2021-2022 Continuing Approval Review Report
Texas A&M University - Commerce

Introduction
A 5-year Continuing Approval Review was conducted by Education Specialists Lorrie Ayers, Vanessa Alba, and Emily Carrizalez of the educator preparation program (EPP) at Texas A&M University – Commerce (116501) on February 1-3, 2022. Per 19 Texas Administrative Code (TAC) §228.10(b), an entity approved by the State Board for Educator Certification (SBEC) to certify educators shall be reviewed at least once every five years. The Texas A&M University – Commerce educator preparation program (EPP) was originally approved as an EPP on November 10, 1969.

Dr. Kimberly McLeod was the program Legal Authority and Sherri Harwell was the primary EPP contact for the review. Texas A&M University – Commerce (TAMUC) is approved to prepare and certify candidates in the following certificate classes: Teacher, Principal (PIL), Superintendent (SPN), School Counselor (COU), Educational Diagnostician (DIA), School Librarian (LIB), and Reading Specialist (RSP). Certification is offered in the Undergraduate (U), Post-Baccalaureate (PB), and Alternative (ALT) routes. The EPP reported 539 finishers for the 2019-2020 reporting year and 532 finishers for 2020-2021. The EPP was rated Accredited at the time of the review. The risk level was Stage 1 (high).

Candidate records were reviewed for 50 candidates, five (5) from each the Principal, Superintendent School Counselor, and Reading Specialist classes. Ten records were requested from the Educational Diagnostician class: five (5) from the PB route and five (5) from the ALT route. Fifteen records were requested from the Teacher class: five (5) each from the U, PB, and ALT routes.

EPP staff participating in the review at various stages: Kimberly McLeod, Juan Araujo, DeMarquis Hayes, Sherri Harwell, Nate Templeton, Ava Munoz, Melanie Loewenstein, Ray Thompson, Anjum Najmi, Keith Frost, Michelle Hanks, April Sanders, Donna Hickman, Darla Meek, Beth Jones, Carol Revelle, and Kathy Dixon

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 "Virtual On-site" format where EPP staff submitted requested documents to TEA for review and TEA staff engaged EPP staff in virtual chats to discuss program components and outcomes of the 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. A Compliance Plan was developed to address plans for quality improvement. Evidence of compliance was measured using a rubric aligned to TAC.

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 January 13, 2022. Additional EPP documents, including records for 50 candidates, were submitted on January 26, 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.

Results: EPP and Program Requirements
Per self-reported information in the Status Report and minutes from advisory committee meetings, the EPP meets requirements for program governance including a) support provided by the governing body; and b) advisory committee activity as required in 19 TAC §228.20. It was noted that the EPP has 8 advisory committees that are each focused on a unique program within the EPP. It was recommended to program staff that they should capture evidence of attendance at each meeting. Additionally, it was suggested that the EPP consider holding one comprehensive advisory committee meeting each year where the 8 program committees come together and share information. The EPP has additional teaching sites in Mesquite, Corsicana, McKinney, Dallas, Richardson, and Terrell. Most of the programs in the EPP have an online component or are offered fully online. The programs meet the requirement in 19 TAC §228.35(a)(6) for online quality; however, the EPP was reminded that, per 19 TAC §228.20(e), TEA must be informed in writing of program amendments to transition a face-to-face delivery to an online delivery.

The website and application materials were reviewed to verify the EPP had posted the required information for applicants and candidates in all programs. There is a central page on the university website for "The Office of Educator Certification and Academic Services" that displays most of the required information and additionally, links to pages for the programs within the EPP.

- Overall information about the effect of supply and demand forces on the educator workforce in Texas and information about the performance of the EPP over five years were found on this page. Some information was provided about potential salaries for various educator credentials and some links to employment opportunities in various partner districts were identified on linked pages for specific programs. Admission and completion requirements for each program were not easily located when following logical steps to reach the information. There was some conflicting information in separate locations for one or more programs and some outdated information on posted items such as for the DIA program identifying two (2) years of teaching experience required instead of three (3) which is the more recent requirement. Program staff were encouraged to review, and revise published admission and completion information for each program so that it is transparent and accurate.
- The following information was identified on the EPP website on the "The Office of Educator Certification and Academic Services" page which is linked to individual program-specific pages which meets requirements in 19 TAC §227.1(b) and §227.1(d):
  - The required fingerprint background check;
  - The potential ineligibility of an individual for certification due to a criminal history; and

- o The right of an individual to request a Preliminary Criminal History Evaluation (PCHE) from TEA.

  EPP staff were encouraged to consider placing this information also on the applications for admission into each program and requiring candidates to sign an acknowledgement of reading and understanding to ensure each candidate is properly informed.

- The EPP complaints process was posted on the website on the "Educator Certification and Academic Services" page which is linked to all other program specific pages. There was a link to the TEA complaints process within the complaints process information as required in 19 TAC §228.70(b)(2). A complaints process is on file at TEA as required; however, the information and links in the version are out of date. Program staff were encouraged to submit a more recent copy of the complaints process.

EPP staff and candidates in all programs sign an attestation of reading and understanding the Texas Educators' Code of Ethics (ECOE) which meets requirements in 19 TAC §228.50 related to professional conduct. The EPP was encouraged to update the document to the most recent version of the ECOE and to consider updating the agreements to "understand and adhere to" the ECOE to align with 19 TAC §228.50.

Per 19 TAC §229.3(e), "all required EPP data for an academic year shall be submitted to the TEA staff annually by September 15 following the end of that academic year". The EPP is required to report admission activities, enrollment data, and observation data.

