



**Compliance Audit Report
2011-2012
Houston Independent School District
Alternative Certification Program
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 rules required by the Texas legislature for the regulation of all educator preparation programs in the state. Please see the complete Texas Administrative Code rules at www.tea.state.tx.us for details.

Contact Information: Melanie Evans-Smith, Director of Alternative Certification

County/District Number: 101-912

SBEC Approval Date: 1985

Program Specialists, Vanessa Alba and Mixon Henry, conducted a Texas Education Agency Compliance Audit of Houston Independent School District Alternative Certification Program (HISD-ACP) on January 11-13, 2012. The focus of the compliance audit was the initial alternative teacher certification program and the Physical Science (Grades 8-12) certificate. The following are findings and recommendations for program improvement.

Data Analysis:

Information concerning compliance with Texas Administrative Code (TAC) governing educator preparation programs was collected by various qualitative means. A self-report was submitted to the Texas Education Agency on December 13, 2011. An on-site review of documents, student records, course material, online courses, and curriculum correlations charts provided evidence regarding compliance. In addition, electronic questionnaires were sent to HISD-ACP stakeholders by TEA staff. Nine (9) out of twenty (20) advisory committee members; thirty (30) out of one hundred thirty-one (131) teacher interns; six (6) out of six (6) field supervisors; twenty-nine (29) out of one hundred thirty (130) campus principals; and thirty-seven (37) out of one hundred thirty-one (131) mentor teachers responded. 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 correlated to Texas Administrative Code.

Opening and Closing Session:

The opening session on January 12, 2012, was attended by twenty-five (25) individuals, including the following HISD-ACP leadership staff: Melanie Evans-Smith, Senior Manager Professional Support & Development; Pearl Black, ACP Program Manager; Wally deCovarrubia, ACP Program Manager; and Antanita Harvey, HISD Certification Officer. In addition, Zoe Stemm-Calderon, Assistant Superintendent of Professional Development, was in attendance. The closing session on January 13, 2012, was attended by twenty (20) people, including the leadership team noted above. Among others, Superintendent of Schools, Terry B. Grier, Ed.D. was also in attendance at the closing session via audio webinar.

COMPONENT I: COMMITMENT AND COLLABORATION - Texas Administrative Code (TAC) §228.20 – GOVERNANCE OF EDUCATOR PREPARATION PROGRAMS

FINDINGS:

Program support was indicated by the governing body of HISD-ACP per TAC §228.20(c) as evidenced by the participation of Melanie Evans-Smith, Wally deCovarrubia, Pearl Black, and Antanita Harvey in various aspects of the compliance audit.

The advisory committee consists of seventeen (17) members. Eleven (11) members are from local school districts, one member (1) from an education service center, and four members (4) from institutions of higher education. There were no members representing community/business interests. HISD-ACP meets TAC §228.20(b) requirements for advisory committee composition.

The first meeting of the advisory committee for the academic year was held on September 27, 2011. Attendance logs and sign-in sheets were presented as evidence that members from the following stakeholder groups attended the meeting: the HISD-ACP team; advisory committee members; and professional support and development team members. The agenda and typed minutes reflected the following items were discussed: the Annual Performance Report; ACP new hires; curriculum alignment in terms of Teach for America (TFA) and non-TFA schools; summer institute reading course; and opportunities for advisory committee members to provide feedback. A second meeting for the academic year was held on December 6, 2011. The purpose of this meeting was to discuss program goals & performance measures, on-going training for candidates, Pedagogy and Professional Responsibility (PPR) test preparation, an update on the educational diagnostician certification, candidate folder reviews, and an update to advisory committee members regarding the TEA compliance audit. An agenda, typed minutes, and sign-in sheets were available as evidence noting the discussion of the aforementioned topics. The next advisory committee meeting is scheduled for May 19, 2012. Advisory committee sign-in sheets were presented as evidence in the document review dating back to 2006. One hundred percent (100%) of the advisory committee members indicated in their questionnaire that they did meet two or more times per academic year. The program meets the requirements for conducting a minimum of two advisory committee meetings per academic year as required by TAC §228.20(b).

The advisory committee members reported in their questionnaire that they do assist in the design (71.4%), delivery, evaluation and major policy decisions (100%) of the educator preparation program.

The advisory committee cited some of the strengths of the HISD-ACP program as strong admission requirements, supportive field supervisors, and an experienced program staff. Some areas cited for improvement included the need to measure the success of the program by the achievement of students in the interns' classrooms and the need to increase the advisory committee involvement in program decision-making and evaluation.

Based on the evidence presented, Houston ISD-ACP is in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.

