



## Compliance Audit Report 2012-2013 ATC-East Houston Initial Teacher Certification Program

According to Texas Administrative Code (TAC) §228.10(c), "An entity approved by the SBEC under this chapter...shall be reviewed at least once every five years under procedures approved by the Texas Education Agency (TEA) staff; however, a review may be conducted at any time at the discretion of the TEA staff." Per 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 Texas Education Agency administers Texas Administrative Code required by the Texas legislature for the regulation of all educator preparation programs in the state. Please see the complete Texas Administrative Code at [www.tea.state.tx.us](http://www.tea.state.tx.us) for details.

**Contact Information:** Jackie L. Smith

**County/District Number:** 101-716

**SBEC Approval Date:** January 13, 2006

Texas Education Agency Education Preparation Manager, Sandra Jo Nix, and Scott Lewis, State Director Title II, conducted a compliance audit of ATC-East Houston, 14515 Luthe Rd, Houston, Texas, 77039 on October 9-11, 2012, as required by Texas Administrative Code (TAC) §228.1(c). The above street address is the location of Bakersfield Pipe Supply Company. The program stated that this was the physical location of their program and the compliance audit was conducted at this site. The candidate's records were on the premise; however, there was no sign on the building identifying that this was the program's location. The focus of the compliance audit was the Generalist EC-6 certification area. The following are findings and recommendations for program improvement.

### **Scope of the Compliance Audit:**

The scope of this audit was restricted solely to verifying compliance with Texas Administrative Code §227, §228, §229, and §230.

### **Data Analysis:**

Information concerning compliance with TAC governing educator preparation programs was collected by various qualitative and quantitative means. A self-report was submitted to TEA on September 17, 2012. An onsite review of documents, student records, online course materials, and curriculum correlations charts provided evidence regarding compliance. In addition, TEA sent electronic questionnaires to ATC-East Houston stakeholders. No advisory committee

members responded; however, eight (8) out of thirty-five (35) educator candidates, two (2) out of five (5) principals, and four (4) out of thirteen (13) cooperating teachers/mentors responded to the questionnaires. Qualitative methods of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. Evidence of compliance was measured using a rubric aligned to Texas Administrative Code.

### **Opening and Closing Session:**

The opening session on October 11, 2012, was attended by Jackie Smith, Program Director, and Debbie Hensarling, Program Coordinator. ATC-East Houston is a subsidiary of Teaching Texas Teachers, LLC owned by Ms. Smith and Ms. Hensarling. The closing session was held on October 12, 2012, and was attended by the same individuals.

## **COMPONENT I: COMMITMENT AND COLLABORATION - Texas Administrative Code (TAC) §228.20**

### **FINDINGS:**

Program support was indicated by the governing body of ATC-East Houston per TAC §228.20(c) as evidenced by the participation and cooperation of Jackie Smith and Debbie Hensarling in various stages and aspects of the compliance audit. The Texas Education Agency had a concern about the location of the audit. In previous discussions, Ms. Smith indicated that the educator preparation program was operated out of her home and correspondence was sent to P. O. Box 24008, Houston, TX 77229. In discussions with Ms. Smith about TEA not being able to visit a home for a state audit, she indicated that she had secured a physical address at the Luthe location. When Ms. Smith was asked, if she was planning to interview prospective candidates at the Luthe address, she responded that she was.

The advisory committee consists of three (3) members. One (1) member of the advisory committee is from a local school district, one (1) member represents an institution of higher education, and one (1) member represents business and community interests. ATC-East Houston meets TAC §228.20(b) requirements for advisory committee composition.

