According to Texas Administrative Code (TAC) §228.10(c) “An entity approved by the State Board for Educator Certification (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 TAC §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.

Contact Information: Dr. Noe Sauceda and Mr. Frank Sauceda  
County/District Number: 108704

Background:

Original Proposal Submitted and Approved by the State Board for Educator Certification (SBEC)

Teacherbuilder.com (TBC) was approved by to operate as a Texas educator preparation program on March 4, 2005. In their proposal, they requested to offer certification in Bilingual Generalist EC-4. The proposal stated that the program would:

- Combine a web-based teacher preparatory delivery model with a high-quality, research and field-based practicum;
- Provide high-quality professional development that is sustained, intensive and classroom-focused;
- Assure that the program is customer-service oriented and willing to adjust to meet the needs of the program constituents;
- Provide 18 hours of web-based preparatory modules; and
- Ensure completion of pre-induction curricular modules by all candidates.

Other required components of the application referenced a Teacherbuilder.com PowerPoint. A copy of this PowerPoint is in the program’s electronic cumulative file at TEA. In the State Board of Educator Certification (SBEC) Board agenda, it states that the candidates in the program may complete in 12 months.
Pre-Approval Site Visit – 2005

A pre-approval site visit was conducted on February 10, 2005, in Edinburg, Texas. An approval of entity evaluation document was completed prior to the visit by Christopher Sanchez on February 7, 2005. This review was based on the proposal review. Evidence identified to check is as follows:

- concerns about responsibilities of stakeholders in program evaluation; check on plan for advisory board financial, planning, and time investment; development of website and chat rooms; actions that are going to be/have been taken by Board of Directors;
- insufficient information on delineation of admission criteria in regards to test scores and use of past course grades for admission; use of letters of recommendation, or other evidence of past performance in the field
- insufficient details on course objectives; insufficient benchmark information specific to courses/coursework; publishing benchmarks;
- insufficient details on course make-up;
- insufficient frequency of pre-service training;
- insufficient information such as names and credentials of personnel grading the modules;
- lack of timelines for evaluations;
- lack of specific procedures for evaluation;
- insufficient information about testing and certificate application procedure;
- insufficient evidence of clear indications of a support system.

In addition, there was note on a pre-visit planning worksheet referencing the need for a demonstration of online coursework/chat rooms/portfolios. There was no formal pre-approval report created for this visit. Only program specialist notes could be located.

One Year Post Approval Visit - 2006

A one year post-approval visit was conducted on April 27, 2006. During the visit, it was discovered that:

- Collaboration with an advisory committee was not evident;
- Interviews revealed that candidates who were able to pass both the content and PPR exams were exempt from completing the instructional modules;
• Candidates were recommended for certification without instruction in classroom management, ethics, school law, pedagogy, or any other basic educator preparation areas;

• Interns did not have mentors for the entire internship. There was a disconnect between the field supervisors and the interns/mentors. A review of the process was recommended; and

• A student handbook was not available.

Findings:

As a result of the one year post-approval visit, the TEA monitoring team required Teacherbuilder.Com to develop an action plan to address the following areas.

 Establish an advisory committee;

 Follow state rules for language proficiency. Candidates MUST prove language proficiency before admission to the program;

 Ensure all modules are accessible and updated as needed. Continue to enhance the student support availability on the website;

 Discontinue the practice of recommending candidates for certification without the required preparation. Ensure that all candidates are given the complete program for which they have contracted and paid; and

 Develop and distribute guidelines for mentors to help ensure that interns receive the best possible assistance and also develop a plan for facilitating field supervisor communication through various levels.

No Child Left Behind Compliance - June 28, 2006

On June 28, 2006, a letter was submitted to Dr. Karen Loonam, former Deputy Associate Commissioner, restating the proposal guidelines and requesting to be recognized as in compliance with No Child Left Behind (NCLB) regulations. The program addressed compliance of the four standards by assuring:

I. High Quality Professional Development consisting of:

 Sixty hours of web-based instructional modules which include:

   TEKS, TAKS, and Instructional Planning;
   Test Construction and Educational Measurement;
   Effective Teaching Strategies and Enhancement of the Classroom Climate;
   Multiple Intelligences and Special Student Populations;
   Special Education and Inclusion;
Effective Classroom Management Strategies;
Technology in the Classroom;
Language Acquisition and Language Development;
Multiculturalism and the Diverse Learner;
Motivating Students; Effective Communication Skills;
Age Level Characteristics and Learning Styles;
Human Development Theory; PDAS and Teacher Effectiveness;
The Teacher, the Law and Code of Ethics; and
Test Taking Strategies, and any other topic deemed necessary.

- A minimum of 4 classroom observations by the field supervisor and mentor; two conducted by the field supervisor.
- Texas Beginning Educator Support System (TxBESS) training required for all mentor teachers and program field supervisors.

II. Intensive Supervision/Mentor Training consisting of:

- Regularly scheduled meetings among interns, mentor teachers, and field supervisors during pre-service training and the internship;
- Visits by the Field Supervisors with the mentors and principals as evidenced by signatures of interns, mentors, and principals;
- Providing a copy of the intern observation to the principal;
- Activities that consisted of structured guidance and regular ongoing support. This would be in the form of self-evaluation videos made by the interns and submitted to field supervisors for review and feedback. The interns would also view their videos and conduct a self-evaluation to be submitted to the field supervisor. The videos would be used to measure progress. One video should be done the first semester and one the second semester; and

Completion of all pre-induction curricular modules by the intern.