COMPONENT II: ADMISSION CRITERIA - Texas Administrative Code (TAC) §227.10 - ADMISSION AND CERTIFICATION CRITERIA

FINDINGS:

According to the self-report, website and document review, to enter the HISD-ACP alternative teacher certification program, an applicant must have a four year degree from an accredited institution of higher learning [TAC §227.10(a)(2)]; a passing score on PACT [TAC §227.10(c)]; an overall GPA of at least 2.5 or 2.5 in the last 60 hours [TAC §227.10(A)]; twelve (12) semester credit hours in a content field [TAC §227.10(C)]; show mastery of basic skills proficiency [TAC §227.10(4)]; exhibit adequate oral communication skills [TAC §227.10(C)(5)]; submit an application [TAC §227.10(6)]; participate in an interview [TAC 227.10(6)]; and meet any other requirements the program determines [TAC §227.10(7)].

Out-of-country applicants whose first language is not English must demonstrate competence in the English language by submission of an official minimum score of 26 or higher on the written or computer-based Test of English as a Foreign Language (TOEFL). In addition, the applicant must have his/her transcripts from an out-of-country non-English speaking university evaluated by an approved evaluation service [TAC §227.10(5)].

TEA program specialists reviewed twenty-one (21) applicants' records to verify compliance with admission criteria. The applicant records were pre-selected prior to the audit as a result of pre-audit preparation and possible discrepancies.

All current interns' records contained the following documentation to verify compliance: an original transcript reflecting that a baccalaureate degree had been conferred prior to acceptance into the program [TAC §227.10(a)(2)] and a GPA ranging from 2.57-3.91 [TAC §227.10(a)(3)(A)].

The pre-admission content test (PACT) route is not a requirement in all cases. In cases where it is required (4 files), applicants passed the appropriate PACT exam and evidence was documented in applicants' records. For applicants who did not take the PACT route for admission (5 files), undergraduate coursework hours served as documentation of content compliance [TAC §227.10(a)(3)(C)].

Because the program requires that applicants show mastery of basic skills, applicant records were reviewed for compliance. For applicants who had a GPA of 3.0 or higher, the Texas Success Initiative (TSI) was used. Those with a GPA below 3.0 were required to take the Texas Higher Education Assessment (THEA). Basic skills scores were verified in the files reviewed and met the requirements of TAC §227.10(a)(4).

Applicant records were reviewed to verify that each contained a signed application. It was found that all twenty-one (21) records reviewed contained a signed application. Applicants are also required to participate in a one-to-one abridged version of the Haberman interview that is scored utilizing a rubric. The application and interview process met the requirements of TAC §227.10(a)(6).

It was noted that none of the candidates were admitted with a grade point average of less than 2.5. As a result, evidence was not required that admission of 10% of the candidates were approved by the program director and were granted because of extraordinary circumstances as allowed by TAC §227.10(a)(3)(B).

The self-report submitted by HISD-ACP stated that recruitment was conducted through the website, career fairs, brochures, and media outlets. The documentation provided to support the information was in a review of the HISD-ACP website, in a copy of the brochure provided, and in PowerPoint presentation notes. A recruitment session was held on December 7, 2011, for the 2012-2013 cycle of interns. In addition, the recruitment session was reflected and documented as an advisory committee topic of discussion prior to the recruitment session. Other academic criteria for admission that are published and applied consistently met the requirements of TAC §227.10(7).

Based on the evidence presented, Houston ISD-ACP is in compliance with TAC § 227 - Admission and Certification Criteria.

COMPONENT III: CURRICULUM - Texas Administrative Code (TAC) §228.30 – Educator Preparation Curriculum

FINDINGS:

Houston ISD-ACP is approved to offer teacher certification in thirty-eight (38) certification fields and six (6) professional classes. For the purpose of this compliance audit, the Physical Science (8-12) Certificate was selected as the curriculum area for in-depth review.

Qualifications necessary to be selected as a course instructor in the HISD-ACP require an advanced degree, Texas teacher certification in the corresponding content and grade level, more than five years of experience teaching content at the specific grade level in a public or private school, out-of state teaching certification in corresponding grade level in a public or private school, out-of state teaching certification in corresponding content and grade level, and principal/superintendent certification. Instructors' credentials were presented for review and criteria for selection verified. It was verified that the instructors had the appropriate background or experience to provide instruction in this certification area.

In a review of the Physical Science (8-12) curriculum, it was found that the educator standards were the curricular basis for instruction as required by TAC §228.30(a). This was documented in the alignment charts submitted by the program staff and verified at the time of the audit.

