirements.

- Four of the five (5) candidates in the Teacher (U) program were admitted after the formal admission process was effective in TAC. Records for each of the five (5) contained written offers of admission and written acceptance via email; however, three (3) of the four (4) that should have been uploaded as admitted in the Educator Certification Online System (ECOS) within the 7 calendar-day time frame required in 19 TAC §227.17(e)



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were not. Four (4) of the five (5) Teacher (PB/ALT) candidates were admitted after the formal admission process in 19 TAC §227.17 was effective but there was no evidence these candidates were formally admitted as required in 19 TAC §227.17, including none were reported as admitted to the TEA within the 7 days required in 19 TAC §227.17(e). EPP staff were reminded that candidates must have an admission record in ASEP within 7 days of the formal admission date identified in the formal offer of admission.

- Evidence that candidates met additional published admission requirements such as completed coursework, letters of reference, and written essays, was found in records for all teacher candidates reviewed. [19 TAC §227.10(a)(9) and §227.10(b)]
- One (1) of five (5) Teacher (U) candidates reviewed was admitted without the required 15 semester credit hours completed in the subject area of the certificate sought and had not passed a content test prior to admission as required in 19 TAC §227.10(a)(4).
- Records for all Teacher (U) candidates contained evidence of an interview scored with a rubric that meets requirements that an admission screen has been implemented for this program. One (1) of the five (5) records for the Teacher (PB/ALT) candidates contained evidence of an admission screen. EPP staff must implement, and consistently use, a screen to determine if the applicant's knowledge, experience, skills, and aptitude are appropriate for the certificate sought as required in 19 TAC §227.10(a)(8) including an objective rubric and cut score to equitably apply the screen across all applicants.
- Teacher candidates had demonstrated English language proficiency as required in 19 TAC §230.11(b)(5) through credentials from schools in the United States. None of the candidates whose records were reviewed held credentials from out-of-country.

Principal Program

Principal certification is offered through the School of Education. Admission requirements for the Principal program posted on the website at the time of the review were:

- An undergraduate degree;
- Acceptance into the UNT-Dallas graduate school;
- A GPA of 2.8 or higher on all undergraduate coursework or a 3.0 or better in the last 60 hours of undergraduate coursework; and
- Two years of teaching experience.

Due to limited evidence in records reviewed for five (5) candidates, it could not be determined that the Principal program met requirements for admission.



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- It was difficult for the review team to determine if the Principal program was inconsistent in the application of its admission policies or if the records retention requirements were not met. Candidates' records contained evidence that the Principal program collects a resume, a service record, a writing sample, and letters of recommendation from applicants; however, two (2) of the five (5) records reviewed were missing one or more of these documents.
- One (1) candidate was admitted with a GPA below 2.5 which does not meet EPP or graduate school admission requirements. Evidence of documentation supporting the admission of this candidate under the 10% exception as required in 19 TAC §227.10(a)(3)(B) could not be located in the candidate's record.
- Principal program staff were encouraged to evaluate admission requirements to determine the requirements they feel are necessary to qualify an applicant for admission into the Principal program and then implement a process to ensure application requirements are consistently met by all applicants. Documentation must be retained in candidates' records as required by 19 TAC §228.40(f).
- Three (3) of the five (5) candidates whose records were reviewed were admitted into the Principal program after the implementation of the formal admission process required in 19 TAC §227.17 yet evidence was not provided for these candidates that they had been formally admitted. Principal program staff were advised they must implement the formal admission process.
- Applications for admission, required in 19 TAC §227.10(a)(8) were present in all candidates' records; however, there was no evidence that the Principal program had implemented screening activities to determine the applicant's appropriateness for the certificate sought as required in 19 TAC §241.5(c). EPP staff were advised to develop two (2) or more admissions screens with rubrics and cut scores. Various ideas and examples of types of screens were discussed with Principal program staff.
- None of the candidates whose records were reviewed held credentials from out-of-country.

