

2023-2024 Continuing Approval Review Report

Education Career Alternatives Program

INTRODUCTION

Texas Education Agency (TEA) Education Specialist, Vanessa Alba, conducted a five-year Continuing Approval Review of the Education Career Alternatives Program (ECAP) educator preparation program (EPP) from December 11, 2023, through February 8, 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...”. Sharon Fikes, the owner, was identified as the program's Legal Authority, and Micah Fikes, was identified as the primary EPP contact for the review process. ECAP was approved as an EPP on November 17, 2000. At the time of the review, the EPP was rated Accredited. The risk level was Stage 3 (low). The EPP reported 244 finishers for the 2021-2022 reporting year and 220 finishers for 2022-2023.

At the time of the review, the ECAP EPP was approved to prepare and recommend candidates for certification in the Teacher class in the alternative certification (ALT) route.

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 the Teacher certification class in the alternative certification route 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 November 3, 2023. Additional EPP documents, including records for seven candidates, were submitted on December 5, 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 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 not been consistently trained in their roles and responsibilities. [19 TAC §228.20(b)]
Evidence: The EPP did not provide any evidence that the advisory committee was informed of their roles and responsibilities.
3. The EPP has established evaluative tools and processes for continuous improvement of 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 amended the program since the last five-year review. [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 a clinical teaching or internship experience. [19 TAC §228.20(g)]
7. The EPP has published an exit policy that is reviewed & signed by each candidate at admission. [19 TAC §228.20(h)]
8. The EPP has not added any new program locations since the last five-year review. [19 TAC §228.10(e)]
9. The EPP is approved to offer clinical teaching but none of the candidates selected for review had completed clinical teaching. [19 TAC §228.10(c)]
10. The EPP has qualified instructors for the certificate categories offered. [19 TAC §228.10(d)(1)]
11. The EPP has not consistently retained candidate and EPP records per the records retention requirement in [19 TAC §228.40(f) & §228.10(b)(2)]
Evidence: The EPP did not provide sufficient evidence of the following:
 - Advisory committee meeting attendance records for advisory committee meetings;
 - Mentor teachers assigned to candidates completing internships;
 - Mentor teacher training;
 - Field supervisor local training;
 - Interactive field-based experiences;
 - Successful internship recommendations;
 - Initial contact; and
 - Pre- and post-observation conferences.

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CORRECTIVE ACTION REQUIRED

The EPP must correct the deficiencies identified by 5:00 PM CST on Monday, June 10, 2024.

1. 19 TAC §228.20(b) Governance: Advisory Committee Training

Update Advisory Committee (AC) requirements so that the EPP informs AC members of their roles and responsibilities.

Retain evidence per records retention requirements in 19 TAC §228.40, such as:

- Advisory committee training materials, date(s), attendance records; or
- Advisory committee handbook with acknowledgment of receipt by advisory committee members; or
- Letter of invitation with roles and responsibilities outlined and acknowledged by invitee as to accept or decline; or
- Bylaws acknowledged receipt by advisory committee members.

2. 19 TAC §228.40(f) Records Retention

Develop and implement a process for records retention that ensures evidence of candidate admission and completion of program requirements and evidence of EPP activity is retained securely. Retain all records for a period of five years after a candidate completes, withdraws from, or is discharged or released from the program as required in 19 TAC §228.40(f), including evidence of the following that was missing during the review:

- Advisory Committee attendance at meetings;
- Mentor teachers assigned;
- Qualifications of mentor teachers;
- Mentor teacher training;
- Field Supervisor local training;
- Interactive field-based experiences;
- Successful internship recommendations;
- Initial contact within the first three weeks of assignment; and
- Pre- and post-observation conferences at each formal observation.

