



## **2021–2022 Continuing Approval Review Report East Texas Baptist University**

### **PURPOSE**

Texas Education Agency (TEA) Education Specialist, Vanessa Alba, conducted a five-year Continuing Approval Review of the educator preparation program (EPP) for the East Texas Baptist University on January 10-31, 2022. Per 19 Texas Administrative Code (TAC) §228.10(b), "...An entity approved by the SBEC under this chapter shall be reviewed at least once every five years...". Dr. Amber Daub, Dean, was identified as the program Legal Authority and the primary EPP contact for the review process. East Texas Baptist University was approved as an educator preparation program on May 4, 1970. At the time of the review, the EPP was rated Accredited in 2018-2019 and Not Rated-Declared State of Disaster in 2021-2022. The risk level was Stage 3 (low). The EPP reported 36 finishers for the 2019-2020 reporting year and 65 finishers for 2020-2021.

At the time of the review, East Texas Baptist University (ETBU) was approved to certify candidates in the following classes: Teacher, Principal, Superintendent, and School Counselor. It was noted that ETBU does not currently have an active Superintendent program and no files were reviewed for that program. The EPP is approved to offer the undergraduate (U) and post-baccalaureate (PB) routes to certification.

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 five-year Continuing Approval Review was conducted in a "Desk Review" format where EPP staff submitted requested documents to TEA for review.

The scope of this review included: 1) verifying compliance with Texas Administrative Code and Texas Education Code as applicable to all certification classes in all certification routes offered by the EPP; and 2) developing a plan for improvement based on review data, performance indicators identified in 19 TAC §229.4, and self-reported EPP information provided in the Status Report. Next Steps were developed to address plans for quality improvement. Evidence of compliance was measured using a rubric aligned to TAC.

EPP staff participating in the review at various stages were Dr. Amber Daub and Ms. Shelby Burger, certification officer.

### **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 to TEA on December 13, 2021. Additional EPP documents, including records for 17 candidates, were submitted on January 7, 2022. 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. If the program is “not in compliance” with any identified component, the program should consult the TAC and correct the issue immediately. A “Compliance Plan” or “Next Steps” may be drafted during the review that identifies compliance issues to be addressed and a timeline for completion. “Recommendations” are suggestions for general program improvement and no follow-up is required.

### **COMPONENT I: GOVERNANCE – 19 TAC Chapter 228**

#### **Findings**

- TEA relied on self-reported information in the Status Report and related documents submitted by the EPP to determine compliance with Governance requirements.
- TEA was unable to verify the advisory committee membership. ETBU submitted a “proposed membership” roster noting five ETBU staff and six members representing public/private schools, Region 7 Education Service Center (ESC), and business/community members. The documents for advisory committee meetings did not correspond to what was identified in the Status Report for advisory committee membership and the program staff was advised that the group must be an advisory committee (AC) and not a proposed AC. The program did not meet the requirements for AC membership. [19 TAC §228.20(b)]
- TEA was unable to verify that the AC assisted in the design, delivery, and major policy decisions of the EPP. ETBU provided a PowerPoint (PPT) for the 2021-2022 AC meeting on April 20, 2021, noting items discussed, but no evidence of who was present at the meeting. For the 2020-2021 AC Zoom meeting on April 21, 2020, an agenda identifying required topics discussed with a list of members present was provided. For the 2018-2019 AC meeting on April 23, 2019, sign-in sheets, an agenda with required topics discussed, and list of members present were provided. The program only met the requirement for two out of three (66%) of AC meetings and did not meet the requirement as prescribed. [19 TAC §228.20(b)]
- ETBU informed each member of the AC of their roles and responsibilities. For the 2018-2019 and 2020-2021 years, the program submitted agendas as evidence the members received training. The 2021-2022 year is not yet over and the program still has time before August 31, 2022, to meet requirements for the current year, since an AC meeting that meets requirements has not yet been held. TEA provided a copy of the TEA AC Training PPT for use to advise members of their roles and responsibilities at the next meeting. The program met the requirement as prescribed. [19 TAC §228.20(b)]
- The ETBU AC met on April 23, 2019, April 21, 2020, and has not yet met for the 2021-2022 year. The program has met once per year and has met the requirement of meeting each year. Agendas and sign-in sheets served as evidence. The program met the requirement as prescribed. [19 TAC §228.20(b)]
- The governing body has provided sufficient support and resources for the ETBU programs. The participation of the legal authority in all aspects of the review served as evidence of compliance. [19 TAC §228.20(c)]



- ETBU has a published calendar of activities for the Teacher program. Evidence in the form of a calendar was found on the website for that program. A calendar of activities was not provided for the Principal program, and the calendar for the School Counselor program posted on the website only included admission requirements. The program met the requirement as prescribed for the Teacher class but did not meet the requirement as prescribed for the Principal or School Counselor programs. [19 TAC §228.20(g)]
- ETBU submitted the Status Report for the EPP Review on December 13, 2021, as required. [19 TAC §228.10(b)(1)]
- ETBU has met the requirements to offer clinical teaching in the PB Teacher route. The program was approved to offer clinical teaching on July 15, 2013. The application is on file with TEA. [19 TAC §228.10(c)]
- ETBU opened an additional location in 2018-2019. A letter is on file dated February 5, 2021, stating that the university offers the Core Subjects EC-6 curriculum effective August 2019 in Kilgore, TX at the Baptist Student Ministry building. The program met the requirement as prescribed. [19 TAC §228.10(e)]
- All EPPs shall have a published exit policy for dismissal of candidates that is reviewed and signed by candidates upon admission. ETBU provided a link to its exit policy for dismissal, but the link did not work. The program did not meet the requirement as prescribed. [19 TAC §228.10(h)]

#### **Compliance Issues to be Addressed (see Next Steps)**

- 19 TAC §228.20(b) Advisory Committee Membership  
The preparation of educators shall be a collaborative effort among 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. An advisory committee with members representing as many as possible of the groups identified as collaborators.  
Action: Require AC members to represent required membership. EPP staff are not members of AC. The membership roster should not be a “proposed” document and does not have to be static. Retain all documentation of membership.
- 19 TAC §228.20(b) Advisory Committee Activity  
An advisory committee...shall assist in the design, delivery, evaluation, and major policy decisions of the educator preparation program (EPP).  
Action: Require AC members to assist in the design, delivery, evaluation, and major policy decisions of the educator preparation program (EPP). Retain agendas, minutes, and sign-in sheets.
- 19 TAC §228.20(g) Program Calendar  
Each EPP must develop and implement a calendar of program activities that must include a deadline for accepting candidates into a program cycle to assure adequate time for admission, coursework, training, and field-based experience requirements prior to a clinical teaching or internship experience. If an EPP accepts candidates after the deadline, the EPP must develop and implement a calendar of program activities to assure adequate time for admission,



coursework, training, and field-based experience requirements prior to a clinical teaching experience or prior to or during an internship experience.

Action: Post on the ETBU website a calendar for the Principal and School Counselor programs that meets the requirements. Ensure that the Superintendent program also has a calendar posted on the website.

- 19 TAC §228.20(h) Exit Policy  
All EPPs shall have a published exit policy for dismissal of candidates that is reviewed and signed by candidates upon admission.  
Action: Require a published exit policy for dismissal of candidates in all programs. Require all candidates to sign an acknowledgement of receipt of the exit policy upon admission.

#### **Recommendations**

- None

Based on the evidence presented, East Texas Baptist University was not in compliance with 19 TAC Chapter 228 – Governance of Educator Preparation Programs.

#### **COMPONENT II: ADMISSION - 19 TAC Chapter 227**

##### **Findings**

- ETBU has informed all Teacher applicants and candidates about the required information regarding criminal history and the preliminary criminal history evaluation. The information was found on the website, within the application, and candidates sign a document indicating receipt of the information with the document retained in candidate files. Principal applicants and candidates were not informed of the requirement. Three out of five (60%) School Counselor candidate applications contained the required information. The program met the requirement as prescribed for the Teacher programs, but not the Principal or School Counselor programs. [19 TAC §227.1(b), (d)]
- ETBU is required to inform applicants in writing of the admission requirements, program completion requirements, the effect of supply & demand on the educator workforce, and the performance of the EPP over time for the past five years. Admission requirements were found on the website for each program. EPP completion requirements were found on the website for all programs, except the Principal program. The effects of supply and demand on the educator workforce were found on the website for the Teacher programs, but not the Principal or School Counselor programs. The performance of the EPP over time for the past five years was found on the website for the Teacher programs, but not the Principal or School Counselor programs. The program met the requirement for the Teacher programs, but not the Principal or School Counselor Programs. [19 TAC §227.1(c)(1-3)(A-B)]
- A total of 17 files were reviewed to verify the EPP meets admission requirements. They included five undergraduate (UG) Teacher files, five post-baccalaureate (PB) Teacher files, five PB Principal files, and two PB School Counselor files. All candidates met the required institution of higher education (IHE) enrollment or degree requirements. All five UG Teachers were enrolled at



the time of admission per transcripts provided for review noting enrollment. All five PB Teachers held a minimum of a bachelor's degree at the time of admission per transcripts reflecting the degree conferred. Five PB Principal candidates and two PB Counselor candidates held a bachelor's degree at the time of admission per transcripts reflecting the degree conferred. The program met the requirement as prescribed. [19 TAC §227.10(a)(1-2); 19 TAC §241.5; 19 TAC §239.5]