Advisory committee meetings were held on September 10, 2011, May 5, 2012, and September 8, 2012. Three members attended each of these meetings. Agendas, minutes, and attendee records were available as evidence of compliance. At the September 2011 meeting, the advisory committee agenda and minutes reflected a discussion of enrollment numbers, Highly Qualified status, TEA updates, and the class calendar. At the May 2012, meeting, the financial report was discussed and voted on by the advisory committee, TEA updates were provided, the TEA rule review was discussed, and the class schedule was presented and discussed. At the September 8, 2012, meeting, the advisory committee discussed an enrollment report, TEA updates, a review of the compliance audit information, and the class schedule. Participation of the advisory committee in evaluation of the overall program was not evident in provided documentation.

In a review of the self-report with the program staff, no advisory committee training had been provided which would outline and help facilitate the members' roles and responsibilities. In addition, no advisory committee members returned their questionnaires, so input from the members themselves as to their understanding of their involvement with the governance of the program was not available. However, ATC-East Houston presented an invitation letter sent to each member of their advisory committee which outlined the members' roles and responsibilities.

The next meeting is scheduled for May 4, 2012. A tentative agenda was available for program specialists to review.

Because of the lack of evidence of the advisory committee's participation in program evaluation, the program did not meet all the indicators for compliance in this component.

**Based on the evidence presented, ATC-East Houston is not in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.**

## **COMPONENT II: ADMISSION CRITERIA - Texas Administrative Code (TAC) §227.10**

### **FINDINGS:**

According to ATC-East Houston's website and self-report, to be admitted into the teacher certification program, a candidate must meet the following criteria:

- Complete an application [TAC §227.10(6)];
- Provide official transcripts reflecting a Bachelor's Degree [TAC §227.10(c)];
- Provide three professional references;
- Provide a written composition;
- Submit test results of the TOEFL if the applicant is from out-of-country [TAC §227.10(5)];
- Complete the Watson-Glasser Critical Thinking Test;
- Attain a grade point average of 2.5 on 4.0 scale overall or 2.7 on a 4.0 scale in the last 60 hours [TAC §227.10(a)];
- Present acceptable THEA scores if not exempt by the Texas Success Initiative [TAC §117.10(4)];
- Complete an interview [TAC §227.10(6)];

A review of eleven candidate records found evidence that the published admission criteria on the website and in the application packet was not consistently implemented. The program accepted unofficial or copies of transcripts from university sites. Some transcript grades had been altered on the copies provided to the program. In addition, the grade point average used to admit candidates into the program was 2.5 overall and 2.5 in the last 60 hours, not the 2.7 in the last 60 hours as indicated in admission information on the program's website [TAC §227.10(a)(3)(B)]. There was some question as to how the program calculated the GPA for applicants. For candidates admitted with less than the required grade point average, there was no documentation of what the exception to the minimum GPA requirement was or that the director approved the exception.

In addition, results of the Watson-Glasser Critical Thinking Test were found in only two (2) out of eleven (11) candidate folders reviewed. No other interview was utilized with the applicants.

One out-of-country applicant file whose first language was not English was reviewed. A Test of English as a Foreign Language (TOEFL) [TAC §230.11(b)(5)(C)] was not evident. The candidate completed a degree at a non-English speaking university and, as a result, had transcripts from an out-of-country, non-English speaking university evaluated by an approved evaluation service [TAC §2227.10(e)]. Evidence of the evaluation was found in the candidate's records. However, ATC-East Houston presented a certificate of English Proficiency from the University of Cambridge, Local Examinations Syndicate, International Examinations, stating that the applicant was proficient in English. However, the TAC says that the candidate must be evaluated using an instrument approved by the TEA. The only approved instrument at this time is the TOEFL.

Other admission requirements such as a resume, letters of reference, TSI or THEA scores were documented as required by TAC rules.

The self-report submitted by ATC-East Houston stated that general information about the ATC-East Houston and its admission criteria can be found on its website and in a published brochure [TAC §227.10(a)(7)].