REQUIRED NOTIFICATIONS (COMPONENTS 2 & 7)

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

FINDINGS

1. The EPP has published information about the required criminal history background checks for clinical teaching and for 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 the EPP. [19 TAC §227.1(c)(1)]
4. The EPP has published the completion requirements for 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)]

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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 has published a complaints process that provides a link to the TEA complaints process. [19 TAC §228.70(b)]

CORRECTIVE ACTION REQUIRED

None

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 and contingency admission process as required in 19 TAC §227.17 and §227.15. Following are the findings:

FINDINGS

1. All candidates reviewed met admission requirements and were formally or contingently admitted. [19 TAC §227.17(a) & §227.15(a)(1)-(2)]
2. The formal or contingency written offer of admission was consistently found in candidates' records. [19 TAC §227.17(b) & (c) and §227.15(a)(3)-(4)]
3. Applicants were consistently required to accept the offer of admission in writing. [19 TAC §227.17(c) & §227.15(a)(4)]
4. The formal or contingency date of admission was consistently included in the written offer of admission. [19 TAC §227.17(d) & §227.15(b)]
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) & §227.15(c)]
6. Candidates were not provided coursework, training, or test approval prior to formal or contingency 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 Chapter 227. Following are the findings:

FINDINGS

1. The EPP consistently requires applicants to meet requirements for GPA. [19 TAC §227.10(a)(3)]
2. The EPP consistently requires applicants to meet requirements for subject-specific semester credit hours. [19 TAC §227.10(a)(4)]
3. The EPP consistently requires applicants to complete an application for admission. [19 TAC §227.10(a)(8)]

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4. The EPP consistently uses an appropriate screening device to evaluate each applicant's appropriateness for the certificate sought. [19 TAC §227.10(a)(8)]
5. The EPP does not have additional requirements for admission. [19 TAC §227.10(a)(9) & §227.10(b)]
6. The EPP has consistently verified English language proficiency. [19 TAC §227.10(a)(7)]

CORRECTIVE ACTION REQUIRED

None

STANDARDS-BASED COURSEWORK (COMPONENTS 3 & 4)

Syllabi, performance assessments, standards alignment charts, and information provided by the EPP in the Status Report, were reviewed as evidence that the EPP provides the required standards-based coursework in the Teacher 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)]
2. Required standards were identified in coursework. [19 TAC §228.30(a)]
3. Evidence of performance assessments was missing and the assessments that were provided were not aligned to standards. [19 TAC §228.35(a)(2) & §228.40(a)]
Evidence: The EPP was using the Texas Gateway material for field-based experience (FBE) videos and identifying them as performance-based assessments. The one rubric that was used by the EPP to evaluate the videos was not aligned to any standards.
4. Coursework and training that is offered online by the EPP are making progress toward meeting criteria set for accreditation, quality assurance, and compliance with program design and teaching support certification by Quality Matters. The program is undergoing the program review process and the maximum three-year candidacy period is from September 15, 2022, through September 15, 2025, but there has not been any required activity to complete this certification process. [19 TAC §228.35(a)(6)(B)]

CORRECTIVE ACTION REQUIRED

The EPP must revise coursework to ensure candidates are provided at least the minimum number of hours of standards-based coursework and assessments to meet requirements in 19 TAC §228.30, §228.35, and §228.40 by 5:00 PM CST on Monday, June 10, 2024.

1. **19 TAC §228.35(a)(2) Coursework & Training: Quality of Coursework & 19 TAC §228.40(a)**

Candidate Assessment

For all certificates the EPP intends to retain:

Update all coursework to ensure that it is rigorous, intensive, interactive, candidate-focused, and performance-based. Require instructors to interact with candidates. Require current instructional methods and practices currently in use to be rigorous.

Require performance-based assessments to be aligned to standards and assess the coursework offered.

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Revise virtual instruction so that candidates are engaged with a qualified instructor in an instructional setting.

Develop and implement:

- Standards-based performance assessments; and
- Rubrics aligned to the standards addressed in the related performance assessment.

Retain evidence of all structured assessments in the candidates' records per the records retention requirement in 19 TAC §228.40.