- Candidates have met the minimum GPA requirement for admission. Per the Status Report, a 2.75 GPA is required for admission to all programs. The Teacher GPA range reviewed in ten files (UG and PB) was 2.98-4.0. The Principal GPA range in the five files reviewed was 3.07-4.0. The School Counselor GPA range in the two files reviewed was 2.72-2.79, but there was a discrepancy in what was reported in the Accountability System for Educator Preparation (ASEP) and that was a GPA range of 3.63-3.89. While the School Counselor program met the minimum requirement as prescribed in TAC, it did not meet its published requirement of a 2.75 GPA for one candidate and did not correspond to what was reported in ASEP for both files. The program met the requirement as prescribed. [19 TAC §227.10(a)(3)(A)]
- Teacher applicants are required to demonstrate content knowledge prior to admission by having completed 12 hours in the content area for which they are admitted, 15 hours if the content area is math or science at grade 7 or above, or by passing a pre-admission content test (TX PACT) prior to admission. All five Teacher UG candidates met the requirement. The program used a GPA content hours calculation to ensure the requirement was met and provided that calculation along with transcripts as evidence. Four out of five PB Teacher candidates (80%) met the requirement and the program provided the GPA content hours calculation and transcripts as evidence. The program met the requirement as prescribed. [19 TAC §227.10(a)(4)]
- If an applicant to a non-teacher program has not met the minimum certification, degree, and/or experience requirement(s) for issuance of a standard certificate prior to admission, the EPP shall inform the applicant in writing of any deficiency prior to admission. Five Principal files were reviewed for evidence. Official transcripts and valid Teacher certificates were provided for all, but service records noting two years of experience as a Teacher were not provided. The program identified that one of the candidates had a deficiency, but a written deficiency letter was not provided at the time of admission. Two School Counselor files were reviewed. Both contained official transcripts and valid Teacher certificates, but neither contained evidence of a service record noting two years of experience as a teacher. The program did not meet the requirement as prescribed. [19 TAC §227.10(a)(5)]
- Applicants must demonstrate basic skills prior to admission. Four out of five (80%) UG Teacher applicants met the requirement with the SAT/TSI. The fifth file reviewed contained evidence of an Accuplacer, which is not acceptable as a basic skills requirement for admission; however, the candidate had completed college level coursework prior to admission which meets the exemption in 19 TAC §4.54. All five PB Teacher files contained evidence the candidates met the requirement with a bachelor's degree conferred. The five Principal and two School Counselor candidates met the requirement with a bachelor's degree conferred. Transcripts were in the candidates' files. The program met the requirement as prescribed. [19 TAC §227.10(a)(6)]
- All applicants must demonstrate proficiency in English language skills prior to admission. All ten Teacher (UG/PB) files reviewed contained evidence of a US degree conferred. One of the files



contained a degree from Canada and neither a transcript evaluation nor a Test of English Language (TOEFL-iBT) was required because the degree was in English and a TOEFL is not required for applicants from Canada. All five Principal and two School Counselor files reviewed contained evidence of a US degree conferred. The program met the requirement as prescribed. [19 TAC §227.10(a)(7); 19 TAC §227.10(f)]

- All files reviewed contained a completed application. Ten Teacher UG/PB, five Principal, and two School Counselor files were reviewed for evidence of an application. The program met the requirement as prescribed. [19 TAC §227.10(a)(8)]
- An applicant for admission must be screened to determine appropriateness for the certification sought. A Principal applicant is required to have two or more screens. All ten Teacher (UG/PB) files reviewed contained evidence of an interview scored on a rubric with levels of proficiency noted with a score of 83-99 required for admission. All met the required score range for admission. Principal applicants are required to participate in an interview scored on a rubric with levels of proficiency identified and submit two letters of recommendation. A score between 22-33 is acceptable for admission on the interview. All five files reviewed contained evidence of both requirements. School Counselor applicants are required to participate in an interview scored on a rubric. A score of 20 will be denied admission. Both files reviewed contained a score above 22. The program met the requirement as prescribed. [19 TAC §227.10(a)(8); 19 TAC §241.5; 19 TAC §239.5]
- Only the UG Teacher program had additional academic requirements. The program requires an essay response to the prompt “Why I want to be a teacher.” The essay was found in all five UG files reviewed. The program met the requirement as prescribed. [19 TAC §227.10(a)(9)]
- The PB Teacher program requires two letters of recommendation as an additional admission requirement. Two letters of recommendation were found in all five PB files reviewed. The School Counselor program requires two letters of recommendation and an on-site essay. Evidence of both requirements was found in both files reviewed. The program met the requirements as prescribed. [19 TAC §227.10(b)(10)]
- One PB Teacher candidate and two Principal candidates were contingently admitted. The files contained evidence of a written and dated contingency offer of admission, written dated acceptance letters, official transcripts, information from the university confirming the date of graduation, and program records indicating for which semester the admission applies. The program was advised to be more specific about the fact that the contingency admission was for that semester only. The program met the requirement as prescribed. [19 TAC §227.15(a-b); 19 TAC §227.10(a)(2)(1-4)]
- The EPP must notify TEA within seven calendar days of a candidate’s contingency admission. ETBU notified TEA within seven calendar days of the PB Teacher’s contingency admit by uploading the candidate into the Educator Certification Online System (ECOS). ETBU notified TEA of one out of two (50%) Principal contingency admits within seven calendar days by uploading the candidate into ECOS. The other candidate was uploaded after seven calendar days. The program met the requirement for the PB Teacher program but not for the Principal program. [19 TAC §227.15(c)]
- The PB Teacher and two Principal candidates did not begin training or testing until contingently admitted and met the requirement as prescribed. [19 TAC §227.15(d-f)]



- All applicants are required to be formally admitted. Nine UG/PB Teacher candidates (five UG and four PB) were formally admitted. The effective date of formal admission was found in eight out of nine (89%) admission offer letters. The ninth file did not contain a formal offer of admission or written acceptance. All candidates were admitted prior to beginning coursework and training as required. The formal offers of admission accepted by the candidates, testing history, and degree plans served as evidence of compliance for eight out of nine Teacher files reviewed. Three Principal and two School Counselor candidates were also formally admitted. The effective date of formal admission, offer of admission, and written letter of acceptance were found in each file reviewed. The Principal and School Counselor candidates did not begin coursework until formally admitted. The formal offers of admission accepted by the candidates, testing history, and degree plans served as evidence of compliance for Principal and School Counselor candidate files reviewed. The program met the requirements as prescribed. [19 TAC §227.17; 19 TAC §227.17(d); 19 TAC §227.17(f)]
- An EPP must notify TEA within seven calendar days of a candidate's formal admission. In the UG/PB Teacher programs, ETBU notified TEA of the formal admission within seven calendar days for seven out of nine (77%) candidates. ETBU notified TEA within seven calendar days of the formal admission for two out of three (66%) Principal candidates and for both School Counselor candidates. The program met the requirement for the School Counselor program, but not for the UG/PB Teacher or Principal programs. [19 TAC §227.17(e)]

#### **Compliance Issues to be Addressed (see Next Steps)**

- 19 TAC §227.1(c)(2)-(3)(A) EPP and Program Information  
EPPs shall inform all applicants, in writing of the following: (2) the requirements for program completion; and (3) in accordance with TEC, §21.044(g): (A) the effect of supply and demand forces on the educator workforce in this state; and (B) the performance over time of the EPP for the past five years.  
Action: For the Principal and School Counselor Programs, provide the posted information for the PIL and School Counselor Programs the following as evidence of completion requirements: the effects of supply & demand and performance of the EPP over time.
- 19 TAC §227.1(d) Notifications - Preliminary Criminal History Evaluation  
EPPs shall notify, in writing by mail, personal delivery, facsimile, email, or an electronic notification, each applicant to and enrollee in the EPP of the following regardless of whether the applicant or enrollee has been convicted of an offense: (1) the potential ineligibility of an individual who has been convicted of an offense for issuance of a certificate on completion of the EPP; (2) the current SBEC rules prescribed in 19 TAC §249.16... and (3) the right to request a criminal history evaluation letter as provided in 19 TAC Chapter 227, Subchapter B.  
Action: Provide the mechanism by which the EPP notifies Principal and School Counselor applicants of the Preliminary Criminal History Evaluation requirement.  
Provide one Principal and one School Counselor file that contains the required notification and method used to notify each. Retain all documentation in each candidate file.