- The EPP met deadlines for data submission.
- Admission data was reported either using the GPA spreadsheet or, effective September 1, 2019, through an admission record created in the Educator Certification Online System (ECOS). There was sufficient evidence that admission data was reported accurately for each program except the DIA and LIB programs. Five of the 10 DIA candidates and two of the five LIB candidates were reported with GPA data and/or admission dates that did not agree with documentation in their records.
- Candidate enrollment data is reported annually on the Finisher Records List in ECOS. Enrollment status was reported accurately for candidates in all programs.
- Observation data is reported in ECOS. Data for the Teacher (U) and PIL programs had not yet been reported for the 2021-2022 year so the accuracy of this data could not be verified. For each of the other programs, discrepancies in dates or durations of observations were found, or observations were not reported and should have been, for more than 20% of records reviewed.

19 TAC §228.40(f) requires the EPP to retain "documents that evidence a candidate's eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after a candidate completes, withdraws from, or is discharged or released from the program". Records were available for each requirement for the Teacher, SPN, COU, and LIB programs. There was insufficient evidence the PIL, DIA, and RSP programs retain documentation as required.

Per information on the TEA Data Dashboard, the EPP has consistently met the requirement in 19 TAC §227.19(a) that the overall GPA of each incoming class must be 3.0 or higher. The four most recent years of data were included in the evaluation.

Compliance Issues to be Addressed (See Compliance Plan)
The EPP will submit evidence to TEA that deficiencies in these areas have been corrected on or before June 8, 2022:

1. **19 TAC §229.3(a), §229.3(f)(1), & related graphic Figure 19 TAC §229.3(f)(1)**
   Data Reported: Accurately
   Implement a process to ensure all data reported to TEA is accurate when compared with the actual data in Candidate and EPP records.

2. **19 TAC §228.40(f) Records Retention**
   Implement a process for all program within the EPP to collect and retain evidence that candidates met admission requirements and completed all program requirements per the records retention requirements in 19 TAC §228.40

Recommendations
- There is a market for COU (ALT) programs for those who hold a 48-hour master's degree and want to pursue certification only. The EPP is encouraged to consider whether they have a niche in that market. If not, the program is encouraged to remove the COU (ALT) program from EPP inventory to avoid confusion for consumers.

- Utilize the most recent TEA Advisory Committee Training slide deck to train advisory committee members. Have each sign the verification form that they have been trained and identify the group represented. Retain the dated evidence that training occurred.

- Have advisory committee members sign in at meetings to capture actual membership vs. listed membership (active members)

- Consider holding one advisory committee meeting per year where each of the program committees attend and share learning and advisement.

- Review and revise published admission and completion information for each program so that it is transparent and accurate.

- Update the ECOE attestation document signed by staff and candidates in all programs to the most recent version of the ECOE and consider updating the verbiage on the attestation documents to agreements to "understand and adhere to" the ECOE to align with 19 TAC §228.50.

- Because the Exit Policy is found in the candidate handbooks, continue to ensure programs collect and retain attestations from candidates that they have received and read the contents of the handbooks since the Exit Policy must be acknowledged in writing by candidates upon program admission.

- Consider including ethics violations as part of the Exit policy where appropriate.

- Update the complaints process that is on file at TEA with the most recent version.

- For concrete evidence of notifying all candidates of fingerprint background check and criminal history information, consider including the information on applications for admission into the

EPP and then collect a signature of reading and understanding the requirements to retain in each candidate's record.

Results: Candidate Preparation

Candidate and EPP records were reviewed to verify that each program within the EPP is compliant with TAC requirements for candidate admission and completion of preparation and certification requirements. Transcripts, admission documents, benchmark documents, degree plans, course materials, training certificates, completed logs and observation documents, and feedback from EPP staff were considered as evidence. The following are the results of the review by program.

Teacher (U, PB, ALT) Programs

Findings

The website refers to the Undergraduate teacher preparation program as the "Field-Based Teacher Education Program". The undergraduate degree is offered through a hybrid program which is partially online and partially face-to-face. Candidates must be enrolled in ELED or SED 300 to apply to the certification program. Published degree plans reveal that candidates complete more than the 300 clock-hours required for certification. The website details requirements for completing the early field-based experiences (FBE) and for completing clinical teaching. Candidates must apply for clinical teaching and must pass the content pedagogy exam prior to starting the clinical teaching assignment. Sixteen weeks of clinical teaching is required. Candidates who are Educational Aides may complete clinical teaching in the aide placement. Certified aides with at least two (2) full years of service may waive one of the two semesters required for clinical teaching. Program staff verified the clinical teaching assignment required by SBEC rules is not waived.

The website identifies the PB and ALT routes are offered fully online. The PB route offers certification with a 36-hour master's degree. The website identifies "18 hours of study in the major and 18 hours of alternative certification coursework." A master's in Special Education with teacher certification may require additional coursework, up to 42 hours, in a hybrid, online delivery. Candidates certified in these routes may complete an internship of one full school year or a clinical teaching assignment of 16 weeks.

1. Transcripts provided for each of the 15 Teacher candidates provided evidence the candidates were enrolled in the university and met the GPA and basics skills requirements for admission into the EPP. Transcripts or scores on the Pre-admission Content Test (PACT) were evidence each candidate met the subject-specific content hour requirement, and transcripts and TOEFL scores were evidence candidates demonstrated English language proficiency (ELP) prior to admission. There was sufficient evidence the EPP consistently collects an application for admission; however, consistent use of a screen was verified for Teacher (U) and Teacher (PB) candidates but not for Teacher (ALT) candidates.