School Counselor Program

The School Counselor program is offered through the School of Human Services. The EPP offers a 48-hour master's degree in counseling with a track in School Counseling and in Clinical Mental Health Counseling. The courses required to complete the program are posted on the



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website. Admission into the School Counseling program appears to be concurrent with admission into the Graduate School. Published requirements are:

- A bachelor's degree;
- A GPA of 3.0 in last 60 hours of coursework or 2.8 overall;
- At least two years of creditable teaching experience as verified by an official service record provided at admission;
- An application;
- An interview;
- 3 references;
- A one-page typed writing sample; and
- Specified grades on initial coursework.

The program offers “provisional” admission based on performance in initial graduate coursework. The EPP was advised that TAC does not allow “provisional” admission into the School Counselor program, and if this is necessary for a candidate to pursue School Counseling certification, the admission requirements should be separated from Graduate School admission to allow for full admission into the EPP after the initial graduate coursework has been completed.

Based on records reviewed for five (5) candidates, the School Counselor program did not meet requirements for admission.

- Two (2) of the five (5) candidates selected for review were identified in Test Approval in ECOS with an admission date. Three (3) of the five (5) candidates had not been admitted into the School Counselor program but instead appeared to have completed requirements for the Clinical Mental Health Counseling program. Records for these candidates were selected randomly from the Finisher Records List where they were reported by the EPP as enrolled in the School Counselor program for multiple years.
- There was limited evidence that admission requirements were met. It was not clear to the review team if this was because of the randomly selected candidates with no records, or because the EPP does not have a records retention process established for this program, or if the program does not equitably apply its admission policies. The TEA review team discussed with program staff the need to review admission policies and requirements, publish and consistently implement those they feel are necessary to qualify a an applicant for admission into the School Counselor track, and retain documentation for admitted candidates according to the records retention requirement in 19 TAC §228.40(f).



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- Records available for one (1) of the five (5) candidates provided evidence the School Counselor program has an admission screen evaluated with a rubric and cut score as required in 19 TAC §227.10(a)(8) but due to the limited documentation for the five (5) candidates it could not be determined if the screen is implemented consistently for all applicants.

Compliance Issues (per Compliance Plan)

1. The EPP must implement a process for all programs within the entity to create admission records in ASEP within 7 days of each candidate's formal date of admission. [19 TAC §227.17(e)]
2. The Teacher (PB/ALT), Principal, and School Counselor programs must implement a formal admission process as required in 19 TAC §227.17.
3. The Principal and School Counselor programs must update admission requirements and other information that is required to be posted in writing for applicants on a website, application, or another place that would be accessible by all applicants. [19 TAC §227.1]
4. The Principal and School Counselor programs must implement a process to collect and retain the documentation related to admission, including documentation that candidates met all published admission requirements. [19 TAC §227.10(b) and §228.40(f)]
5. The Principal program must update the admission process to include two or more admissions screens including rubrics and cut scores to evaluate candidate performance on screens. [19 TAC §241.5(c)]
6. If the Principal program allows candidates to be admitted with a GPA below the minimum 2.5, then the Principal program must establish policies and/or processes for admitting candidates with a GPA below the minimum as identified in 19 TAC §227.10(a)(3)(B), including guidelines for determining a) an extraordinary circumstance; and b) the work experience equivalent that "demonstrates achievement equivalent to the academic achievement represented by the GPA requirements".
7. The School Counselor program must set an admission point for candidates entering the School Counselor program that must be at a point where candidates can complete a minimum of 14 semester credit hours of coursework and the 160 clock-hour practicum after admission into the program and must not provide coursework or training to applicants before they are formally admitted into the program. [19 TAC §227.17(f)]



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8. The School Counselor program must implement an application for admission as required in 19 TAC §227.10(a)(8) and must retain the completed application in each candidate's record as required in 19 TAC §228.40(f).