- **19 TAC §227.10(a)(5) Deficiency Principal and School Counselor**  
If an applicant has not met the minimum certification, degree, and/or experience requirement(s) for issuance of a standard certificate prior to admission, the EPP shall inform the applicant in writing of any deficiency prior to admission.  
Action: For all non-teacher admissions to be able to determine if there is a deficiency or not, require the following: Official transcripts; Teaching certificate; and Service records. Provide a Written deficiency letter when applicable. Retain all documentation per the records retention requirement in 19 TAC §228.40(f). Provide the written process noting admission documents EPP will require of all applicants to be able to make a determination about any deficiencies.
- **19 TAC §227.15(c) Contingency Admission 7-Day Notice of Admission Principal**  
An EPP must notify the Texas Education Agency within seven calendar days of a candidate's contingency admission.  
Action: For all contingency admits, require a written contingency admission offer, a written and dated contingency admission acceptance, and an ECOS admission record. Retain all documentation per the records retention requirement in 19 TAC §228.40(f). Be more specific about the fact that the contingency admission is only for the semester identified in the written offer of contingency admission. Provide the written process that ETBU will utilize to ensure that all contingency admits will be uploaded into the Educator Certification Online System (ECOS) within 7-days.
- **19 TAC §227.17(d) Formal Admission 7-Day Notice of Admission Teacher and Principal**  
An EPP must notify the Texas Education Agency within seven calendar days of a candidate's formal admission.  
Action: Implement a process to create an admission record in ECOS for each formally admitted candidate within 7 days of the admission date identified in the written admission offer. Require the following: Written formal admission offer letter; Written and dated formal admission acceptance letter; and ECOS admission record. Retain all related documentation in the candidates' files. Provide the written process that ETBU will utilize to ensure that all formal admits will be uploaded into the Educator Certification Online System (ECOS) within 7-days.

### **Recommendations**

- Since ETBU provided website links for the required EPP and Program Information for the Teacher program, it is recommended that the same method of communicating the information is provided for the Principal and School Counselor programs. It is also recommended that one landing place on the ETBU website be the place for all required postings.
- Be advised that Accuplacer is not an acceptable way to meet basic skills requirements. Effective Fall 2013, the only Board-approved assessment instrument is the Texas Success Initiative Assessment (TSIA), and version 2.0 (TSIA2) went into effect on January 11, 2021. Do not use Accuplacer any longer. Applicants to the ETBU undergraduate program will meet the requirement with an exemption with coursework completed per 19 TAC §4.54(a)(6) and post-baccalaureate teacher applicants will meet the requirement with the degree conferred prior to admission per 19 TAC §4.54(a)(4).





Based on the evidence presented, East Texas Baptist University is not in compliance with 19 TAC Chapter 227 - Admission Criteria.

### **COMPONENT III: CURRICULUM – 19 TAC §228.30**

#### **Findings**

- TEA relied on self-reported information contained within the Status Report and alignment charts for the Core Subjects EC-6/Science of Teaching Reading (STR) certificate, to determine compliance.
- ETBU reported that the curriculum is based on educator standards and addresses the relevant Texas Essential Knowledge and Skills (TEKS). There are 20 courses required for the UG Core Subjects/STR certificate and alignment charts were reviewed to determine compliance. TEKS instruction is taught for UG candidates in READ 3318, EDUC, 3304, and EDUC 3309 as verified in alignment charts. PB Teacher candidates receive TEKS instruction in EDUC 5340. The program met the requirement as prescribed. [19 TAC §228.30(a)]
- ETBU relies on scientifically-based research to ensure educator effectiveness. In addition to other sources cited in the Status Report, the program cited the following work:
  - Wiggins, G. P., & McTighe, J. (2005). *Understanding by design* (2nd ed.);
  - International Dyslexia Association. Knowledge and Practice Standards for Teachers of Reading;
  - Shanahan, T. (2020). What Constitutes a Science of Reading Instruction? *Reading Research Quarterly*, 55;
  - Vogt, M., Echevarria, J. J., & Short, D. J. (2016). Making content comprehensible for English learners (5th ed.); and
  - Anderson, Lorin W. and David R. Krathwohl. A Taxonomy for Learning, Teaching, and Assessing of Educational Objectives. New York: Longman, 2001.The program met the requirement as prescribed. [19 TAC §228.30(b)]
- The Educators Code of Ethics (ECOE) is required to be taught to all candidates. UG Teacher candidates receive the required instruction in EDUC 3323 but there was insufficient evidence the PB Teacher candidates receive the instruction. UG and PB Teacher candidates are required to submit a signed statement of receiving and understanding the ECOE. It was found in eight out of the ten (80%) files reviewed. All five Principal candidate files reviewed contained a signed commitment to the ECOE, but no explicit instruction was found. School Counselor candidates receive instruction in EDUC 5330 and the two files reviewed contained a signed commitment to the ECOE. The program met the requirement as prescribed in the UG Teacher and School Counselor programs, but not in the PB Teacher or Principal programs. [19 TAC §228.30(c)(1)]
- Instruction in the detection and education of students with dyslexia, as indicated in the Texas Education Code (TEC) §21.044(b), must be provided to all candidates. UG Teacher candidates receive the instruction in EDUC 3302. Instruction in the topic was not identified for PB Teacher candidates. Principal candidates receive instruction in EDUC 5002. Instruction on the topic was not identified for School Counselor candidates. The program met the requirement as prescribed



for the UG Teacher and Principal programs, but not for the PB Teacher or School Counselor programs. 19 TAC §228.30(c)(2)]

- Instruction regarding mental health, substance abuse, and youth suicide must be taught to all candidates. UG Teacher candidates are instructed in EDUC 3302. PB Teacher candidates are not instructed on the topic. Principal candidates are not instructed on the topic. School Counselor candidates are instructed in EDUC 5002. The program met the requirement as prescribed for the UG Teacher and School Counselor programs, but not for the PB Teacher or Principal programs. [19 TAC §228.30(c)(3)]
- The skills that educators are required to possess, the responsibilities they are required to accept, and the high expectations for students in this state are required to be taught to all candidates. The Status Report identified many courses and several examples follow. UG Teacher candidates receive instruction in EDUC 3101, EDUC 3102, EDUC 4242, EDUC 3301, and EDUC 3321. PB Teacher candidates receive instruction in EDUC 5322, EDUC 5340, EDUC 5324, EDUC 5333, EDUC 5315, and EDUC 5316. Principal candidates receive instruction in EDUC 5382, EDUC 5384, EDUC 5380, and EDUC 5381. School Counselors receive instruction in EDSC 5302. The program met the requirement as prescribed. [19 TAC §228.30(c)(4)]
- All candidates must receive instruction on the importance of building strong classroom management skills. UG Teacher candidates receive instruction in EDUC 3323. PB Teacher candidates receive instruction in EDUC 5340. Principal candidates receive instruction in EDUC 5240. The topic was not addressed in the School Counselor program. All programs met the requirement as prescribed, but the School Counselor program did not. [19 TAC §228.30(c)(5)]
- The framework for teacher and principal evaluation in this state must be taught to all candidates. UG Teacher candidates receive the required instruction in EDUC 3323. PB Teacher candidates receive instruction in EDUC 5340. Principal candidates receive instruction in EDUC 5340. School Counselor candidates are not instructed on the topic. All programs met the requirement as prescribed, but the School Counselor program did not. [19 TAC §228.30(c)(6)]
- Appropriate relationships, boundaries, and communication between educators and students must be taught to all candidates. UG Teacher candidates receive the required instruction in EDUC 3252, EDUC 4257, and EDUC 4258; PB Teacher candidates in EDUC 5381; and Principal candidates in EDUC 5330. School Counselor candidates are instructed in EDUC 5340. The program met the requirement as prescribed. [19 TAC §228.30(c)(7)]
- Instruction in digital learning, including a digital literacy evaluation followed by a prescribed digital learning curriculum must be provided to all candidates. UG Teacher candidates receive the required instruction in EDUC 3101, PB Teacher candidates in EDUC 5333, and Principal candidates in EDUC 5333. School Counselor candidates are not provided instruction on the topic. All programs met the requirement as prescribed, but the School Counselor program did not. [19 TAC §228.30(c)(8)]
- Teacher candidates are required to be instructed in the relevant TEKS, including the English Language Proficiency Standards (ELPS). UG Teacher candidates receive instruction in READ 3318, EDUC 3304, and EDUC 3309, and PB Teacher candidates receive instruction in EDUC 5340. The program met the requirement as prescribed. [19 TAC §228.30(d)(1)]
- Reading instruction, including instruction that improves students' content area literacy must be provided to all Teacher candidates. UG Teacher candidates are instructed in READ 3305, READ



3316, READ 3317, READ 3318, and READ 3320, and PB Teacher candidates are instructed in READ 5317. The program met the requirement as prescribed. [19 TAC §228.30(d)(2)]