   There was sufficient evidence the Teacher programs have implemented a formal admission process as required in 19 TAC §227.17. Thirteen of the 15 records contained a written offer signed by the candidate; however, the Teacher (ALT) program did not consistently include the formal date of admission in the offer letter. Dates on letters compared with upload dates in the ECOS audit trail confirmed the admission records were consistently created within 7 calendar days of the admission date on the offer letter for the Teacher (U) and (PB) programs but not for

the Teacher (ALT) program. None of the 15 candidates had been admitted contingently. The Teacher (PB) and (ALT) programs were reminded that an applicant may be offered contingency admission if the applicant meets all admission requirements except the required conferred degree and only if the missing degree is expected to be conferred in the semester of the contingency admission. All other admission is formal where applicants must meet all EPP admission requirements prior to being offered admission. Candidates in the Teacher (PB) and (ALT) programs were admitted prior to beginning coursework; however, it was noted that Teacher (U) candidates complete a significant amount of coursework prior to admission. The EPP was encouraged to adjust the admission date so that candidates are able to complete at least 18 semester credit-hours of coursework and the clinical teaching requirement after formal admission into the EPP.

2. Teacher candidates complete 300 or more clock-hours of coursework as required in 19 TAC §228.35(b). Self-reported information in the Status Report, with course descriptions, degree plans, and syllabi provided evidence that coursework and training provided to candidates in the Teacher programs is standards-based and addresses the TEKS. In a more detailed evaluation of the coursework provided to Teacher (U) candidates pursuing certification in Core Subjects with Science of Teaching Reading EC-6, the review team found the curriculum appeared to be missing alignment with some content pedagogy standards for the EC-6 certificate area including Art & Music EC-12, ELAR & Math EC-6, Science & Social Studies EC-6, Theatre EC-12, English Language Proficiency Standards (ELPS), and Technology Applications standards for all teachers. Evidence of performance-based assessments was found in coursework documentation reviewed. There was sufficient evidence that all other required instruction was provided except the digital literacy requirement in 19 TAC §228.30(c)(8) had not been implemented. The EPP is piloting digital literacy instruction with an online digital literacy evaluation based on ISTE standards which will meet the digital literacy requirement when implemented. Relevant documentation was provided for TEA review.

3. Per transcripts and logs reflecting field-based experience (FBE) hours completed, there was sufficient evidence that Teacher candidates completed pre-service requirements prior to beginning clinical teaching or an internship as required in 19 TAC §228.35(b). Completed FBE logs were provided for the identified candidates; however, FBE logs did not capture evidence candidates complete at least 15 hours of interactive FBE as required in 19 TAC §228.35(e)(1)(A). Thirteen of the 15 candidates had reached the point of completing FBE and none of the logs captured evidence of the interactive hours. Candidates did not complete FBE hours via video except for one candidate who completed video-based observations during COVID. All other requirements for FBE identified in 19 TAC §228.35(b)(1) and §228.35(e)(1) were met.

There was sufficient evidence the Teacher programs require candidates to complete the supervised clinical experience. At the time of the review, 8 of the 15 Teacher candidates had completed clinical teaching, five had completed an internship, and two (PB) candidates had not yet progressed to clinical teaching or an internship. The clinical teaching assignments met requirements except one of the two (ALT) candidates was not placed in an assignment that matched the certificate sought and logs for two of the five (U) candidates were missing or

incomplete so completion of the 16 weeks could not be verified. 19 TAC §228.35(e)(2)(B) requires the duration of an internship to be a full school year. Certificate effective dates in the ECOS reflected each of the five interns had not completed the full year as required.

Candidates were assigned field supervisors and cooperating teachers or mentors during the supervised clinical experience. There was sufficient evidence that field supervisors, cooperating teachers, and mentors met qualification requirements in 19 TAC §228.2(18), (14), & (26) respectively per verification of qualifications documents or signed mentor agreements in each of the candidate's records. There was limited evidence that cooperating teachers and mentors supporting Teacher (U) and (ALT) candidates received training within the first three weeks of assignment to the candidate. Five of 10 records for candidates in these programs were missing evidence of training provided within the first three weeks of assignment. Field supervisors received the training as required in 19 TAC §228.35(g).

There was sufficient evidence that field supervisors provided support to candidates in clinical teaching or internship; however, for two of the five Teacher (ALT) candidates, there was limited evidence the field supervisor made first contact with the candidate within the first three weeks of the assignment as required in 19 TAC §228.35(g). Additionally, for eight of the 13 candidates that completed the supervised clinical experience, there was limited evidence the field supervisors conducted pre-conferences with the candidate for each formal observation. There was sufficient evidence that field supervisors capture candidate proficiency in the standards and educational practices observed; however, there is limited evidence for the Teacher (PB) and (ALT) programs that feedback from the observations is provided to the appropriate campus personnel as required. Field supervisors provide ongoing coaching and support to candidates; however, evidence that field supervisors collaborate with cooperating teachers and mentors was limited for the eight Teacher (PB) and (ALT) candidates. Candidate demonstration of proficiency in the standards was captured by field supervisors during observations.

The Teacher programs consistently collected recommendations of success in clinical teaching or internship from the field supervisor and the cooperating teacher or campus supervisor as required in 19 TAC §228.35(e)(2)(A)(iii) and §228.35(e)(2)(B)(ix).

4. 19 TAC §§228.40(b) and (d) identify the EPP is responsible for ensuring that each candidate is adequately prepared to pass the appropriate content pedagogy examination(s) required for certification, and the EPP shall determine the readiness of each candidate to take the appropriate certification examination(s). Fourteen candidates had received a test approval at the time of the review. Dates in ECOS provided evidence that each of the candidates had been admitted into the EPP prior to being given test approval as required in 19 TAC §228.40(d). Evidence of test preparation and determination of test readiness was not found in the records for 13 of the 14 Teacher candidates.

