



## 2021–2022 Continuing Approval Review Report University of Houston Clear Lake

### Purpose

Texas Education Agency (TEA) Education Specialist, Vanessa Alba, conducted a five-year Continuing Approval Review of the educator preparation program (EPP) at the University of Houston Clear Lake (UHCL) on June 21-July 14, 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. Joan Pedro, the Dean, was identified as the program Legal Authority, and Ms. Cordeen Hudson, Sr. Certification Coordinator, and Certification Officer was identified as the primary EPP contact for the review process. The University of Houston Clear Lake was approved as an EPP on January 28, 1974. At the time of the review, the EPP was last rated Accredited in 2018-2019 and has been Not Rated Declared State of Disaster from 2019-2020 thru 2020-2021. The risk level was Stage 3 (low). The EPP reported 193 finishers for the 2019-2020 reporting year and 230 finishers for 2020-2021.

At the time of the review, UHCL was approved to certify candidates in the following classes: Teacher, Principal, Superintendent, School Counselor, School Librarian, and Reading Specialist. The EPP is approved to offer the undergraduate (U), post-baccalaureate (PB), and alternative (ACP), 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. Joan Pedro, Dean and Legal Authority; Dr. Felix Simieou, Associate Dean; Ms. Cordeen Hudson, Sr. Certification Coordinator and Certification Officer; Dr. Michelle Lane, Director of Planning & Assessment; and Dr. David Benz, Director of the College of Education Student Relations.

### 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 March 14, 2022. Additional EPP documents, including records for 50 candidates, were submitted on March 28, 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 verified compliance with Governance requirements using self-reported information contained within the Status Report.
- 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 shall meet a minimum of once during each academic year. An advisory committee shall assist in the design, delivery, evaluation, and major policy decisions of the educator preparation program (EPP). It was reported that advisory committee membership, input provided by members, and meeting frequency met requirements. Advisory committee meeting minutes, agendas, and sign-in sheets for two meetings in 2020-2021 and one meeting in 2021-2022 served as evidence. The program met the requirement as prescribed. [19 TAC §228.20(b)]
- The approved EPP shall inform each member of the advisory committee of the roles and responsibilities of the advisory committee. UHCL submitted signed Ethics documents submitted by each advisory committee member. TEA advised UHCL staff that signed ethics statements are not acceptable evidence of training. The program did not meet the requirement as prescribed. [19 TAC §228.20(b)]
- The governing body has provided sufficient support and resources for the UHCL programs. The Legal Authority and Certification Officer’s participation in all aspects of the review served as evidence of compliance. The program met the requirement as prescribed. [19 TAC §228.20(c)]
- UHCL has a published calendar of activities for each of its programs. Evidence in the form of a calendar was found on the website. The program met the requirement as prescribed. [19 TAC §228.20(g)]
- UHCL was approved to offer clinical teaching on August 29, 2013. The application and documentation are on file with TEA. The program met the requirement as prescribed. [19 TAC §228.10(c)]
- UHCL has a published exit policy. It was found in the Handbook on pp. 14-16 and each candidate signs for receipt of the exit policy. The program met the requirement as prescribed. [19 TAC §228.20(h)]



- UHCL submitted the Status Report for the EPP Review on March 14, 2022, as required. The program met the requirement as prescribed. [19 TAC §228.10(b)(1)]

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

- 19 TAC §228.10(b) Advisory Committee Training  
The approved EPP shall inform each member of the advisory committee of the roles and responsibilities of the advisory committee.  
Action: Require advisory committee members to be trained each academic year. Retain evidence of training.

#### **Recommendations**

- Use the TEA Advisory Committee PowerPoint provided to the EPP to train the membership.

Based on the evidence presented, the University of Houston Clear Lake is not in compliance with 19 TAC Chapter 228 – Governance of Educator Preparation Programs.

#### **Component II: Admission - 19 TAC Chapter 227**

##### **Findings**

- UHCL has informed applicants and candidates about the required information regarding the criminal history background check and preliminary criminal history evaluation. The information was found within the application for candidates in all programs that are signed/acknowledged by each candidate at admission. In the School Counselor program, the preliminary criminal history evaluation was only provided to one of the five candidates. The EPP met the requirement as prescribed for all programs except the School Counselor program. [19 TAC §227.1(b), (d)]
- UHCL has informed applicants of the required information about the EPP. Admission & completion requirements, the effects of supply and demand on the educator workforce, and the performance of the EPP over time for the past five years were all found on the website. The program met the requirement as prescribed. [19 TAC §227.1(c)(1-3)]
- A total of 50 files were reviewed to verify admission requirements were met. They included five undergraduate (UG), five alternative certification program (ACP), & five post-baccalaureate (PB) Teacher files, five PB & three ACP Principal files, five Superintendent PB files, five School Counselor PB files, five PB & four ACP School Librarian files, and five PB & three ACP Reading Specialist files. All files met the required institution of higher education (IHE) enrollment or degree requirements. All five undergraduates were enrolled at the time of admission, and ACP and PB Teacher candidates all held bachelor's degrees. All five PB Principal candidates held a bachelor's degree. Two ACP Principal candidates held a master's and one held a bachelor's degree. All five Superintendent candidates held a master's degree. Four out of five School Counselor candidates held a bachelor's degree and one candidate file reviewed contained no evidence of a degree. Four out of five PB School Librarian candidates held a bachelor's degree and one candidate file reviewed contained no evidence of a degree. All four ACP School Librarian candidates held a master's degree. All five PB Reading Specialist candidates held a



bachelor's degree and all three ACP Reading Specialist candidates held a master's degree. Transcripts served as evidence for all files reviewed. The program met the requirement as prescribed. [19 TAC §227.10(a)(1-2); 19 TAC §241.5; 19 TAC §242.5; 19 TAC §239.5; 19 TAC §239.45; 19 TAC §239.91]

- Candidates must have a minimum GPA of 2.5 for admission. The Teacher candidate GPA range in the UG/ACP/PB programs was 2.75-3.90. The program requirement for Teacher admission is 2.75. The Principal PB/ACP GPA range was 3.1-3.28. The Superintendent GPA range was 3.83-4.0. The School Counselor GPA was only provided for three out of five files reviewed and was 2.71-3.55. The School Librarian PB/ACP GPA range was 3.075-3.89 and UHCL did not provide a GPA for one ACP candidate. The Reading Specialist PB/ACP GPA range was 3.17-3.78. The program met the requirement as prescribed for all programs, except the School Counselor program. [19 TAC §227.10(a)(3)(A)]
- Teacher applicants are required to demonstrate content knowledge prior to admission by having 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. Fourteen out of 15 UG/ACP/PB Teacher candidates had the required content hours. One PB file contained no evidence of content hours. UHCL used a subject content hours tracker to document content hours. The program met the requirement as prescribed. [19 TAC §227.10(a)(4)]
- Non-teacher files reviewed met the minimum certification and degree requirements prior to admission. Seven out of eight PB/ACP Principal candidates had a service record noting a minimum of two years' experience as a Teacher, one PB Principal candidate's service record was not signed by the district and all met degree and certification requirements. All Superintendent, School Counselor, and School Librarian candidates had evidence of service records with required years of experience, the required degrees, and certification. All PB Reading Specialist candidates met degree and certification requirements. Two out of three ACP Reading Specialist candidates had less than two years of experience and should have had a deficiency letter at the time of admission, but did not and the third candidate's service record was not provided so TEA was unable to determine whether the candidate had the required years of experience. Service records, the appropriate transcripts reflecting the bachelor's or master's degrees conferred as required, and valid teaching certificates served as evidence. The program met the requirement as prescribed for all, except for the Reading Specialist ACP program. [19 TAC §227.10(a)(5)]
- Applicants must demonstrate basic skills prior to admission. The five undergraduate Teacher applicants met the requirement with coursework and the ten ACP/PB Teacher candidates met the requirement with degrees. All five Superintendent candidates, four out of five School Counselor candidates, eight out of nine PB/ACP School Librarian candidates, and eight PB/ACP Reading Specialist candidates met the requirement with degrees. Transcripts served as evidence. 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 candidates in all programs met the requirement in the undergraduate program with coursework and in the ACP and PB programs with US degrees. One PB School Counselor and one PB School Librarian file reviewed each did not have evidence of a degree. All transcripts reviewed were from US schools. The program met the requirement as prescribed. [19 TAC §227.10(a)(7)]