**Based on the evidence presented, ATC-East Houston is not in compliance with TAC 227 - Admission Criteria.**

### **COMPONENT III: CURRICULUM - Texas Administrative Code (TAC) §228.30**

#### **FINDINGS:**

ATC-East Houston is approved to offer teacher certification in six (6) content areas and three (3) supplemental areas. They indicated that two (2) of the six (6) content areas were currently inactive: Mathematics 4-8 and Math/Science 4-8. For the purpose of this compliance audit, the Generalist EC-6 certification was selected for an in-depth curriculum review.

ATC-East Houston identified three instructors who assisted in course creation, presentation and facilitation. Their credentials were presented for review and it was verified that all the instructors have advanced degrees, current teaching credentials relevant to the certification fields they are instructing, and public school experience.

In reviewing the ATC-East Houston Generalist EC-6 syllabi and alignment charts, it was noted that the educator standards for the Generalist EC-6 were the curricular basis for instruction as required by TAC §228.30(a). In reviewing the alignment charts and materials used in the Generalist EC-6 instruction, it was noted that the book, *Preparing to Teach Texas Content Areas the TExES EC-6 Generalist and ESL Supplement* by Janice L. Nath and John M. Ramsey was used as the foundation content. This material guides the candidates through the eight content areas: language arts and reading, mathematics, social studies, science, art, music, health and physical education, and theatre arts. Through sample lesson plans, lesson plan prompts, classroom observation forms, and practice questions, each content area is concretely applied to classroom practice. The guide also helps students understand many of the basic theories and methodologies behind best practices for each content area. The book concludes with preparatory information on the ESL supplemental certification.

In further review of the curriculum, it was verified that the curriculum did address the Texas Essential Knowledge and Skills (TEKS) as required by TAC §228.30(a). Course syllabi and alignment charts for Pedagogy and Professional Responsibilities EC-12 curriculum verified coverage of the seventeen mandated topics as prescribed by TAC 228.30(b). Reading

instruction is provided for all candidates. The seventeen topics were verified by locating the specific topics in the content of the coursework syllabi, curriculum materials, and in the alignment chart.

Assessments and assignments for the coursework were found in the curriculum material and in the syllabi.

**Based on evidence presented, ATC-East Houston is in compliance with Texas Administrative Code Section §228.30 – Educator Preparation Curriculum.**

## **COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT - Texas Administrative Code (TAC) §228.35**

### **FINDINGS:**

Currently, the ATC-East Houston's initial teacher preparation program is delivered in a face-to-face format. According to the self-report, the total clock hours necessary for certification is 314. Six (6) clock hours of Pedagogy and Professional Responsibilities (PPR) test preparation and six (6) clock hours of content test preparation were provided outside of coursework on designated Saturdays. Program clock hours were verified by review of the self-report, discussions with program staff, and the course syllabi. There were tracking charts for each candidate reflecting completed modules in order to verify that each candidate acquired a minimum of 300 clock hours [TAC §228.35(a)(3)]. However, these were kept by the candidate as a reference, not by the program as verification of progress through the program.

The thirty (30) clock hours of field-based experiences prior to clinical teaching or internship are required by TAC §228.35 (a)(3)(A). No observation logs or other evidence of completion of the 30 clock hours were present in the candidates' records. The program reported using up to 15 hours of field-based experience by video. However, no documentation was presented to verify video experience hours.

Clinical teaching [TAC §228.35(d)(2)(B)] consists of twelve weeks. Evidence was present in the form of observation documentation in the individual candidate's record. The observation form recorded the campus where the candidate was placed, the mentor assigned, the principal, and the field supervisor assigned. Clinical teaching occurs only in an actual school setting rather than a distance learning lab or virtual school setting as prohibited by TAC §228.35(d)(2)(C)(ii). A handbook was prepared for candidates who would complete clinical teaching. However, at the time of the compliance audit, there were no clinical teachers for the 2012-2013 academic year.