Recommendations

None

Based on the evidence presented, UNT-Dallas did not meet minimum requirements for admissions as identified in 19 TAC §227.10, §239.5, and §241.5.

COMPONENT III: CURRICULUM – 19 TAC §228.30

Findings

The coursework was evaluated to verify that all candidates in all programs received instruction in the required areas identified in 19 TAC §228.30. Coursework for the Core Subjects EC-6 certificate area was reviewed as representative that curriculum meets minimum requirements for being standards-based, performance-based, research-based, rigorous, interactive, and overall would lead to preparation of a candidate to be effective in the classroom as required in 19 TAC §228.35(a)(1) and (2). The Core Subject EC-6 certificate area was the focus of the curriculum review because it was identified as the subject area that is the lowest-performing but prepares the highest number of candidates.

Based on curriculum alignment charts, syllabi, and samples of activities and assessments in some courses, the curriculum is based on the approved educator standards and addresses the relevant TEKS as required in 19 TAC §228.30(a). There was limited evidence that curriculum provided to candidates in the Teacher (PB/ALT) program contains sufficient instruction in a) the Technology Applications standards I-VII for all teachers; and b) content-specific methodology for each certificate area offered.

Scope and Sequence documents were provided for the Teacher (U) and the Teacher (PB/ALT) programs to evaluate if the organization of coursework appeared to lead to adequate preparation as required in 19 TAC §228.35(a)(1), including pre-service coursework and training as identified in 19 TAC §228.35(b). Based on the Scope and Sequence documents submitted, candidates meet preservice requirements prior to clinical teaching or internship.

Syllabi and coursework samples were reviewed for evidence of instruction in the following areas required in 19 TAC §228.30:

- The Educator's Code of Ethics;



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- Detection and education of students with dyslexia;
- Mental health, substance abuse, and youth suicide (provided by an approved provider);
- The skills that educators are required to possess, the responsibilities that educators are required to accept, and the high expectations for students in this state;
- The importance of building strong classroom management skills;
- The framework in this state for teacher and principal evaluation;
- Appropriate relationships, boundaries, and communications between educators and students;
- Digital learning, including a digital literacy evaluation followed by a prescribed digital learning curriculum;
- The English Language Proficiency Standards (ELPS);
- Reading instruction, including instruction that improves students' content-area literacy;
- For certificates that include early childhood and prekindergarten, the Prekindergarten Guidelines; and
- The skills and competencies captured in the Texas teacher standards in Chapter 149, Subchapter AA, of this title (relating to Teacher Standards).

All programs provided the required instruction except:

- All programs lacked depth in the instruction in the Educators' Code of Ethics including instruction in appropriate relationships, boundaries, and communications between educators and students;
- The Teacher (PB/ALT) program lacked sufficient instruction in the Pre-Kindergarten Guidelines and in the ELPS;
- The Teacher (PB/ALT) program lacked instruction by an approved provider in mental health, substance abuse, and youth suicide.

Compliance Issues (per Compliance Plan)

1. Strengthen coursework and requirements for Teacher (PB/ALT) candidates in all certificate areas to include instruction in content-specific methodology, Pre-Kindergarten Guidelines (for certificates containing early childhood grades), ELPS, and the Technology Applications standards I-VII for all teachers.
2. Strengthen coursework for all candidates in all programs to include more instruction in the ECOE and in appropriate relationships.