It was also noted that Physical Science (8-12) curriculum supported the evidence provided by the HISD-ACP that it addressed the relevant Texas Essential Knowledge and Skills (TEKS) as required by TAC §228.30(a). All candidates are required to participate in content specific training that addresses the TEKS throughout the program. This training met the requirements of TAC §228.30(a). The seventeen (17) subject matter topics were included in the program's training as prescribed by TAC §228.30(b).

Six hours of test preparation, not embedded in any other coursework, are provided for candidates prior to TExES testing. This was verified in candidates' records and documented with a TExES Certification Exam Review (T-CERT) Certificate along with additional preparation documentation that exceeded the six hours of test preparation required per TAC §228.30(b)(17) and TAC §228.35(a)(3)(C).

Candidates were asked to respond to a series of questions prepared by TEA and sent to them electronically in order to verify aspects of the curriculum, its delivery, and its effectiveness. While candidates reported that they had been provided with instruction in all curricular areas (ranging from 96.3%-80.8%), they reported that they did not feel prepared in the following areas: reading strategies across the curriculum (29.6%) and laws and standards regarding special education (29.6%). In addition, they responded that the online coursework was an area to be improved.

Mentor teachers responding to their questionnaire reported that curricular areas to improve included: Reading strategies across the curriculum for all grade levels (32.4%); classroom management (39.4%); gifted and talented instruction (39.4%); instruction for English language learners (37.5%); state assessment responsibilities for teachers (36.4%); and student motivation (23.5%).

Principals responding to their questionnaire reported that curricular areas to improve included: classroom management (29.2%); instruction for English language learners (30.4%); and special needs inclusion (34.8%).

Based on evidence presented, Houston ISD-ACP is in compliance with Texas Administrative Code §228.30 – Educator Preparation Curriculum.

COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT - Texas Administrative Code (TAC) §228.35 – PREPARATION PROGRAM COURSEWORK AND/OR TRAINING

FINDINGS:

Currently, the HISD-ACP initial teacher certification program is delivered predominantly in a face-to-face format. However, it is important to note that a portion of the program is delivered in an online format. Because the online portion of the program is less than 50% of the program, it was not reviewed prior to the audit. The total program consists of 358 clock hours for elementary certification, 337-349 clock hours for secondary certification, and 337 clock hours for all-level certification. Evidence was found in the program hours chart provided in the self-report and verified in candidates' record review. For current candidates, total clock hours will be ongoing until program completion at the end of the academic year. Program hours meet the requirements set forth in TAC §228.35(a)(3).

Thirty clock-hours of field-based experience were verified prior to internship. This requirement is documented on the “Activity Checklist”. Candidates are also required to complete a self-evaluation of a lesson that they presented as well as complete teacher observations of lessons presented on a “Lesson Cycle Observation Form”. Evidence was provided and documented in the candidates’ record review. Thirty-clock hours of field-based experiences prior to internship met the requirements of TAC §228.35(a)(3)(A). Fifteen hours of field-based experience may be provided by use of electronic transmission, or other video or technology-based method per TAC §228.35(a)(3)(A). This option was not utilized by HISD-ACP.

Per TAC §228.35(a)(6), the program implemented may allow candidates to substitute prior ongoing experience and/or professional training for part of the educator preparation requirements such as the 30 clock-hours of field-based experiences. However, previous experience cannot replace internship, student teaching, or clinical teaching. Houston ISD-ACP does not allow for such an accommodation and, therefore, does not have policies for such an accommodation.

Completion of eighty clock-hours of coursework prior to internship was verified in a review of candidates’ records. The completion of 80 clock-hours of coursework is completed in the following formats: face-to-face, on-line, and Saturday seminars. HISD-ACP program staff reviews an informal grade report from the EPP and/or Teach for America (TFA). The electronic candidate tracking system was reviewed to confirm that the required hours prior to internship were completed. The review showed an average of 130 clock-hours prior to internship and met the requirements of TAC §228.35(a)(3)(B). The tracking system is continuously updated as a candidate progresses throughout the program until the candidate reaches the required 80 clock hours of coursework prior to internship and throughout the program.

Per TAC §228.35(a)(5), a program may accept 50 clock-hours of training provided by a school or district with proper documentation. Houston ISD-ACP accepts 50 clock-hours of training provided by a school district and/or campus toward the total number of program hours. This was reported in the self-report and verified in district training records for the candidates reviewed. The 50 clock-hours of training met the requirements of TAC §228.35(a)(5).