- Candidates seeking certificates that include early childhood education and prekindergarten must receive instruction in the PK Guidelines. UG Teacher candidates are instructed in READ 3316 and PB Teacher candidates are instructed in READ 5317. The program met the requirement as prescribed. [19 TAC §228.30(d)(3)]
- Instructional planning and delivery is taught to UG Teacher candidates in EDUC 3323 and EDUC 4309. The topic is taught to PB Teacher candidates in EDUC 5340. The program met the requirement as prescribed. [19 TAC §228.30(d)(4)(A); 19 TAC 149.1001(b)(1)]
- Knowledge of students and student learning is taught to UG Teacher candidates in EDUC 3302 and EDUC 3323. The topic is taught to PB Teacher candidates in EDUC 5340. The program met the requirement as prescribed. [19 TAC §228.30(d)(4)(B); 19 TAC 149.1001(b)(2)]
- Content knowledge and expertise is taught to UG Teacher candidates in EDUC 3306, EDUC 3309, READ 3316, Math 3351, EDUC 3305, GEOG 1303, and many other courses identified in the Status Report. The topic is taught to PB Teacher candidates in EDUC 5342. The program met the requirement as prescribed. [19 TAC §228.30(d)(4)(C); 19 TAC 149.1001(b)(3)]
- Learning environment is taught to UG Teacher candidates in EDUC 3302 and EDUC 3323. The topic is taught to PB Teacher candidates in EDUC 5340. The program met the requirement as prescribed. [19 TAC §228.30(d)(4)(D); 19 TAC §149.1001(b)(4)]
- Data-driven practice is taught to UG Teacher candidates in EDUC 3323. The topic is taught to PB Teacher candidates in EDUC 5342. The program met the requirement as prescribed. [19 TAC §228.30(d)(4)(E); 19 TAC §149.1001(b)(5)]
- Professional practices and responsibilities are taught to UG Teacher candidates in EDUC 3323. The topic is taught to PB Teacher candidates in EDUC 5342. The program met the requirement as prescribed. [19 TAC §228.30(d)(4)(F); 19 TAC §149.1001(b)(6)]
- Developmentally appropriate research-and evidence-based instruction to promote students' development of grade-level skills is taught to UG Teacher candidates in EDUC 3320 and EDUC 4309. The topic is taught to PB Teacher candidates in EDUC 5342. The program met the requirement as prescribed. [19 TAC §231.31(b)(3)]
- Principal candidates receive instruction in the skills and competencies captured in the Texas administrator standards as identified in coursework in EDUC 5386.01 Practicum II. The program met the requirement as prescribed. [19 TAC §228.30(e)]

#### **Compliance Issues to be Addressed (see Next Steps)**

- 19 TAC §228.30(c)(1)(A-C) Code of Ethics Instruction  
The following subject matter shall be included in the curriculum for candidates seeking initial certification in any certification class: (1) the code of ethics and standard practices for Texas educators, pursuant to 19 TAC Chapter 247, which includes: (A) professional ethical conduct, practices, and performance; (B) ethical conduct toward professional colleagues; and (C) ethical conduct toward students.  
Action: Require instruction in educator code of ethics for PB Teacher and Principal candidates.



- 19 TAC §228.30(c)(3) Mental Health Instruction  
The following subject matter shall be included in the curriculum for candidates seeking initial certification in any certification class: (3) instruction regarding mental health, substance abuse, and youth suicide, as indicated in the TEC, §21.044(c-1).  
Action: Require this instruction for PB Teacher and Principal candidates as prescribed.
- 19 TAC §228.30(c)(5) Classroom Management Skills  
The following subject matter shall be included in the curriculum for candidates seeking initial certification in any certification class: (5) the importance of building strong classroom management skills.  
Action: Provide School Counselor candidates instruction in classroom management skills.
- 19 TAC §228.30(c)(6) Teacher and Principal Evaluation  
The following subject matter shall be included in the curriculum for candidates seeking initial certification in any certification class: (6) the framework in this state for teacher and principal evaluation.  
Action: Provide School Counselor candidates instruction in the framework for teacher and principal evaluation.
- 19 TAC §228.30(c)(8) Digital Literacy  
The following subject matter shall be included in the curriculum for candidates seeking initial certification in any certification class: (8) instruction in digital learning, including a digital literacy evaluation followed by a prescribed digital learning curriculum.  
Action: Provide School Counselor candidates instruction in digital literacy as prescribed. The instruction must: Include a digital literacy evaluation; be aligned with the International Society for Technology in Education (ISTE) ISTE Standards for Educators; must provide effective evidence-based strategies to determine a person's degree of digital literacy, and must include resources to address any deficiencies identified by the digital literacy evaluation. Submit evidence these requirements are met.

#### **Recommendations**

- Consider using the Education Service Center (ESC) Training in the Educators' Code of Ethics and require a certificate of completion to retain in each candidate file noting the date of the training and the total hours earned for the training. Factor that into the total hours required for certification, if using an outside source for the required topic.

Based on the evidence presented, East Texas Baptist University is not in compliance with 19 TAC §228.30-Curriculum.



## COMPONENT IV: COURSEWORK, TRAINING, PROGRAM DELIVERY, AND ONGOING SUPPORT – 19 TAC §228.35

### Findings

- ETBU provides candidates with adequate preparation and training that is sustained, rigorous, and interactive. TEA reviewed candidate testing history, program benchmarks, degree plans, and transcripts for ten UG/PB Teacher candidates, five PB Principal candidates, and two PB School Counselor candidates to determine compliance. The program met the requirement as prescribed. [19 TAC §228.35(a)(1-2)]
- Two out of five UG Teacher candidates, three out of five PB Teacher candidates, and two School Counselor candidates had reached the point of standard certification at the time of the review. Degree plans and program benchmarks were reviewed for each to determine that all coursework and training were completed prior to standard certification. None of the Principal candidates had reached the point of standard certification. The program met the requirement as prescribed. [19 TAC §228.35(a)(3)]
- ETBU has procedures for allowing relevant military experiences and procedures for allowing prior experience, education, or training. The information was found on the website for each program. The program met the requirement as prescribed. [19 TAC §228.35(a)(5)(A-B)]
- ETBU offers some coursework online in the various certification fields and classes. The program provided a letter to TEA on EPP letterhead dated 2017 that the program was seeking Quality Matters (QM) accreditation for its online coursework. An actual accreditation letter was not provided. TEA was not able to determine which programs are offered online. TEA advised ETBU to seek accreditation through its university and via the private school option. That accreditation would come directly from the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC). The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(6)(A-D)]
- Candidates for initial Teacher UG certification earn 120 semester credit hours and Teacher PB candidates earn 36 semester credit hours, which exceeds the 300 clock-hours of required coursework and training. Degree plans and transcripts for ten UG/PB candidate files reviewed served as evidence of compliance. The program met the requirement as prescribed. [19 TAC §228.35(b)]
- Candidates in the Principal program earn a 30-semester credit-hour master's and candidates in the School Counselor program earn a 48-semester credit-hour master's in counseling. The hours exceed the 200 clock-hour requirement for certification. Degree plans and transcripts were reviewed for the five Principal and two School Counselor candidates. The program met the requirement as prescribed. [19 TAC §228.35(c)]
- Unless a candidate qualifies as a late-hire, a candidate shall complete 150 clock-hours of specified coursework prior to clinical teaching or internship. In the UG Teacher program, four out of five candidates met the requirement and the fifth was in process. Transcripts and benchmarks served as evidence of compliance for the five files reviewed. In the PB Teacher program, two out of five (80%) candidates met the requirement as prescribed. Of the three that did not, two completed 80 clock-hours and evidence of the completed pre-service coursework



was not provided for the third candidate. The program met the requirement as prescribed for the UG Teacher program, but not for the PB Teacher program. [19 TAC §228.35(b)(2)(A-J)]