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Recommendations

1. The PACT test will change effective at the end of January 2020. Plan to update curriculum to meet requirements for instruction in content-specific pedagogy and test preparation. The TExES content pedagogy exams cannot be used for admission purposes after 1/27/2020 but may be used for certification purposes. New PACT, TxPACT, may not be used for certification purposes.
2. The Application A, used to add new certificate areas to EPP inventory, has changed – staff in Teacher programs should plan to review requirements in the updated application in advance of preparing to add new certificate areas.
3. Develop and implement more performance assessments. Evidence of performance assessments will be a requirement for adding new certificates using the updated Application A.
4. Review all certificate areas that the EPP no longer plans to support and request, in writing, for TEA to remove them from inventory.
5. The Science of Teaching Reading (STR) will impact the renewal of Core Subjects EC-6, Core Subjects 4-8, ELAR 4-8, and ELAR /Social Studies 4-8 certificates, effective January 1, 2021. Programs that are not able to demonstrate an updated curriculum that addresses the standards, domains, and competencies of the STR, will not be able to renew these certificates after January 2021. To prevent a lapse in service for candidates in these areas, teacher programs are encouraged to plan ahead by updating curriculum and submitting the application for approval to TEA well in advance of the January 1, 2021 implementation date.

Based on the evidence presented, UNT-Dallas did not meet minimum requirements for curriculum as identified in 19 TAC §228.30.

COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT – 19 TAC §228.35

Findings

Teacher Programs

Per the Scope and Sequence document created by EPP staff for the 5-year review, candidates in the Teacher (U) program pursuing certification in the Core Subjects EC-6 certificate area



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complete 27 semester credit hours, or 405 clock-hours, of coursework and more than 30 clock-hours of field-based experiences (FBE) embedded in requirements across multiple courses which exceeds requirements for coursework hours in 19 TAC §228.35(b). Four (4) courses appear to be offered online. Per 19 TAC §228.35(a)(6), if offering coursework in an online delivery format, the EPP must pursue quality certification through one of the options in 19 TAC §228.35(a)(6). All courses are completed prior to clinical teaching.

The precise number of clock-hours of coursework required for the Teacher (PB/ALT) candidates could not be determined based on documentation provided for the review. A published degree plan revealed candidates pursuing Core Subjects EC-6 certification complete 12 semester credit hours, or 180 clock-hours, of coursework. The Scope and Sequence document prepared by EPP staff for the review revealed that candidates complete 18 semester credit hours, or 270 clock-hours, of coursework with 45 clock-hours of FBE required. The only course that reflects instruction in content methodology is EDCE 5016, STEM Literacy across the Disciplines.

Teacher candidates complete FBE requirements in K-12 classrooms. Syllabi reflect that candidates are interactive with students in the FBE classrooms; however, the precise number of FBE hours required could not be determined. Evidence of reflections completed after FBE was limited in candidates' records, and evidence of EPP requirements for FBE reflections was limited in syllabi. Some FBE records were found in paper files and others were located in TK20.

- Records for four (4) of the five (5) Teacher (U) candidates contained signed FBE logs reflecting 60 or more hours completed. Records for two (2) of the five (5) Teacher (PB/ALT) candidates contained signed logs reflecting 30-47 FBE hours completed. Evidence of FBE requirements completed could not be located for four (4) of the 10 teacher candidates. It could not be determined if this was because the FBE hours were not completed or because the records were not retained. Due to the missing FBE documentation, there was not enough evidence to support that all teacher candidates meet requirements for FBE in 19 TAC §228.35(e)(1).
- Records for two (2) of the 10 teacher candidates revealed the FBE hours were completed in a variety of settings as required in 19 TAC §228.35(e). Information on four (4) of the logs reflected the FBE requirements were completed in only one (1) K-12 classroom setting and not in a variety of settings as required in 19 TAC §228.35(e).
- One (1) or more reflections were found in records for two (2) candidates as required in 19 TAC §228.35(e)(1)(A). It could not be determined if reflections were not retained in candidates' records because they were submitted to instructors to meet course requirements or because of an incomplete records' retention process.



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- Records for one (1) Teacher (PB/ALT) candidate revealed the FBE requirement was waived because the candidate had educational aide experience. FBE requirements may not be waived except for the reasons identified in 19 TAC §228.35(l) which includes: a) candidates pursuing the JROTC certificate that are, or have been, employed as JROTC instructors in a K-12 placement; and b) candidates who meet the aide exemption requirement under TEC 21.050(c).