Per TAC §228.35(d)(2)(C), an internship of 180 school days or an academic year is required for teaching candidates. The assignments must match the certification field for which the individual is accepted into the program and trained. Each candidate record contained a cover sheet that documented the area for which the candidate was accepted into the program, the content exam or area for certification, and the current assignment. In addition, according to TAC §228.35(d)(2)(C), the intern should be issued the appropriate probationary certificate and be classified as “teacher” of record on the campus PEIMS data. The probationary certificates were in the candidates’ records and met the requirements of TAC §228.35(d)(2)(C).

Evidence was presented in the form of observation documents that identified where the candidates were serving their internships: HISD schools and the Knowledge Is Power Program (KIPP) Academy at HISD. It documented that internship took place in an actual school setting rather than a distance learning lab or virtual school setting as required by TAC §228.35(d)(2)(C)(ii).

According to TAC §228.35(e), HISD-ACP is responsible for providing mentor teacher training that is scientifically-based or verify that training has been provided by a school district or education service center. Evidence to support that mentor teachers had received training was found in candidates’ records reviewed. Each mentor was required to sign a “Mentor Commitment Form” that included the following requirements: observe candidates; provide

feedback; allow candidates to observe in the mentor teacher's classroom; notify the program of candidate concerns; and meet the mentor requirements of the program. Mentor training met the requirements of TAC §228.35(e).

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. Currently there are six (6) field supervisors who provide field supervision to candidates in the program. The vitas, resumes, and educator certificates were provided as evidence that each was an experienced educator. Attendance records for trainings show that field supervisors attended training on November 17, 2011. The training evidence included a TEA training certificate, district training documentation, and a signed Code of Ethics affirmation for each field supervisor assigned to candidates.

Initial contact by the field supervisor was verified within the first three weeks of the assignment as required by TAC §228.35(f). It was reported in the self-report that evidence to support initial contact could be found in field supervisor contact logs, a signed contact form by the field supervisor and teaching candidate, and via an introductory email to the intern. One hundred percent (100%) of the field supervisors and 92.6% of candidates responding to their questionnaires reported that initial contact was made within the first three weeks of the semester. Initial contact within the first three weeks of assignment met the requirements of TAC §228.35(f).

A total of three observations [TAC §228.35(f)(1-3)] must be conducted by the field supervisor during the internship assignment and must be at least 45 minutes in duration [TAC §228.35(f)]. According to 228.35(f)(3), during internship, the program must provide a minimum of two formal observations during the first semester and one formal observation during the second semester. The candidates' records reflected that the number of observations exceeded the minimum requirement. Up to six observations conducted by the field supervisor were found in past candidates' records. In the HISD-ACP, candidates may be observed up to three times each semester. In current candidate records, the observations are in progress. For a candidate who had two successful observations during a semester, the option to waive the third observation was available for that particular semester.

TAC §228.35(f) requires that the field supervisor document instructional practices observed and provide written feedback through an interactive conference with the assigned candidates. Instructional practices were documented on "ACP Field Supervisor Observation Forms" and were provided as evidence in candidates' records. The documentation provided to support that the interactive conference occurred were signatures of the candidate and field supervisor on the observation forms.

It is the responsibility of HISD-ACP to provide a copy of the written feedback of the observation to the candidate's campus administrator as required by TAC §228.35(f). The campus principal or designee signed that they had received a copy of each observation. This was documented in candidates' records review. Additional informal observations and coaching were provided and documented by the program as specified in TAC §228.35(f).

As specified in TAC §228.2(13), a candidate who was hired after June 15th of the academic year is considered a "late hire." The candidate is responsible for completing 30 clock-hours of field-based experiences as well as 80 clock-hours of initial training. It is the responsibility of the program to ensure that both of these requirements are completed within 90 school days of the assignment. Information was found in the data tracking system and in the candidates' records review that two late hires had occurred. The candidates' records were reviewed and contained

evidence that the candidates were classified as “late hires” and that the HISD-ACP late hire training met the requirements of TAC §228.35(c).

Based on evidence presented, Houston ISD-ACP is in compliance with Texas Administrative Code §228.35 – PROGRAM DELIVERY AND ON-GOING SUPPORT.

COMPONENT V: PROGRAM EVALUATION – Texas Administrative Code (TAC) §228.40 – ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT.

FINDINGS:

Houston ISD-ACP does not have a candidate assessment and benchmarking process as prescribed by TAC §228.40(a). When reviewing the training modules, TEA program specialists found that the HISD-ACP training did not contain assessments within the modules. The candidate benchmarking process conducted throughout the program included the following: Training prior to classroom assignment; a midyear evaluation of the documentation contained in the candidate’s record; and prior to standard certification.