III. One-year Internship on Probationary Certificate consisting of:

- Supervision of all interns on probationary certificates by a mentor teacher and field supervisor while he/she is fulfilling the initial probationary period and any additional probationary years.

IV. Demonstrated Satisfactory Progress: Benchmarks and Assessments consisting of:

- Benchmarks for formative evaluation for the curriculum would be gathered from the intern’s performance on the TBC web-based curriculum;
- Benchmarks for admission/interview would consist of a transcript review, program admission documents, Gallup Teacher Insight, area of certification, a plan recommending curriculum sequence (as needed), and an E-Portfolio;
- Benchmarks for On-Line Curriculum: Module Tests (70%); Summative Score (80%), Chat Transcripts (review), and Barcode Issued;
- Benchmarks for the TExES: ASEP and E-Portfolio;
- Benchmarks for the Internship: Letter of Introduction, procurement of teaching position, probationary certificate, mentor evaluation, supervisor evaluation, self-evaluation;
- Benchmarks for PDAS: Formative (baseline), Summative (baseline), and Contract renewal; and
- Benchmarks for TBC: Standard Certificates.

Oversight Visit – 2007

On June 14, 2007, an oversight team made a follow-up visit to Teacherbuilder.com and found that the administration and staff had addressed each recommendation outlined in the April 27, 2006 report. At that time, the program staff indicated that it had four categories for students: 1) applicants; 2) eligible candidates; 3) enrolled; and 4) intern. All interns must finish the program in order to be recommended for certification. A TxBESS training module was offered online. Frank Sauceda, owner, and Roman Gomez, two program staff members, are trainers of trainers for TXBESS and created the online training module. The action plan submitted indicated that the advisory would meet quarterly and the roles and responsibilities of the members were outlined. It was noted that Noe Sauceda, owner, conducted a Haberman interview via phone before admission into the program. He received training two years ago to use this instrument. It was also noted during the visit that an information packet was provided to principals along with a visit by program staff and field supervisors.

On May 7, 2007, program staff received training in order to support the certification area of Teachers of Deaf and Hard of Hearing and Visually Impaired. Noe Saucedas, owner, indicated that two staff members have extensive experience with Schools of the Deaf and Blind as program supervisors, administrators and teachers. The names of the two staff members were not provided.

Baseline Data - 2009

TEA gathered baseline data on each educator preparation program as required by an auditor’s report in February, 2009. Dr. Noe Saucedas signed a document as being an accurate representation of Teacherbuilder.com. The information indicated that there were offices in Brownsville, Edinburg, Laredo, Houston, and Austin/San Antonio. It also indicated that interns and customers were serving on its advisory committee along with other advisory committee
members required in TAC §227. He also indicated that the advisory committee participated in the design, delivery, evaluation and major policy decisions and that the board met a minimum of twice (October and May) each academic year. The information also indicated that completion of two math and two English courses with a 2.5 GPA or better was evidence of meeting basic skills requirements. The staff indicated that policies were in place to admit a candidate for career and technology education certification and to admit a candidate from out-of-country. It also indicated that beginning with the 2009-10 school year, the program would require a minimum of 30 clock hours of field-based experience prior to assignment as an intern. Fifteen hours of video experiences would be used as part of the 30 clock hours. Furthermore, it was indicated that all internship contact was face-to-face. The program curriculum was evaluated by student/candidate intern feedback. Effective with the 2009-10 year, all records would be kept in both paper and electronic formats. The program indicated that it trained the mentors on their roles and responsibilities. The mentor was paid $200 per semester or as required by the district. The baseline data indicated that upon request, Teacherbuilder.com would direct the intern to share their formal observations with their administrator.

**Desk Audit Summer 2009**

During the summer of 2009, a desk audit was conducted by the Division of Educator Standards staff at TEA. Teacherbuilder.com was found to be out of compliance in three (3) out of five (5) component areas. The areas of non-compliance were TAC §228.30 Curriculum, TAC §228.35 Program Delivery and On-Going Support, and TAC § 228.40 Assessment and Evaluation of Candidates for Certification and Program Improvement.

**Findings:**

As a result of the desk audit, the following findings were reported:

- Student folders should contain all materials required for admission: interview record, written assessment, passing score on the screening instrument, screening instrument, and letter of recommendation. Full documentation should be placed in student folders.

- No documentation of any field experiences was found in the student folders.

- The program stated that it accepted up to 50 hours of school district training, however, no documentation could be found in the student folders.

- Observation forms were missing and some contained only school district PDAS instruments.

- There was no program orientation program to instruct the candidates how to navigate the online program.

- Teacherbuilder.com did not meet the required clock hours. Additional clock hours should be created.
• The curriculum was an online textbook, strictly narrative with no charts, graphs, or other explanatory material.

• Assessments were inadequate consisting only of assessments for each domain and a final examination of 80 questions. Unlimited attempts were allowed with the option of reviewing correct answers prior to the next attempt.

• There were no projects, written response/reflections, lesson plan assignments or modeling of effective classroom management or instruction.

• Adequate coverage of the 17 topics could not be substantiated.

• There was no documentation of evaluation instruments or other evaluative material.