ATC-East Houston also utilizes an internships of 180 days as prescribed by TAC §228.35. The observation forms contained the information listed above and was found in candidates' records. Internship occurs only in an actual school setting rather than a distance learning lab or virtual school setting as prohibited by TAC §228.35(d)(2)(C)(ii). Candidates were provided handbooks for Internship which included: Guidelines for observations, monthly post-observation conferences, mentor/intern conference logs, and examples of the Supervisor Visitation Log.

According to TAC §228.35(e), ATC-East Houston is responsible for providing mentor training that is scientifically-based or verify that training has been provided by a school district or education service center. ATC-East Houston presented an observation log that listed the one-

on-one training provided by the field supervisor. In addition, a certificate of mentor training was provided for one mentor by a school district. Mentor training materials were presented for review.

TAC §228.35(f) states that supervision of each candidate shall be conducted with the structured guidance and regular ongoing support of an experienced educator who has been trained as a field supervisor. There is one field supervisors who has current Texas certification and at least five years of school experience. Training was provided for the field supervisor by utilizing the PowerPoint provided by the Texas Education Agency.

Initial contact with the candidate within the first three weeks of placement by the field supervisor was verified for the 2012-2013 academic year on the field supervisor logs. However, there was no evidence of contact within the first three weeks of the assignment in candidates' records prior to 2012-13 as required by TAC §228.35(f).

A total of three formal observations [TAC §228.35(f)(4)] must be conducted during the clinical teaching assignment and must be at least 45 minutes in duration [TAC §228.35(f)]. Internship assignments require two formal observations the first semester and one the second semester. Documentation of formal observations evaluations were found in the candidates' records. Candidates' records indicated that more than the minimum number of observations were conducted by the program. However, the candidates' records did not differentiate who was in clinical teaching or in internship situations.

TAC §228.35(f) also states that the first observation must be conducted within the first six weeks of clinical teaching/ internship placement. Verification was not made since the candidate's records prior to 2012-13 did not contain the start date for placement. On the 2012-2013 field supervisor's log, a start date is required.

The ATC-East Houston observation form is a three part NCR which provides copies of observations to the candidate, program records, and campus administrator. It is the responsibility of ATC-East Houston to provide a copy of the written feedback to the candidate's campus administrator as required by TAC §228.35(f). The candidate, the field supervisor, and the campus administrator sign and date the observation form.

Additional informal observations and coaching is provided by the program as specified in TAC §228.35(f) and is logged on the Field Supervisor's Log for each candidate beginning the 2012-13 academic year. Evidence of previous coaching and support was not located in candidates' records.

**Based on evidence presented, ATC-East Houston is not in compliance with Texas Administrative Code Section §228.35 – Program Delivery and On-Going Support.**

## **COMPONENT V: PROGRAM EVALUATION – Texas Administrative Code (TAC) §228.40**

### **FINDINGS:**

ATC-East Houston has a candidate benchmarking process as prescribed by TAC §228.40(a). Evidence presented to support candidate benchmarking was submitted by a Program Milestone Checklist which identifies benchmarks as application, content courses, pedagogy and professional development, internship or clinical teaching which includes a mid-year conference. Currently the candidate is responsible for tracking his/her progress through the program and

using the checklist as a reminder of the work that needs to be completed. ATC-East Houston currently does not update or maintain this progress tracking system in order to ensure that the candidate is progressing successfully through its program.

Readiness for TExES testing [TAC §228.40(b)] is determined by completion of the content and PPR review sessions.

Evaluation of the program’s design and delivery of the curriculum should be continuous per TAC §228.40(c). Information such as performance data, scientifically-based research practices, and the results of internal and external assessments should be included in the evaluation process. ATC-East Houston submitted an overall Plan for Evaluation in their self-report which detailed the indicator, program’s measurement tool, procedures, timeline for data collection, and the personnel responsible. However, it could not be verified that evaluative information was shared with the advisory committee as required.

According to TAC §228.40(d), the program will retain documents that evidence a candidate’s eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after program completion. ATC-East Houston maintains its records for five years in paper format in a safe and secure environment.