- An applicant must submit a completed application. All fifteen UG/ACP/PB Teacher candidates had an application in the files. Two out of eight PB/ACP Principal candidates had an application in their file. Two out of five PB Superintendent candidates had an application in their file. Three out of five School Counselor candidates had an application in their file. Five out of nine PB/ACP School Librarian candidates had an application in their file. Five out of eight Reading Specialists had an application in their file. The program met the requirement as prescribed for the Teacher program, but did not meet the requirement as prescribed for the non-teacher programs. [19 TAC §227.10(a)(8)]
- An applicant for admission must be screened to determine appropriateness for the certification sought. Principal and Superintendent candidates must have two or more screens. Fourteen out of fifteen UG/ACP/PB Teacher candidates were screened with an essay scored on a rubric with levels of proficiency identified. The file for candidate 15 did not contain evidence of a screen. None of the non-teacher files reviewed contained evidence of a screen. The program met the requirement as prescribed for the Teacher program, but did not meet the requirement as prescribed for the non-teacher programs. [19 TAC §227.10(a)(8); 19 TAC §241.5; 19 TAC §242.5]
- The non-teacher programs had additional admission requirements. The Principal PB/ACP programs require a district letter of support. All eight files reviewed contained the letter of support. The Superintendent program requires three letters of recommendation, a district letter of support, and a resume. All five files reviewed contained evidence of each. The School Counselor program requires a resume, FERPA, and three letters of recommendation. Three out of five files contained a resume, FERPA, and three letters of recommendation. The School Librarian PB/ACP program requires a district letter of support and FERPA. All nine files reviewed contained a FERPA and eight out of nine contained a letter of support. The one candidate that did not have a letter of support had moved to another school. The Reading Specialist PB/ACP program requires a FERPA and district letter of support. Six out of eight files reviewed contained evidence of both and two ACP candidates were missing both. The program met the requirement as prescribed for all, but did not meet the requirement as prescribed in the School Counselor and Reading Specialist ACP programs. [19 TAC §227.10(b)]
- One Teacher PB candidate was contingently admitted. That candidate file contained the written dated contingency offer of admission noting the semester in which the offer of admission was valid, the candidate's written dated acceptance letter, and required transcripts. The candidate was reported as admitted to TEA within seven days and did not begin coursework until contingently admitted. The program met the requirement as prescribed. [19 TAC §227.15(a-f)]
- All applicants are required to be formally admitted. In the UG/ACP/PB Teacher program, 14 out of 15 candidates were formally admitted and the last PB candidate had no evidence of formal admission in the file. All eight PB/ACP Principal candidates were formally admitted. Three out of five Superintendent candidates were formally admitted and two were admitted prior to the effective date of the formal admission requirement. Two out of five School Counselor candidates were formally admitted and the other three had no evidence of formal admission in their files. All nine PB/ACP School Librarian candidates and eight PB/ACP Reading Specialist candidates were formally admitted. Dated offers of admission noting the effective date of admission and signed dated acceptance letters served as evidence in the files reviewed. The



program met the requirement as prescribed in all programs, but did not meet the requirement as prescribed in the School Counselor program. [19 TAC §227.17(a-d)]

- An EPP must notify TEA within seven calendar days of a candidate's formal admission. In the UG/ACP/PB Teacher program, 14 out of 15 were reported to TEA within seven calendar days. Four out of five PB and two out of three ACP Principal candidates were reported within seven calendar days. Two out of three Superintendent candidates were reported as admitted within seven calendar days and two were admitted prior to the effective date of the requirement. Three out of four School Counselor candidates were reported as admitted within seven days and the fifth candidate was admitted prior to the effective date of the requirement. In the PB School Librarian program, two were reported as admitted within seven days and were reported thru the GPA spreadsheet as required at the time, two were admitted prior to the effective date of the requirement, and one was not reported within seven days. In the ACP School Librarian program, two were reported as admitted within seven days and two were not. In the Reading Specialist PB program, three out of five were reported as admitted within seven days and the other two were reported thru GPA spreadsheets as required at that time and verified in the test approval audit trail. In the Reading Specialist ACP program, one out of three were reported as admitted within seven days and the other two were not. TEA verified admission reporting dates in the Admission record audit trail in the Educator Certification Online System (ECOS) audit trail for each candidate reviewed. The program met the requirements as prescribed in all programs, but did not meet the requirement as prescribed in the ACP Principal, Superintendent, School Counselor, School Librarian ACP, or the ACP Reading Specialist programs. [19 TAC §227.17(e)]
- Except as provided by 19 TAC §227.15, an alternative certification program or post-baccalaureate program, prior to formal admission, shall not provide coursework, training, and/or examination approval to an applicant that leads to initial certification in any class of certificate. A post-baccalaureate or alternative certification program at an institution of higher education (IHE) may admit an applicant if coursework and training were provided by the same IHE as part of a previous degree that was conferred; a prerequisite for a master's degree leading to initial certification; or a different post-baccalaureate program of study. Fourteen out of fifteen UG/ACP/PB Teacher candidates were formally or contingently admitted prior to beginning coursework and documentation was not provided for candidate 15. All of the non-teacher candidates had training in the required curriculum topics prior to formal admission. Evidence for requiring coursework prior to admission was found in the offers of admission advising candidates to complete specific coursework prior to admission. The program met the requirement as prescribed for the Teacher program, but did not meet the requirement as prescribed for the non-Teacher programs. [19 TAC §227.17(f)]

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

- 19 TAC §227.1(d) Notifications: Preliminary Criminal History Evaluation  
Educator preparation programs (EPPs) shall inform all applicants that pursuant to the Texas Education Code (TEC), §22.083, candidates must undergo a criminal history background check prior to employment as an educator and pursuant to the TEC, §22.0835, candidates must undergo a criminal history background check prior to clinical teaching.



Action: Notify all School Counselor applicants and enrollees in writing by mail, personal delivery, fac, email, or other electronic communication about the required information. Retain evidence in each candidate file.

- 19 TAC §227.10(a)(3)(A) Admission Requirements: GPA  
For a post-baccalaureate program, to be eligible for admission into an EPP, an applicant shall have a grade point average (GPA) of at least 2.5 before admission.  
Action: Retain official transcripts and documentation of calculations to determine GPA used for admission for all School counselor and School Librarian applicants.
- 19 TAC §227.10(a)(5) Admission Requirements: Requirements Deficiency  
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: Require the following documents to be collected from all non-teacher applicants at admission: service records; official transcripts; and teaching certificates. Provide applicants a written deficiency letter (if applicable) and retain a copy of the letter in the candidate's file.
- 19 TAC §227.10(a)(8) Admission Requirements: Application  
An applicant must submit an application.  
Action: Require all Principal, Superintendent, School Counselor, School Librarian, and Reading Specialist applicants to submit an application for admission. Retain evidence in each candidate file.
- 19 TAC §227.10(a)(8); 19 TAC §241.5; 19 TAC & §242.5. Admission Requirements: Screen  
An applicant must participate in either an interview or other screening instrument to determine if the EPP applicant's knowledge, experience, skills, and aptitude are appropriate for the certification sought. The Principal & Superintendent applicants require two or more screens.  
Action: Require all non-teacher applicants to be screened with an interview or other screening instrument. Require Principal and Superintendent applicants to complete two or more screens. Implement a rubric with a cut score to evaluate applicant response(s) on each screen. Retain evidence in each candidate file.
- 19 TAC §227.10(b) Admission Requirements: Additional Requirements  
An EPP may adopt requirements in addition to and not in conflict with those required in this section.  
Action: Require all Counselor and ACP Reading Specialist applicants to submit the required additional admission documents. Retain evidence in each candidate file.
- 19 TAC §227.17 & 19 TAC §227.17(d) Formal Admission  
For an applicant to be formally admitted to an educator preparation program (EPP), the applicant must meet all the admission requirements specified in 19 TAC §227.10. The EPP must notify the applicant of the offer of formal admission in writing by mail, personal delivery,



facsimile, email, or electronic notification. The applicant must accept the offer of formal admission in writing by mail, personal delivery, facsimile, email, or electronic notification. Action: Implement a formal admission process for the School Counselor program. Retain the dated offer of admission and signed acceptance letter in each candidate file.

