

2023–2024 Continuing Approval Review Report

Baylor University

INTRODUCTION

Texas Education Agency (TEA) Education Specialist, Vanessa Alba, conducted a five-year Continuing Approval Review of the Baylor University educator preparation program (EPP) on November 13, 2023-January 11, 2024. 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. Shanna Hagan-Burke, Dean of the Baylor School of Education, was identified as the program’s Legal Authority and the primary EPP contact for the review process. Baylor University was approved as an EPP on March 27, 1971. At the time of the review, the EPP was rated Accredited. The risk level was Stage 3 (low). The EPP reported 111 finishers for the 2021-2022 reporting year and 118 finishers for 2022-2023.

At the time of the review, the Baylor University EPP was approved to certify candidates in the following classes: Teacher, Principal, and Superintendent, School Counselor, and Reading Specialist. The School Counselor and Reading Specialist classes are currently inactive. The EPP is approved to prepare and recommend candidates for certification in the undergraduate (U) and post-baccalaureate (PB) routes.

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 the 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 requirements for EPPs as applicable to all certification classes in all certification routes offered by the EPP using a standardized rubric aligned to the Texas Administrative Code and Texas Education Code; and
- 2) developing a corrective action plan for compliance and quality improvement based on review data, performance indicators identified in 19 TAC §229.4, and self-reported EPP information provided in the Status Report.

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 October 30, 2023. Additional EPP documents, including records for 15 candidates, were submitted on November 10, 2023. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence.

“Findings” reflect EPP compliance with the TAC requirement(s) in a component. Determinations of non-compliance are supported by “Evidence” collected during the review process. Where a “Corrective Action” is required, the program should consult the TAC and/or TEC, complete the corrective action to bring the EPP into compliance and submit the required evidence of corrective action to TEA by the identified Due Date.

Corrective actions that are planned but have not been implemented must include an implementation date.

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

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GOVERNANCE (COMPONENTS 1 & 5)

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

FINDINGS

1. The EPP has established an advisory committee that provides guidance and input on matters of program design, delivery, evaluation, and major policy decisions of each program within the EPP. [19 TAC §228.20(b)]
2. The advisory committee has been consistently trained in their roles and responsibilities. [19 TAC §228.20(b)]
3. The EPP has established evaluative tools and processes for continuous improvement of the programs within the EPP and has engaged the advisory committee in the evaluation and continuous improvement process. [19 TAC §228.40(e)]
4. The governing body of the EPP has provided sufficient support to enable the EPP to meet all standards set by the SBEC. [19 TAC §228.20(c)]
5. The EPP has not had any program amendments within the past five years. [19 TAC §228.20(e)]
6. The EPP has established a calendar of program activities that allows adequate time for admission, coursework, training, and field-based experience requirements prior to the clinical experience for each program in the EPP. [19 TAC §228.20(g)]
7. The EPP has not published an exit policy that is reviewed & signed by each candidate at admission. [19 TAC §228.20(h)]
Evidence: The EPP provided an exit policy signed at admission for two out of five candidates from each program Teacher, Principal, and Superintendent.
8. The EPP has qualified instructors for all certificate categories and classes offered. [19 TAC §228.10(d)(1)]
9. The EPP has consistently retained candidate and EPP records per the records retention requirement in [19 TAC §228.40(f) & §228.10(b)(2)]

CORRECTIVE ACTION REQUIRED

The EPP must correct the deficiencies identified by 5:00 PM CST on May 13, 2024:

1. **19 TAC §228.20(h) Exit Policy**
Require each candidate to sign an acknowledgment for receipt of the exit policy. Retain evidence in each candidate's record.