The EPP is approved to offer clinical teaching and internships to teacher candidates in both the (U) and (PB/ALT) routes. Fifteen weeks of clinical teaching is required. At the time of the review, four (4) of the five (5) Teacher (U) candidates had completed clinical teaching and one (1) candidate was in process of completing clinical teaching. Three (3) of the five (5) Teacher (PB/ALT) candidates had completed an internship, one (1) completed clinical teaching, and one (1) was in process of completing an internship extension.

- The Teacher (U) and Teacher (PB/ALT) programs met requirements for clinical teaching and internship assignments, including placement that was appropriate for the certificate sought, trained and qualified field supervisors (FS), mentors, and cooperating teachers, and formal observation frequency and duration, except:
- It could not be verified that campus personnel receives copies of written feedback provided to candidates relating to formal observations conducted by FS as required in 19 TAC §228.35(g).
- It could not be verified that all cooperating teachers, mentors, and FS meet the qualification of “accomplished educator as shown by student learning” as required in 19 TAC §228.2(12), (16), and (24).
- The EPP has not yet implemented a process to secure a recommendation from campus personnel and the FS regarding candidate success in an internship or clinical teaching as required in 19 TAC §228.35(e)(2)(A)(iii) and (e)(2)(B)(vii).

Principal Program

According to degree plans and published program requirements, candidates in the Principal program complete at least 15 semester credit hours of coursework and both an internship and a practicum (or a 30 hour master’s degree with certification). Coursework is delivered in a face-to-face format. Due to differences between EPP terminology and that found in TAC, the “internship” was identified by program staff as the program requirement that meets the TAC requirement for a 160 clock-hour practicum in 19 TAC §228.35(e)(8).



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The Principal certification page on the website indicates a candidate may transfer in up to 9 hours of credit toward completing principal requirements if the coursework is within 6 years old. The EPP was advised to update that to reflect the 5-year limit on coursework required in 19 TAC §228.35(a)(5)(B).

None of the candidates whose records were reviewed completed a practicum while holding an Intern or Probationary certificate.

The Principal program did not meet the requirements for the practicum portion of training.

- Practicum logs found in records for four (4) of the five (5) candidates provided evidence that candidates complete a practicum; however, only one (1) of the records identified the 160-clock hour requirement had been met. Other logs revealed half of the hours had been completed. Program staff stated they returned logs to the candidates instead of retaining them in candidates' EPP records.
- Due to limited documentation retained for the Principal program candidates, it could not be determined if the practicum is standards-based or if it meets requirements for field supervision or for on-campus mentoring. Due to limited documentation and to the fact that formal observations for Principal candidates are not reported in ASEP, it could not be determined if Principal candidates are supervised during the practicum, including formal observations and feedback and coaching provided by a FS as required in 19 TAC §228.35(h), or if the program determines candidate proficiency in the standards as required in 19 TAC §241.10(b).
- There was no evidence the Principal program has implemented a process to secure a recommendation from campus personnel and FS regarding candidate success in the practicum as required in 19 TAC §228.35(e)(2)(A)(iii) and (e)(2)(B)(vii).

School Counselor Program

Coursework and practicum records for five (5) School Counselor candidates were requested but only one (1) record was provided because the other four (4) candidates either left the program or were pursuing a counseling degree and not pursuing a School Counselor certificate.

The School Counselor program is embedded in a 48-hour master's degree in counseling, so candidates likely complete more than 200 clock-hours (14 semester credit hours) of coursework; however, they complete the coursework prior to admission which is not allowed per 19 TAC §227.17(f).



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Program staff stated candidates in the School Counselor program complete two (2) different field experiences, an internship and a practicum. Due to terminology differences between program requirements and requirements in TAC, program staff stated the internship fulfills the “practicum” required in 19 TAC §228.35(e)(8). Other field experiences in the School Counselor program are general counseling experiences required as part of the master’s degree and do not take place in a school setting.