- **19 TAC §227.17(e) Formal Admission: 7-Day Notice of Admission**  
An EPP must notify the TEA within seven calendar days of a candidate's formal admission. Action: Update the admission process so that all candidates, including those in the Teacher PB, Principal ACP, Superintendent PB, School Counselor, School Librarian ACP, and Reading Specialist ACP programs are reported as admitted within seven calendar days of their formal admission date.
- **19 TAC §227.17(f) Formal Admission: No Coursework or Training Prior to Admission**  
Except as provided by 19 TAC §227.15, an alternative certification program or post-baccalaureate program, prior to formal admission, shall not provide coursework, training, and/or examination approval to an applicant that leads to initial certification in any class of certificate. Action: Require that all non-teacher candidates not begin any coursework and/or training until formally admitted.

#### **Recommendations**

- As with all other programs at UHCL, utilize the application as the mechanism to provide each applicant/ enrollee of the notification of the preliminary criminal history evaluation requirement.

Based on the evidence presented, the University of Houston Clear Lake is not in compliance with 19 TAC Chapter 227 - Admission Criteria.

#### **Component III: Curriculum – 19 TAC §228.30**

##### **Findings**

- To verify compliance with Curriculum requirements, TEA reviewed self-reported information contained within the Status Report. The Core Subjects EC-6/ Science of Teaching Reading (STR) UG certificate area was selected for review.
- UHCL reported that the curriculum was standards-based but were not able to provide the related curriculum alignment charts as evidence. The program staff acknowledged that it would be a compliance item to submit for the Next Steps. The program did not meet the requirement as prescribed. [19 TAC §228.30(a)]
- UHCL addresses relevant Texas Essential Knowledge and Skills (TEKS) in the Core Subjects EC-6/STR certificate. Identified coursework in the Status Report where TEKS are taught served as evidence. The program met the requirement as prescribed. [19 TAC §228.30(a)]





- The UHCL coursework relies on scientifically based research to ensure educator effectiveness. The Status Report identified research that the EPP uses to ensure educator effectiveness for each certificate offered. The program met the requirement as prescribed. [19 TAC §228.30(b)]
- The required subject matter must be included in the curriculum for candidates seeking initial certification in any certification class.
  - The code of ethics is taught to candidates in all classes by using TEA Code of Ethics training. The EPP met the requirement as prescribed. [19 TAC §228.30(c)(1)]
  - Dyslexia instruction is provided to Teacher, Principal, and Reading Specialist candidates in identified coursework, but it was not identified as taught to Superintendent, School Counselor, or School Librarian candidates. The program met the requirement as prescribed for all, but did not meet the requirement as prescribed for Superintendent, School Counselor, or School Librarian programs. [19 TAC §228.30(c)(2)]
  - Instruction in mental health is provided to Teacher candidates but was identified as being taught prior to admission for all non-Teacher candidates per the information contained on the formal offers of admission advising them to complete identified coursework prior to admission. The program met the requirement as prescribed for the Teacher program, but did not meet the requirement as prescribed for the non-Teacher programs. [19 TAC §228.30(c)(3)]
  - Instruction in the skills that educators are required to possess, the responsibilities required to accept, and the high expectations for students in this state are taught to Teacher, Principal, Superintendent, School Librarian, and Reading Specialist candidates, but were not identified as taught to School Counselor candidates. The program met the requirement as prescribed for all programs, but did not meet the requirement as prescribed for the School Counselor program. [19 TAC §228.30(c)(4)]
  - The importance of building strong classroom management skills is taught to Teacher candidates in identified coursework but was not identified as taught to any non-Teacher candidates. The program met the requirement as prescribed for the Teacher program, but did not meet the requirement as prescribed for the non-Teacher programs. [19 TAC §228.30(c)(5)]
  - The framework for Teacher and Principal evaluation is taught in identified coursework for Teacher and School Librarian candidates but was not identified as taught to Superintendent, School Counselor, or Reading Specialist candidates. The program met the requirement as prescribed for all programs, but did not meet the requirement as prescribed for the Superintendent, School Counselor, or Reading Specialist programs. [19 TAC §228.30(c)(6)]
  - Appropriate relationships and boundaries and communications between educators and students are taught in identified coursework to Teacher, Principal, Superintendent, and Reading Specialist candidates, but were not identified as taught to School Counselor or School Librarian candidates. The requirement was met as prescribed for all programs except the School Counselor and School Librarian programs. [19 TAC §228.30(c)(7)]
  - Instruction in digital learning, including a digital literacy evaluation followed by a prescribed digital learning curriculum with resources to address any deficiencies, was identified as taught to Teacher and School Librarian candidates in identified coursework



but was not identified as taught to Principal, Superintendent, School Counselor, or Reading Specialist candidates. The program met the requirement as prescribed for all programs, but did not meet the requirement as prescribed in the Principal, Superintendent, School Counselor, or Reading Specialist programs. [19 TAC §228.30(c)(8)]

- The following required subject matter is taught to candidates pursuing certification in the Core Subjects w/STR EC-6 certificate area:
  - The English language proficiency standards; [19 TAC §228.30(d)(1)]
  - Reading instruction, including instruction that improves students' content-area literacy; [19 TAC §228.30(d)(2)]
  - The PK Guidelines; [19 TAC §228.30(d)(3)]
  - Instructional planning and delivery; [19 TAC §228.30(d)(4)]
  - Knowledge of students and student learning; [19 TAC §228.30(d)(4)(B)]
  - Learning environment; [19 TAC §228.30(d)(4)(D)]
  - Data-driven practice; and [19 TAC §228.30(d)(4)(E)]
  - Professional practices and responsibilities; [19 TAC §228.30(d)(4)(F)]
- Principal candidates receive instruction in the skills and competencies captured in the Texas administrator standards as identified in coursework. UHCL provided the syllabi for the Principal program identifying that the administrator standards are addressed. It was noted on syllabi that coursework is based on the work of Bambrick-Santoyo (*Leverage Leadership*). The program met the requirement as prescribed. [19 TAC §228.30(e)]

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

- 19 TAC §228.30(a) Standards-based Curriculum  
The educator standards adopted by the State Board for Educator Certification shall be the curricular basis for all educator preparation.  
Action: Update coursework as needed in the Core Subjects EC-6/STR certificate area to ensure it is standards-based, including all standards required for the certificate area. Submit completed alignment charts as evidence of updates completed.
- 19 TAC §228.30(c)(2) Dyslexia Instruction  
Instruction in the detection and education of students with dyslexia, as indicated in the Texas Education Code (TEC), §21.044(b).  
Action: Require Superintendent, School Counselor, and School Librarian candidates to receive instruction in the required topic after being formally admitted. Retain evidence of training. Require all UHCL candidates to take the [Dyslexia Training](#) offered by TEA thru TEALearn. Retain the certificates of completion for each candidate.
- 19 TAC §228.30(c)(3) Mental Health Instruction  
Instruction regarding mental health, substance abuse, and youth suicide, as indicated in the TEC, §21.044(c-1).  
Action: Provide instruction in mental health, substance abuse, and youth suicide to all non-Teacher candidates after candidates are formally admitted. Retain evidence of training.



- **19 TAC §228.30(c)(4) Educator & Student Expectations**  
The skills that educators are required to possess, the responsibilities that educators are required to accept, and the high expectations for students in this state.  
Action: Require the EPP to provide instruction in the skills educators are required to possess, responsibilities they are required to accept, and the high expectations for students in this state to School Counselor candidates after candidates are formally admitted. Retain evidence of training.
- **19 TAC §228.30(c)(5) Classroom Management Skills**  
The importance of building strong classroom management skills.  
Action: Provide instruction in classroom management skills to all non-teacher candidates after candidates are formally admitted. Retain evidence of training.
- **19 TAC §228.30(c)(6) Teacher & Principal Evaluation Framework**  
The framework in this state for teacher and principal evaluation.  
Action: Provide Superintendent, School Counselor, and Reading Specialist candidates instruction in the framework for teacher and principal evaluation after candidates are formally admitted. Retain evidence of training.
- **19 TAC §228.30(c)(7) Appropriate Boundaries**  
Appropriate relationships, boundaries, and communications between educators and students.  
Action: Provide School Counselor and School Librarian candidates instruction in appropriate relationships, boundaries, and communications between educators and students after candidates are formally admitted. Retain evidence of training.
- **19 TAC §228.30(c)(8) Digital Literacy**  
Instruction in digital learning, including a digital literacy evaluation followed by a prescribed digital learning curriculum.  
Action: Provide Principal, Superintendent, School Counselor, and Reading Specialist candidates instruction in digital learning, including a digital literacy evaluation followed by a prescribed digital learning curriculum after candidates are formally admitted. Utilize the [ISTE Standards for Educators](#) for all non-teachers and the [ISTE Standards for School Leaders](#) for Principal and Superintendent candidates. Retain evidence of training.