REQUIRED NOTIFICATIONS (COMPONENTS 2 & 7)

Candidate records, the EPP website, and other EPP documents were reviewed for evidence the EPP has published the required notifications for applicants and candidates. Following are the findings:

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FINDINGS

1. The EPP has published information about the required criminal history background checks for clinical teaching and employment as an educator in Texas. [19 TAC §227.1(b)]
2. The EPP has published information about the potential impact of criminal history on candidate certification and the right to request a Preliminary Criminal History Evaluation from TEA. [19 TAC §227.1(d)]
3. The EPP has published the admission requirements of each program in the EPP. [19 TAC §227.1(c)(1)]
4. The EPP has published the completion requirements for each program in the EPP. [19 TAC §227.1(c)(2)]
5. The EPP has published Information about the EPP performance over time for the past five years. [19 TAC §227.1(c)(3)(B)]
6. The EPP has published information about the effect of supply and demand forces on the educator workforce in Texas. [19 TAC §227.1(c)(3)(A)]
7. The EPP does not have a published policy regarding prior coursework for candidates who are not military service members or military veterans. [19 TAC §228.35(a)(5)(B)]
Evidence: The policy and procedures were not found in handbooks, advisory committee meeting minutes, admission information, orientation material, or on the website. The EPP advised TEA that it did not have a policy in place.
8. The EPP has published a complaints process that provides a link to the TEA complaints process. [19 TAC §228.70(b)]

CORRECTIVE ACTION REQUIRED

The EPP must correct the deficiencies identified by 5:00 PM CST on May 13, 2024:

1. **19 TAC §228.35(a)(5)(B) Coursework & Training: Prior Coursework Policy-Non-Military:**
Determine what the EPPs policy will be for specific criteria for admitting non-military candidates and publish the policy. Apply the policy equitably for all.

FORMAL & CONTINGENCY ADMISSION (COMPONENT 2)

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

FINDINGS

1. Applicants who were formally admitted met all admission requirements. [19 TAC §227.17(a)]
2. The formal written offer of admission was consistently found in candidates' records. [19 TAC §227.17(b) & (c)]
3. Applicants were consistently required to accept the offer of admission in writing. [19 TAC §227.17(c)]
4. The formal date of admission was consistently included in the written offer of admission. [19 TAC §227.17(d)]
5. The ECOS audit trail revealed candidate admission records were consistently created in the ECOS within the seven calendar days required. [19 TAC §227.17(e)]

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- Candidates were not provided coursework, training, or test approval prior to formal admission. [19 TAC §227.17(f) & §228.40(d)]

CORRECTIVE ACTION REQUIRED

None

ADMISSION REQUIREMENTS (COMPONENT 2)

Candidate records including applications, transcripts, screening rubrics, and other documentation were reviewed to verify the programs within the EPP qualify applicants for admission as required in 19 TAC Chapters 227, 241, and 242. Following are the findings:

FINDINGS

- The EPP consistently requires applicants to meet requirements for GPA. [19 TAC §227.10(a)(3)]
- The EPP consistently requires applicants to Teacher programs to meet requirements for subject-specific semester credit hours. [19 TAC §227.10(a)(4)]
- The EPP consistently requires applicants to complete an application for admission. [19 TAC §227.10(a)(8)]
- The EPP does not consistently use appropriate screening devices to evaluate applicants' appropriateness for the certificate sought. [19 TAC §227.10(a)(8), §241.5(c), and §242.5(c)]
Evidence: The EPP did not provide admission screens for the Principal or Superintendent programs. The EPP was incorrectly using other admission requirements, including resumes, personal statements, GPA, and school service records as the screens in both programs.
- The EPP inconsistently collects evidence that candidates meet all additional requirements for admission. [19 TAC §227.10(b)]
Evidence: In the Teacher program three letters of recommendation, a signed FERPA, and an essay are required but only one out of five records reviewed contained evidence of all three required additional documents.
- The EPP has consistently verified English language proficiency. [19 TAC §227.10(a)(7)]
- The EPP consistently notifies non-teacher candidates of deficiencies in certification requirements at the time of admission. [19 TAC §227.10(a)(5)]

CORRECTIVE ACTION REQUIRED

The EPP must implement processes to appropriately qualify applicants for admission into each program offered as required in 19 TAC Chapters 227, 241, and 242 by 5:00 PM CST on May 13, 2024:

