



2021–2022 Continuing Approval Review Report Criswell College

Purpose

Texas Education Agency (TEA) Education Specialist, Lorrie Ayers, conducted a five-year Continuing Approval Review of the educator preparation program (EPP) at Criswell College on January 11, 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. Vickie Brown was identified as the program Legal Authority and primary contact for the review process. The Criswell College EPP was initially approved by the State Board for Educator Certification (SBEC) on June 10, 2016. At the time of the review, the EPP was rated Accredited. The risk level was Stage 3 (low). The EPP reported one finisher for the 2019-2020 reporting year and one finisher for 2020-2021.

At the time of the review, the Criswell College EPP was approved to prepare candidates in the Teacher class in the undergraduate (U) certification 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 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.

Dr. Brown was engaged in every aspect of the review process.

Data Analysis

Information concerning compliance with TAC governing EPPs was collected by a variety of means. A Status Report and related program documents were submitted to TEA on December 6, 2021. Additional EPP documents, including records for 6 candidates, were submitted on December 14, 2021. 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

- Self-reported data and information in the Status Report and documents provided by the EPP were reviewed for evidence of compliance with TAC related to Governance.
- Program staff reported they have an active advisory committee that meets twice a year to discuss the business of the EPP. A list of members reflected representation from each of the groups, including K-12 district and campus employees, a representative from a Regional Education Service center, representatives of the business community, and college employees. The advisory committee has supported the EPP in making updates to the admission screening process, developing evaluative rubrics, and identifying locations of candidate placements on K-12 campuses. The EPP meets the requirement in 19 TAC §228.20(b) for advisory committee.
- The governing body has provided sufficient support and resources to support the Criswell College program. The legal authority participation in all aspects of the review served as evidence of compliance. [19 TAC §228.20(c)]
- Criswell College has a published calendar of activities for the program. Evidence in the form of a calendar was found on the website. [19 TAC §228.20(g)]
- The Status Report was submitted as required in 19 TAC for the EPP Review as required. [19 TAC §228.10(b)(1)]
- There is no evidence the EPP has been amended or expanded since the initial approval in 2016.
- The EPP has published an exit policy in the candidate handbook but there was no evidence the policy is reviewed and signed by candidates at admission. [19 TAC §228.20(h)]

Compliance Issues to be Addressed (see Next Steps)

1. 19 TAC §228.20(h) Exit Policy

Action: The EPP must implement a process for candidates to review and sign the exit policy at admission. Retain the signed document in candidates’ records per the records retention requirement in 19 TAC §228.40(f).

Based on the evidence presented, the Criswell College EPP is not in compliance with 19 TAC Chapter 228 – Governance of Educator Preparation Programs.

Component II: Admission - 19 TAC Chapter 227

Findings

- The EPP has published a graphic called “Becoming a Teacher” on the website which contains information about the program and its processes. There is information about background checks, but the information is not sufficient to meet the requirement that a) the EPP has informed applicants and candidates they will be required to complete a fingerprint background check prior to employment as an educator; and b) the EPP has informed applicants of the



potential impact of criminal history on issuance of an educator certificate. [19 TAC 19 TAC §227.1(b)(1) and §227.1(d)(1)]

- The program has provided the notice required in 19 TAC §227.1(d)(3) that applicants and candidates may request a preliminary criminal history evaluation (PCHE) from TEA; however, the wording in EPP documentation suggests the PCHE is a requirement for all applicants and candidates which is not accurate. The program was advised to review and update the wording if necessary, so that they do not require all candidates to request a PCHE from TEA.
- Information about admission and completion requirements was published as required in 19 TAC §227.1(c)(1) and (2) in the “Becoming a Teacher” document; however, the completion information about the clinical teaching requirements reflected outdated information.
- Information about the effects of supply and demand forces on the educator workforce in Texas was published as required in 19 TAC §227.1(c)(3)(A). Information about the performance of the EPP was published but the information was not sufficient as a representation of the performance of the EPP over time which did not meet the requirement in 19 TAC §227.1(c)(3)(B).
- The “Becoming a Teacher” graphic identifies the admission point into the EPP as Spring of the sophomore year. Published admission requirements are:
 - GPA of 2.75 or higher;
 - Completion of at least 60 semester credit hours of college courses;
 - Participation in an admission screen; and
 - A completed application.