Technical Visit 2010

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

Findings:
The Teacherbuilder.com Advisory Committee consisted of fifteen (15) members: five (5) members from school district, one (1) member from higher education, one (1) member from an education service center, and three (3) members from business and community. The seven (7) staff members of Teacherbuilder.com comprised the remaining members of the advisory committee. The advisory committee member representing higher education contacted TEA and indicated that he did not serve on the advisory committee.

Two meetings for the 2010-2011 academic year were listed in the self-report as November 2, 2010, and April 5, 2011. However, in reviewing the self-report with the Teacherbuilder.com staff, they indicated that they had not had any advisory committee meetings this year and were waiting until after the audit to have the first meeting for the 2010-2011 academic year. It was discovered that the dates listed above were incorrectly reported and should have been November 2, 2009, and April 5, 2010. The meetings scheduled for the 2010-11 academic year are December 7, 2010, and March 16, 2011.

Based on evidence presented, Teacherbuilder.com is in compliance with COMPONENT I: COMMITMENT AND COLLABORATION - Texas Administrative Code (TAC) §228.20 – GOVERNANCE OF EDUCATOR PREPARATION PROGRAMS.
COMPONENT II: ADMISSION CRITERIA - Texas Administrative Code (TAC) §227.10 - ADMISSION CRITERIA

Findings:

Admission requirements for the Teacherbuilder.com initial certification program were described in the self-report, on their website, and in a public relations flier presented for review. According to these sources, in order to be admitted into the Teacherbuilder.com teacher education program, the candidate must have completed a bachelor’s degree from an accredited institution [TAC §227.10(c)], have a cumulative grade point average of 2.5 or a 2.5 in the last sixty hours and a 2.5 in the candidate’s content area [TAC 227.10(a)]. The candidate must also demonstrate competency in reading, writing, and math as determined by a transcript review and have a “B” or better in English composition, literature, math, or a combination approved by the program. The applicant must pass the THEA/TASP with a score of 230 in reading, 220 in math, and 230 in writing in order verify basic skill competence. If SAT is used for admittance, a verbal score of 500 and a math score of 450 is required. If the ACT is used, a score of 23 in reading and writing and a score of 21 in math is required [TAC §227.10(4)]. According to the website, bilingual candidates may be required to take an oral proficiency test. The Test of English as a Foreign Language (TOEFL) with a computer assisted score of 213 or a paper administered test score of 550 is required [TAC §227.10(5)]. The program also indicated that the Test of Spoken English (TSE) with a score of 50 would be acceptable. (This test was discontinued on March 31, 2010. However, the scores of candidates taking this test prior to the discontinued date are valid for two years). Lastly, the website indicated that all participants will undergo the Haberman Interview and will complete a Gallup Teacher Insight® assessment. The applicants are asked to complete an online electronic application. A step-by-step process was available for applicants to follow in order to complete the admission process [TAC §227.10(6)].

In reviewing fifty-eight (58) candidate folders, evidence of compliance with the admission requirements was inconsistent. A large number of candidate files who had been identified for review could not be located. One program specialist searched for twenty individual files and only located nine.

The application for admission was completed online and maintained electronically. Periodically, portions of the application were found in candidate’s files. However a printout of the entire application was not available in the document review and could not be accessed online for review electronically [TAC §227.10(6)].

Transcripts had been faxed or had been printed from the college registrar’s site were found in candidate files. Other transcripts were found that were official but with “issued to student” stamped on them. Transcripts had notes on them reflecting the calculation of candidates’ hours [TAC §227.10(C)]. All candidates’ records reflected a baccalaureate degree from an institution of higher learning recognized by regional accrediting agency [TAC §227.10(c)]. Evidence of grade point compliance was found with some exceptions falling within the 10% cohort rule [TAC §227.10(A)]. One candidate was admitted with a 1.878 grade point average. No evidence was present in the candidate’s files of the Co-Director’s approval to admit candidates within the 10% cohort rule [TAC §227.10(3) (b)]. Evidence of test data reflecting basic skills competency was not found in all candidates’ folders or on candidates’ transcripts [TAC §227.10(4)].
There was evidence that transcripts from out-of-country candidates had been reviewed by credentialing services. However, there was no evidence of TOEFL scores for these candidates included in their records [TAC §227.10(4)]. A Foreign Educator Eligibility Review checklist was presented by Teacherbuilder.com staff in the document review requiring check off of the following: 6 or more hours of English in transcripts, successful interview with Teacherbuilder.com staff, TOEFL score requirements, and successful completion of approved English as a second language (ESL) course. For Written English Proficiency the check off item was “Has the student passed a content TExES exam?” The check off item for Oral Language Proficiency was “Has student successfully completed a job interview?”

In addition, no evidence was present in the candidates’ files or presented by the program staff that the Haberman interview or any interviews were conducted [TAC §227.10(6)]. Dr. Sauceda indicated that he conducted the Haberman interview over the phone, and because of the Haberman’s requirement for confidentiality of the questions, he would not be able to place the results of the interview, the scoring rubric, or the response record in the candidates’ folders. It was indicated by Dr. Sauceda that the Gallup Teacher Insight was no longer used by the program. Therefore, because of a lack of sufficient evidence, it must be concluded that no interview is conducted as an admission requirement. Pre-admission content testing (PACT) is currently not required for admission by the program. In the TEA review of records provided by the Educational Testing Service (ETS), five candidates affiliated with Teacherbuilder.com have tested with PACT. However, no evidence of the PACT scores was found in the candidates’ folders [TAC §227.10(C)]. In summary, the admission requirements listed on the website and other recruiting material do not match the current admission requirements of the program.