5. Ten of the 15 Teacher candidates had achieved standard certification at the time of the review. Benchmark documents and transcripts provided evidence that each met requirements for the standard certificate as required in 19 TAC Chapter 230; however, five of the 10 Teacher (PB) and (ALT) candidates were recommended for Standard certificates that were effective before the last day of the full year internship.

Compliance Issues to be Addressed (See Compliance Plan)

The EPP will submit evidence to TEA that the deficiencies in these areas have been corrected on or before June 8, 2022:

19 TAC §227.10(a)(8) Admission Requirements: Screen

The Teacher (ALT) program must implement a process to consistently screen applicants for their appropriateness for the certificate sought and retain evidence of the scored screen in candidate's records per the records retention requirement in 19 TAC §228.40.

19 TAC §227.17(d)
Formal Admission: Dates

The Teacher (ALT) program must implement an admission process that ensures a concrete admission point into the program and captures the effective dates of candidate entry into the program. Ensure the effective date of admission is represented on the admission offer letter signed by the candidate. Retain evidence in the candidate's record per the records retention requirement in 19 TAC §228.40.

19 TAC §227.17(e)
Formal Admission: 7-Day Notice of Admission

The Teacher (ALT) program must ensure admission records are created for candidates within 7 calendar days of the formal date of admission. Update admission processes to ensure the requirement is met.

19 TAC §228.30(a)
Standards-based Curriculum

Require all Art & Music EC-12, ELAR & Math EC-6, Science & Social Studies EC-6, Theatre EC-12, ELPS, and Tech Apps for all Teachers standards to be incorporated into the coursework required for Core Subjects w/STR EC-6 certification in the Teacher (U) program.

19 TAC §228.30(c)
Digital Literacy

Implement the digital literacy requirements including the digital literacy evaluation and the prescribed digital literacy curriculum (see complete rule text in TAC for detail) for Teacher (U), (PB), and (ALT) programs.

19 TAC §228.35(e)(1)(A)
FBE: Interactive Hours

Implement a process to require and capture evidence that candidates complete at least 15 hours of the required 30 hours of FBE actively engaged in instructional or educational activities. Retain evidence in candidate or EPP records that each candidate met the requirement.

19 TAC §228.35(e)(2)(A)
Skills Implementation: Clinical Teaching Assignment

Implement a process for the Teacher (ALT) program to ensure each candidate is in a clinical teaching placement that matches each certificate sought, including supplemental certificate areas.

19 TAC §228.35(e)(2)(A)(i)
Skills Implementation: Clinical Teaching Duration
Implement a process for the Teacher (U) program to capture candidate hours in clinical teaching as evidence the candidate completes the required clinical teaching assignment. Retain evidence in each candidate's record.

19 TAC §228.35(e)(2)(B) Skills Implementation: Internship-Duration
For the Teacher (PB) and (ALT) programs, implement a process to ensure candidates complete the full school year internship before the EPP recommends them for standard certification. Note: The effective date on the Standard certificate is the date the last requirement was met which cannot be before the internship was complete.

19 TAC §228.2(14) and §228.2(26)
Campus Supervision: Training Cooperating Teachers and Mentors
Implement a process for the Teacher (U) and (ALT) programs to train cooperating teachers and mentors within the first three weeks of assignment to candidates and retain evidence of their attendance at training per the records retention requirement in 19 TAC §228.40.

19 TAC §228.35(g) & §228.35(h)
 Field Supervision: Pre- and Post-Conferences
For Teacher (PB) and (ALT) programs, provide training to field supervisors and/or update field supervision documents such as observation instruments or field supervisor logs to capture evidence that field supervisors hold pre- and post-conferences for each formal observation.

19 TAC §228.35(g) & §228.35(h)
Field Supervision: Observation-Written Feedback
Implement a process for Teacher (PB) and (ALT) programs for the field supervisors to provide written feedback about the outcome of candidate observations to the campus supervisor assigned to the candidate.

19 TAC §228.35(g) & §228.35(h)
Field Supervision: Informal Observations & Ongoing Coaching
Teacher (PB) and (ALT) programs must provide training to field supervisors and/or require field supervisors to capture evidence of ongoing support of candidates and collaboration with candidates and site supervisors, such as through consistent use of a field supervisor log. Retain the evidence in the candidate's record.

19 TAC §228.35(g)(2)
Field Supervision: Formal Observations-Frequency
For the Teacher (ALT) program, provide training to field supervisors and/or implement a process for field supervisors to complete the first formal observation within the first third for clinical teaching assignments and within the first six weeks for internship assignments.

19 TAC §228.40(b) & §228.40(d)
Test Preparation
All Teacher programs must implement a process to determine, and capture evidence of, candidate readiness to test (e.g., practice test scores, certificates of completion of test preparation materials, evidence of completion of prerequisite courses/coursework, etc.)

19 TAC §230.13(a)(2) & §230.13(b)(3)
Teacher Certification: Completion of EPP
The Teacher (PB) and (ALT) programs must implement the requirement (and any related processes) that teacher candidates must complete the full year internship before being identified as a finisher and before being recommended for a standard certificate.

Recommendations
- It is recommended for the TCH (U) program to review the admission point to ensure candidates are completing at least the 300 hours after admission and not admitting candidates immediately prior to clinical teaching.
- Review EC-6 coursework in other routes (PB) and (ALT) to ensure required standards are embedded in curriculum.
- 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.
- 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 for certification, candidates must be certified by December 30, 2022. To use the 117 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.