Records for 6 candidates were reviewed to verify the EPP is compliant with admission requirements in TAC. Transcripts were evidence each candidate was enrolled in Criswell College at the time of admission. Additionally, transcripts reflected that each candidate met or exceeded the published GPA requirement, had completed a minimum of 12 semester credit hours in the subject area of the certificate sought, and demonstrated basic skills, which met the related requirements in 19 TAC §227.10(a)(1), (3), (4) and (6).

- None of the 6 candidates had been admitted with credentials from out of country.
- An applicant for admission must be screened to determine appropriateness for the certification sought. Each of the candidates had completed an admission interview that was scored on a rubric which met the admission screening requirement in 19 TAC §227.10(a)(8).
- Each of the candidate’s records contained a completed admission application as required. [19 TAC §227.10(a)(8)]
- All applicants are required to be formally admitted. Signed written offers of admission were found in the records for each candidate as required in 19 TAC §227.17; however, the effective date of formal admission was not included in the written offer as required in 19 TAC §227.17(d). There was sufficient evidence that the EPP notifies TEA of candidates’ admission within the 7 calendar day time frame.

Compliance Issues to be Addressed (see Next Steps)

1. 19 TAC §227.1(b): Required Background Check



Action: Update information provided to applicants and candidates that fingerprint background checks are required for clinical teaching and for employment as an educator. Publish the information in a place that is reasonably accessible to both applicants and candidates such as the EPP webpage or the application for admission or other handout that can be downloaded or handed to individuals for review

2. 19 TAC §227.1(c) Notifications: EPP and Program Information

Action: Update information on the published document and any other applicable place such as program handbooks and training materials to reflect completion of the program requires 14 weeks of clinical teaching and not 12 weeks. And Update published information about the performance over time of the EPP to identify the actual performance and not the performance standard that must be achieved.

3. 19 TAC §227.1(d) Notifications: Preliminary Criminal History Evaluation

Action: Update information provided to applicants and candidates about the potential impact of criminal history on certification and revise the PCHE information so that it is not required but is an option for those who feel they need to pursue that action. Publish the notifications in a place that is reasonably accessible to applicants and candidates such as on the application for admission into EPP, on the EPP webpage, or on a handout

4. 19 TAC §227.17(d) Formal Admission: Dates

Action: Revise the formal written offer of admission so that the letter reflects the candidate's formal admission date. This date must also appear in the ECOS admission record as the date of admission.

Based on the evidence presented, the Criswell College EPP is not in compliance with 19 TAC Chapter 227 - Admission Criteria.

Component III: Curriculum – 19 TAC §228.30

Findings

- Course syllabi, published degree plans, coursework artifacts, curriculum alignment charts, and information from the Status Report were used to verify the EPP met requirements for curriculum.
- There is sufficient evidence the curriculum is based on educator standards and addresses the relevant Texas Essential Knowledge and Skills (TEKS) within the coursework identified in the Status Report. [19 TAC §228.30(a)]
- There is sufficient evidence the EPP uses assessments to measure candidate progress. [19 TAC §228.40(a)]
- Bibliographies in course syllabi were evidence the curriculum is research-based. [19 TAC §228.30(b)]
- There was sufficient evidence the EPP provides instruction in the additional subject matter required in 19 TAC §228.30(c) and (d) except the for these areas:
 - instruction regarding mental health, substance abuse, and youth suicide, as indicated in the TEC, §21.044(c-1); [19 TAC §228.30(c)(3)] and



- instruction in digital learning, including a digital literacy evaluation followed by a prescribed digital learning curriculum. [19 TAC §228.30(c)(8)]

Compliance Issues to be Addressed (see Next Steps)

1. 19 TAC §228.30(c) Mental Health Instruction

Action: Update coursework to include the required instruction in mental health, substance abuse, and youth suicide.