REQUIRED CURRICULUM TOPICS (COMPONENT 3)

Syllabi, 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 but was not provided by the approved provider. [19 TAC §228.30(c)(2)]
Evidence: The EPP identified that the required topic was addressed in STA103 Dyslexia Training, ACA141 Pre-Study Intro to Special Education, and ACA241 Introduction to Special Education. The online course was provided by a specific instructor and was not provided by the approved provider, TEALearn.
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 not provided to candidates. [19 TAC §228.30(c)(6)]
Evidence: The EPP addresses the framework for teacher evaluation but did not provide evidence that it addresses the framework for principal evaluation. The identified courses where the framework for teacher evaluation was addressed were ACA 101 Connections, ACA104 Surviving the First Year, ACA222 Lesson Planning in Elementary, INT310 Lesson Planning: Elements, and INT322 Pedagogy.
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 was not consistently provided to candidates, and the Digital Literacy evaluation and the related prescribed curriculum were not provided to candidates [19 TAC §228.30(c)(8)]
Evidence: The EPP identified that the topic is addressed in INT342 Web 2.0 Legal Issues in Technology and INT346 Techtactics. As evidence, the EPP provided a candidate's 32-second sample of an Animoto video of how people celebrate Christmas in France and that did not meet the requirements.

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9. Instruction regarding students with disabilities, the use of proactive instructional planning techniques, and evidence-based inclusive instructional practices was provided to candidates. [19 TAC §228.30(c)(9)]

CORRECTIVE ACTION REQUIRED

The EPP must revise coursework to include instruction in the missing curriculum areas to meet requirements in 19 TAC §228.30 by 5:00 PM CST on Monday, June 10, 2024.

- 1. 19 TAC §228.30(c)(2) Dyslexia Instruction**

Update and implement a process that includes requiring Dyslexia Instruction provided to all candidates to be provided by the TEA-approved provider. The approved provider is the [TEALearn Dyslexia](#) course. Update the syllabus for the related course to include that the approved provider is the [TEALearn Dyslexia](#) course. Require candidates to provide dated certificates of completion to the EPP. Retain evidence per records retention requirements in 19 TAC §228.40.

- 2. 19 TAC §228.30(c)(6) Teacher & Principal Evaluation Framework**

Update and implement coursework so that all candidates receive instruction in the framework for Teacher and Principal evaluation. Revise the syllabus for the updated course to include that candidates will receive instruction in the framework for both teacher and principal evaluation. Retain evidence per records retention requirements in 19 TAC §228.40.

- 3. 19 TAC §228.30(c)(8) Digital Literacy**

Update and implement coursework so that all candidates receive instruction in digital learning, virtual instruction, and virtual learning as defined in TEC, §21.001, including a digital literacy evaluation followed by a prescribed digital learning curriculum. Instruction must:

- be aligned with the latest version of the [International Society for Technology in Education's \(ISTE\) standards](#) as appears on the ISTE website;
- provide effective, evidence-based strategies to determine a person's degree of digital literacy; and
- include resources to address any deficiencies identified by the digital literacy evaluation.

Revise the syllabus for the course to include that candidates will receive instruction that is aligned with the latest version of the [International Society for Technology in Education's \(ISTE\) standards and includes resources](#) to address any deficiencies identified by the digital literacy evaluation.

Retain evidence per records retention requirements in 19 TAC §228.40.

PRE-SERVICE REQUIREMENTS FOR TEACHER CANDIDATES (COMPONENT 4)

Syllabi, benchmark documents and other candidate records, and published information were reviewed for evidence the EPP requires 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 insufficient evidence that candidates consistently complete the field-based experience (FBE) hours as required. [19 TAC §228.35(b)(1) & §228.35(e)(1)]
Evidence: Records for seven candidates were reviewed for evidence of FBE activities. Four of the seven records contained evidence that the candidates had completed the required number of FBE but did so after the internship start date and none were late-hires. An additional candidate had not completed any FBE but started the internship year and then resigned. The candidate was not a late-hire and should have completed the required FBE prior to the start of the internship year.