The self-report indicated that over twenty (20) students were admitted that required verification of the ability to speak and understand the English language [TAC §227.10(e)]. In clarification of the self-report, Teacherbuilder.com staff also indicated that they admitted six (6) to ten (10) candidates under the 10% cohort rule. In the self-report, it was reported that eleven (11) or more “late hire” interns [TAC §227.10(7)(d)] were in their program. However, in discussions with the program staff, they indicated that ninety-nine percent (99%) of their interns were “late hires”. The program staff did not respond to the question about the number of students in Career and Technology Education [TAC §227.10(3)(b)] in the self-report but did indicate that career and technology education candidates were required to present a statement of qualifications in order to meet TAC §230 and TAC §233. In response to a request by the TEA program specialists, it was reported by a Teacherbuilder.com staff member that there were twenty-three (23) career and technology education candidates currently enrolled. While some evidence of the statement of qualifications was noted in a few candidates’ files, TEA program specialists requested a list of all candidates in the above mentioned category (career and technology education) so that evidence of compliance with TAC could be substantiated through a candidate file review. The list was not produced by the program and compliance with TAC could not be verified.

The self-report indicated that the program has between eleven (11) to twenty (20) candidates who are participating in the Teacher Aide Exemption program. TEA program specialists pointed out to the Teacherbuilder.com staff that they were not eligible to have candidates in this program. Dr. Sauceda indicated that this item had been marked on the self-report by mistake and he corrected it before he signed it.
An incident pertaining to candidate documentation occurred prior to the compliance audit. A former Teacherbuilder.com intern forwarded an email sent by Teacherbuilder.com to the TEA Director of Educator Standards. The Teacherbuilder.com email informed the former interns that their candidate files were incomplete because they did not contain official transcripts. The email stated that if an official transcript was not received by a specified date TEA would revoke their standard teaching certificates. The Director of Educator Standards and program specialist Sandra Nix placed a telephone call to Mr. Frank Sauceda and demanded that a retraction email be sent instructing the recipients to disregard the Teacherbuilder.com request for official transcripts and retract the statement that the teachers’ standard teaching certificates were in danger of being revoked by TEA. Teacherbuilder.com sent a retraction email.

The program staff indicated in the self-report that information about their program could be found on the Teacherbuilder.com website, in catalogs, and brochures. The self-report also indicated that they attended career fairs and made school and community college visits. Media outlets such as radio, television, newspaper, and billboards were also utilized per the program. The only evidence available for review was the website and one brochure.

Based on the evidence presented, Teacherbuilder.com is not in compliance with Texas Administrative Code §227.10-Admission Requirements.

COMPONENT III: CURRICULUM - Texas Administrative Code (TAC) §228.30 - EDUCATOR PREPARATION CURRICULUM

Findings:
Dr. Noe Sauceda was the only instructor listed for the online modules. In review of his vita, Dr. Sauceda is certified in Math and Biology. Since the program does not mandate the PACT as an admission requirement, Teacherbuilder.com was informed that they are required to provide qualified instructors for each certification area that they are approved to offer or for which they have students pursuing certification. The instructor is expected to provide content methodology and support for those pursuing specific certification areas. No instructors were identified by the program that were certified as a Generalist EC-4, Generalist 4-8, Generalist EC-6 or certified in language arts, social studies, music, art, physical education, or health, or trade and industrial education.

On the Teacherbuilder.com website, a curriculum summary was provided. “The curriculum program will focus on integrating the TExES standards in the area and level for which certification is sought. Interns will participate in a minimum of 90 hours of web-based instructional modules focusing on the development of the participant’s knowledge and skills necessary for the completion of the program. The hands-on experience will further assist the interns to prepare them (sic) for successful completion of the certification examinations.”
Teacherbuilder.com provided TEA program specialists with access to their online program in order to evaluate the online format and curriculum content. Sufficient coverage and alignment of the Texas Essential Knowledge and Skills (TEKS) could not be verified through the self-report, student teacher responses, the alignment chart required by TEA, or through a review of the online curriculum. On the alignment chart for the PPR under the TEKS section, Teacherbuilder.com indicated that the TEKS were covered in the Module: Bilingual Supplement and Content Specific Reading. This module could not be located in the online program. The program staff indicated that the Bilingual curriculum was delivered in a face-to-face format. Teacherbuilder.com indicated that it has a cooperative agreement with Bilingual Educators in Houston, Texas, to deliver bilingual training. The TEA program specialists requested the bilingual curriculum for review. Teacherbuilder.com agreed to provide it. At one point, when reminded about the request for the bilingual curriculum, Frank Sauceda responded that it was printing. However, no bilingual coursework was presented for review during the compliance audit. Numerous other attempts were made to secure the bilingual material. A request was sent to Lillian Hernandez with Bilingual Educators who works with Teacherbuilder.com in providing bilingual instruction and supervision. Ms. Hernandez replied that she did not have the curriculum and it would have to be secured from Frank Sauceda. Since the material was not provided, the TEA staff was unable to review or verify that it addressed the appropriate educator standards, TEKS or 17 mandated curriculum topics.