### **Recommendations**

- If using the TEA code of ethics videos on the TEA website, they are becoming outdated and UHCL may consider the Education Service Center (ESC) for Code of Ethics Training and require a dated cert of attendance to retain in each candidate file as evidence.
- Consider using [ISTE U](#) for the digital literacy evaluation if the EPP does not have access to a digital literacy evaluation.



Based on the evidence presented, the University of Houston Clear Lake is not in compliance with 19 TAC §228.30-Curriculum.

#### **Component IV: Coursework, Training, Program Delivery, and Ongoing Support – 19 TAC §228.35**

##### **Findings**

- UHCL provides candidates with adequate preparation and training that is sustained, rigorous, interactive, and to ensure the educator is effective in the classroom. Candidate testing histories, program benchmarks, and degree plans were reviewed as evidence for 15 UG/ACP/PB Teacher, eight PB/ACP Principal, five Superintendent, five School Counselor, nine PB/ACP School Librarian, and eight PB/ACP Reading Specialist candidates. The program met the requirement as prescribed. [19 TAC §228.35(a)(1-2)]
- Nine out of 15 UG/ACP/PB Teacher, three out of eight PB/ACP Principal, one out of five Superintendent, one out of five School Counselor, five out of nine PB/ACP School Librarian, and one out of eight PB/ACP Reading Specialist candidates reached the point of standard certification. Program benchmarks, attendance policies, and degree plans/transcripts were reviewed as evidence that all requirements were met and that each candidate completed all coursework/training prior to standard certification. The program met the requirement as prescribed. [19 TAC §228.35(a)(3)]
- UCL did have procedures for allowing relevant military experiences but did not have procedures for allowing prior experience, education, or training for non-military candidates. Veteran and military service credit information was provided on the website but was not found for non-military candidates. The program met the requirement for military prior coursework but did not meet the requirement for non-military prior coursework. [19 TAC §228.35(a)(5)(A-B)]
- UHCL offers some coursework online in the School Librarian, Principal, and Superintendent certificate classes as identified in the Status Report. The program did not provide evidence that it meets, or is making progress toward meeting, the criteria set for accreditation, quality assurance, and/or compliance with requirements relating to the approval of distance education courses and programs for public institutions. The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(6)(B-C)]
- Candidates for initial Teacher certification in the UG route earn 300 clock hours of required coursework and training, ACP candidates earn 300 clock hours of coursework/training, and PB candidates earn a 39-semester hour master's degree which includes the 300 clock-hour requirement for certification. Degree plans, transcripts, and benchmarks served as evidence. The program met the requirement as prescribed. Principal, School Librarian, and Reading Specialist PB candidates all exceed the requirement with master's degrees conferred. Superintendent PB candidates earn a doctorate and exceed the requirement. School Counselor candidates earn a 48-hour master's in counseling. All non-Teacher ACP candidates earn 200 clock-hours of coursework and training. Degree plans, transcripts, and benchmarks served as evidence. The program met the requirement as prescribed. [19 TAC §228.35(c)]
- Teacher UG/ACP/PB candidates completed required coursework in specified pre-service topics prior to clinical teaching or internship. Degree plans, transcripts, benchmarks, and assessments



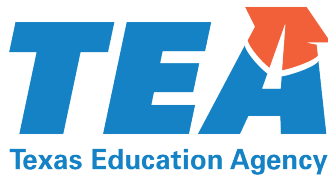
served as evidence. The program met the requirement as prescribed. [19 TAC §228.35(b)(2)(A-J)]

- A Teacher candidate must complete a minimum of 30 clock hours of field-based experiences (FBEs) in a variety of settings with diverse student populations, including observation, modeling, and demonstration of effective practices to improve student learning, with 15 clock hours of interactive FBEs. An EPP may provide up to 15 clock hours of electronic FBEs. All FBEs must be at the direction of the EPP, in authentic school settings in accredited public/private schools, with instruction by content-certified teachers with actual students in instructional settings with identity-proof provisions. A candidate must write written reflections for FBEs. The program requires all candidates to complete an FBE log. UG candidates complete FBEs in TED 1301, TED 4378, and other courses. UHCL specifically requires 45 hours of hands-on FBEs in TED 4378. The courses were noted on transcripts for candidate files reviewed. Five UG candidates had transcripts noting coursework where FBEs are required. In the ACP program, one ACP candidate had an FBE log with documentation of 31 clock hours, three had no documentation, and one withdrew. Four PB candidates had transcripts noting they were in process and the fifth PB candidate file had no documentation. TEA requested syllabi that would evidence FBEs, but they were not provided. UHCL provided the link to the [FBE requirement and log](#) posted on the website that identified candidate documentation of FBEs, but the actual evidence of completion of FBEs was not found in any file reviewed. The program did not meet the requirement as prescribed. [19 TAC §228.35(b)(1); 19 TAC §228.35(e)(1)(A-B)]
- Seven UG/ACP/PB Teacher candidates had reached the point of clinical teaching and were either in the process of completing or had completed the requirement, two ACP candidates completed an internship, and the third candidate withdrew before the internship started. Clinical teaching/internship placement lists with placement information including start and end dates, start and end time, grade level, subject area, and clinical teaching logs including dates, start and end times each day verified by the cooperating teacher served as evidence. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(A-B)]
- The six UG/ACP Teacher candidates were in one assignment for the subject area in which the candidate was seeking initial certification and the assignment was not less than an average of four hours each day in the subject area and grade level of certification sought. The six candidates were placed in public schools. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(A)(ii)(b); 19 TAC §228.35(e)(2)(A)(iii)]
- Clinical teaching is successful when the candidate demonstrates proficiency in each of the educator standards for the assignment. Clinical teaching assignments were a minimum of 14 weeks. Clinical teaching placement lists and standards-based observation instruments with documented educational practices observed by the FS for each served as evidence. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(A)(ii)(b); 19 TAC §228.35(e)(2)(A)(iii); 19 TAC §228.35(e)(6)]
- 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. Six out of seven UG/ACP/PB candidate files contained evidence of the required recommendations. UHCL EPP has a final observation with a fitness to teach document that the FS & cooperating teacher sign/date as evidence of their recommendations. One UG file



reviewed did not contain evidence. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(A)(iii)]

- Two ACP Teacher candidates completed a full-year internship in public schools. The internship placement lists with placement information including tests passed, start and end dates, start and end times, district, campus, grade level, and subject area served as evidence. The program also provided a completed statement of eligibility as evidence that the beginning date was the first date of instruction with students in the certificate category for not less than four hours per day for which each candidate was seeking certification. The candidates were both issued a probationary certificate. An internship is successful when the candidate demonstrates proficiency in each of the educator standards for the assignment and the FS & campus supervisor recommends to the EPP that the candidate was successful in the internship. Standards-based observation instruments for each candidate served as evidence. The FS completed a final fitness to teach observation document and the FS/campus supervisor both signed/dated the recommendation for each candidate. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(B)(ii); 19 TAC §228.35(e)(2)(B)(iii); 19 TAC §228.35(e)(2)(B)(iv); 19 TAC §228.35(e)(2)(B)(vii); 19 TAC §228.35(e)(6)]
- 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, the candidate is standard certified, resigns, is non-renewed, terminated, or is released from the EPP prior to the expiration of that term. The FS provided ongoing support to each candidate completing the internship via email and as documented on each candidate's log of support provided for review. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(B)(vi)(i-v)]
- Teacher candidate training included experiences with a full range of professional responsibilities including the start of the school year. For the two ACP candidates in an internship assignment, both experienced the start of the year during the internship. One began at the beginning of the year and the other experienced the start of the year in the second semester of the internship year because the candidate began in January. Two clinical teachers began clinical teaching at the start of the year and four began clinical teaching in the Spring semester and experienced the start of the year in FBEs. One UG and one ACP candidate began clinical teaching in January and did not have evidence that they experienced the start of the year while completing FBEs. Five out of eight candidates experienced the beginning of the year as required. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(4)]
- The seven UG/ACP/PB Teacher candidates in clinical teaching and two ACP candidates in an internship were in a setting where the candidate did not have an administrative role over the mentor or cooperating teacher and were not related to the field supervisor, mentor, or cooperating teacher. Clinical teaching and internship placement lists served as evidence. The program met the requirement as prescribed. [19 TAC §228.35(e)(7)]
- UHCL did not provide any evidence that the non-Teacher candidates completed a practicum for a minimum of 160 clock hours or that each candidate demonstrated proficiency in the standards required for the certificate sought. The programs reviewed were the Principal, Superintendent, School Counselor, and School Librarian in the PB and ACP routes, as applicable. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(8)]