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Non-Teacher Programs

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Findings
Five records from each of the following programs were reviewed: Principal (PIL), School Counselor (COU), Educational Diagnostician (DIA) Alternative, DIA (PB), Superintendent (SPN), School Librarian (LIB), and Reading Specialist (RSP). Evidence in candidates' records were compared with published requirements and with requirements in TAC to verify compliance with both.

1. Transcripts provided for 32 of the 35 candidates provided evidence the candidates were enrolled in the university and met the GPA, basics skills, and degree requirements for admission into the EPP. Transcripts were not provided for one of the five PIL candidates and two of the five RSP candidates so there was insufficient evidence that RSP candidates consistently meet the admission requirements. Two of the DIA candidates had been admitted from out of country with transcripts reviewed by an approved credential review service. It was noted that a GPA could not be discerned from the information on the transcript evaluation for the DIA (ALT) candidate. None of the candidates had been admitted with a GPA below 2.5. Service records, teaching certificates and conferred degrees on transcripts were evidence each of the candidates had met

certification, degree, and/or experience requirement(s) for issuance of a standard certificate prior to admission, so letters notifying candidates of deficiencies were not expected or found in records which meets the requirement in 19 TAC §227.10(a)(5). Transcripts were evidence that candidates demonstrated English language proficiency (ELP); however, one candidate in each DIA (PB), DIA (ALT), and RSP programs was admitted with credentials from out of country and TOEFL scores were not collected prior to admission which does not meet the requirement in 19 TAC §227.10(a)(7) that applicants must demonstrate ELP prior to admission. There was sufficient evidence the EPP consistently collects an application for admission for the PIL, COU, RSP, and LIB programs; however, two of the five SPN records were missing evidence of an application and two of the five DIA (PB) records contained applications that were dated after the formal date of admission for those candidates. Consistent use of one or more screens to determine the appropriateness for the certificate sought was verified for SPN, COU, DIA (PB), DIA (ALT), and LIB candidates but not for PIL or RSP candidates. The PIL program had implemented only one screen when more than one is required in 19 TAC §241.5(c) and the RSP records for three of the five candidates were missing evidence of a screen. There were no additional academic requirements published for the non-teacher programs but there were various other admission requirements such as resumes, letters of recommendation, and written philosophy statements as allowed in 19 TAC §227.10(b). A review of candidates' records revealed that only the LIB program consistently collected and retained evidence that candidates had met the additional requirements prior to admission. Program staff were advised to review and revise, if necessary, the additional requirements and then implement an admission process that enables them to consistently collect evidence that admitted candidates have met the requirements.

Written, dated admission offers signed by candidates were found in candidates' records which was sufficient evidence the programs have implemented the formal admission process as required in 19 TAC §227.17; however, for three of the five DIA (PB) candidates, there were discrepancies in admission dates. Per 19 TAC §227.17(e), the EPP must report candidates as admitted to TEA within 7 calendar days of the date of formal admission. When dates in admission offer letters were compared with dates in the Educator Certification Online System (ECOS) audit trail, there was sufficient evidence that the EPP consistently creates admission records for candidates in the PIL, SPN, COU, and RSP programs as required; however, admission was not consistently reported to TEA within the 7-day time frame for three of the five DIA (PB), two of the five DIA (ALT), and two of the five LIB candidates. None of the non-teacher candidates had been contingently admitted; however, one DIA (PB) candidate had been admitted "contingent upon" completing two graduate courses. EPP staff were reminded that an applicant may be offered contingency admission if the applicant meets all admission requirements except the required conferred degree and only if the missing degree is expected to be conferred in the semester of the contingency admission. All other admission is formal where applicants must meet all EPP admission requirements prior to being offered admission. Admission dates and dates on transcripts and benchmark documents were evidence candidates were admitted before they were provided coursework or test approval as required in 19 TAC §227.17(f).

2. Per degree plans for master's degrees, the non-teacher programs require candidates to complete more than the 200 clock hours (14 semester credit hours) of coursework required in 19 TAC §228.35(c). The DIA (ALT) program requires 21 semester credit hours and a 3-credit hour

practicum. The SPN program is offered in the alternative certification route where candidates complete five three credit-hour courses that includes the three-hour practicum course. Program staff stated the three-hour practicum course requires instructional seat time and the practicum hours are earned outside of class which allows the SPN program to meet the minimum 14 credit-hour requirement. It was noted that the SPN program may be allowing coursework prior to admission and were encouraged to ensure they are not and were encouraged to remove the SPN acknowledgement "I will not be able to use more than 20 clock hours of activity completed prior to the first day of my practicum semester" since candidates cannot complete coursework prior to admission unless there is a specific policy around types of coursework accepted and from whom. Alternatively, the program could adjust the practicum start date to allow candidates to capture the additional 20 hours that occur before the practicum semester begins.

Self-reported information in the Status Report, with course descriptions, degree plans, and syllabi provided evidence that coursework and training provided to candidates in the non-teacher programs is standards-based and has some performance-based training. There was sufficient evidence, including certificates of completion in candidates' records, that all other required instruction was provided except the digital literacy requirement in 19 TAC §228.30(c)(8) had not been implemented. The EPP is piloting digital literacy instruction with an online digital literacy evaluation based on ISTE standards which will meet the digital literacy requirement when implemented. Relevant documentation was provided for TEA review.