- Teacher candidates are required to complete 30 clock-hours of field-based experiences (FBE) prior to clinical teaching or internship. Fifteen of the thirty-clock hours must be interactive working in the EC-12 setting. Up to 15 clock-hours may be completed via video or other electronic transmission or other video or technology-based method. Four out of five (80%) of the UG Teacher candidates completed field-based experiences prior to clinical teaching or internship as required. FBE logs, written reflections, and the start dates of clinical teaching were provided as evidence in the files reviewed. Two out of five PB Teacher candidates completed more than 30 clock-hours of FBEs required. Of the three that did not meet the requirement, one had no evidence of FBEs completed, one completed 30 clock-hours as a paraprofessional, and one completed 20 clock-hours via video transmission. FBE logs, candidate reflections, and clinical teaching or internship start dates served as evidence. The UG Teacher program met the requirement as prescribed, but the PB Teacher program did not. [19 TAC §228.35(b)(1); 19 TAC §228.35(e)(1)(A-B)]
- Two out of five UG Teacher candidates completed clinical teaching and the other three UG Teacher candidates had not yet started clinical teaching. Two out of five PB Teacher candidates completed clinical teaching and the other three PB Teacher candidates completed an internship year. Clinical teaching placement lists noting start/end dates of clinical teaching and statements of eligibility (SOE) noting start/end dates of internship served as evidence. It was noted that the EPP was using an outdated SOE and TEA staff provided the current version for EPP use. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(A-B)]
- All four UG/PB clinical teachers had a single assignment for 14 weeks as reflected in the clinical teaching placement records reviewed noting start/end dates, grade levels, subject area, cooperating teacher, and field supervisor assigned. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(A)(i-ii)]
- Clinical teaching is successful when a candidate demonstrates proficiency in each of the educator standards for the assignment. Two UG and one PB Teacher candidates completed clinical teaching and were standard certified. Candidate proficiency in the educator standards was determined by the field supervisor using a standards-based observation instrument that captured levels of proficiency obtained. The field supervisor observation instruments used for each served as evidence that the field supervisor observed the candidates demonstrating proficiency in the standards. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(A)(iii)]
- Clinical teaching is successful when the field supervisor (FS) and cooperating teacher recommend to the EPP that the candidate should be recommended for a standard certificate. If either the FS or cooperating teacher does not recommend, the person who does not recommend the candidate must provide documentation supporting the lack of recommendation to the candidate and either the FS or cooperating teacher. Both UG Teacher candidates that were standard certified received a recommendation from the field supervisor and cooperating teacher. Both PB Teacher candidates were standard certified without a recommendation from the FS and cooperating teacher. The program met the requirement as prescribed in the UG Teacher program, but not in the PB Teacher program. [19 TAC §228.35(e)(2)(A)(iii)]





- An internship must be for a minimum of one school year. The beginning of the internship for the purposes of field supervision is the first day of instruction with students in the district where the internship takes place. The internship assignment must be for the classroom teacher assignment that matches the certification category for which the candidate is prepared by the EPP. An internship shall not be less than an average of four hours per day. The candidate must hold an Intern or Probationary certificate. Three PB Teacher candidates completed an internship for a full year in full-day assignments that matched the certificates sought. All held an Intern certificate. Statements of Eligibility (SOEs), internship placement lists with start/end dates, district, campus, grade level, subject area, mentor, and FS assigned for each served as evidence of compliance. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(B)(iii-iv)]
- An internship is successful when the candidate demonstrates proficiency in the standards. Candidate proficiency in the educator standards was determined by the field supervisor using a standards-based observation instrument that captured levels of proficiency demonstrated by the candidates. Three sets of observation documents for the three PB Teacher candidates that completed an internship were reviewed for evidence of compliance. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(B)(vii)]
- An internship is successful when the field supervisor and campus administrator recommend to the EPP that the candidate should be recommended for a standard certificate. If either the field supervisor or campus administrator does not recommend, the person who does not recommend the candidate must provide documentation supporting the lack of recommendation to the candidate and either the field supervisor or campus administrator. The field supervisor and campus administrator provided recommendations to the EPP regarding candidate success in the internship for one out of two (50%) PB Teacher interns and the 2<sup>nd</sup> was standard certified without the required recommendations. The third intern had not yet reached the point of standard certification. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(2)(B)(vii)]
- An EPP must provide ongoing support to a candidate for the full term of the initial and any additional internships unless a candidate is standard certified, resigns, is non-renewed, terminated, released, withdraws, or the internship assignment does not meet requirements. The program did not provide any evidence of ongoing support for the three candidates completing internships. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(2)(B)(vi)]
- Candidates participating in an internship or clinical teaching assignment need to experience a full range of professional responsibilities including the start of the school year. The start of the school year is defined as the first 15 instructional days of the year. If these experiences cannot be provided through clinical teaching or an internship, they must be provided through field-based experiences. Four UG/PB Teacher candidates started at the beginning of the year and experienced the start of the year during clinical teaching. The other two UG Teacher candidates experienced them through video observations of the start of the year in FBEs. Two out of three (66%) PB Teacher interns started the internship at the beginning of the year and the 3<sup>rd</sup> did not and should have experienced the beginning of the year through FBEs, but did not. The program met the requirement as prescribed in the UG Teacher program, but not for the PB Teacher program. [19 TAC §228.35(4)]





- Clinical teaching and internships must take place in an actual school setting rather than a distance learning lab or virtual school setting. All UG and PB teacher candidates were placed in public schools for clinical teaching and internships. Clinical teaching placement lists, SOEs, and observation documents were provided as evidence in the files reviewed. [19 TAC §228.35(6)]
- An internship or clinical teaching experience shall not take place in a setting where a candidate has an administrative role over the mentor or cooperating teacher or is related to the FS, mentor, or cooperating teacher. All candidate placements met the requirement. Candidate placement lists and SOE documents noting FS and cooperating teacher or mentor assigned provided evidence the requirement was met. [19 TAC §228.35(7)]
- A practicum for candidates completing certification in a class other than classroom teacher must be a minimum of 160 clock-hours. Two Principal candidates completed the practicum in EDUC 5385/5386 and three were in process of completing the practicum. Two School Counselor candidates completed a 472 clock-hour practicum. Practicum information reflecting site supervisor and FS assigned, start and end dates, and district/campus served as evidence of compliance. The program met the requirement as prescribed. [19 TAC §228.35(e)(8)]
- A non-teacher candidate must demonstrate proficiency in each of the standards required for the certificate sought. Principal candidates are required to be observed by the FS four times throughout the practicum. Two candidates had completed the requirement and three were in process. School Counselor candidates are required to be observed by the FS three times throughout the practicum. Both School Counselor candidates had completed the requirement. Field supervisor observation instruments with standards and levels of proficiency identified served as evidence. [19 TAC §228.35(e)(8)]
- A practicum must take place in an actual school setting rather than a distance learning lab or virtual school setting. A practicum shall not take place in a setting where the candidate has an administrative role over the site supervisor or is related to the site supervisor or FS. All practicum placements were in public schools per observation documents provided for the five Principals and two School Counselor candidates reviewed. None of the candidates had an administrative role over the site supervisor or FS. Practicum placement lists with FS and site supervisor assigned served as evidence. The program met the requirement as prescribed. [19 TAC §228.35(e)(8)(A-B)]
- A practicum is successful when the FS and site supervisor (SS) recommend to the EPP that the candidate should be recommended for a standard certificate. If either the FS or SS does not recommend, the person that does not recommend the candidate must provide documentation supporting the lack of recommendation to the candidate and either the FS or SS. The FS and campus SS did not provide recommendations to the EPP regarding candidate success in the practicum. None of the five Principal candidates have reached the point of standard certification. Both School Counselor candidates were standard certified and neither had a recommendation from the FS and site supervisor. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(8)(D)]
- All candidates placed in clinical teaching, internship, or practicum are required to be assigned to a cooperating teacher, mentor, or site supervisor as applicable. Two UG Teacher candidates (100%) were assigned a cooperating teacher. Two PB Teacher clinical teachers and two out of three PB interns were assigned a mentor. Four out of five PB Teacher candidates (80%) had a



cooperating teacher/mentor. All five Principal candidates and two School Counselor candidates (100%) were assigned a site supervisor. Placement lists with cooperating teacher/mentor/site supervisor assigned served as evidence. The program met the requirement as prescribed. [19 TAC §228.35(f)]

- Cooperating teachers, mentors, and SS must be qualified. The two cooperating teachers (100%) assigned to the UG clinical teachers held a valid teaching certificate and the district had verified qualifications. Four out of five cooperating teachers or mentors (80%) assigned to PB clinical teachers or interns held valid teaching certs and the district had verified qualifications. The EPP did not provide evidence of the qualifications of the five SS assigned to Principal candidates. Both SS assigned to School Counselor candidates held a valid standard School Counselor certificate and a resume was provided as evidence of qualifications for each. The program met the requirement as prescribed for the UG/PB Teacher and School Counselor programs, but not for the Principal program. [19 TAC §228.2(14); 19 TAC §228.2(26); 19 TAC §228.2(33)]
- Mentors, cooperating teachers, and site supervisors must be trained within three weeks of assignment to a candidate. The training must rely on scientifically-based research, but the program may allow the training to be provided by a school, district, or regional education service center if properly documented. Training must include training in how to coach and mentor candidates. Two cooperating teachers (100%) assigned to UG Teacher candidates were trained, but only one out of two (50%) was trained within three weeks of assignment to the clinical teacher. Four out of five (80%) cooperating teachers or mentors assigned to PB Teacher candidates were trained. All five (100%) of SS assigned to Principal candidates were trained. One out of two SS (50%) assigned to School Counselor candidates was trained. Mentor/Cooperating Teacher/SS Handbooks, signatures as verification that training occurred as required, and training material were provided as evidence. It was noted that the School Counselor Handbook contained incorrect information and the program was advised to correct that information. All programs, except the UG Teacher and School Counselor programs, met the requirement as prescribed. [19 TAC §228.35(f); 19 TAC §228.2(14); 19 TAC §228.2(26); 19 TAC §228.2(33)]
- All candidates that reached the point of clinical teaching, internship, or practicum were assigned to a field supervisor. Two UG Teachers, five PB Teachers, five Principal, and two School Counselor files were reviewed for evidence. All contained candidate placement information noting the FS assigned. The program met the requirement as prescribed. [19 TAC §228.35(g); 19 TAC §228.35(h)]
- Field supervisors are required to be qualified. A FS shall not be employed by the same school where the candidate is being supervised and a mentor, cooperating teacher, or SS may not also serve as the candidate's FS. All FS held the required credentials appropriate for the candidate supervised. All of the FS assigned to seven UG/PB Teacher candidates, the five Principal candidates, and the two School Counselor candidates (100%) held the required credentials. None of the FS were employed on the same campus as the candidate they supervised and were not also serving as the cooperating teacher, mentor, or SS. Certificates and resumes provided for each FS served as evidence. The program met the requirement as prescribed. [19 TAC §228.2(18)]
- Field supervisors must be trained, and supervision provided on or after September 1, 2017, must be provided by a FS who has completed TEA-approved training. All FS assigned to UG Teacher