**Based on evidence presented, ATC-East Houston is not in compliance with Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates of Candidates for Certification and Program Improvement.**

**COMPONENT VI: Professional Conduct (TAC) §228.50**

TAC §228.50(a) states that during the period of preparation, the educator preparation entity shall ensure that the individuals preparing candidates and the candidates themselves demonstrate adherence to Chapter 247 of this title (relating to Educators’ Code of Ethics). The staff of ATC-East Houston signed Texas Educators Code of Ethics letters. Candidates were provided instruction in the Texas Code of Ethics through their coursework and each had a signed ethics letter in his/her candidate records.

**Based on evidence presented, ATC-East Houston is in compliance with Texas Administrative Code §228.50 – Professional Conduct**

**Texas Administrative Code §229**

**Current Accreditation Status**

ATC-East Houston currently has a status of “Accredited”.

**Standard I: Results of Certification Exams**

<b>Pass Rate Performance:</b>	2009-2010	2010-2011	2011-2012
	70% Standard I	75% Standard I	80% Standard I
Overall:	100%	100%	100%

## **Program Recommendations:**

The following are recommendations based on the findings of the Texas Education Agency. If the program is NOT in compliance with any identified component, consult the Texas Administrative Code and correct the issue IMMEDIATELY. A Compliance Status Report will be required every sixty days until the compliance issues are totally corrected.

Program recommendations are suggestions for general program improvement and no follow up is required.

## **PROGRAM COMPLIANCE RECOMMENDATIONS:**

### **TAC 228.20- Governance**

- Involve advisory committee members in evaluation of the overall program operation.

### **TAC 227.10 – Admission**

- Accept only official transcripts from applicants. Retain this information in the candidates' records;
- Conduct a standardized interview with each applicant and evaluate his/her responses with a rubric. Retain this information in the candidates' records;
- Set admission standards for GPA and be consistent in publishing correct information in all application material and on the website;
- Use other identified screening instruments for all applicants. Retain the results of the screening in all candidates' records;
- Require the TOEFL for all out-of-country applicants. Retain the results in the candidate's records.

### **TAC 228.35 – Program Delivery and On-Going Support**

- Maintain records to verify 30 hours of field-based observations that includes the candidate's name, date, site and grade level of observation, activity observed, and length of time of the observation and the observed teacher's signature or initials. Retain this information in the candidates' records;
- Maintain records to verify first contact with the candidate during the first 3 weeks of placement. Retain this information in the candidates' records;
- Maintain records to verify first formal observation during the first six weeks of placement. Retain this information in the candidates' records.

### **TAC 228.40 – Program Evaluation**

- Institute a process that allows ATC-East Houston to monitor the benchmarks for each candidate for completion of the 300 clock hours;

- Share formal overall program evaluation results with the advisory committee annually.

## **GENERAL PROGRAM RECOMMENDATIONS:**

### Component I. Recommendations:

- Expand the advisory committee into include district human resource directors, cooperating teachers/mentors, principals, and candidates;
- Conduct advisory committee training or prepare a handbook to ensure that advisory committee members understand their roles and responsibilities;
- As the advisory committee expands, seek creative ways to encourage advisory committees participation such as Go-To-Meeting, Skype, or conference calls;
- Provide more detailed information in the agendas and minutes to ensure that all TAC required topics are adequately reflected.

### Component II Recommendations:

- Construct a checklist including a completion date to ensure that all candidates have completed all admission requirements;
- Ensure that correct admission information is clearly identified on the ATC-East Houston's website;
- Consider moving to an electronic record keeping system to aid in candidate record storage.

### Component IV Recommendations:

- Have students sign a FERPA agreement allowing the program to share information with the cooperating teacher/mentor and district administration.

### Other Recommendations:

- Attend webinars that pertain to the operation of the teacher education program and certification of educators;
- Participate in stakeholder meetings on Texas Administrative Code for rule revision.