- 19 TAC §227.10(a)(8) Admission Requirements: Screens**
Require at least two screens to determine if the EPP applicant's knowledge, experience, skills, and aptitude are appropriate for the certification sought for all Principal and Superintendent applicants. Retain the screens and rubrics per records retention requirements.
- 19 TAC §227.10(b) Admission Requirements: Additional Requirements**
Require all applicants to the Teacher program to submit all additional required items as published. If the EPP continues to require a signed FERPA, three letters of recommendation from faculty, and an

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essay prior to admission, implement a process to collect and verify each item. Retain the documents per the records retention requirements.

STANDARDS-BASED COURSEWORK (COMPONENTS 3 & 4)

Syllabi, performance assessments, published degree plans, standards alignment charts, and information provided by the EPP in the Status Report, were reviewed as evidence the EPP provides the required standards-based coursework in each certificate class offered. Following are the findings:

FINDINGS

1. Candidates were consistently required to complete the minimum number of hours of coursework and training prior to completing the EPP. [19 TAC §228.35(b) & (c)]
2. Required standards were identified in coursework. [19 TAC §228.30]
3. Evidence of performance assessments was found, and assessments were aligned to standards. [19 TAC §228.35(a)(2) & §228.40(a)]

CORRECTIVE ACTION REQUIRED

None

REQUIRED CURRICULUM TOPICS (COMPONENT 3)

Syllabi, published degree plans, candidate records, and information provided by the EPP in the Status Report were reviewed to verify the EPP provides instruction in the additional curriculum areas required in the Texas Administrative Code and/or Texas Education Code. Following are the findings:

FINDINGS

1. Training in Ethics was found in coursework provided to candidates. [19 TAC §228.30(c)(1)]
2. Training in educating students with Dyslexia was found in coursework provided to candidates and was provided by the approved provider. [19 TAC §228.30(c)(2)]
3. Training in Mental Health, Substance Abuse, & Youth Suicide was consistently provided to candidates by an approved provider. [19 TAC §228.30(c)(3)]
4. Instruction in the skills educators are required to possess, the responsibilities educators are required to accept, and the high expectations for students in Texas were apparent in the coursework provided to candidates. [19 TAC §228.30(c)(4)]
5. The importance of building strong classroom management skills was identified in the coursework provided to candidates. [19 TAC §228.30(c)(5)]
6. Information about the framework for teacher and principal evaluation in Texas was provided to candidates. [19 TAC §228.30(c)(6)]
7. Training in appropriate relationships, boundaries, and communications with students was consistently provided to candidates. [19 TAC §228.30(c)(7)]
8. Instruction in digital learning, virtual instruction, and virtual learning were consistently provided to candidates. [19 TAC §228.30(c)(8)]

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9. The Digital Literacy evaluation and the related prescribed curriculum were provided to candidates. [19 TAC §228.30(c)(8)]
10. Instruction regarding students with disabilities, the use of proactive instructional planning techniques, and evidence-based inclusive instructional practices were provided to candidates. [19 TAC §228.30(c)(9)]

CORRECTIVE ACTION REQUIRED

None

PRE-SERVICE REQUIREMENTS FOR TEACHER CANDIDATES (COMPONENT 4)

Syllabi, degree plans, benchmark documents, other candidate records, and published information were reviewed for evidence the EPP requires Teacher candidates to complete pre-service requirements (coursework and field-based experiences) as identified in 19 TAC §228.35(b) and §228.35(e)(1). Following are the findings:

FINDINGS

1. There is sufficient evidence that candidates consistently complete the field-based experience (FBE) hours as required. [19 TAC §228.35(b)(1) & §228.35(e)(1)]
2. FBE assignments and activities consistently meet the requirements for completing FBE. [19 TAC §228.35(e)(1)]
3. Candidates consistently complete pre-service coursework and training as required prior to beginning the supervised clinical experience. [19 TAC §228.35(b)(2)]
4. The structure of pre-service coursework and training allowed the EPP to consistently capture candidate proficiency in the identified pedagogical areas. [19 TAC §228.35(b)(2)]