candidates met the statewide FS observation training requirement but did not receive local training. In the PB Teacher program, all FS assigned to clinical teachers or interns received training from ESC 11 or received statewide FS training at ETBU with a certificate of completion. One had completed local training and one did not. The three FS assigned to PB Teacher interns met some requirements. One had completed ESC 11 training and two had completed statewide FS training provided by the ETBU trainer of trainers. Two completed local training and one did not. In the Principal program, all received field supervisor coaching training at ETBU provided by a trainer of trainers. Two out of five (40%) received local training. The FS assigned to School Counselor candidates did not receive statewide or local training. The program did not meet the requirement as prescribed. [19 TAC §228.35(g) & (h)]

- All Teacher candidates must receive an initial contact within the first three weeks of assignment to a FS and all non-teacher candidates must receive an initial contact within the first quarter of assignment to a FS. Both UG Teacher candidates received an initial contact as required. Four out of five (80%) of the PB Teacher candidates received an initial contact as required. All five (100%) principal candidates received an initial contact as required. None of the School Counselor candidates received an initial contact as required. Observation documents and FS logs with initial contact identified served as evidence. All programs, except the School Counselor program, met the requirement as prescribed. [19 TAC §228.35(g) & (h)]
- For each formal observation, the field supervisor shall participate in an individualized pre-observation conference with the candidate and provide written feedback through an individualized, synchronous, and interactive post-observation conference with the candidate. Neither the pre- nor the post-observation conference need to be onsite. All seven UG/PB Teacher candidate files contained evidence that both conferences occurred at each formal observation. It was noted that one PB Teacher candidate had one post-observation conference via email and the program was advised that email post-observation conferences are not interactive. None of the Principal files reviewed contained evidence of a pre- or post-observation conference. The two School Counselor files reviewed contained evidence of a pre- and post-observation conference for all three observations. All programs met the requirement as prescribed except the Principal program did not. [19 TAC §228.35(g) & (h)]
- For each formal observation, the field supervisor shall document educational practices observed. All seven UG/PB Teacher files reviewed contained evidence of documented educational practices observed on the T-TESS type observation documents reviewed. Two out of five (40%) of the Principal files reviewed contained evidence the FS captured educational practices observed on the observation documents. Both School Counselor files reviewed contained evidence the FS captured educational practices observed based on the School Counselor standards. The program met the requirement as prescribed for all except the Principal program. [19 TAC §228.35(g) & (h)]
- Written feedback must be provided at each formal observation to the candidate's cooperating teacher, mentor, or site supervisor, as applicable. All seven UG/PB Teacher candidates, five Principal candidates, and two School Counselor candidate files contained a signed document indicating that the cooperating teacher, mentor, or site supervisor received a copy of each formal observation conducted by the FS. The program met the requirement as prescribed. [19 TAC §228.35(g) & (h)]



- Informal observations and coaching shall be provided by the field supervisor as appropriate. There was no evidence that the FS provided informal observations and coaching to any candidate in any programs. The program did not meet the requirement as prescribed. [19 TAC §228.35(g) & (h)]
- The field supervisor shall collaborate with the candidate and the cooperating teacher, mentor/campus administrator, or site supervisor, as applicable, throughout the clinical teaching, internship, or practicum experience. Observation documentation with signatures was provided as evidence for seven UG/PB Teacher candidates, five Principal candidates, and two School Counselor candidates. The program met the requirement as prescribed. [19 TAC §228.35(g) & (h)]
- Formal observations conducted by the field supervisor for Teacher candidates must be a minimum of 45 minutes in duration and must be conducted on the candidate's site in a face-to-face setting. Observations conducted for the seven clinical teacher or intern candidates met the requirement. Observation documents completed by the field supervisor provided evidence. It was noted that one of the clinical teachers completed field supervision during the pandemic and only had two observations, but that was acceptable at that time. The program was 100% compliant and met the requirement as prescribed. [19 TAC §228.35(g)(1)]
- All four UG/PB clinical teachers had their first formal observation within the first third of the assignment. All three PB interns had their first formal observation within the first six weeks of the assignment. The observation documents provided for review served as evidence. The program met the requirement as prescribed. [19 TAC §228.35(g)(2)]
- For an internship under an Intern certificate in one assignment, the EPP must provide a minimum of three formal observations during the first half of the internship assignment and a minimum of two observations during the last half of the internship assignment. There were three PB Teacher observation records reviewed and all three (100%) met the requirement. The program met the requirement as prescribed. [19 TAC §228.35(g)(3)]
- For a 14-week, full-day, clinical teaching assignment, an EPP must provide a minimum of one formal observation during the first third, second third, and final third of the assignment. Each of the four UG/PB Teacher files (100%) reviewed had evidence of formal observations as required. [19 TAC §228.35(g)(8)]
- For candidates in the non-teacher class, FS conduct a minimum of three formal observations that must be at least 135 minutes total. Observations are completed during the first, second, and final third of the practicum. Five Principal observation records were reviewed for evidence. The program requires four formal observations conducted by the field supervisor. Four candidates had completed four formal observations, which exceeded requirements, and the fifth candidate was in process of completing the requirement. Two School Counselor observation records were reviewed. The program requires three formal observations conducted by the field supervisor. Both School Counselor candidate files contained three observations that met the requirements. The program met the requirement as prescribed. [19 TAC §228.35(h)(1-3)]



### **Compliance Issues to be Addressed (see Next Steps)**

- 19 TAC §228.35(a)(6)(A-D) Online  
Coursework and training that is offered online must meet, or the EPP must be making progress toward meeting, criteria set for accreditation, quality assurance, and/or compliance with one or more of the following:
  - (A) Accreditation or Certification by the Distance Education Accrediting Commission;
  - (B) Program Design and Teaching Support Certification by Quality Matters;
  - (C) Part 1, Chapter 4, Subchapter P, of this title (relating to Approval of Distance Education Courses and Programs for Public Institutions); or
  - (D) Part 1, Chapter 7 of this title (relating to Degree-Granting Colleges and Universities Other than Texas Public Institutions).Action: Provide the accreditation letter from the accrediting body that supports the EPP is accredited to offer online coursework.
- 19 TAC §228.35(b)(1)-(2); 19 TAC 228.35(e)(1)(A-B) Pre-Service Requirements Coursework and FBE Requirements; FBE Settings; Interactive FBEs; Electronic FBEs - Unless a candidate qualifies as a late hire, a candidate shall complete the following prior to any clinical teaching or internship: 150 clock-hours of coursework and/or training and a minimum of 30 clock-hours of field-based experience. An EPP shall provide evidence of ongoing and relevant field-based experiences throughout the EPP in a variety of educational settings with diverse student populations, including observation, modeling, and demonstration of effective practices to improve student learning. Field-based experiences must include 15 clock-hours in which the candidate, under the direction of the EPP, is actively engaged in instructional or educational activities. Up to 15 clock-hours of field-based experience may be provided by the use of electronic transmission or other video or technology-based method.  
All FBEs must include:
  - (i) authentic school settings in a public school accredited by the TEA or other school approved by the TEA for this purpose;
  - (ii) instruction by content certified teachers;
  - (iii) actual students in classrooms/instructional settings with identity-proof provisions; (iv) content or grade-level specific classrooms/instructional settings; and
  - (v) written reflection of the observation.Action: Require all PB Teacher candidates to complete 150 clock hrs. of pre-service training and 30 clock-hrs. of FBEs in a variety of settings, including 15 clock-hrs. of interactive FBEs prior to clinical teaching or internship. Retain all documentation for auditing purposes.
- 19 TAC §228.35(e)(2)(A)(iii); 19 TAC §228.35(e)(2)(B)(vii) Skills Implementation: Clinical Teaching/Internship is Successful-Recommendation  
Clinical teaching/internship is successful when... the field supervisor and cooperating teacher or campus supervisor recommend to the EPP that the candidate should be recommended for a standard certificate. If either the field supervisor or cooperating teacher/campus supervisor does not recommend, the person who does not recommend the candidate must provide



documentation supporting the lack of recommendation to the candidate and either the field supervisor or cooperating teacher/campus supervisor.