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2. FBE assignments and activities inconsistently meet the requirements for completing FBE. [19 TAC §228.35(e)(1)]
Evidence: In the seven records reviewed, two contained evidence of FBE completed in three to five settings, two completed FBE in only one setting, one completed FBE in two settings, one completed electronic FBE during the pandemic which was acceptable at that time, and one completed no FBE but should have done so.
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)]
5. There is insufficient evidence that FBE assignments for late-hires meet the requirements for completing FBE. [19 TAC §228.35(d)]
Evidence: Based on conversations with the EPP, TEA asked the EPP to identify the late-hires. Three out of seven records that the EPP identified as late-hires were reviewed for late-hire status. Of the three files reviewed, one was a true late-hire and completed the FBE within 90 days of assignment as required. The other two files reviewed were not late-hires because they were both admitted the year prior to the internship start dates but completed FBE after the start of the internship year. The EPP was identifying candidates as late-hires when they were not late hires, which is why the requirement was not met.

CORRECTIVE ACTION REQUIRED

The EPP must revise the structure and activities required in pre-service coursework to ensure Teacher candidates complete preservice requirements and demonstrate proficiency in the identified pedagogical areas prior to authorizing the supervised clinical experience as required in 19 TAC §228.35(b) and §228.35(e)(1) by 5:00 PM CST on Monday, June 10, 2024.

1. **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)(A); FBE Interactive Hours; and 19 TAC §228.35(e)(1)(B) FBE Electronic Hours**

Update and implement a field-based experience (FBE) process that meets or exceeds all requirements for completing FBE activities including FBE that are completed in a variety of settings and at least 15 hours of interactive activity. The process must include that the EPP will not give FBE credit for more than 15 clock-hours of electronic FBE. Update and implement a process to track and follow up with candidates ensures and documents the candidates complete all pre-service requirements prior to the clinical experience. Update and implement a process to track and follow up with candidates who are late hires that ensures and documents the candidates complete all pre-service requirements within the first 90 days of the assignment.

Retain FBE logs and reflections and benchmark documents or other evidence that reflects pre-service requirements completed in candidates' records per the records retention requirement in 19 TAC §228.40.

SUPERVISED CLINICAL EXPERIENCE (COMPONENT 4)

Syllabi, degree plans, and documentation in candidate records such as placement documents, logs, observation records, mentor 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)-(g). Following are the findings:

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FINDINGS

1. There is sufficient evidence that candidates consistently complete the required duration for the supervised clinical experience. [19 TAC §228.35(e)(2)(B)]
2. Candidates were consistently placed in an approved supervised clinical experience assignment. [19 TAC §228.35(e)(2)(B)]
3. There is insufficient evidence that candidates consistently engage with the educator standards for the certificate sought during the supervised clinical experience. [19 TAC §228.35(e)(2)(B)(ix)]
Evidence: In the seven records reviewed, none contained evidence that the candidates demonstrated proficiency in the standards. The completed observation instruments reviewed for each candidate were not standards-based and were not constructed to capture levels of proficiency. It was noted that one out of seven records reviewed did not contain evidence of all observations because the candidate resigned and dropped out of the EPP prior to completion.
4. Candidates were not consistently assigned appropriate qualified campus personnel to support them during the supervised clinical experience. [19 TAC §228.35(f)]
Evidence: Statements of Eligibility (SOE) that identified the mentor teacher and district/campus assigned were provided for two out of seven candidates reviewed. The EPP did not receive completed SOEs for the remaining candidates and in conversations with the EPP they stated that they did not know if a mentor teacher was assigned.
5. Qualifications of campus personnel supporting candidates in the supervised clinical experience were not consistently verified by the EPP. [19 TAC §228.2(26)]
Evidence: The EPP did not provide evidence of qualifications for mentor teachers assigned to the seven candidates reviewed.
6. Training was not consistently provided as required to campus personnel supporting candidates in the supervised clinical experience. [19 TAC §228.2(26)]
Evidence: The EPP provided signed and dated district verifications of mentor training for mentor teachers assigned to two out of the seven candidates reviewed. The EPP did not provide evidence of training for the remaining mentor teachers assigned to the remaining five candidates reviewed.
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)]
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)]
Evidence: Field supervisors assigned to six out of seven candidates completed TEA-approved training through an Education Service Center (ESC). The field supervisor assigned to the seventh candidate had T-TESS training but was not a currently certified T-TESS appraiser. There was insufficient evidence that the seven field supervisors completed local field supervisor training. The EPP provided training agendas and notes for training in 2022 and 2023 and provided a 2023-2024 field supervisor handbook, but did not provide any documentation, such as a sign-in sheet or certificate of completion, as evidence that any of the field supervisors assigned to the candidates attended training.
10. There was sufficient evidence that field supervisors conducted the first observation within the required time frame. [19 TAC §228.35(g)]