- A practicum experience must take place in an actual school setting rather than a distance learning lab or virtual school setting. Three out of eight PB/ACP Principal candidates were placed in a practicum. One of the three candidate files contained evidence that the candidate was in a public school and for the remaining two evidence was not provided. Three out of five Superintendent candidates reached the point of practicum and no placement evidence was provided for TEA to make a determination. One out of five School Counselor candidates had reached the point of practicum in a public school setting. Six out of nine School Librarian PB/ACP candidates had reached the point of practicum and documentation was only provided for two candidates noting that they were completed in public schools. Four out of eight PB/ACP Reading Specialist candidates had reached the point of practicum and all were in public schools. Evidence was collected from completed recommendation forms. The program met the requirement as prescribed for the School Counselor and Reading Specialist programs, but did not meet the requirement as prescribed for the Principal, Superintendent, or School Librarian programs. [19 TAC §228.35(e)(8)(A)]
- 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 field supervisor or site supervisor. TEA could not make a determination for any candidate in any non-Teacher program because insufficient evidence was provided. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(8)(B)]
- A practicum is successful when the field supervisor and the site supervisor recommend to the EPP that the candidate should be recommended for a standard certificate. If either the field supervisor or site supervisor does not recommend, the person who does not recommend the candidate must provide documentation supporting the lack of recommendation. TEA was not able to make a determination for any non-Teacher program because insufficient evidence was provided. It was noted that three out of eight PB/ACP Principal, one out of eight Superintendent, one School Counselor, six out of nine PB/ACP School Librarian, and one out of eight Reading Specialist candidates were all standard certified without the recommendations. The second Superintendent candidate had completed all requirements of the program and applied/paid for the standard certificate, but had not yet been recommended by UHCL. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(8)(D)]
- Each candidate completing clinical teaching, internship, or practicum must have a cooperating teacher, mentor, or site supervisor assigned. Seven UG/ACP/PB clinical Teachers were assigned a cooperating teacher and two ACP Teacher candidates were not assigned a mentor. Site Supervisors were not assigned to Principal PB/ACP, Superintendent, School Librarian PB, or Reading Specialist ACP candidates. The one School Counselor and three Reading Specialist ACP candidates were each assigned a site supervisor. Clinical teaching and practicum recommendations served as evidence. The Teacher UG/PB, School Counselor, and Reading Specialist programs met the requirement as prescribed, but the ACP Teacher, PB/ACP Principal, Superintendent, PB/ACP School Librarian, and PB Reading Specialist programs did not meet the requirement as prescribed. [19 TAC §228.35(f)]
- Cooperating teachers, mentors, and site supervisors must be qualified and trained within three weeks of assignment to the candidate assigned. Five out of nine UG/ACP/PB Teacher candidates had cooperating teachers and mentors that were qualified. Campus administrator attestations served as evidence. Three out of five UG cooperating teachers were trained, one out of three



ACP cooperating/mentor teachers were trained, and the PB mentor teacher was not trained. Site Supervisor qualifications were not provided for any assigned to non-teacher candidates and no evidence was provided that any of the site supervisors were trained. The program did not meet the requirement as prescribed. [19 TAC §228.2(12); 19 TAC §228.2(24); 19 TAC §228.2(31); 19 TAC §228.35(f)]

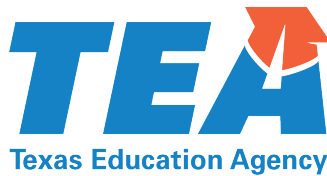
- Supervision of each candidate shall be conducted with the structured guidance and regular ongoing support of an experienced educator who has been trained as a field supervisor within three weeks of assignment to the candidate. All nine UG/ACP/PB clinical teachers and interns were assigned a field supervisor. In the PB/ACP Principal program, one out of three candidates that reached the point of practicum was assigned a FS per the practicum placement document provided. Three out of five Superintendent candidates reached the point of practicum and evidence was not provided that any were assigned a FS. One School Counselor candidate was assigned a FS per the practicum placement document provided. Six out of nine PB/ACP School Librarian candidates reached the point of practicum and evidence was not provided that any were assigned a FS. Four out of eight PB/ACP Reading Specialists reached the point of practicum. A FS was only assigned to one PB candidate per the practicum placement document provided and the three ACP candidate files reviewed did not contain evidence of a FS assigned. Six out of nine UG/ACP/PB Teacher FS were locally trained per dated signatures on the training material. None of the FS assigned to Teacher candidates received statewide training as required. None of the FS assigned to non-teacher candidates were trained locally or received statewide training. The program met the field supervisors assigned requirement as prescribed in the UG/ACP/PB Teacher program but did not meet the requirement as prescribed for the nonteacher programs. The program did not meet the training requirement as prescribed for all programs. 19 TAC §228.2(18); 19 TAC §228.35(g) & (h)]
- A field supervisor is a currently certified educator, who preferably has advanced credentials, shall have at least three years of experience and current certification in the class in which supervision is provided. A field supervisor shall be an accomplished educator as shown by student learning. The program did not provide any evidence that any of the FS assigned to candidates met qualification requirements. The program did not meet the requirement as prescribed. [19 TAC §228.2(18)]
- Initial contact between field supervisors and Teacher candidates must occur within the first three weeks of the assignment. For certification in a certification class other than classroom teacher, the initial contact, with the assigned candidate must occur within the first quarter of the assignment. Initial contact may be made by telephone, email, or other electronic communication. One out of six UG/PB Teacher candidates had an initial contact as required. The three ACP candidates that began clinical teaching/internship had an initial contact as required. Evidence of initial contact was not provided for any non-Teacher candidate file reviewed, except for one Principal and one Reading Specialist candidate. The program met the requirement as prescribed for the ACP Teacher program, but did not meet the requirement as prescribed for the UG/PB Teacher or any non-Teacher program. [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-observation conference nor the post-observation conference needs to be onsite. All nine UG/ACP/PB Teacher candidates completing clinical teaching/internship had the required pre-and post-observations as required for each formal observation. Observation documents completed by the FS served as evidence. The program did not provide any evidence of pre- or post-observation documentation for any non-Teacher candidate, except for one Principal candidate. The program met the requirement as prescribed for the Teacher program, but did not meet the requirement as prescribed for the non-Teacher programs. [19 TAC §228.35(g) & (h)]

- For the initial certification of Teachers, for each formal observation, the field supervisor shall provide a copy of the written feedback to the candidate's cooperating teacher or mentor. For certification in a certification class other than classroom teacher, for each formal observation, the field supervisor shall provide a copy of the written feedback to the candidate's site supervisor. All nine UG/ACP/PB Teacher candidates completing clinical teaching/internship had in their files the required written feedback for each formal observation signed by the cooperating teacher/mentor, candidate, and FS. Insufficient evidence was provided for the non-Teacher candidates. The program met the requirement as prescribed for the Teacher program, but did not meet the requirement as prescribed for the non-Teacher programs. [19 TAC §228.35(g) & (h)]
- Formal observations of Teacher candidates conducted by the field supervisor must meet the requirements for duration, frequency, and format. Each formal observation must be at least 45 minutes in duration, must be conducted by the field supervisor, and must be on the candidate's site in a face-to-face setting. An EPP must provide the first formal observation within the first third of all clinical teaching assignments and the first six weeks of all internship assignments. For a first-year internship under a probationary certificate or an additional internship described in 19 TAC §228.35(e)(2)(B)(v)(II), an EPP must provide a minimum of one formal observation during the first third of the assignment, a minimum of one formal observation during the second third of the assignment, and a minimum of one formal observation during the last third of the assignment. For a 14-week, full-day clinical teaching assignment, an EPP must provide a minimum of one formal observation during the first third of the assignment, a minimum of one formal observation during the second third of the assignment, and a minimum of one formal observation during the last third of the assignment. All nine UG/ACP/PB Teacher candidates had face-to-face observations that were 45 minutes in duration for each observation. The first formal observation occurred within the first third of the assignment for the seven clinical teachers and the first formal observation occurred within the first six weeks for the two interns on probationary certificates. For the two candidates in an internship, one had evidence of six observations that met requirements and the other had three observations in the first half of the year but did not provide the remaining observation documentation for the second half of the year. For the seven clinical teachers, two candidates only had evidence of one observation each. Both were provided with field supervision during the pandemic. The third candidate had four observations in the file that met requirements, the fourth candidate was in process and only had one observation in their file. The fifth candidate had one observation that occurred prior to the pandemic and did not meet requirements because there should have been three observations for that candidate. One ACP clinical teacher had three observations that met the requirements.