3. None of the candidates whose records were selected for review had completed the practicum in an internship so none of the requirements around Intern and Probationary certificates, such as Late Hire, pre-service, and certificate deactivation requirements, were applicable. Degree plans, handbooks, practicum logs, and observations reported in ECOS suggest the programs require a practicum; however, practicum documentation was not consistent. Three of the DIA (ALT) candidates, three SPN candidates, and two COU candidates had not reached the point of practicum at the time of the review, so no evidence was expected in records for these candidates. There was insufficient evidence that the RSP and COU programs consistently require a standards-based practicum of 160 clock hours or more. Four of the five RSP candidate records contained logs reflecting candidates completed less than half of the required hours and one candidate had no record of a practicum. Two of the three COU candidates that completed a practicum were missing logs verifying hours. Practicum assignment information was found in records for candidates in each program except the RSP program and were evidence the assignments were appropriate for the certificate sought as required in 19 TAC §228.35(e)(8). RSP candidate assignments could not be verified. There was insufficient evidence the programs consistently collect recommendations from field supervisors and campus site supervisors that candidates were successful in the practicum experience as required in 19 TAC §228.35(e)(8)(E). One or both recommendations were missing from records for five PIL, two SPN, three COU, five DIA (PB), two DIA (ALT), three LIB, and five RSP candidates.

4. Site supervisor agreements and qualification documents provided evidence candidates were assigned site supervisors during the practicum except for there was no documentation for two COU candidates and no documentation for any RSP candidates. Based on the documentation, there was insufficient evidence that the non-teacher programs consistently verify site supervisors meet all qualification requirements identified in 19 TAC §228.2(33). Within this

documentation, evidence of one or more qualifications was missing for four PIL candidates, one SPN candidate, three COU candidates, two DIA (ALT) candidates and all DIA (PB), LIB, and RSP candidates. 19 TAC §228.2(31) also requires the EPP to ensure site supervisors are trained, including training in coaching and mentoring candidates, within the first three weeks of assignment to a candidate. There was insufficient evidence the non-teacher programs consistently provide training to site supervisors. Evidence of training was provided for three of five PIL and two of five DIA (PB) candidates. There was no evidence for the remaining candidates in non-teacher programs.

19 TAC §228.35(h) requires the EPP to assign a trained field supervisor to support the candidate during the practicum experience. 19 TAC §228.2(18) additionally requires the field supervisor to be qualified. Observation documents for the PIL, SPN, COU, DIA (PB) and DIA (ALT) programs provided evidence a field supervisor was assigned to those candidates. There was no evidence for the LIB and RSP programs. Resumes and teaching certificates were provided as evidence of qualifications of field supervisors; however, within these documents, evidence for one or more qualifications was missing for: three PIL, two SPN, three COU, and all LIB and RSP candidates. The DIA (PB) and DIA (ALT) programs provided evidence of field supervisor qualifications for the 7 candidates who completed a practicum. Evidence field supervisors completed the required training was provided for PIL, SPN, DIA (PB) and DIA (ALT) candidates. Evidence of training was inconsistent or not found for COU, LIB, and RSP candidates.

Per 19 TAC §228.35(h), field supervisors are required to make initial contact with the candidate within the first quarter of the practicum assignment, must continue to provide ongoing support and coaching and collaborate with the site supervisor, and must provide feedback from the formal observations to the campus site supervisor. Field supervisor logs for the three COU candidates who completed a practicum reflected initial contact, but did not reflect evidence of ongoing support or observation feedback provided to the site supervisor. There was no evidence of these requirements met for the candidates in the other non-teacher classes.

19 TAC §228.35(h) requires field supervisors to conduct a minimum of three formal observations that total 135 minutes or more during the candidate's practicum. Observation documentation in candidates' records reflect the non-teacher programs, except RSP and LIB, require field supervisors to conduct formal observations that meet the duration and frequency requirements. Observation documentation was not provided for RSP or LIB programs. It was noted that "observations" for the DIA (PB) and DIA (ALT) programs appeared to be meetings and not observations. The program was advised the format of the observations for candidates in all non-teacher programs must be actual observations and not meetings so the DIA programs must revise the observation process so that field supervisors observe candidate implementation of skills and then hold meetings during the pre- and post-conferences. Field supervisors must also hold a pre- and post-conference with the candidate for each formal observation. Observation documents reflecting conferences were provided for two of the PIL candidates and for the five DIA (PB) candidates but for other candidates there was insufficient evidence to support the pre- and/or post-conferences are consistently held with candidates. When conducting an observation, field supervisors are required to capture educational practices observed and whether the candidate demonstrated proficiency in the standards observed. For four PIL, one SPN, three COU, two DIA (ALT) and all DIA (PB), LIB, and RSP candidates, the educational

practices observed were either not captured on the observation instrument or were minimally captured in verbiage such as "Loved it!" 19 TAC §228.35(e)(8) requires that a candidate must demonstrate proficiency in the standards for the certificate sought during the practicum. The observation instruments used by field supervisors to observe candidates in non-teacher practicums do not allow the field supervisors to capture candidate proficiency in the standards. The PIL and SPN observation instruments captured candidate proficiency in test competencies and not standards. The COU instrument allowed field supervisors to capture proficiency; however, the instrument reflected standards that were not the Texas educator standards. For all other non-teacher programs, the observation instruments were either not available for review or were not constructed to capture candidate proficiency.