2. 19 TAC §228.30(c) Digital Literacy

Action: Update EPP training to include the required instruction in digital literacy. Include a curriculum that is aligned with ISTE standards, a digital literacy assessment to determine a candidate's degree of digital literacy, and a prescribed curriculum to address the candidate's deficiencies uncovered by the assessment.

Based on the evidence presented, the Criswell College EPP is not in compliance with 19 TAC §228.30-Curriculum.

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

Findings

Course syllabi, program information published on the EPP website, training and assessment samples, handbooks, and documentation of early field-based experience (FBE) and clinical teaching activities were reviewed as evidence of candidate preparation. The following were found:

- There is sufficient evidence the EPP provides candidates with adequate preparation and training that is sustained, rigorous, interactive and performance-based and that candidates complete requirements prior to being recommended for certification. [19 TAC §228.35(a)(1-3)]
- The EPP does not have established procedures for allowing relevant military experiences or procedures for allowing prior experience, education, or training. [19 TAC §228.35(a)(5)(A-B)]
- Coursework is delivered in a face-to-face format.
- Candidates for initial teacher certification receive over 300 clock-hours of required coursework and training which exceeds the requirement in 19 TAC §228.35(b).
- Candidates complete preservice coursework and training prior to beginning clinical teaching as required in 19 TAC 228.35(b).
 - Hours recorded on FBE logs for each of the 6 candidates provided evidence the candidates completed more than the 30 clock-hours of FBE required in 19 TAC §228.35(b)(1).
 - Information captured on FBE logs and in candidate reflections of the experiences provided sufficient evidence the program has an FBE process that meets requirements in 19 TAC 228.35(e)(1); however, it is recommended the program update the FBE log to capture evidence of the 15 interactive hours as that information was only captured in the reflections of the candidates.
- Four of the 6 candidates had completed clinical teaching at the time of the review.



- The records reflected candidates completed assignments on approved campuses and in subject area and grade level classrooms appropriate for the certificate sought by the candidate.
- There was insufficient evidence to conclude the number of days the candidates completed in clinical teaching. Candidates are not required to complete logs, and information provided in various program resources were inconsistent in naming clinical teaching requirements.
- There was sufficient evidence the EPP captures candidate proficiency in the standards during the clinical teaching experience which meets the requirement in 19 TAC §228.35(e)(2)(A)(iii); but it was noted that the observation instrument used to capture candidate performance is fairly general. It was recommended to EPP staff that they should add more definition to the standards addressed which will also provide a foundation for more detailed feedback to candidates.
- Candidates' records contained evidence the cooperating teachers conduct midpoint and final evaluations of candidates; however, there was no evidence the program has implemented the requirement to capture a recommendation of candidate success in clinical teaching from the cooperating teachers or the field supervisor as required in 19 TAC §228.35(e)(2)(A)(iii).
- None of the candidates had completed clinical teaching in an out-of-state placement.
- Each of the four candidates who completed clinical teaching was assigned a cooperating teacher; however, the qualifications of the cooperating teachers could not be verified. Teaching certificates were provided as evidence the cooperating teachers were certified but there was no additional evidence of experience or accomplishment which does not meet the requirement in 19 TAC §228.2(14).
- There was sufficient evidence the EPP provides training to cooperating teachers; however, training in coaching and mentoring candidates could not be identified in the training as required in 19 TAC §228.2(14). There was insufficient evidence the program consistently ensures cooperating teachers complete training within three weeks of being assigned to the candidate. The record for one of the four candidates was missing this evidence.
- Sufficient evidence was provided that each clinical teacher candidate was provided a field supervisor that met qualification requirements in 19 TAC §228.2(18) and was trained as required in 19 TAC §228.35(g).
- A sign in sheet for a "clinical teacher first meeting" and emails were sufficient evidence that field supervisors make first contact with clinical teacher candidates within the first three weeks of the assignment and provide ongoing coaching and support throughout the assignment which meets those requirements in 19 TAC §228.35(g).
- The field supervisor conducted formal observations of each of the four candidates during the clinical experience. Observation documentation was found in the records for each candidate. The field supervisor conducted post-conferences with each candidate following an observation; however, there was no evidence that a pre-conference was conducted before each observation as required in 19 TAC §228.35(g).