- Documentation in the record for one (1) candidate provided evidence the candidate completed a practicum of at least 160 clock hours that was supervised by a qualified FS and mentored by an on-campus site supervisor.
- The observation instrument used to evaluate candidate performance was based on counseling standards but did not reflect specific requirements for demonstration of proficiency of the School Counselor standards

Due to limited documentation and to the fact that observations for School Counselor candidates are not reported in ASEP, it could not be determined if School Counselor candidates are consistently required to complete a supervised practicum in a school setting as required in 19 TAC §228.35(e)(8), including formal observations and feedback and coaching provided by a FS as required in 19 TAC §228.35(h), or if the program has prepared candidates to implement *The Texas Model for Comprehensive School Counseling Programs* (TEC, Chapter 33, Subchapter A) as required in 19 TAC §239.10(c).

Compliance Issues (per Compliance Plan)

1. The Teacher (PB/ALT) program must establish a calendar that reflects each candidate receives a minimum of 300 clock-hours of coursework (18 semester credit hours + 30 clock-hours of FBE) and training appropriate for the certificate sought after admission into the program. [19 TAC §228.35(b)]
2. The Teacher (PB/ALT) program must establish a process for collecting evidence that candidates complete a minimum of 30 clock-hours of FBE and that the FBE meets the requirements in 19 TAC §228.35(e)(1).
3. The Teacher (U) and (PB/ALT) programs must implement a process to a) collect evidence the candidate demonstrated proficiency in the standards for the certificate sought during clinical teaching or internship; and b) the FS and appropriate campus personnel agree the candidate is ready for standard certification. [19 TAC §228.35(e)(2)(a)(iii) and §228.35(e)(2)(B)(vii)]



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4. The Principal program must update policies regarding accepting prior coursework completed by a candidate in lieu of coursework required for completion of the Principal program to be in alignment with requirements in 19 TAC §228.35(a)(5)(B).
5. The School Counselor program must implement a program calendar that allows candidates to complete at least 200 clock-hours (14 semester credit hours) of coursework that is based on the School Counselor standards after admission into the School Counselor program. [19 TAC §228.35(c)]
6. The Principal and School Counselor programs must implement a supervised standards-based practicum that requires candidates to complete a minimum of 160 clock-hours in a school setting, including maintaining records of the practicum per the records retention requirement in 19 TAC §228.40(f). [19 TAC §228.35(e)(8) and §228.35(h)]
7. Field supervision processes for the Principal and School Counselor programs must be updated so that a) proficiency in the standards for the certificate can be determined; and b) documentation that the FS and site supervisor agree the candidate is ready for certification can be collected and retained by the program. [19 TAC §239.10(a) and (c), 19 TAC §241.10(b), and 19 TAC §228.35(e)(8)(D)]
8. All programs must establish a process to verify and document that cooperating teachers, mentors, site supervisors, and FS meet the qualification of “accomplished educator as shown by student learning”. [19 TAC §228.2(12), (24), (31), and (16)]

Recommendations

1. Develop and implement a process for collecting, verifying, and retaining documentation of mentor and FS qualifications and training.

Based on the evidence presented, UNT-Dallas has not met minimum requirements for program delivery as identified in 19 TAC §228.35.

COMPONENT V: ASSESSMENT AND EVALUATION OF CANDIDATES AND EPP – 19 TAC §228.40

Findings

The EPP is in transition from retaining paper records to retaining records in TK20 which is an electronic format. Various records, such as some observation documents, were not available for review per 19 TAC §228.40(f).



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Evidence of candidate benchmarks was found in the candidates' records available for review. [19 TAC §228.40(a)]

There was evidence that test readiness requirements are in place, but there was limited evidence in the records available for review that candidates consistently met the test readiness requirements. [(19 TAC §228.40(b) and (d)]

Per 19 TAC §228.40(e), the EPP must use data and feedback from a variety of sources to continuously evaluate the design and delivery of the EPP components. There was limited evidence that the EPP captures program evaluation data for the purpose of program improvements. The School Counselor program presented a copy of a survey used to collect information about the counseling program as required by CACREP, but the survey was not focused on the School Counselor program and there was no evidence of data that had been collected using the survey.