Further review by TEA staff indicated insufficient coverage and alignment of the 17 curriculum topics [TAC §228.30]. Coverage could not be verified through the self-report, intern responses, or the curriculum alignment chart required by TEA or through a review of the online curriculum. In reviewing the online curriculum, the 17 curriculum topics were fragmented and were mentioned in various modules, but nowhere were they covered in a depth that would provide the candidate with adequate knowledge to pass the PPR test. Examples of the lack of depth of curriculum can be found in the following modules: Assessment consisted of five (5) sentences; Competency 1–Understanding Growth and Development consisted of nine (9) sentences; TEKS explanation consisted of eighteen (18) sentences; Learning styles consisted of twenty-two (22) sentences; Lesson planning consisted of thirty-three (33) sentences; How learning occurs consisted of thirteen (13) sentences. Many more examples of superficial coverage of the topics are available in the printed curriculum documentation. Information about reading instruction, which is required in all certification areas, could not be located in any of the online materials.

The Code of Ethics was listed in Domain IV Section 13.4. It was difficult to locate the actual Code of Ethics because it was embedded in a module along with communicating through family involvement and interacting with other members of the educational community. There was no explanation of the code itself or examples of misconduct or consequences. There was no way to check the candidate’s understanding of the content, the candidate was only asked to read the Code of Ethics.

Child Development was listed in Domain I Competencies 1.4, 1.11, 1.12, 1.13, 1.14 with articles about Piaget, Kohlberg, Maslow, and Erikson. Candidates were provided links to the Wikipedia for more information about each person. There were no projects or activities associated with this activity. In Domain I, Section 2.4, in discussing the Hawthorne Effect, the following reference was made: “Those students who were identified as being extremely intelligent made significant gains in academic achievement and were performing at the top on national achievement tests.
The students where were identified as being slow and even mentally retarded made no gains at all.” This is an example of the content not being updated to reflect the current appropriate and acceptable terminology. The notation at the bottom of the screen indicates that this section was last updated on Thursday, February 9, 2006. In discussions with Frank Sauceda on this issue, he stated that he could see how candidates would have difficulty understanding and knowing how to appropriately apply the information in a classroom setting. He further stated that there was much work to be done and that he did not understand the specifics of the required curriculum.

Student confusion with the online program can be summed up by comments on the student forum. Students were asking each other what to do after they had finished reading and could they take the test again if they did not pass it the first time.

Curriculum that included theories regarding motivation, learning, TEKS organization and skills, content TEKS, teacher responsibilities for TAKS, parent conferencing and communication skills, instructional technology, instructional strategies, and differentiated instruction were difficult to locate and were not sufficient in preparing a beginning teacher to be successful in the classroom.

Domain II: Competency 5 and 6 discuss “Environment of Hope” and “Managing Student Behavior” respectively. A glossary provided in Domain II lists vocabulary not related to the domain. There were no major projects or activities to reinforce the content. After taking the assessment for Domain II, a candidate wrote the following to Teacherbuilder.com: “Seems to me there are several questions unfair in this test. For example, test assumes that student know what a “paraprofessional does, (sic) it was never covered in the course... Answer to question no. 5 goes against everything taught in the course... The answer to question no. 8 assumes that the student knows what a Behavioral Log Spreadsheet is. Does this chart really exist? I don't know! Again, this was never covered in the course.”

Special populations were covered in Domain IV Competency 13.2. This area focused on defining Dyslexia, Dysgraphia, Dyscalculia, and Attention Deficit Disorders. A TEA staff member conferred with Frank Sauceda in an attempt to align the online modules with the 17 mandated curriculum topics. After some review, Frank Sauceda indicated that the content needed to be more in line with TAC requirements and was difficult to follow, particularly when following identified links to other Internet sites. The PPR curriculum was last reviewed by TEA staff during a desk audit in the summer of 2009. At that time numerous recommendations were made to remedy the deficiencies noted in the curriculum area. However, no evidence exists that the online modules have been changed or updated because of the previous evaluation.

In reviewing the format of the online program, it was discovered that objectives for each section were not provided. The coursework is best described as an online textbook with links to Wikipedia topics. There are no assignments, interactive activities, projects, written responses/reflections, or lesson plan requirements which a candidate must complete in order to show mastery of the module content and/or skills. There were no charts, graphs, diagrams, videos, or pictures used to expand or clarify the topics. The only type of interaction present in the online program was chat and discussion. However, when the interaction components were opened, there was nothing to view. When asked in the self-report to select the types of modules
assessments used in the online coursework, Teacherbuilder.com staff indicated that it used quizzes/tests with a mastery level determined. This was verified in the online coursework and curriculum summary found on their website. There was an assessment at the end of each domain consisting of five (5) multiple-choice questions and a final examination. However, they further responded that they used open ended essay questions with grading rubrics, student-written reports graded with a rubric, portfolios graded with rubrics, and reactions to case studies/hypothetical classroom situations graded with rubrics. None of these could be located as part of the course requirements. There was mention of an e-portfolio in the module descriptions submitted to TEA in the Generalist EC-6 matrix which stated that the e-portfolio would be maintained by interns and would be emailed to program supervisors at periodic intervals during the internship and upon completion of the internship. The contents would include communications between the program supervisor and intern, sample lesson plans, a sample grade book and other artifacts/records deemed appropriate by program supervisors and staff. When asked to see a sample of an intern e-portfolio, Dr. Saucedca indicated that the program no longer used the portfolios but perhaps its use should be revisited. There was no mention or evidence presented of using videos as a means of evaluation or self-reflection as outlined in an earlier plan presented to the TEA.