- Observation documents for each of the four candidates reflected the field supervisor captured educational practices observed and provided feedback from the observation to the campus cooperating teacher as required in 19 TAC §228.35(g).
- Dates and times recorded by the field supervisor on observation documents were evidence that each candidate received at least three formal observations that were 45 or more minutes in duration which meets the requirement for field supervision in 19 TAC §228.35(g)(1), (2), and (7).

Compliance Issues to be Addressed (see Next Steps)

- 1. 19 TAC §228.35(a)(5)(A) Coursework & Training: Prior Coursework Policy-Military
19 TAC §228.35(a)(5)(B) Coursework & Training: Prior Coursework Policy-Non-Military**
Action: Develop EPP policy for a) allowing military veteran candidates to credit verified military service, training, or education toward EPP requirements; and b) allowing candidates who are not military service members or military veterans to substitute prior or ongoing service, training, or education toward EPP requirements.
- 2. 19 TAC §228.35(e)(2)(A)(i) Skills Implementation: Clinical Teaching Duration**
Action: Update the clinical teaching requirements and process to include capturing evidence candidates have completed at least 14 weeks of clinical teaching. Revise related notifications and EPP documents to reflect the correct requirements. Retain evidence of clinical teaching requirements completed in candidates' records per the records retention requirement in 19 TAC §228.40(f).
- 3. 19 TAC §228.35(e)(2)(A)(iii) Skills Implementation: Clinical Teaching is Successful-Recommendation**
Action: Update the clinical teaching process to collect written recommendations from the cooperating teacher and field supervisor that the candidate was successful in the clinical teaching experience. Develop a process for collecting the documentation required when the candidate is not successful. Retain evidence in candidate's records per the records retention requirement in 19 TAC §228.40(f).
- 4. 19 TAC §228.2(14) Campus Supervision: Qualifications of Cooperating Teachers**
Action: Update the process for ensuring the cooperating teachers meet the qualification requirements. Retain evidence of requirements met in candidates' records per the records retention requirement in 19 TAC §228.40(f).
- 5. 19 TAC §228.35(f) and §228.2(12) Campus Supervision: Training Mentors, Cooperating Teachers, and Site Supervisors**
Action: Update the training provided to cooperating teachers so that it includes information on how to coach and mentor candidates. Additionally, update the process for providing training to cooperating teachers so that training is provided to each within 3 weeks of assignment to the candidate. Capture evidence of training completed and retain in candidates' records per the records retention requirement in 19 TAC §228.40(f).

Recommendations

- Update the FBE log to capture evidence of the 15 interactive hours so the information is captured in a more concrete way than in candidate reflections.



- Add more definition to the standards addressed on the field supervisor observation form to capture more specific information about candidate proficiency and to provide a foundation for more detailed feedback to candidates in the post-observation conference.

Based on the evidence presented, the Criswell College EPP 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

- Degree plans were benchmarks that measured candidate progress. [19 TAC §228.40(a)]
- The EPP has structured assessments to measure candidate progress. Samples of performance assessments and rubrics were reviewed as well as program information identifies candidates are required to complete a culminating portfolio that is scored by EPP staff. [19 TAC §228.40(a)]
- The EPP has processes in place to ensure that candidates are prepared to be successful in their certification exams. Program staff identified they encourage candidates to begin preparing for their TExES practice tests during the fall semester of their senior year. After EDU 410 Clinical Teaching Practicum is completed, candidates are eligible to begin taking practice tests in order to be approved for their certification tests. Candidates must pass an official TExES Practice Test with a score of 80% before the Program Director approves them for their first testing attempt. Three candidates had received approval to test at the time of the review. Scored practice tests were found in the records for those three candidates and one additional candidate.
- Test approval dates and admission dates in ECOS were evidence candidates had been formally admitted prior to receiving test approval as required in 19 TAC §228.40(d).
- The EPP has engaged the advisory committee in making improvements to various processes in the EPP. [19 TAC §228.40(e)]
- All candidate records for the review served as evidence that the EPP retains records as required for a period of five years from admission to completion or withdrawal from the program. [19 TAC §228.40(f)]

Compliance Issues to be Addressed

None

Recommendations

- Implement additional evaluative tools to assess the effectiveness of the program components including ongoing refinement of curriculum.