CORRECTIVE ACTION REQUIRED

None

SUPERVISED CLINICAL EXPERIENCE (COMPONENT 4)

Syllabi, degree plans, and documentation in candidate records such as placement documents, logs, observation records, cooperating teacher and site supervisor agreements, and training materials were reviewed as evidence the EPP consistently ensures that candidates complete the supervised clinical experience as required in 19 TAC §228.35(e)-(h). Following are the findings:

FINDINGS

1. There is sufficient evidence that candidates consistently complete the required duration for the supervised clinical experience. [19 TAC §228.35(e)(2)(A) & §228.35(e)(8)]
2. Candidates were consistently placed in an approved supervised clinical experience assignment. [19 TAC §228.35(e)(2)(A), §228.35(e)(8)(A)-(D)]

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3. There is sufficient evidence that candidates consistently engage with the educator standards for the certificate sought during the supervised clinical experience. [19 TAC §228.35(e)(2)(A)(iii) & §228.35(e)(8)]
4. Candidates were consistently assigned appropriate qualified campus personnel to support them during the supervised clinical experience. [19 TAC §228.35(f)]
5. The qualifications of campus personnel supporting candidates in the supervised clinical experience were consistently verified by the EPP. [19 TAC §228.2(14) & (33)]
6. Training was not consistently provided as required to campus personnel supporting candidates in the supervised clinical experience. [19 TAC §228.2(14) & (33)]

Evidence: In the Teacher and Principal programs, the EPP provided evidence that one out of five cooperating teachers and site supervisors in each program were trained as required. In the Teacher program, the other four cooperating teachers were trained years before they were assigned to candidates. In the Principal program, the site supervisors were trained midway through the practicum which did not meet the timing requirements. In the Superintendent program, four out of five site supervisors were trained a month prior to candidate placement and one out of five was trained years prior to candidate placement.

7. Candidates were consistently assigned a field supervisor to provide support and feedback to the candidate and EPP during the supervised clinical experience. [19 TAC §228.35(g) & (h)]
8. There was sufficient evidence that field supervisors supporting candidates in the clinical experience met qualification requirements. [19 TAC §228.2(18)]
9. Training was not consistently provided as required to field supervisors supporting candidates in the clinical experience. [19 TAC §228.35(g) & (h)]

Evidence: Although the field supervisors assigned to Teacher, Principal, and Superintendent candidates completed the TEA-approved statewide field supervisor training, they did not consistently complete local training. In the Teacher program, the field supervisors assigned to four out of five candidates received local training years before being assigned to the candidates and training evidence was not provided for the field supervisor assigned to the fifth candidate. In the Principal and Superintendent programs, the field supervisors assigned to ten candidates received local training prior to candidate placement.

10. There was sufficient evidence that field supervisors conducted the first observation within the required time frame. [19 TAC §228.35(g) & (h)]
11. Candidates received the required number and duration of formal observations during the clinical experience. [19 TAC §228.35 (g) & (h)]
12. The frequency of formal observations conducted by the field supervisor during the practicum did not meet the requirements. [19 TAC §228.35(h)]

Evidence: In the Superintendent program, two out of five candidates did not receive formal observations in thirds throughout the practicum.

13. There was sufficient evidence that field supervisors consistently conduct observations through a POP cycle which includes a pre-conference and a post-conference for each formal observation. [19 TAC §228.35(g) & (h)]
14. Field supervisors consistently captured educational practices observed and evidence of candidate demonstration of proficiency in the supervised clinical experience. [19 TAC §228.35(g), §228.35(h), §228.35(e)(2)(A)(iii), & §228.35(e)(8)(E)]

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15. There is sufficient evidence the field supervisor consistently provides ongoing coaching and support to candidates completing the supervised clinical experience. [19 TAC §228.35(g) & (h)]