TEA was not able to understand the observation documentation for the PB clinical teacher. Observation documents were provided as evidence. The program met the requirement as prescribed for clinical teachers and interns, but did not meet the requirement as prescribed for the number of observations for interns. [19 TAC §228.35(g)(1-8)]

- Formal observations for non-Teacher candidates must be at least 135 minutes in duration in total throughout the practicum and must be conducted by the field supervisor. If a formal observation is not conducted on the candidate's site in a face-to-face setting, the formal observation may be provided by the use of electronic transmission or other video or technology-based method. A formal observation that is not conducted on the candidates' site in a face-to-face setting must include a pre- and post-conference. Regardless of the type of certificate held by a candidate during a practicum, an EPP must provide a minimum of one formal observation within the first third of the practicum, one formal observation within the second third of the practicum, and one formal observation within the final third of the practicum. The program did not provide sufficient evidence for any non-teacher candidate file reviewed other than placement documentation for some non-teacher candidates. Evidence of observations was only found in the records for one Principal candidate who had three observations, one School Counselor candidate who had two observations, and one School Librarian who had three observations. The program did not meet the requirement as prescribed. [19 TAC §228.35(h)(1-3)]

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

- 19 TAC §228.35(a)(5)(B) Coursework & Training: Prior Coursework Policy-Non-Military  
Each EPP must develop and implement specific criteria and procedures that allow candidates who are not military service members or military veterans to substitute prior or ongoing service, training, or education, provided that the experience, education, or training is not also counted as a part of the internship, clinical teaching, or practicum requirements, was provided by an approved EPP or an accredited institution of higher education within the past five years and is directly related to the certificate being sought.  
Action: Develop and implement a prior coursework policy for non-military candidates. Publish the policy so it is available to all.
- 19 TAC §228.35(a)(6) Coursework & Training: Quality of Online Coursework  
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 Part 1, Chapter 4, Subchapter P, of this title (relating to Approval of Distance Education Courses and Programs for Public Institutions).  
Action: Require any programs (School Librarian, Principal, and Superintendent) or courses that are offered online to meet THECB accreditation requirements for online coursework.
- 19 TAC §228.35(b)(1) Pre-Service Requirements: FBE Hours; 19 TAC §228.35(e)(1) FBE Settings; 19 TAC §228.35(e)(1)(B) FBE: Electronic Hours  
Unless a candidate qualifies as a late hire, a candidate shall complete the following prior to any clinical teaching or internship: a minimum of 30 clock-hours of field-based experiences in a



variety of educational settings with diverse student populations, including observation, modeling, and demonstration of effective practices to improve student learning. 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. FBEs must include authentic school settings in a public school accredited by the TEA or other school approved by the TEA for this purpose; instruction by content certified teachers; actual students in classrooms/instructional settings with identity-proof provisions; content or grade-level specific classrooms/instructional settings; and written reflection of the observation.

Action: Update processes as needed to ensure all Teacher candidates complete FBEs as required. Retain [FBE Log evidence as published on website](#) for each Teacher candidate. Require candidates to use the FBE log that the EPP has published on the website to document their FBEs.

- **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 all Teacher candidates who complete clinical teaching in the Spring semester to experience the beginning of the year through FBEs. Require candidates to document the start of the year experiences on their FBE logs. Retain evidence in each candidate file. Advise candidates that begin an internship in the Spring semester that they will experience the beginning of the year in the fall semester during their internship.
- **19 TAC §228.35(e)(8) Skills Implementation: Non-Teacher Practicum**  
For certification in a class other than classroom teacher, each EPP shall provide a practicum for a minimum of 160 clock-hours.  
Action: Require all non-teacher candidates to complete a 160 clock-hr. practicum. Retain evidence of practicum information with start and end dates, district, campus, site, and field supervisor assigned. Utilize a standards-based practicum log where candidates record dated practicum activities and hrs. earned and that is signed by the site supervisor assigned. This would be similar to the Teacher FBE log.
- **19 TAC §228.35(e)(8) Skills Implementation: Candidate Proficiency in Practicum**  
A candidate must demonstrate proficiency in each of the educator standards for the certificate class being sought.  
Action: Require all non-teacher candidates to demonstrate proficiency in each of the educator standards for the certificate being sought. Require the FS to utilize a standards-based observation instrument for each observation conducted of the candidate that is specific for each certificate class. Retain evidence in each candidate file.



- 19 TAC §228.35(e)(8)(A)-(B) & (D); Skills Implementation: Successful Practicum; Practicum Placement-Actual School Setting; Practicum Setting

A practicum experience 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 field supervisor or site supervisor. A practicum is successful when the field supervisor and the site supervisor recommend to the EPP that the candidate should be recommended for a standard certificate. If either the field supervisor or site supervisor does not recommend, the person who does not recommend the candidate must provide documentation supporting the lack of recommendation.

Action: Require the non-teacher candidates to complete the practicum in an actual school setting. Retain evidence of practicum information with start and end dates, district, campus, site, and field supervisor assigned. Ensure and retain evidence that the practicum is not taking place in a setting where the candidate has an administrative role over the site supervisor and is not related to the FS or site supervisor. Retain evidence of successful practicum: Written documentation of a successful practicum from the field supervisor and Written documentation of a successful practicum from the site supervisor.

- 19 TAC §228.35(f); 19 TAC §228.2(14), §228.2 (26), and §228.2(33) Campus Supervision: Mentor, Cooperating Teacher, or Site Supervisors Assigned; Qualifications of Cooperating Teachers, Mentors, Site Supervisors; Training Mentors, Cooperating Teachers, and Site Supervisors

EPP shall collaborate with the campus or district administrator to assign each candidate a mentor during the candidate's internship, assign a cooperating teacher during the candidate's clinical teaching experience, or assign a site supervisor during the candidate's practicum. For a clinical teacher/intern candidate, an educator who has at least three years of teaching experience; who is an accomplished educator as shown by student learning; who is currently certified in the certification category for the clinical teaching/internship assignment for which the clinical teacher/intern candidate is seeking certification. The site supervisor for a practicum candidate is 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. Cooperating teachers/mentors/site supervisors must complete mentor training, including training in how to coach and mentor teacher candidates, within three weeks of being assigned to the candidate.

Action: Retain evidence of mentors and site supervisors assigned to the Teacher and Non-Teacher candidates. Retain evidence in each candidate file. Assign cooperating teachers, mentors, and site supervisors that meet qualification requirements. Retain evidence of qualifications in each candidate file. Require all cooperating teachers, mentors, and site supervisors to be trained within 3 weeks of assignment to candidates as prescribed. Retain dated evidence of training in each candidate file. If allowing training to be provided by the district, retain a dated copy of the Certificate of Completion in each candidate file.