Based on the evidence presented, the Criswell College EPP is 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).

- Candidates and EPP staff had signed an attestation of understanding and adhering to the Texas Educators' Code of Ethics.

Compliance Issues to be Addressed

None

Based on the evidence presented, the Criswell College EPP is in compliance with 19 TAC §228.50 - Professional Conduct.

Component VII: Complaints Process – 19 TAC §228.70

Findings

- Per 19 TAC §228.70(b), the EPP complaints process is on file at TEA. The EPP was encouraged to submit an updated copy of the policy to TEA as policy changes occur.
- The complaints process is published in the candidate handbook posted on the EPP website; however, the candidate handbook is not a reasonably accessible location for individuals and entities that are not EPP candidates. The program was advised they must update the EPP website to transparently publish the EPP complaints process with a link to the TEA complaints process

Compliance Issues to be Addressed (see Next Steps)

1. 19 TAC §228.70(b)(2-4) Complaints Process: Posted

Action: Publish the complaints process on the EPP website. Include a link to the TEA complaints process.

Recommendations

- If the complaints process is revised, provide TEA the updated copy for the files.

Based on the evidence presented, the Criswell College EPP is not in compliance with 19 TAC §228.70 – Complaints Process.

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

Findings

Three of the 6 candidates reviewed had achieved a Standard certificate. Transcripts and degree plans were reviewed as evidence the EPP is compliant with certification requirements in TAC.



- Records for each of the three candidates contained a transcript that reflected program completion and a conferred bachelor's degree which meets the requirement in 19 TAC §230.13(a)(1) and (2).
- The program offers certification through the undergraduate route so there were no Intern or Probationary certificates recommended.

Compliance Issues to be Addressed

None

Based on the evidence presented, the Criswell College EPP is in compliance with 19 TAC Chapters 228 and 230 – Certification Procedures.

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

Findings

Educator preparation programs (EPPs) ...field supervisors, administrators, mentors, site supervisors, and cooperating teachers shall provide to the TEA staff all data and information required by 19 TAC Chapter 229, as set forth in 19 TAC §229.3(e) and §229.3(f) of this section.

- The EPP has consistently submitted all required data by the deadline of September 15 each year.
- The EPP has not consistently reported data accurately when compared with data in candidate and EPP records.
 - Observation durations for each of the four candidates that completed clinical teaching were not accurate because the EPP reported both the observation and the post-conference time as one number. EPP staff were advised the observation must be reported without adding pre-conference or post-conference time to the duration reported.
 - Four of the 6 candidates were admitted as pursuing the ESL supplemental; however, ESL was not listed as an enrollment area on the Finisher Records List. Staff were advised to report all enrollment areas on the Finisher Records List.
 - The number of subject-specific semester credit hours completed by the candidates prior to admission was reported inaccurately for each of the 6 candidates when compared with their transcripts. The program reported all hours completed by candidates instead of the subject-specific hours. Program staff were advised to report only hours in the subject area of the certificate sought.
 - GPA data was reported accurately when compared with GPA in candidates' transcripts.
 - Candidate admission dates could not be verified because dates were not included in the formal offer of admission.

Compliance Issues to be Addressed (see Next Steps)

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



Action: Implement a process to report all candidate data and EPP records accurately in ECOS when compared with the data in the candidate and EPP records. Additionally, implement a quality check step to verify accuracy before submitting final data to TEA

Recommendations

- None

Based on the evidence presented, the Criswell College EPP 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 to add new certificate categories 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.

PROGRAM RECOMMENDATIONS FOR ALL EPPS

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

I, the legal authority for the Criswell College EPP, have reviewed the Report and agree that all required corrections will be made on or before November 26, 2022.

Signature of Legal Authority

Date

Printed Name of Legal Authority

Date