Compliance Issues (per Compliance Plan)

1. The EPP must show evidence they have implemented a program evaluation process to “continuously evaluate the design and delivery of the EPP components based on performance data, scientifically-based research practices, and the results of internal and external feedback and assessments”. [19 TAC §228.40(e)]
2. The EPP must implement a records retention process to retain candidate and EPP records for a period of five (5) years “after a candidate completes, withdraws from, or is discharged or released from the program” as required in 19 TAC §228.40(f).
3. All programs in the EPP must retain evidence that each candidate met test readiness requirements established by that program. [19 TAC §228.40(b) and (d)]

Recommendations

1. Develop a plan to update EPP benchmarks and test readiness requirements for the Teacher (PB/ALT) program to address changes in PACT that will be in effect January 27, 2020.

Based on the evidence presented, UNT-Dallas has not met minimum requirements for program and candidate evaluation as identified in 19 TAC §228.40.



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COMPONENT VI: PROFESSIONAL CONDUCT - 19 TAC §228.50

Findings

19 TAC §228.50 requires that during the period of preparation, the EPP shall ensure that the individuals preparing candidates and the candidates themselves understand and adhere to 19 TAC Chapter 247 (relating to the Educators' Code of Ethics).

- Candidates in the Teacher (U) program sign a statement of understanding and abiding the Texas Educators' Code of Ethics; however, there was no evidence this was a requirement in the Teacher (PB/ALT), Principal, or School Counselor programs.
- The School Counselor program has a process for capturing candidate agreement of abiding and understanding of ethics in counseling but these are not focused on the educator.
- There was no evidence identified in EPP records that staff have signed an agreement of understanding and abiding the Texas Educators' Code of Ethics.

Compliance Issues (per Compliance Plan)

1. The EPP must implement a process to ensure that all candidates, and those individuals that prepare them, understand and agree to adhere to the Texas Educators' Code of Ethics in 19 TAC §247.2. [19 TAC §228.50]

Recommendations

None

Based on the evidence presented, UNT-Dallas has not met minimum requirements for professional conduct as identified in 19 TAC §228.50.

COMPONENT VII: COMPLAINTS PROCESS – 19 TAC §228.70

Findings

Per 19 TAC §228.70(b), the EPP complaints process is on file at TEA. A clear, understandable process is posted as required for access by candidates and others. The website copy provides a link to the TEA website and may be printed from the website which meets the requirement for a physical copy provided to an individual upon request.



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Recommendations

None

Based on the evidence presented, UNT-Dallas met minimum requirements for a complaints process as identified in 19 TAC §228.70.

COMPONENT VIII: CERTIFICATION PROCEDURES - 19 TAC §228 and §230

Findings

Records in ECOS show that three (3) of the five (5) Teacher (U) candidates and three (3) of the five (5) Teacher (PB/ALT) candidates had achieved a standard certificate. One (1) Principal candidate and two (2) School Counselor candidates had achieved standard certification.

Various documents such as checklists, benchmark documents, degree plans, and transcripts were evidence that candidates met requirements for certification except:

- Two (2) of the Teacher (PB/ALT) candidates were issued standard certificates with effective dates that were prior to the completion of the full school year internship. EPP staff were advised that the effective date of a standard certificate cannot be before the internship is complete even if the candidate has graduated from the university prior to the end of the full school-year internship.
- One (1) School Counselor candidate was certified by a different EPP.