In May 2010, Teacherbuilder.com staff submitted a matrix requesting approval to offer the Generalist EC-6, Generalist EC-6 Bilingual Spanish, and Generalist EC-6 ESL certificates to replace its Generalist EC-4 certificate. In the application, the program was asked to provide assurances that all appropriate educator standards would be addressed in the content and properly assessed. In reviewing the curriculum alignment chart submitted by Teacherbuilder.com staff for completion prior to the visit, the chart revealed that the educator standards for English Language Arts/Reading, Math, Science, Social Studies, Health, Physical Education, Music, and Art were covered in the internship and in a course entitled “Content Specific Reading”. The module entitled “Content Specific Reading” was not available for review. It was listed as a course to be developed submitted by Teacherbuilder.com staff. There was no coursework available in their online program that addressed the educator standards, domains, or competencies of the Generalist EC-6 certificate.

One intern that was on the original questionnaire email list provided by Teacherbuilder.com started the questionnaire but stopped responding after a few questions. This was the sole response from the initial email request. In an effort to gather data pertaining to the Teacherbuilder.com program, TEA requested the email addresses of all first, second, and third year probationary candidates. The program did not supply the email lists to TEA. During the data collection process, Teacherbuilder.com emailed a communication to former candidates who are now certified teachers stating that their folders were incomplete and the teacher needed to secure an official transcript and send it to Teacherbuilder.com by a specific date or their teaching certificate would be revoked by TEA. This email was forwarded by one concerned recipient to the Director of Educator Standards at the Texas Education Agency. The Teacherbuilder.com staff was confronted by the Director of Educator Standards about the inappropriateness of the email and the threat that it contained. They were directed to send a retraction email directing recipients to disregard the request and indicate that their teaching certificates were not in danger of being revoked.
In order to gain more information on the Teacherbuilder.com program, TEA staff used the addresses of the Teacherbuilder.com email to send a student teacher/clinical teacher/ intern questionnaire. Seventeen people on that email list responded to the questionnaire request. In reviewing the student teacher/clinical teacher/intern questionnaire responses, in answer to how effective the courses were in preparing the candidate for the teaching experience, the following areas were identified as areas of need: forty-three point eight (43.8%) reading strategies across the curriculum for all grade levels; forty-three point eight (43.8%) Texas Essential Knowledge and skills (TEKS) Organization, Structure, and Skills; fifty percent (50%) utilizing TEKS in the content areas; fifty percent (50%) process of curriculum development; forty-three point eight percent (43.8%) use of formative assessments to diagnose student learning needs; fifty percent (50%) laws and standards regarding students with special education needs; fifty-six point three percent (56.3%) standards and teaching strategies for students designated as gifted and talented.

No mentor teachers responded to the TEA questionnaire, so evaluation of the effectiveness of the curriculum or candidate preparation from their perspective was not available. However, from the principal questionnaire, special populations were identified as an area of concern. In addition, when asked to rate the preparation level of the Teacherbuilder.com candidates, fifty percent (50%) of the principals responding reported that the program prepared its candidates in most areas with a few areas to work on. The other fifty percent (50%) of the principals responding felt that the candidates were prepared in few areas with many areas to work on.

**Based on evidence presented, Teacherbuilder.com is not in compliance with TAC §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:**

Teacherbuilder.com staff indicated in their self-report that they are currently offering certification in sixty (60) different certification areas. The original proposal submitted to TEA indicated that Teacherbuilder.com would provide preparatory modules for the following: Bilingual Generalist (EC-4); Bilingual Generalist (4-8); Generalist (4-8); and English as a Second Language Supplemental.” Since Teacherbuilder.com is not requiring Pre-Admission Content Testing (PACT) as a requirement for admission, qualified instructors are required to support each of the certification fields. If Teacherbuilder.com is unable to supply qualified content instructors for all active certification areas, certification areas should be reviewed and possibly discontinued. Certification areas may be removed by sending an official letter to the TEA, Division of Education Certification and Standards.

The curriculum is delivered totally online with the bilingual supplement being delivered, per a discussion with the program staff, in a face-to-face format. The online curriculum is divided into four domains. Domain 1 reportedly consists of thirty-five (35) hours; domain 2 consists of ten (10) hours; domain three (3) consists of thirty (30) hours; and domain 4 consists of fifteen (15)
hours. The total number of hours reported by Teacherbuilder.com in the self-report and Program Hours Chart was three hundred (300) clock hours. However, in analysis, three hundred (300) clock hours of coursework could not be validated.