CORRECTIVE ACTION REQUIRED

The EPP must revise the structure and requirements in the supervised clinical experiences as needed to ensure candidates are placed in appropriate assignments where they are able to complete the experiences with appropriate supervision and support, and that candidate proficiency is accurately captured by the EPP as required in 19 TAC §228.35(e) by 5:00 PM CST on May 13, 2024:

1. **19 TAC §228.35(f), 19 TAC §228.2(14), & 19 TAC §228.2(33) Campus Supervision: Training Mentors, Cooperating Teachers, and Site Supervisors**
Require all cooperating teachers assigned to Teacher Candidates and site supervisors assigned to Principal and Superintendent candidates to receive training that relies on scientifically-based research within 3 weeks of assignment to a candidate. Retain evidence of training per records retention requirements.
2. **19 TAC §228.35(h)(3) Field Supervision: Practicum-Observation Number & Frequency**
Require formal observations conducted by the field supervisor for Superintendent candidates to occur in the first, second, and final third of the practicum.
Train field supervisors in the requirements during local field supervisor training. Retain evidence per records retention requirements.

EPP COLLABORATION WITH CAMPUS AND CANDIDATE (COMPONENT 4)

Documentation in candidate records such as logs, observation records, cooperating teacher and site supervisor agreements, and training materials were reviewed as evidence the EPP consistently collaborates with the campus and candidate during the candidate’s supervised clinical experience as required in 19 TAC §228.35(g) & (h). Following are the findings:

FINDINGS

1. There is sufficient evidence the field supervisor consistently collaborates with the campus personnel assigned to support the candidate during the supervised clinical experience. [19 TAC §228.35(g) & (h)]
2. There is sufficient evidence the field supervisor makes initial contact with the candidate as required during the supervised clinical experience. [19 TAC §228.35(g) & (h)]
3. There is sufficient evidence the field supervisor provides feedback from the observation to the campus personnel assigned to support the candidate during the clinical experience. [19 TAC §228.35(g) & (h)]

CORRECTIVE ACTION REQUIRED

None

CERTIFICATION (COMPONENT 8)

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

FINDINGS

1. Candidates who were recommended for certification consistently met the degree required for the certificate sought. [19 TAC §230.11]
2. There was sufficient evidence that the EPP consistently ensures candidates complete all requirements prior to recommendation for the certificate sought. [19 TAC §230.11]
3. Candidates consistently met the English language proficiency requirement prior to being recommended for certificates. [19 TAC §230.11(b)(5)]
4. Candidates were consistently recommended for certificates in areas in which they were prepared by the EPP. [19 TAC §228.35(e)(2)(B), §230.11, & §230.13]

CORRECTIVE ACTION REQUIRED

None

INTEGRITY OF DATA SUBMISSION (COMPONENT 9)

Admission data, enrollment data, and observation data reported in the Educator Certification Online System (ECOS) by the EPP were compared with the data retained in candidates' records. Following are the findings:

FINDINGS

1. Admission data were not reported accurately according to information in candidate transcripts and admission letters. [19 TAC §229.3(f)(1)(4)]
Evidence: In the Superintendent program, two of the five candidates had admission records that were created outside of the seven day window and the GPAs reported for four of the five candidates did not match the GPAs on the candidates' transcripts. Candidates were not consistently identified as enrolled in the area in which one or more certificates were issued. [19 TAC §229.3(f)(1)(5)]
In the Teacher program, two out of five candidates had an enrollment record that corresponded to the certificate area for which the candidate was admitted and seeking certification and three out of five did not. In the Superintendent program, all five candidates were identified as post-baccalaureate when they should have been identified as ACP because they did not earn another advanced degree concurrent with certification.

CORRECTIVE ACTION REQUIRED

The EPP must revise the process of maintaining records and reporting data so that data reported in ECOS is an accurate representation of data retained in candidates' records to meet requirements in 19 TAC §229.3 and §229.4 by 5:00 PM CST on May 13, 2024:

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1. 19 TAC §229.3(a), §229.3(f)(1), & related graphic Figure 19 TAC §229.3(f)(1) Data Reported: Accurately

Teacher program:

Accurately report each candidate as enrolled in the same certificate area for which the candidate was admitted.