Compliance Issues (per Compliance Plan)

1. Update processes and documentation to ensure candidates in the Teacher (PB/ALT) program complete all requirements, including a full school-year internship prior to being recommended for standard certification. The effective date on the certificate is the date the last requirements was met. [19 TAC §228.35(e)(2)(B) & §230.93]

Recommendations

None

Based on the evidence presented, UNT-Dallas has not met minimum requirements for certification procedures as identified in 19 TAC §228 and §230.



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COMPONENT IX: INTEGRITY OF DATA REPORTED - 19 TAC §229

Findings

Candidate and EPP records were reviewed to verify self-reported data as identified in the Figure: 19 TAC §229.3(f)(1) and §229.4(a)(4)(A) was accurate as reported to the TEA.

- Admission data for 10/10 Teacher candidates were reported accurately to TEA according to records retained at the EPP which meets requirements for reporting in 19 TAC §229.3.
- Admission data for two (2) of five (5) Principal candidates and two (2) of the five(5) School Counselor candidates were complete and reported accurately according to supporting documentation in candidates' records.
- Enrollment status was reported accurately in the ASEP system for 9/10 Teacher candidates. One (1) candidate was not classified as Other Enrolled in the admission year.
- Enrollment status for one (1) of the five (5) Principal candidates and for none of the School Counselor candidates was reported accurately to the TEA.
- Observation data for three (3) of the Teacher (U) candidates were accurately reported to the TEA. One (1) candidate currently completing clinical teaching had no observations uploaded into ASEP at the time of the review. Reported observation data for all Teacher (PB/ALT) candidates was not supported by evidence in their records.
- Observation data for Principal and School Counselor candidates has not been required to be reported to the TEA until the 2018-2019 reporting year which was an optional reporting year for that data. The EPP was advised they will need to report observations for non-teacher classes beginning the reporting year 2019-2020 and supporting documentation must be retained in candidates' records.

Compliance Issues (per Compliance Plan)

1. Implement reporting processes to ensure admissions and enrollment data are reported accurately and timely for candidates in the Principal and School Counselor programs as required in 19 TAC §229.3(e) and (f).



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2. Implement a process for Teacher (PB/ALT), Principal, and School Counselor programs to ensure observation data is accurately reported as required in 19 TAC §229.4(a)(4)(A) and evidence is retained to support observation data reported per 19 TAC §228.40(f).

Recommendations

None

Based on the evidence presented, UNT-Dallas has not met minimum requirements for integrity of data reported is identified in 19 TAC Chapter 229.

Additional Items Discussed with EPP Staff

1. The Pre-Admission Content Testing (PACT) process will change effective January 27, 2020. Teacher programs should plan to update curriculum to meet requirements for content pedagogy test preparation and approval. Passing scores on TExES exams cannot be used to meet admission requirements after 1/27/2020 but may be used for certification purposes until the expiration date of the related certificate. The new PACT is a content-pure assessment that cannot be used for certification purposes.
2. Certificate deactivation timelines and requirements changes are proposed. Changes will include new timelines for requesting deactivations and information that must be provided to stakeholders in advance of internship start dates. FS will need to verify candidate placement information at the beginning of the internship assignment.
3. EPP staff should continue to stay abreast of changes in educator preparation requirements and make updates to educator preparation processes and/or curriculum as necessary to meet minimum requirements in TAC and TEC.

PROGRAM RECOMMENDATIONS All EPPS

- To ensure continuity in record keeping and other related processes, consider creating a procedure manual documenting EPP processes.
- Implement quality control procedures to ensure ASEP reports are submitted accurately and timely during state reporting each year.
- Align the verbiage of the program to the verbiage of Texas Administrative Code (TAC) (ex. Field supervisor, cooperating teacher, mentor, candidate, practicum, internship, etc.);



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- 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 current Texas Administrative Code;
- Continue to participate in webinars provided by the Division of Educator Preparation to ensure that the program staff is knowledgeable about current requirements and changes in the TAC;
- Continue to maintain communication with the program specialist assigned to the program.
- Ensure that TEA has the most current contact information by sending updates to the assigned program specialist.