5. 19 TAC §228.40(b) and (d) identify the EPP is responsible for ensuring that each candidate is adequately prepared to pass the examination(s) required for certification, and for determining the readiness of each candidate to take the appropriate certification examination(s). Three SPN candidates, two COU candidates, three DIA (ALT) candidates, and four RSP candidates had not received a test approval at the time of the review, so evidence of test preparation and test readiness was not expected in their records. For those candidates who had been given test approval, evidence of test preparation and test readiness was found in the records for four of five PIL candidates and the three COU candidates. There was no other test preparation or test readiness documentation presented for review. None of the candidates had been provided test approval prior to admission which meets the requirement in 19 TAC §228.40(d) that an EPP cannot grant test approval to an individual that has not been formally or continently admitted into the EPP.

6. One PIL candidate, one SPN candidate, four DIA (PB), two DIA (ALT) candidates, three COU candidates and five LIB candidates had been standard certified at the time of the review so evidence each met certification requirements was expected in their records. None of the RSP candidates had achieved standard certification so no determination of compliance with certification requirements could be made. For those candidates who were certified, transcripts reflected each candidate held the appropriate degree required for the certificate. Teaching certificates and service records provided evidence each met the certification and experience requirements for certificate issuance. It was noted that the SPN program collects service records, and the program was reminded that evidence of service is not a requirement for issuance of the SPN certificate; however, if the program requires service for admission into the SPN program that is not in violation of admission requirements in TAC. Benchmark documents and transcripts reflected each of the certificate candidates had completed EPP requirements.

Compliance Issues to be Addressed (See Compliance Plan)
The EPP will submit evidence to TEA that the deficiencies in these areas have been corrected on or before June 8, 2022:

19 TAC §227.10(a)(1) & (2)
Admission Requirements: Degree
The RSP program must implement a process to consistently collect, review, and retain official transcripts as evidence candidates are admitted with the required degree.

19 TAC §227.10(a)(3)(A)
Admission Requirements: GPA
The RSP program must implement a process to consistently collect, review, and retain official transcripts as evidence candidates who are admitted meet or exceed the GPA requirement.

19 TAC §227.10(a)(6)
Admission Requirements: Basic Skills
The RSP program must implement a process to consistently collect, review, and retain official transcripts as evidence candidates have met the basic skills requirement.

19 TAC §227.10(a)(7)
Admission Requirements: English Language Proficiency
The RSP, DIA (PB), and DIA (ALT) programs must implement a process to verify English language proficiency requirements are met by all applicants prior to admission. Retain evidence in candidates' records.

19 TAC §227.10(f)
Admission Requirements: Out of Country Applicant
The DIA (ALT) program must implement a process for evaluating transcripts issued outside the U.S. that requires a course-by-course evaluation and includes evidence of a degree conferred and, at least, an overall GPA equivalent.

19 TAC §227.10(a)(8)
Admission Requirements: Application
The SPN and DIA (PB) programs must implement a process to consistently collect and retain an application for admission into the EPP for each candidate admitted.

19 TAC §227.10(a)(8)
Admission Requirements: Screen
The RSP and PIL programs must implement a process to consistently screen applicants for their appropriateness for the certificate sought and retain evidence of the scored screen in candidate's records per the records retention requirement in 19 TAC §228.40. Note: The Principal program must implement at least one more admission screen that is scored with a rubric for a total of two screens.

19 TAC §227.10(b)
Admission Requirements: Additional Requirements
The PIL, SPN, RSP, COU, and DIA (PB) programs should review and revise, if needed, published admission requirements. Then, each program must update the admission process as needed to collect and retain evidence that all published admission requirements are met.

19 TAC §227.17(d)
Formal Admission: Dates
The DIA (PB) program must implement an admission process that ensures a concrete admission point into the program and captures the effective dates of candidate entry into the program. Ensure the effective date of admission is represented on the admission offer letter signed by the candidate. Retain evidence in the candidate's record per the records retention requirement in 19 TAC §228.40.

19 TAC §227.17(e)
Formal Admission: 7-Day Notice of Admission
The DIA (PB), DIA (ALT), and LIB programs must update admission processes to ensure admission records are created for candidates within 7 calendar days of the formal date of admission.

19 TAC §228.30(c)
Digital Literacy
All non-teacher programs must implement the digital literacy requirements including the digital literacy evaluation and the prescribed digital literacy curriculum (see complete rule text in TAC for detail).

19 TAC §228.35(e)(8)
Skills Implementation: Non-Teacher Practicum
RSP and COU programs must implement a practicum process that requires candidates to complete at least 160 hours of standards-based activities. Capture activities, along with dates, times, and site supervisor verification, on a practicum log. Retain the logs in the candidates' records per the records retention requirement in 19 TAC §228.40.

19 TAC §228.35(e)(8)(A)
Skills Implementation: Practicum Placement-Actual School Setting
The RSP program must implement a process to collect and retain information related to the practicum that includes placement information. Retain evidence in the candidate's record per the records retention requirement of 5 years.

19 TAC §228.35(f)
Campus Supervision: Mentor, Cooperating Teacher, or Site Supervisors Assigned
The RSP and COU programs must implement a process to ensure that each candidate completing a practicum is assigned a site supervisor. Retain evidence in each candidate's record per the records retention requirement in 19 TAC §228.40.

19 TAC §228.2(33)
Campus Supervision: Qualifications of Site Supervisors
All non-teacher programs must Implement a process to consistently collect and retain evidence of qualifications of site supervisors (SS) assigned to candidates during the practicum. Include a method of verification that does not include the SS self-verifying qualifications.

19 TAC §228.35(f)
Campus Supervision: Training Site Supervisors
All non-teacher programs must implement a process to train site supervisors within the first three weeks of assignment to candidates and retain evidence of the site supervisors' attendance at training per the records retention requirement in 19 TAC §228.40. Consider a process that does not include the site supervisor verifying his or her own attendance at training.