- 19 TAC §228.35(g) & §228.35(h); 19 TAC §228.2(18) Field Supervision: Candidates Assigned a Field Supervisor; Field Supervisor Qualifications; Field Supervisor Training  
Supervision of each candidate shall be conducted with the structured guidance and regular ongoing support of an experienced educator who has been trained as a field supervisor. Field supervisors held the required credentials appropriate for the candidate(s) supervised: A currently certified educator, who preferably has advanced credentials, shall have at least three years of experience and current certification in the class in which supervision is provided. A field supervisor shall be an accomplished educator as shown by student learning. If an individual is not currently certified, an individual must hold at least a master's degree in the academic area or field related to the certification class for which supervision is being provided and comply with the same number, content, and type of continuing professional education requirements described in 19 TAC §232.11, §232.13, and §232.15. The field supervisor must be 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 training.  
Action: Require all field supervisors to be certified, and to have three years of experience, in the class in which field supervision is provided, and to be accomplished educators as shown by student learning. Require field supervisors to be trained locally by the EPP and to receive statewide FS training. Retain evidence of training in each candidate file.
- 19 TAC §228.35(g) & §228.35(h) Field Supervision: Field Supervisor Initial Contact  
The initial contact for Teacher candidates, which may be made by telephone, email, or other electronic communication, with the assigned candidate must occur within the first three weeks of the assignment. 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 Teacher UG/PB candidates to receive an initial contact within the first three weeks of the assignment. Require all non-teacher candidates to receive an initial contact within the first quarter of assignment. Retain evidence of initial contact in each candidate file.
- 19 TAC §228.35(h) Field Supervision: Pre- and Post-Conferences; Educational Practices Observed; Written Feedback; Informal Observations & Ongoing Coaching; Field Supervisor Collaboration  
For nonteacher candidates 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-observation conference nor the post-observation conference needs to be onsite. For each formal observation, the field supervisor shall document educational practices observed. For each formal observation, the field supervisor shall provide a copy of the written feedback to the candidate's site supervisor. The field supervisor shall collaborate with the candidate and site supervisor throughout the practicum experience.  
Action: Require all non-teacher candidates to receive a pre- and post-observation conference for each formal observation. Require the field supervisor to document educational practices observed for each non-teacher candidate and to provide a copy of each observation to the



candidate and the site supervisor. Require the field supervisor to provide informal observations and coaching as appropriate and to collaborate with the candidate and site supervisor throughout the practicum experience.

Retain evidence in each candidate file.

- 19 TAC §228.35(g)(3-4) Field Supervision: Internship-Number of Observations (One Subject Area)  
For a first-year internship under a probationary certificate or an additional internship described in 19 TAC §228.35(e)(2)(B)(v)(II), an EPP must provide a minimum of one formal observation during the first third of the assignment, a minimum of one formal observation during the second third of the assignment, and a minimum of one formal observation during the last third of the assignment.  
Action: For Teacher ACP candidates, require the field supervisor to conduct a minimum of three formal observations as follows: one in the 1<sup>st</sup> third, one in the 2<sup>nd</sup> third, and one in the final third of the assignment. Retain completed observation documents in candidates' records.
- 19 TAC §228.35(h) Field Supervision: Practicum-Formal Observation Duration, Format, & Frequency  
Formal observations for all non-Teacher candidates must be at least 135 minutes in duration in total throughout the practicum and must be conducted by the field supervisor. If a formal observation is not conducted on the candidate's site in a face-to-face setting, the formal observation may be provided by the use of electronic transmission or other video or technology-based method. A formal observation that is not conducted on the candidates' site in a face-to-face setting must include a pre- and post-conference.  
Action: Require all formal observations to be at least 135 minutes in duration and conducted by the field supervisor. Require, at minimum, one formal observation within the first third of the practicum, one formal observation within the second third of the practicum, and one formal observation within the final third of the practicum. Retain evidence in each candidate file.

### **Recommendations**

- For the non-teacher practicum, utilize a document similar to that used in the teacher program where the required field supervisor and site supervisor signatures are obtained and retained by the program.
- Consider using a signed campus/district personnel attestation of the cooperating teacher, mentor, and site supervisor qualifications. Retain the evidence in each candidate file.

Based on the evidence presented, the University of Houston Clear Lake 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**

- UHCL has established benchmarks to measure candidate progress. Each candidate file reviewed contained evidence of a benchmark document. Benchmarks included the date each requirement was completed and was initialed by UHCL staff. The program met the requirement as prescribed. [19 TAC §228.40(a)]
- UHCL has structured assessments to measure candidate progress. UHCL submitted a candidate Project Approach Paper with a rubric that identifies levels of proficiency. The areas assessed were aspects of the lesson cycle. UHCL recently added the Principal as Instructional Leader (PIL) certificate in the ACP route. TEA reviewed the application on file with TEA and the EPP met the requirements for each Pillar at a 3 or 4 level of proficiency. The program met the requirement as prescribed. [19 TAC §228.40(a)]
- UHCL has processes in place to ensure that candidates are prepared to be successful in their certification exams. All candidates in all programs are not granted permission to test until after they are formally admitted. The policy for testing was noted on all candidate admission documents. All benchmark documents reviewed included the date each candidate was approved to test and a dated testing record was provided for all candidates as applicable. The program met the requirement as prescribed. [19 TAC §228.40(b); 19 TAC §228.40(d)]
- UHCL did not provide sufficient evidence that it uses information from a variety of sources to evaluate program design and delivery. The program provided a sample PIL assessment survey and advisory committee meeting minutes only and they were not specific to program evaluation or have any evaluation documentation. While the EPP stated in the Status Report that it met the requirements for program evaluation, the documentation provided for the review was insufficient. The program did not meet the requirement as prescribed. [19 TAC §228.40(e)]
- Not all candidate records for the review were provided as evidence that the EPP consistently retains records as required for a period of five years from admission to completion or withdrawal from the program for any reason. Applications and field supervision documents were missing for non-teacher candidates. The program did not meet the requirement as prescribed. [19 TAC §228.40(f)]

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

- 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: Develop and implement tools to 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. Plan and implement a schedule of program evaluation and share the resulting information with the advisory committee. Utilize input from the advisory committee to make program changes as needed. Retain evidence of evaluations and advisory committee minutes.



- 19 TAC §228.40(f) Records Retention  
An EPP shall 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.  
Action: Retain all non-teacher candidate records as required. This is being addressed in the Next Steps in Components 2 and 4.

Based on the evidence presented, the University of Houston Clear Lake 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).

- UH Clear Lake ensures that each candidate adheres to the Texas Educators' Code of Ethics. Evidence, in the form of signed statements for reading, understanding, and abiding by the Code of Ethics was provided for 14 out of 15 UG/ACP/PB Teacher, eight PB/ACP Principal, three out of five Superintendent, two out of five School Counselor, eight out of nine PB/ACP School Librarian, and seven out of eight Reading Specialist candidate files reviewed. The program met the requirement as prescribed in all programs except the Superintendent and School Counselor programs. [19 TAC § 228.50; 19 TAC §247.2]
- UHCL provided signed statements of reading, understanding, and abiding by the Educators' Code of Ethics for 147 faculty, staff, field supervisors, and Teacher certification advisory council members. The program met the requirement as prescribed. [19 TAC § 228.50; 19 TAC §247.2]
- It was noted that UHCL was using a UHCL document with an old TEA logo for the code of ethics verification. The program was advised that the TEA logo is for the sole use of TEA and needed to remove it from all EPP documents.

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

- 19 TAC §228.50; 19 TAC §247.2 Ethical Candidates  
During the period of preparation, the educator preparation program shall ensure that the candidates themselves understand and adhere to 19 TAC Chapter 247.  
Action: Require all Superintendent and School Counselor candidates to submit a signed statement of reading, understanding, and abiding by the Educators' Code of Ethics at the time of admission.  
Retain evidence in each candidate file. Follow the same process as used for all other candidates in all other programs to have candidates submit their signed and dated affirmations at admission.





Based on the evidence presented, the University of Houston Clear Lake is not 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. The program has the compliant policy posted on-site and UHCL provided a snapshot of the Complaints Process posted in Bayou 1111 office where applicants and candidates can see it as they sign in for appointments with advisors. It is also provided in candidate handbooks. The program provides the complaint policy in writing upon request. The program met the requirements as prescribed. [19 TAC §228.70(b)(1-4)]

#### **Compliance Issues to be Addressed**

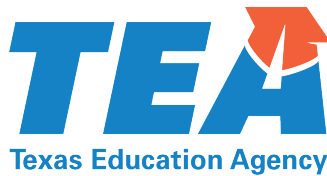
- None.

Based on the evidence presented, the University of Houston Clear Lake is in compliance with 19 TAC §228.70 – Complaints Process.