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11. Candidates received the required number and duration of formal observations during the clinical experience. [19 TAC §228.35(g)]
12. There was insufficient 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)]

Evidence: Five out of seven records reviewed contained evidence of a pre- and post-observation conference at each formal observation. The conferences were noted on the observation documents in each record. The sixth record reviewed contained observation documentation with a conference identified, but it was not clear if it was the pre-observation, post-observation, or both conferences. The seventh file reviewed was the candidate who resigned during the internship year. While observation documents that were completed were provided for review, there was no evidence of a pre- or post-observation conference on the documents provided.
13. Field supervisors consistently captured educational practices observed but did not provide evidence of each candidate's demonstration of proficiency in the supervised clinical experience. [19 TAC §228.35(g) & §228.35(e)(2)(B)(ix)]

Evidence: All seven records reviewed contained evidence of educational practices observed at each formal observation, but none contained evidence of candidate proficiency in the standards because the observation instrument was not designed to do so.
14. 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)]
15. There is sufficient evidence that the EPP followed the requirements for certificate deactivations. One certificate was deactivated due to the candidate's resignation. The EPP submitted the required deactivation documents to TEA and provided the documentation evidence for the deactivation during the review. [19 TAC §228.35(e)(2)(B)(vii-viii)].

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 Monday, June 10, 2024.

1. **19 TAC §228.35(e)(2)(B)(ix) Skills Implementation: Successful Internship-Candidate Proficiency**

Revise the field supervisor observation instrument so that it captures candidate proficiency in the standards required for the certificate sought. Update the local field supervisor training to include norming all field supervisors on the use of the revised observation instrument. Retain evidence per records retention requirements in 19 TAC §228.40.
2. **19 TAC §228.35(f) Campus Supervision: Mentor Assigned**

Update the clinical experience processes to require and verify that each candidate is assigned a campus mentor throughout the full internship assignment and any internship extensions. Retain evidence of a mentor assigned such as on a Statement of Eligibility (SOE), a mentor agreement, or other placement document. The evidence document will contain candidate placement information showing the date of placement, name of candidate, name of mentor, subject area, grade level, campus supervisor (administrator) name, campus name, and district name. Retain evidence per the records retention requirement in 19 TAC §228.40.

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3. 19 TAC §228.2 Campus Supervision: Qualifications of Mentors

Update the clinical experience processes to include verifying, prior to the start of each candidate's clinical experience, the mentor teacher assigned to support each candidate meets qualification requirements.

Evidence of qualifications includes:

- Service record and teaching certificate; and

Evidence of accomplishment as an educator includes:

- Evaluations that include evidence of student learning; or
- Campus or district reports that include evidence of student learning; or
- Letters of recommendation that include evidence of student learning; or
- A form, signed by the campus or district administrator, attesting that the mentors meet requirements for certification, experience, and accomplishment as an educator.

Retain evidence of the mentors' qualifications in the candidates' or EPP records per the records retention requirement in 19 TAC §228.40.

4. 19 TAC §228.35(f) Campus Supervision: Training Mentors

Revise the training that is provided to mentors to include training in coaching and mentoring. Update the clinical experience processes to include providing training to mentors within three weeks of the start of the assigned candidate's clinical experience. Retain evidence of the training in the candidates' or EPP records per the records retention requirement in 19 TAC §228.40.