Action: Require the PB FS and cooperating teacher to provide a final recommendation to the EPP identifying candidate was successful or not successful in the clinical teaching or internship experience. Retain all documentation for auditing purposes.

- 19 TAC §228.35(e)(2)(B)(6); 19 TAC §228.35(g), §228.35(h) Skills Implementation: Ongoing Support Field Supervision: Informal Observations & Ongoing Coaching  
An EPP must provide ongoing support to a candidate as described in 19 TAC §228.35(g) for the full term of the initial and any additional internship, unless, prior to the expiration of that term:(I) a standard certificate is issued to the candidate during any additional internship under a probationary certificate; (II) the candidate resigns, is non-renewed, or is terminated by the school or district. (III) the candidate is discharged or is released from the EPP. (IV) the candidate withdraws from the EPP. (V) the internship assignment does not meet the requirements described in this subparagraph. Informal observations and coaching shall be provided by the field supervisor as appropriate...  
Action: Provide ongoing support to all candidates in all routes and programs as specified. Retain evidence of informal observations and ongoing coaching per the records retention requirement in 19 TAC §228.40(f).
- 19 TAC §228.35(4) Skills Implementation: First of Year Experiences  
Candidates participating in an internship, or a clinical teaching assignment, need to experience a full range of professional responsibilities that shall include the start of the school year. The start of the school year is defined as the first 15 instructional days of the school year. If these experiences cannot be provided through clinical teaching or an internship, they must be provided through field-based experiences.  
Action: Require PB Teacher candidates who complete an internship that begins at mid-year to experience the start of the year through FBEs. Retain all documentation per the records retention requirement.
- 19 TAC §228.2(33) Campus Supervision: Qualifications of Site Supervisors  
Site supervisor-For a practicum candidate, an educator who has at least three years of experience in the aspect(s) of the certification class being pursued by the candidate; who is currently certified in the certification class in which the practicum candidate is seeking certification; who is an accomplished educator as shown by student learning.  
Action: Ensure site supervisors for Principal candidates meet qualification requirements. Retain evidence of qualifications per the records retention requirement.
- 19 TAC §228.35(f); 19 TAC §228.2(33) Campus Supervision: Training Site Supervisors  
The EPP is responsible for providing site supervisor training that relies on scientifically-based research, but the program may allow the training to be provided by a school, district, or regional education service center if properly documented. Training by the EPP must include training in how to coach and mentor candidates.





Action: Require all site supervisors assigned to School Counselor candidates to be trained as prescribed. Retain all documentation per the records retention requirement.

- **19 TAC §228.2(14) & (33) Campus Supervision: Training Cooperating Teachers, and Site Supervisors**  
(14) cooperating teacher ...who has completed cooperating teacher training, by the EPP within three weeks of being assigned to a clinical teacher  
(33) site supervisor ...who has completed training by the EPP, within three weeks of being assigned to a practicum candidate.  
Action: Require cooperating teachers assigned to clinical teachers in the UG Teacher program and site supervisors assigned to School Counselors to be trained within 3 weeks of assignment to the candidate. Retain all documentation per the records retention requirement.
- **19 TAC §228.35(g) & (h) Field Supervision: Field Supervisor Training**  
Field Supervisor who has been trained as a field supervisor. Supervision provided on or after September 1, 2017, must be provided by a field supervisor who has completed TEA-approved observation training.  
Action: Require all field supervisors to receive both local and statewide training as prescribed. Retain all evidence per the records retention requirement.
- **19 TAC §228.35(h) Field Supervision Initial Contact for Certification in a Certification Class other than Classroom Teacher.**  
The initial contact, which may be made by telephone, email, or other electronic communication, with the assigned candidate must occur within the first quarter of the assignment.  
Action: Require all School Counselor candidates to have an initial contact by the FS within the first quarter of assignment to a candidate. Retain all evidence in the candidate's file.
- **19 TAC §228.35(h) Field Supervision Pre- and Post-Conferences**  
For each formal observation, the field supervisor shall participate in an individualized pre-observation conference with the candidate; provide written feedback through an individualized, synchronous, and interactive post-observation conference with the candidate. Neither the pre-observation conference nor the post-observation conference needs to be onsite.  
Action: Require the FS to conduct both a pre- and post-observation conference for each formal observation of a Principal candidate.
- **19 TAC §228.35(h) Field Supervision**  
For each formal observation, the field supervisor shall document educational practices observed.  
Action: Require Principal program FS to document instructional practices observed in all standards on the observation instrument. Retain all documentation for auditing purposes.





### Recommendations

- Consider a central landing page on the ETBU College of Education website to place the military and non-military prior coursework policies that is easy for anyone who visits the website to find.
- Utilize the current SOE for candidates seeking employment during an internship.
- As soon as a non-teacher candidate completes the practicum experience, whether or not the candidate is ready for standard certification, collect the FS and SS recommendations for standard certification.
- It is recommended that the EPP provide the same training verification form to Cooperating Teachers, Mentors, and Site Supervisors as that used for the PB Teacher program and School Counselor programs.
- Utilize the person identified as the trainer of trainers for statewide field supervisor training as the designated trainer for all FS at ETBU.
- Consider using a T-PESS type observation rubric to ensure all Principal standards are addressed on the observation document.

Based on the evidence presented, East Texas Baptist University is not in Compliance with 19 TAC §228.35 – Coursework, Training, Program Delivery, and On-Going Support.

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

#### Findings

- To ensure that a candidate for educator certification is prepared to receive a standard certificate, the educator preparation program (EPP) shall establish benchmarks. ETBU did not consistently have established benchmarks to measure candidate progress. Five out of ten (50%) UG/PB Teacher candidate files contained a benchmark document with evidence of where the candidate was in the program. Three out of five (60%) of Principal files contained a benchmark document with evidence of where the candidate was in the program. Neither of the files for the two School Counselor candidates contained evidence of a benchmark document identifying where the candidate was in the program. The program did not meet the requirement as prescribed. [19 TAC §228.40(a)]
- ETBU has structured assessments to measure candidate progress. TEA requested Core Subjects EC-6 assessments for review since that was the certificate area reviewed for curriculum. The EPP provided an Early Childhood performance-based assessment (PBA) that included an integrated unit and a rubric with levels of proficiency identified that evaluated candidate performance in the integrated unit. Additionally, the EPP provided a candidate example with a completed rubric that identified the candidate's level of proficiency. The program also provided a Science of Teaching Reading (STR) PBA, aligned rubric, and candidate product for the EDUC 3314 course. The program met the requirement as prescribed. [19 TAC §228.40(a)]
- ETBU has processes in place to ensure that candidates are prepared to be successful in their certification exams. The EPP provided syllabi for the Teacher, Principal, and School Counselor programs for EDUC 3302, EDUC 4252, EDUC 330, and EDUC 3352 reflecting where candidates are notified regarding readiness to test. The EPP also provided the testing guidelines document that is provided to all candidates regarding how to take 240 Tutoring for the teacher class.



School Counselor candidates receive an email notification once they pass a practice exam to advise them that they may take the TExES exam. None of the candidates were granted test approval for a certification exam prior to formal admission. The program met the requirement as prescribed. [19 TAC §228.40(b); 19 TAC §228.40(d)]

- For the purposes of EPP improvement, an entity shall 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. The program provided two different pieces of feedback: the 2021-2022 clinical teacher survey about the EPP and Field Supervisor feedback raw data, but there was no evidence that anything was done with the data to make decisions about the program and no data was provided for the Principal or School Counselor programs. The program also provided the Teacher Council and Faculty Minutes noting program evaluation on November 20, 2018, November 26, 2019, September 11, 2020, October 7, 2020, and March 4, 2021, but the EPP did not evaluate all programs and it was not evident that the information was shared with the advisory committee. Since the School Counselor program is new, the EPP should be targeting that program for evaluation to see how the program is progressing and if any changes need to be made. The EPP was advised that it also needs to evaluate the Principal program because that was not evident. The program did not meet the requirement as prescribed. [19 TAC §228.40(e)]
- All candidate records requested for the review were provided which served as evidence that the EPP retains records as required for a period of five years from admission to completion or withdrawal from the program for any reason. The program met the requirement as prescribed. [19 TAC §228.40(f)]

#### **Compliance Issues to be Addressed (see Next Steps)**

- 19 TAC §228.40(a) Benchmarks  
To ensure that a candidate for educator certification is prepared to receive a standard certificate, the educator preparation program (EPP) shall establish benchmarks.  
Action: Establish benchmarks for candidates in all programs and document each benchmark in each candidate file. Retain all documentation for auditing purposes.
- 19 TAC §228.40(e) Program Evaluation  
For the purposes of EPP improvement, an entity shall 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.  
Action: Evaluate all programs as prescribed and share the information with the Advisory Committee. Retain all documentation of program evaluation in EPP records.