### **Component VIII: Certification Procedures - 19 TAC Chapters 228 and 230**

#### **Findings**

- Teacher candidates must meet degree requirements for certification. Four UG, three ACP, and one PB Teacher candidates who reached certification held a degree at the time of standard certification. All completed all requirements of the program. Transcripts and a letter from UHCL identifying that each requirement had been met served as evidence. Each candidate was recommended by UHCL by the deadlines for certificate issuance per the recommendation dates in ECOS. The program met the requirement as prescribed. [19 TAC §230.13(a)(1-2)]
- Non-teacher candidates must hold a minimum of a master's degree at the time of standard certification. They must also successfully complete an approved EPP. Three PB Principal, one PB Superintendent, three PB and two ACP School Librarian, and one PB Reading Specialist reached the point of standard certification. All held a master's degree at the time of standard certification. The Superintendent candidate held a doctorate degree at the time of standard certification. It was noted that a second Superintendent candidate completed the program, had a doctorate, and applied & paid for the standard certification, but the program had not yet made a recommendation. All successfully completed their respective program as evidenced by degree conferral. The program met the requirement as prescribed. [19 TAC §241.20 (1); 19 TAC §242.20(1); 19 TAC §239.60(1); 19 TAC §239.93(1)]
- One School Counselor candidate reached the point of standard certification. A 48-hour master's degree in counseling was conferred on the same date that the standard was recommended. The program met the requirement as prescribed. [19 TAC §239.20(3)]



- Principal candidates are required to hold a valid teaching certificate as a classroom teacher when recommended for standard certification. Both Principal candidates held a valid classroom Teacher certificate. The program met the requirement as prescribed. [19 TAC §241.20]
- Superintendent candidates are required to hold a valid Principal certificate or the required managerial experience when recommended for standard certification. The Superintendent candidate that was standard certified and the one who had not yet been recommended for standard certification both had valid Principal certificates. The program met the requirement as prescribed. [19 TAC §242.20]
- Principal, School Counselor, School Librarian, and Reading Specialist candidates must have two creditable years of teaching experience as a classroom teacher, as defined in 19 TAC Chapter 153, Subchapter CC, (relating to Commissioner's Rules on Creditable Years of Service) and the Texas Education Code, §5.001(2). The two PB Principal, one School Counselor, three PB and two ACP School Librarian, and one PB Reading Specialist candidates all had two or more years of experience as a classroom teacher. Service records provided by UHCL served as evidence. The program met the requirement as prescribed. [19 TAC §241.20(4); 19 TAC §239.20(4); 19 TAC §239.60(4); 19 TAC §239.93(4)].

#### **Compliance Issues to be Addressed**

- None.

Based on the evidence presented, the University of Houston Clear Lake is in compliance with 19 TAC Chapters 228 and 230 – Certification Procedures.

#### **Component IX: Integrity of Data Reported - 19 TAC Chapter 229**

##### **Findings**

- UHCL has submitted ASEP data within the timeline required by TEA. Any corrections that had to be made by the program were done within the timeline required by TEA for the 2018-2019, 2019-2020, and 2020-2021 academic years. The program met the requirement as prescribed. [19 TAC §229.3(f)(1) and Associated Graphic]
- Teacher UG/ACP/PB Program:
  - All candidates were formally admitted. Thirteen out of 15 had an admission date in their records that corresponded to the admission dates reported. Fourteen out of 15 were reported as admitted within seven calendar days. The program met the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(3)]
  - Thirteen out of 15 had a GPA in their records that corresponded to the GPA reported. The program met the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(9)]
  - Fourteen out of fifteen were accurately reported as other enrolled (OE) or finisher (F) for each year they were in the program. The program met the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(4-5)]
  - UG candidate observations in records correspond to observations reported in terms of frequency and duration and those not yet reported in the system were in progress of completing observations. The duration of one observation in a candidate's record did



not correspond to the duration reported. The PB candidate observations reported in ECOS for the one candidate that was observed did not correspond to the observations in the candidate's record. Two ACP candidates had observations completed. One candidate had one observation where the date and duration reported in ECOS did not correspond to the observation date and duration in the candidate's record. The program met the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(1)]

- Principal PB/ACP Program:
  - All eight candidates were formally admitted. Seven out of eight had an admission date that corresponded to the admission date reported. The program met the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(3)]
  - Six out of eight were reported as admitted within seven days. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(3)]
  - Six out of eight were correctly identified as OE or F for each year they were enrolled in the program. Candidate seven was a finisher in another Principal program and should not have been enrolled at UHCL. Candidate eight was identified as both an ACP and PB candidate. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(4-5)]
  - UHCL reported observations in ECOS that met requirements but there were no observation documents in candidate files to support the data reported. One file contained paper documents, but the data on the documents did not correspond with observations reported in ECOS. All observations reported met the duration and frequency requirements. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(1)]
- Superintendent Program:
  - All five candidates were formally admitted, but only two out of five had an admission date in their records that corresponded to the admission date reported. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(3)]
  - Four out of five were reported as admitted within seven days. The program met the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(3)]
  - Two out of five had a GPA in their records that corresponded to the GPA reported. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(9)]
  - All five were correctly reported as OE or F for each year enrolled. The program met the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(4-5)]
  - There were no observations reported for any of the candidates. [19 TAC §229.3(f)(1) Graphic(1)]
- School Counselor Program:
  - Three out of five were formally admitted and two out of five had an admission date in records that corresponded to the admission date reported. It was noted that record-keeping has improved in more recent years. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(3)]
  - Four out of five were not required to be reported as admitted within seven days, but the fifth candidate that was required was not reported within seven days. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(3)]



- All five were correctly identified as OE or F for each year enrolled in the program. The program met the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(4-5)]
- There were no observations reported. [19 TAC §229.3(f)(1) Graphic(1)]
- School Librarian PB/ACP Program:
  - All nine candidates were formally admitted. Eight out of nine had an admission date in their records that corresponded to the admission date reported. The program met the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(3)]
  - Six out of nine were reported as admitted within seven days. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(3)]
  - Five out of nine had a GPA in candidate records that corresponded to the GPA reported. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(9)]
  - Eight out of nine were accurately reported as OE or F for each year enrolled. The program met the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(4-5)]
  - There were no observations reported. [19 TAC §229.3(f)(1) Graphic(1)]
- Reading Specialist PB/ACP Program:
  - Six out of eight were formally admitted and five out of eight had an admission date in candidate records that corresponded to the admission date reported. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(3)]
  - Four out of eight had a GPA in their records that corresponded to the GPA reported. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(9)]
  - All eight were correctly identified as OE or F for each year enrolled. The program met the requirement as prescribed. [19 TAC §229.3(f)(1) Graphic(4-5)]
  - There were no observations reported. [19 TAC §229.3(f)(1) 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:  
Principal Program: Report all candidates as admitted within seven calendar days. Correctly identify Principal candidates as OE/F in the correct route (ACP or PB) and do not report candidates that are Finishers in other EPPs.  
Superintendent Program: Implement reporting processes to ensure that the admission date reported corresponds to the admission date in records. Require the Admission GPA in records to correspond to the GPA reported.  
School Counselor Program: Implement admission and reporting processes that ensure all School Counselor candidates are formally admitted and the admission date reported in ECOS corresponds to the admission date in the candidates' offer letters.  
School Librarian Program: Upload all candidates as admitted within 7 calendar days. Implement a reporting process that ensures the Admission GPA in records matches the GPA reported in ECOS.



Reading Specialist Program: Implement admission and reporting processes that ensure all Reading Specialist candidates are formally admitted and that admission data is reported accurately in ECOS for all candidates.

Ensure that all non-teacher observation data is entered into ECOS beginning with the 2021-2022 academic year. Implement a reporting process that ensures observation duration and frequency in candidate records matches the observation duration and frequency reported in ECOS and ensure that the EPP has retained copies of all observation records.

### **Recommendations**

- Develop a process manual for data reporting.

Based on the evidence presented, the University of Houston Clear Lake is not in compliance with 19 TAC Chapter 229 – Integrity of Data Reported.

### **Recommendations and Advisement**

- 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 recommended for certification on or before December 30, 2022. To use the 117 for certification, candidates must be recommended for certification on or before October 30, 2022. Communicate these important deadlines to applicable current candidates and past finishers who are pending certification.
- 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.
- 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 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 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 program 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 University of Houston Clear Lake staff.

**I, the legal authority for the University of Houston Clear Lake, have reviewed the Report and agree that all required corrections will be made on or before November 15, 2022.**

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**Signature of Legal Authority** **Date**

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**Printed Name of Legal Authority** **Date**