5. 19 TAC §228.35(g) Field Supervision: Field Supervisor Training

Update the clinical experience processes to include:

- EPP-specific training provided to field supervisors; and
- TEA-approved observation training provided to field supervisors.

Retain evidence of the training in the candidates' or EPP records per the records retention requirement in 19 TAC §228.40.

6. 19 TAC §228.35(g) Field Supervision: Pre- and Post-Conferences

Update the clinical experience processes to include requiring field supervisors to conduct pre-and post-conferences for each formal observation and to provide written feedback to the candidate and mentor teacher about the outcome of the observation. Include in the updated process requirements for the field supervisor to provide and document informal observations and ongoing coaching and support of the candidate throughout the clinical experience. Train field supervisors on the requirements and responsibilities. Retain evidence of the pre-and post-conferences in the candidates' records per the records retention requirement in 19 TAC §228.40.

EPP COLLABORATION WITH CAMPUS AND CANDIDATE (COMPONENT 4)

Documentation in candidate records such as logs, observation records, mentor agreements, and training materials was 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). 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)]

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2. There is insufficient evidence the field supervisor makes initial contact with the candidate as required during the supervised clinical experience. [19 TAC §228.35(g)]
Evidence: The EPP provided evidence of initial contact within the first three weeks of assignment for five out of seven records reviewed. The sixth record contained evidence that the first formal observation was the initial contact and the seventh record contained evidence that the initial contact was completed via email after the internship year was completed.
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)]

CORRECTIVE ACTION REQUIRED

The EPP must revise the structure and requirements in the supervised clinical experiences to ensure the EPP staff collaborates with the campus personnel and candidate as needed to support the candidate success in the supervised clinical experience as required in 19 TAC §228.35(g) by 5:00 PM CST on Monday, June 10, 2024.

1. 19 TAC §228.35(g) Field Supervision: Field Supervisor Initial Contact

Update the clinical experience processes to ensure and verify that field supervisors make initial contact with each candidate within three weeks of the start of the candidate's clinical experience. The first observation is not the initial contact. Train field supervisors on the requirements and responsibilities.

Acceptable evidence of initial contact includes:

- Field supervisor log; or
- Emails; or
- Phone records; or
- Other electronic communication.

Retain evidence of the training in the candidates' or EPP records per the records retention requirement in 19 TAC §228.40.

CERTIFICATION (COMPONENT 8)

Candidate records such as transcripts, completed benchmark documents, and data reported in ECOS, provided evidence of EPP compliance with certification requirements as required 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, §230.36(b)(1), & §230.37(b)(1)]
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, §230.36, & §230.37]
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), §230.36, §230.37, §230.11, & §230.13]

CORRECTIVE ACTION REQUIRED

None

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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. Candidates were consistently identified as enrolled in the area in which one or more certificates were issued. [19 TAC §229.3]
2. Admission data were not reported accurately according to information in candidate transcripts or admission letters. [19 TAC §229.3]
Evidence: Four out of seven admission dates in records corresponded to the data reported in ECOS and three out of seven did not. Four out of seven content hours reported corresponded to the content hours in the records. Three out of seven (43%) were not reported and should have been reported even if the hours were zero or if the candidate was admitted with passing scores on a pre-admission content test (TX PACT).
3. Observation dates were reported accurately but durations were not reported as detailed on observation documents. [19 TAC §229.3 & §229.4]
Evidence: All seven records reviewed contained observation durations that did not correspond to the observation durations in ECOS. Five out of seven (71%) observations in candidate records were spaced as required and four out of seven (57%) were not.
4. There was supporting documentation for the observations reported. [19 TAC §229.3 & §229.4]

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 Monday, June 10, 2024.