The program reported thirty (30) hours of field based observation on the TEA Hours Chart, but Teacherbuilder.com’s self-report (Question #51) indicated that it required less than thirty (30) hours of field observations. Three candidates indicated in written comments on their questionnaire that they had completed “none,” “none by my ACP or Bilingual Educators,” and that “all I had to do was modules online.” No observation records were found in the student folders so the thirty (30) hours of field based observation requirements could not be verified as required by TAC §228.35(f). The self-report (Question # 52-53) also indicated that fifteen (15) hours of video were used as part of the field-based observations. The videos used are the TXBess mentor training videos. However, fifty percent (50%) of the respondents to the intern questionnaire stated that did not view any videos and fourteen point three percent (14.3%) indicated that they viewed videos for two (2) hours or less, and finally fourteen point three percent (14.3%) indicated that they did not know if they viewed videos. The self-report (Question # 54) continued that the candidates documented their field-based experiences utilizing time logs, focused observation activities, reflection journals, classroom discussions, response to online questions, and classroom activities. Fifty four point five percent (54.5%) indicated that they just did general observations. There was no consistent evidence of time logs or other records in the candidates' folders or presented in the document review of the required thirty hours of field observation required per TAC 228.35(A).

The coursework reported necessary prior to internship was ninety (90) hours. This would involve completion of the online program. This would meet the minimum one hundred-ten (110) clock hours needed prior to internship. However, in discussion during the audit about “late hires”, Dr. Sauceded indicated that ninety-nine percent (99%) of their interns were late hires. Therefore, “late hires” would have ninety (90) days to complete both the field observations and initial coursework. This essentially means that the Teacherbuilder.com candidates were entering their internship and a classroom on the first day with no preparation. Furthermore, there was no documentation located in the candidates' files or elsewhere to verify that the “late hire” requirements were met within the required time frame [TAC §228.35(c)].

Teacherbuilder.com indicated that it provided one hundred twenty (120) hours of coursework in addition to the online coursework. Frank Sauceded indicated that the bilingual curriculum was being printed out for TEA’s review during the visit. No additional coursework other than what was online was produced for review.

The program reported that ten (10) clock hours of test preparation was provided online in the form of definitions flashcards [TAC §228.30]. In the self-report (Question #57), the program reported that they accepted up to fifty (50) hours of professional training from school districts toward the total number of required program hours. The self-report (Questions #58) indicated that a Continuing Professional Education (CPE) certificate or some type of school district record was required as verification in order to count the hours. Again, no documentation was located in the candidates’ files or elsewhere during the document review to verify this claim. [TAC §228.35(a) (5)]. TEA requested the names of the candidates who were using this means for program credit in order to verify that the appropriate records were in the candidates’ files. However, these names were not furnished, and in the general review of the candidate files, no documentation was located to substantiate this claim.
No systematic method was presented by Teacherbuilder.com staff to track the completion of various requirements required by Texas Administrative Code.

In reviewing the online format, program specialists noted that it was confusing and unorganized. Each lesson was built around testing domains and competencies that acted as an index or table of contents for the lessons. The lessons consisted of reading a screen of text which was not augmented with pictures, charts, diagrams, or videos. After the domain was completed, the candidate was required to answer a multiple choice quiz usually consisting of five questions. Often the candidates were referred to other links such as Wikipedia or professional organizations for additional supplemental information. However, the candidates were sent to these links without a purpose or without instructions for what to do or look for once they were at the sites. Among other notable format issues were that the content did not display copyright permission or sources of the content; the courses were not ADA compliant; an orientation module for students on how to navigate through the coursework did not exist; no evidence of instructor feedback existed; and various means of communication from instructor to candidate such as computer conferencing, email, faxes, chats, webinars, and standard mail were not utilized. Also, there was no modeling by an experienced instructor available in any form. In addition, there were no opportunities to practice teaching in a safe, constructive environment.

No interactive activities, projects, or assignments were required to ensure the candidates’ grasp of the concepts and skills being presented. There were numerous other format issues. For example, in many places a small square substituted for an apostrophe. In Domain 2.2, in the text on multiculturalism in Texas for the candidates, the statistics were left blank and only lines existed where the statistics should have been inserted. In addition, some of the text would be broken up by extra inserted lines giving the illusion that it was a new paragraph when in effect it was the continuation of the sentence.

In discussions with the Teacherbuilder.com directors and other staff about formatting issues, the program indicated that they did not use specific standards in the development of online coursework. They indicated that the program was developed five years ago, and at the time, there were very few guidelines to follow, so they developed the courses to the best of their ability. They also indicated that since their online courses were now five years old, they were ready for revision. The programmer, Saul Rodriguez, presented during the opening session frames in a PowerPoint of how their revised website would appear.

The program requires an internship of one hundred eighty (180) days or one academic year. Recently, Teacherbuilder.com applied for and was approved to allow a minimum of 12 weeks of clinical teaching as a means to assist their candidates who were unable to secure teaching positions. As of the date of the compliance audit, the clinical teaching component had not yet been implemented. All six field supervisors were certified teachers with many years of public school service. Two field supervisors responded to their questionnaire. They indicated that they had been involved in field supervision for one to two years with this program. Sixty-nine point three percent (69.3%) of the teaching candidates reported that the field supervisors were effective or very effective. Since no mentor teachers responded to the questionnaires, the TEA staff was unable to gain their perspective on the effectiveness of the field supervision.

According to the self-report (Question #61), Teacherbuilder.com indicated that it provided yearly training for the cooperating teachers/mentors. The program identified Teacherbuilder.com, the school districts, the education service center and online training as means of providing the required training per TAC §228.35. The program indicated that attendance records, certificates
of completion, CPE credit records, and school district professional development records were used as verification of training. Evidence of verification of the training was not provided in the document review. In addition, no mentor questionnaires were submitted as an alternate way to verify the training.