19 TAC §228.35(h)
Field Supervision: Candidates Assigned a Field Supervisor
The LIB and RSP programs must implement a supervision process for the program that includes a field supervisor.

19 TAC §228.2(18)
Field Supervision: Field Supervisor Qualifications
PIL, SPN, COU, LIB, RSP programs must update the process for collecting and retaining evidence of field supervisor qualifications to ensure accomplishment "as shown by student learning" is captured.

19 TAC §228.35(h)
Field Supervision: Field Supervisor Training
All non-teacher programs must implement EPP specific training for field supervisors. Retain certificates of completion or sign in sheets as evidence of training.

19 TAC §228.35(h)
Field Supervision: Field Supervisor Initial Contact
PIL, SPN, LIB, RSP, DIA (PB), and DIA (ALT) programs must provide training to field supervisors to consistently capture and retain evidence of first contact dates with candidates within the first quarter of the practicum assignment.

19 TAC §228.35(h)
Field Supervision: Pre- and Post-Conferences
All non-teacher programs must provide training to field supervisors and/or update field supervision documents such as observation instruments or field supervisor logs to capture evidence that field supervisors hold pre- and post-conferences for each formal observation.

19 TAC §228.35(h)
Field Supervision: Educational Practices Observed
All non-teacher programs must provide training to field supervisors and/or update field supervision documents so that educational practices observed by the field supervisor during the candidate's practicum can be captured. Retain evidence in candidates' records per the records retention requirement.

19 TAC §228.35(e)(8)
Skills Implementation: Candidate Proficiency in Practicum
PIL, SPN, LIB, RSP, COU, DIA (PB), and DIA (ALT) must review, and revise, observation instruments used to formally evaluate candidates completing a practicum, so they capture candidate proficiency in the standards and not in the test competencies.

19 TAC §228.35(h)
Field Supervision: Practicum-Formal Observation Duration
PIL, LIB, RSP, DIA (PB), and DIA (ALT) programs must provide training to field supervisors and/or implement a process for field supervisors to consistently record time engaged with candidate observations such as either on the observation instrument or on the field supervisor log. Retain evidence in each candidate's record.

19 TAC §228.35(h)(3)
Field Supervision: Practicum-Observation Number & Frequency
The LIB, RSP, and DIA (ALT) programs must implement a supervision process for candidates completing a practicum so that they receive the correct number and frequency of observations. Ensure observations are conducted according to the required observation schedule.

19 TAC §228.35(h)(2)
Field Supervision: Practicum-Observation Format
The LIB, RSP, DIA (PB), and DIA (ALT) programs must implement a supervision process for candidates completing a practicum that requires field supervisors to conduct observations of candidates in approved sites and in the format of an observation. Note: "observations" should not be in the format of meetings to discuss candidate progress on practicum projects or to discuss candidate certification requirements.

19 TAC §228.35(g) & §228.35(h)
Field Supervision: Observation-Written Feedback
All non-teacher programs must implement a process for the field supervisors to provide written feedback about the outcome of candidate observations to the campus site supervisor assigned to the candidate.

19 TAC §228.35(h)
Field Supervision: Informal Observations & Ongoing Coaching
Field Supervision: Field Supervisor Collaboration
All non-teacher programs must provide training to field supervisors and/or require field supervisors to capture evidence of ongoing support of candidates and collaboration with candidates and site supervisors, such as through consistent use of a field supervisor log. Retain the evidence in the candidate's record.

19 TAC §228.35(e)(8)(E)
Skills Implementation: Successful Practicum
All non-teacher programs must implement a process to collect the recommendation from the site supervisor and field supervisor that the candidate was successful in the practicum. Retain evidence in the candidate's record per the records retention requirement of 5 years.

19 TAC §228.40(b) & §228.40(d)
Test Preparation
The SPN, LIB, RSP, DIA (PB), and DIA (ALT) programs must implement a process to determine, and capture evidence of, readiness to test (e.g., practice test scores, certificates of completion of test preparation materials, evidence of completion of prerequisite courses/coursework, etc.)

Recommendations
- TOEFL scores expire after 2 years so score reports should be downloaded and retained at time of admission. It is acceptable to collect score reports via the university TOEFL code.

- Develop and implement more performance assessments in all programs.

- The SPN program is encouraged to update their practice and remove the SPN acknowledgement "I will not be able to use more than 20 clock hours of activity completed prior to the first day of my practicum semester" since candidates cannot complete coursework prior to admission unless there is a specific policy around types of coursework accepted and from whom; or, move the practicum start date back to allow candidates to capture the additional 20 hours that occur before the practicum semester begins if that is necessary.

- Due to missing standards identified in curriculum used in the Teacher (U) program, it is recommended that the other programs within the EPP conduct periodic curriculum reviews to ensure the required standards are included in the coursework for each certificate area. Curriculum alignment charts are available at TEA and can be provided to program staff upon request.

- It was noted in all programs that candidates that were finishers had not tested or achieved standard certification. Consider a more efficient way to move candidates through preparation that includes completing testing prior to completing program.

- Issuance of the SPN certificate does not require evidence of service so consider removing that requirement for the SPN program.

- Review all certificate areas that the EPP no longer plans to support and request, in writing, for TEA to remove them from inventory.

PROGRAM RECOMMENDATIONS FOR 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 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 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.

"I, the legal authority of the Texas A&M University-Commerce EPP, have reviewed the report and agree that all required corrections will be made on or before June 8, 2022".

Signature of Legal Authority	**Date**

Printed Name of Legal Authority	**Date**