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

Revise the data reporting process for the EPP and include quality control measures to ensure all data is reported accurately including:

- The admission date reported in the ECOS must be the same as the effective date of admission reflected in the offer of admission signed by the candidate.
- The admission GPA must be either the overall GPA or the last 60 hours GPA on the candidate's transcript. Report no admission GPA as 0.00 unless the candidate has a transcript that does not have a numeric value for the GPA.
- Report the total number of subject-specific semester credit hours even if the hours exceed the required 12 or 15 and even if the candidate passed a TX PACT. Report zero if the candidate did not have any semester credit hours related to the certificate sought and report 0.00 for GPA if there are no semester credit hours to report.
- The observation data (date, duration, field supervisor name, etc.) reported in ECOS must be the same as the data reflected on the related observation instrument or any other related observation documentation in the candidate's record.

Train staff who will be entering data for the EPP in the updated requirements and quality control measures for data reporting.

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PROACTIVE INSTRUCTIONAL PLANNING TECHNIQUES & INCLUSIVE PRACTICES FOR ALL STUDENTS PROVIDED

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
 - o 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 insufficient 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); §228.35(e)(2)(B)(9); and §228.35(e)(8)]
Evidence: The observation instruments used for the clinical experience did not capture proficiency in the standards for TEA to be able to determine if competency in evidence-based inclusive instructional practices was captured.

CORRECTIVE ACTION REQUIRED

The EPP must update coursework and requirements for the supervised clinical experience to meet the requirements in 19 TAC §228.30(c)(9) and TEC 21.044 (a-1) by 5:00 PM CST on Monday, June 10, 2024.

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1. 19 TAC §228.35(e)(2)(B)(ix) Skills Implementation: Successful Internship-Candidate Proficiency

Update the clinical experience processes, including revisions to the observation instrument used by field supervisors to evaluate candidates during the clinical experience, so that candidate proficiency in Component 10 and [Texas Education Code \(TEC\), §21.0443\(b\)\(1\) and \(2\)](#) requirements are captured during the clinical experience. Train and norm field supervisors on the requirements and responsibilities. Retain evidence per records retention requirements in 19 TAC §228.40.

RECOMMENDATIONS

- Strengthen the screening process for admission to include more than one staff member involved in making determinations about which applicants are admitted to ensure the screening process is equitable for all applicants.
- Work toward being further along with Quality Matters (QM) certification. The whole process should take three years with full accreditation by September 15, 2025. The EPP has maintained membership since 2018 and entered candidacy in fall 2022. There has not been any progress on the process per the information provided to the EPP and TEA via email by QM staff. Effective September 1, 2024, this becomes a compliance item if it is not complete by the date identified by QM and for that reason, the EPP should work toward full accreditation.
- Consider focusing FBE reflections more to ensure candidates are specifically looking for effective teaching practices during the interactive FBE. This will also improve the quality and rigor of FBE. Some candidates had extensive FBE reflections and others had just a few sentences.
- Consider rotating Advisory Committee members to get new/different perspectives. Add members to the Advisory Committee to include district HR staff and campus administrators where the EPP places candidates. The purpose is so the districts know and understand the requirements of the EPP and four reasons for doing this are:
 - To ensure the districts know and understand the FBE requirements so your candidates can interact with students during FBE.
 - To ensure the districts know and understand the requirements for qualified mentors and can complete your mentor teacher qualifications document and send it back to the EPP.
 - To ensure that the districts ECAP works with can know and understand the requirements for mentor training and to ensure that the EPP receives evidence of mentor teacher training, if provided by the district.
 - To ensure that campus administrators know, understand, and sign off on the recommendation or do not recommend.
- Norm field supervisors at local field supervisor training on all requirements/responsibilities to ensure consistency in the quality of field supervision, to ensure that all are using the same observation instruments, and clearly indicate pre- and post-observation conferences at each formal observation.
- Consider attending TEA Certification Officer training the next time it is offered to ensure the EPP knows, understands, and implements current data reporting requirements. The training has been offered in both face-to-face and virtual formats.
- 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 certification categories.

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- 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, Primary Point of Contact, 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, etc.).
- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about the current Texas Administrative Code.
- Continue to participate in training and webinars provided by the Division of Educator Preparation to ensure that the program staff is knowledgeable about current requirements and changes in the Texas Administrative Code.
- Continue to maintain communication with the education specialist assigned to the program.