#### **Recommendations**

- None

Based on the evidence presented, East Texas Baptist University is not in compliance with 19 TAC §228.40 – Assessment and Evaluation of Candidates for Certification and Program Improvement.



## **COMPONENT VI: PROFESSIONAL CONDUCT - 19 TAC §228.50**

### **Findings**

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

- The EPP ensures that candidates in all programs (Teacher, Principal, and Counselor) understand and acknowledge adherence to the Texas Educator's Code of Ethics. Evidence, in the form of a signed Educator Code of Ethics (ECO) document acknowledging receipt, understanding, and adhering to the ECOE was found in eight out of ten (80%) of UG/PB Teacher files reviewed, all Principal files reviewed, and all Counselor files reviewed.
- All associated staff and field supervisors signed an ECOE acknowledgment. The signed document acknowledging receipt, understanding, and adherence to the ECOE, found in all faculty/staff EPP files, was evidence of compliance.

### **Compliance Issues to be Addressed (see Next Steps)**

- None

### **Recommendations**

- None

Based on the evidence presented, East Texas Baptist University is in compliance with 19 TAC §228.50 - Professional Conduct.

## **COMPONENT VII: COMPLAINTS PROCESS – 19 TAC §228.70**

### **Findings**

- Per 19 TAC §228.70(b), the EPP complaints process is on file at TEA. The EPP complaint policy is also posted on the website and a downloadable version is available to all. The program has the complaint policy posted on-site and ETBU provided pictures of where it is found at program offices. The program provides the complaint policy in writing upon request. ETBU met the requirements as prescribed. [19 TAC §228.70(b)(1-4)]

### **Compliance Issues to be Addressed (see Next Steps)**

- None

### **Recommendations**

- None

Based on the evidence presented, East Texas Baptist University is in compliance with 19 TAC §228.70 – Complaints Process.



## **COMPONENT VIII: CERTIFICATION PROCEDURES - 19 TAC Chapters 228 and 230**

### **Findings**

- Teacher candidates have met degree and completion requirements for certification. Five (UG/PB Teacher candidates who reached certification held a degree at the time of standard certification. Transcripts, records of EPP completion, and testing records were provided as evidence. The program met the requirement as prescribed. [19 TAC §230.13(a)(1-2); 19 TAC §230.13(b)(3)]
- None of the Principal candidates reached the point of standard certification. Two School Counselor candidates reached the point of standard certification. Both held the required master's degree. ETBU provided service records for both School Counselor candidates noting two or more years of experience as a classroom teacher. Both School Counselor candidate files contained a record of EPP completion, including official transcripts noting a master's degree conferred. The program met the requirements as prescribed. [19 TAC §241.20; 19 TAC §239.20(1-4)]

### **Compliance Issues to be Addressed (see Next Steps)**

- None

### **Recommendations**

- None

Based on the evidence presented, East Texas Baptist University is in compliance with 19 TAC Chapters 228 and 230 – Certification Procedures.

## **COMPONENT IX: INTEGRITY OF DATA REPORTED - 19 TAC Chapter 229**

### **Findings**

- East Texas Baptist University has submitted ASEP reports within the timeline required by TEA. Corrections had to be made by the program and they were done within the timeline required by TEA for the 18-19, 19-20, and 20-21 academic years. The program met the requirement as prescribed. [19 TAC §229.3(f)(1) and Associated Graphic]
- Seven out of ten (70%) UG/PB Teacher candidate files reviewed contained a formal offer of admission that supported the admission date reported in the Educator Certification Online System (ECOS). [19 TAC §229.3(f)(1) & Associated Graphic (3)]
- Nine out of ten (90%) UG/PB Teacher candidate files reviewed contained an admission GPA that corresponded to the admission GPA reported to TEA during annual reporting for the year the candidate was admitted. The program was 90% compliant. [19 TAC §229.3(f)(1) & Associated Graphic (7-8)]
- All ten (100%) UG/PB Teacher candidates were correctly reported on a Finisher Records List (FRL) as Other Enrolled or Finisher for each year they were in the program [19 TAC §229.3(f)(1) & Associated Graphic (4-5)]
- Seven out of eight (88%) of UG/PB Teacher observations were correctly reported. 19 TAC §229.3(f)(1) & Associated Graphic (1)]



- Three out of five (60%) of Principal admission records were correct in terms of being reported within seven days when compared with related documentation in candidates' files. The candidate files reviewed contained a formal offer of admission letter that corresponded to the admit date in ECOS in those three files. [19 TAC §229.3(f)(1) & Associated Graphic (3)]
- All Principal files reviewed contained an admission GPA that corresponded to the admission GPA reported to TEA during annual reporting for the year the candidate was admitted. [19 TAC §229.3(f)(1) & Associated Graphic (9)]
- All five Principal candidates were correctly reported on a Finisher Records List (FRL) as Other Enrolled or Finisher for each year they were in the program [19 TAC §229.3(f)(1) & Associated Graphic (4-5)]
- One out of two (50%) School Counselor admission records in terms of the admission dates in candidate records as compared to the admission dates reported were correct. [19 TAC §229.3(f)(1) & Associated Graphic (3)]
- None of the School Counselor admission GPAs corresponded to the admission GPA reported to TEA during annual reporting for the year the candidate was admitted. [19 TAC §229.3(f)(1) & Associated Graphic (9)]
- Both School Counselor candidates were correctly reported on a Finisher Records List (FRL) as Other Enrolled or Finisher for each year they were in the program [19 TAC §229.3(f)(1) & Associated Graphic (4-5)]
- No observations were reported for candidates in the Principal or School Counselor programs. [19 TAC §229.3(f)(1) & Associated Graphic (1)]

#### **Compliance Issues to be Addressed (see Next Steps)**

- 19 TAC §229.3(f)(1) and Graphic  
Report all data accurately in ASEP and related candidate documentation.  
Action: Submit the EPP plan to ensure that all data is reported accurately each year. Begin entering non-teacher observation data into ECOS beginning with the current 2021-2022 academic year. Ensure that all data points are included in the plan as referenced in the Figure 19 TAC §229.3(f)(1)

#### **Recommendations**

- Ensure that the admission dates in records correctly correspond to what is uploaded into ECOS and that the GPA that is uploaded is correct and corresponds to what is listed on the transcript for each candidate admitted.
- Put a system in place to ensure that ETBU uploads observations at the end of each Fall and Spring semester to avoid having to do it all at once during ASEP reporting time and reduce the probability of entering incorrect data.

Based on the evidence presented, East Texas Baptist University is not in compliance with 19 TAC Chapter 229 – Integrity of Data Reported.



## **RECOMMENDATIONS AND ADVISEMENT**

- For Teacher preparation programs, the Pre-Admission Content Test (PACT) changed effective January 27, 2020. Ensure curriculum in all teacher certificate areas has been updated to meet requirements for content pedagogy instruction and test preparation. Passing scores on TExES exams cannot be used to meet EPP admission requirements after 1/27/2020 but may be used for certification purposes until the expiration date of the related certificate. The new PACT, or “TX PACT,” is a content-pure assessment that cannot be used for certification purposes.
- Application A has changed – plan to review requirements to prepare for adding new certificate areas.
- Develop and implement more performance assessments in all programs. Evidence of performance assessments is a requirement for adding new certificates using the new Application A.
- Review all certificate areas that the EPP no longer plans to support and request, in writing, for TEA to remove them from inventory.
- For Teacher preparation programs, the TExES exam #291 (Core Subjects EC-6) and #117 (ELAR 4-8) are no longer available for testing effective January 1, 2022. To use the 291 exam for certification, candidates must be certified by December 30, 2022. To use the 117 exam for certification, candidates must be certified by October 30, 2022. Communicate these important deadlines to applicable current candidates and past finishers who are pending certification.
- Intern and Probationary certificate deactivation timelines and requirements have been updated in TAC. Changes include new timelines for requesting deactivations and information that must be provided to stakeholders in advance of internship start dates. Field supervisors will need to verify candidate placement information at the beginning of the assignment.

## **PROGRAM RECOMMENDATIONS ALL EPPS**

- To ensure continuity in record keeping and other related processes, consider creating a procedure manual documenting EPP processes.
- Align the verbiage of the program to the verbiage of the Texas Administrative Code (TAC) (ex. Field supervisor, cooperating teacher, mentor, candidate, etc.);
- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about the current Texas Administrative Code;



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

## SUMMARY

Next Steps were created collaboratively with the East Texas Baptist University staff.

**“I have reviewed the EPP Report and agree that all required corrections will be made on or before April 29, 2022 by 5 PM CST.”**

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**Signature of Legal Authority**

**Date**

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**Printed Name of Legal Authority**

**Date**