Superintendent program:

Upload all candidates into ECOS as admitted within seven calendar days of admission.

Require the GPA uploaded into ECOS to correspond to the GPA in candidate records.

Correctly identify candidates as other enrolled or finisher. If they are earning an Ed.D. or Ph.D.

concurrent with certification, they are PB. If they will be standard certified prior to degree conferral or if they are not earning another advanced degree, they are ACP.

PROACTIVE INSTRUCTIONAL PLANNING TECHNIQUES & INCLUSIVE PRACTICES FOR ALL STUDENTS PROVIDED TO CANDIDATES IN ALL CONTENT AREAS (COMPONENTS 3, 4, & 10)

Syllabi, coursework samples, information in the Status Report, and observation instruments were reviewed for evidence the EPP has implemented the required instruction. Following are the findings:

FINDINGS

1. The EPP incorporates proactive instructional planning techniques throughout coursework and across content areas using a framework that:
 - o provides flexibility in the ways information is presented, students respond or demonstrate knowledge and skills, and students are engaged;
 - o reduces barriers in instruction;
 - o provides appropriate accommodations, supports, and challenges; and
 - o maintains high achievement expectations for all students, including students with disabilities and students of limited English proficiency. [19 TAC §228.10(a)(1)(J) and §228.30(c)(9)]
2. The EPP has integrated instruction in inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies throughout coursework. [19 TAC §228.10(a)(1)(J) and §228.30(c)(9)]
3. The EPP has integrated instruction in inclusive practices for all students, including students with disabilities, and evidence-based instruction and intervention strategies throughout the clinical experience. [19 TAC §228.10(a)(1)(J)]
4. As required under TEC 21.044 (a-1), there is sufficient evidence that field supervisors consistently capture candidate demonstration of competency in the use of proactive instructional planning techniques that:
 - o provide flexibility in the ways information is presented, students respond or demonstrate knowledge and skills, and students are engaged;
 - o reduce barriers in instruction;
 - o provide appropriate accommodations, supports, and challenges; and

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- maintain high achievement expectations for all students, including students with disabilities and students of limited English proficiency. [19 TAC §228.30(c)(9); §228.35(e)(2)(A)(3); §228.35(e)(2)(B)(9); and §228.35(e)(8)]
- 5. In the supervised clinical experience, there is sufficient evidence that field supervisors consistently capture candidate demonstration of competency in the use of evidence-based inclusive instructional practices as required under TEC 21.044 (a-1). [19 TAC §228.30(c)(9); §228.35(e)(2)(A)(3); and §228.35(e)(8)]

CORRECTIVE ACTION REQUIRED

None

RECOMMENDATIONS

- The Physical Education EC-12 (158), Health EC-12 (157), and English Language Arts & Reading 7-12 (231) exams will be available until September 1, 2024, and then will be replaced by new exams 258, 257, and 331, respectively. Candidates must apply and be recommended for certification by September 1, 2025, to use exams 158, 157, and 231 for certification. Additional information about the transitions of these certification exams is on the [Educator Testing](#) page on the tea.texas.gov website.
- Establish a process to add clinical experience records and observation records into ECOS as they occur throughout the year.
- Develop and implement more performance assessments in all programs.
- Review all certificate areas that the EPP no longer plans to support and request, in writing, for TEA to remove them from inventory.
- Notify the assigned specialist at TEA promptly when the EPP has staff changes in the roles of Legal Authority, Backup Legal Authority, or Certification Officer or when the EPP has changes in EPP contact information.
- To ensure continuity in record keeping and other related processes, 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, clinical teaching, internship, practicum, etc.).
- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about current Texas Administrative Code.
- Continue to participate in training and webinars provided by the Division of Educator Preparation to ensure that the program staff is knowledgeable about current requirements and changes in the Texas Administrative Code.
- Continue to maintain communication with the education specialist assigned to the program.