Readiness for testing [TAC §228.40(b)] is determined for candidates in the HISD-ACP by the completion of a representative exam with a score of 80% and completion of program benchmarks. According to TAC §228.40(b), the program shall not grant test approval for the pedagogy and professional responsibilities test until the candidate has met all the requirements for admission to the program and has been fully accepted into the educator preparation program. A review of candidate records provided evidence that candidates were not granted PPR test approval until they had completed the following test preparation as documented on the candidates’ “HISD Alternative Certification Program-All Training Report Card” as follows: Seminar: PPR Introduction & T-Cert Review (3 hours); EC-12 PPR representative exam (two attempts for a total of 7 hours); EC-12 PPR Parts 1 and 2 (6 hours); and an EC-12 PPR item analysis debrief (1.5 hours). Test preparation was documented in candidates’ records by T-CERT certificates showing 4.5 hours of preparation, the completion of a representative exam with a score of 80%, an item analysis completed by the candidate, and a review of the item analysis for a total of at least 7.5 hours of documented test preparation.

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. Examples of the types of program evaluation documents provided included: First year teacher anonymous evaluations of experiences in the program; HISD-ACP candidate evaluations of the field supervision and support they received in aggregate form; and documentation in advisory committee meeting agendas and minutes that the program evaluates the curriculum with input from advisory committee members, instructors, field supervisors, and candidates themselves. The evaluation of the program’s design and delivery of the curriculum met the requirements of TAC §228.40(c).

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. Documents are retained in a variety of

locations and formats as follows: at the HISD administration building in file cabinets that are locked; at the HISD-ACP training facility in a locked room; and electronically. Retention of records meets the requirements of TAC §228.40(d).

Based on evidence presented, Houston ISD-ACP is not compliance with Texas Administrative Code §228.40 – ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT.

COMPONENT VI: Professional Conduct (TAC) §228.50

TAC §228.50 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). Houston ISD-ACP requires a signed Code of Ethics Affirmation statement from all trainers, field supervisors, mentor teachers, and candidates in the educator preparation program. Documentation was verified in candidates’ record review and in training records. In addition, during the Summer Institute candidates are required to participate in a module specifically focused on the Code of Ethics and Cyber-bullying.

Senate Bill 174/Texas Administrative Code §229

Current Accreditation Status

Houston ISD-ACP is currently “Accredited”.

Standard I: Results of Certification Exams

Pass Rate Performance:	2008-2009 Final 80% Standard	2009-2010 70% Standard	2010-2011 75% Pass Rate
Overall:	99%	99%	94%
Demographics:			
Other			67%
Test Areas:			
BTLPT-Spanish			0%
Bilingual Generalist-Spanish EC-6			50%
Music EC-12		0%	
Physical Education (EC-12)		0%	
Physical Science (8-12)		50%	

Program Recommendations:

The following are recommendations based on the findings of the compliance audit. If the program is NOT in compliance with any identified component, please consult the TAC rules 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 §228.40 Program Evaluation

- Establish benchmarks and structured assessments of candidates' progress in coursework modules and throughout the program per TAC §228.40(a).

GENERAL PROGRAM RECOMMENDATIONS:

- Follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and minutes to ensure that the program staff is knowledgeable about current Texas Administrative Code;
- Read the Educator Standards and Educational Testing Services (ETS) newsletters to ensure that the program staff is knowledgeable about current Texas Administrative Code;
- Participate in webinars provided by the Division of Educator Certification, Standards, and Fingerprinting to ensure that the program staff is knowledgeable about requirements and changes in TAC rules;
- Participate in the Dean/Director meetings to ensure that the program staff is knowledgeable about requirements and changes in TAC rules; and
- Continue to align the terminology used in the Houston ISD-ACP with the terminology of Texas Administrative Code.

Component 1 General Recommendations:

- Expand the advisory committee membership to include members from business and community in order to gain a perspective from the community itself;
- Provide more opportunities for all advisory committee members to provide input into the design, revision, and major policy decisions of the educator preparation program; and
- Compile more detailed advisory committee minutes that provide clear evidence of advisory committee input, especially in the area of field-based experiences according to TAC §228.35(d).

Component 3 General Recommendations:

- Add rigor/depth to curriculum.

Component 4 General Recommendations:

- Add the Continuing Professional Education (CPE) number for the 50 clock hours of school district training to ensure that the hours are documented as a part of the candidates' program preparation;
- Consider the current ratio of field supervisors to candidates to ensure that structured guidance, feedback (within five days), and on-going support is relevant and timely; and
- Consider adding an additional start/stop time for post-observation conference that follows within 5 days after observation by the field supervisor.