Per responses from the teaching candidates, seventy-six point nine (76.9%) indicated that the first contact was made within the first three weeks. No verifying evidence of this was found in the candidates’ folder review.

In reviewing fifty-eight (58) candidate folders, only nine folders contained observation forms as evidence of a minimum of three formal observations during each year of the probationary certificate conducted at prescribed intervals as required by TAC §228.35(f)(2) and TAC §228.35(f)(1)(2). The remaining candidate folders had missing observation records especially in the second and third year probationary candidates. Seventy-six point nine percent (76.9%) of the candidates who responded to their questionnaire indicated that formal observations were forty-five (45) minutes in duration [TAC228.35 (f)] followed by an interactive conference. However, it was noted in the candidates' file reviews that the observation forms did not have the start or stop time of the observation noted and were not consistently signed by the candidate as evidence of receipt or conferencing or by a field supervisor as evidence of completing the observation [TAC §228.35(f)]. In addition, it was noted that two different types of observation forms were in the files. It was also discovered that the program was using the formal PDAS evaluation from the school where the intern was employed as one of the formal observations. The school district PDAS evaluation conducted by the campus principal cannot be used as one of the three formal observations. The distribution on the Teacherbuilder.com observation form did not indicate that the administrator received a copy as required by TAC §228.35(f). Per the teaching candidates in their questionnaire, thirty percent (30.8%) indicated that they never communicated with their field supervisor.

According to Teacherbuilder.com, if a candidate is struggling in the program, additional assistance is provided by individual tutoring and by supplying the candidate with supplemental material, such as commercial TExES preparation books, at the program’s expense. Evidence of this supplemental material was available at the compliance audit.

Based on evidence presented, Teacherbuilder.com is not in compliance with TAC §228.35 Preparation Program Coursework and/or Training.

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

Findings:

According to the self-report and the Teacherbuilder.com curriculum summary on their website, “initial performance on the Teacherbuilder.com web-based curriculum will serve as key formative evaluation data and will consist of benchmarks conducted at various intervals targeted to the TExES competencies. Candidates’ progression through the curriculum will be dependent on their performance on benchmark measures of mastery of standards and will require interns
to show mastery before moving on to proceeding modules. Candidates show mastery by meeting the standard of 70% on a module quiz and 80% on the final exam.” The only evaluation evidence presented in the document review was print-outs of each quiz and the final examination. There were no controls in place to prevent the student from progressing to the next module without passing the previous one.

According to Teacherbuilder.com, the candidates’ readiness to test for the content area and PPR is determined by how the individual performs on coursework in the online modules. It was unclear to TEA program specialists how candidates demonstrated a readiness to test due to the inconsistency of data provided as per TAC 228.40(b). According to the self-report, the TEExES exam, supervisor observation forms, and curriculum components are used as benchmarks to monitor the candidates’ progress through the program. No documents were available in the candidates’ folders or document review to substantiate the use of these items as benchmarking indicators.

The overall program evaluation according to the “Curriculum Summary” published on the website was as follows: “TBC staff is committed to systematically using various forms of data, follow-up of candidates’ teaching success, and retention in the profession for continuous program improvement. Program evaluation procedures will include internal as well as external criteria as evidence of the quality of program delivery and will use this data for formative and summative program improvement strategies. Evidence of the quality of program delivery and effectiveness will include but will not be limited to the following: improved student achievement; accountability system for educator preparation data; evaluation of training modules by consumers and instructors; continuous review and update of curriculum for alignment with TEExES, TEKS, and TAKS; intern classroom performance as evidenced by administrator, supervisor and/or mentor evaluations; intern performance on the TBC web-based curriculum.” No evidence of this evaluation process was available for review. However, in reviewing the certification pass rates and other demographic information available on the TEA website with the Teacherbuilder.com program staff, the staff stated they needed more ASEP training.

Student records are kept both paper and electronic format for five years in a locked, secured environment. The program staff indicated an interested in moving toward an electronic only storage format.

**Candidate Testing and Pass Rates**

According to the State Board for Educator Certification (SBEC) Accountability System for Educator Preparation (ASEP), Teacherbuilder.com has been rated as Accredited from its approval in 2005 through 2010. This rating is based solely on candidate pass rates on the TEExES certification examination. During the 2006-2009 academic years, candidates were required to score at least 70% on the initial testing period and at least 80% on the final testing period. With the advent of S.B. 174, the reporting process was changed to reflect only the pass rates for the entire group. The pass rate for the 2009-2010 academic year was set at 70%. Further scores are reflected by demographic categories: all, female, male, African American, Hispanic, Other, and White. If one category scored below the cut-off score, the program was assigned the rating of “Accredited” and an action plan was required. If any program had an overall, specific demographic group, or certification area score below the cut-off for three consecutive years, the program was assigned an accreditation status of “Accredited-Under Review.” Teacherbuilder.com has not been required to submit an action plan as result of
irregularities in pass rates. However, an action plan was required in 2006 as the result of a monitoring visit where several areas did not meet the requirements of the Texas Administrative Code. The table below shows this information.

### Teacherbuilder.com
### ASEP Scores 2005-2010

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of Demographic Categories Below Cut-off Score on Initial</th>
<th>Number of Demographic Categories Below Cut-off Score on Final</th>
<th>Accreditation Status</th>
<th>Action Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>2005</td>
<td></td>
<td></td>
<td>Accredited</td>
<td></td>
</tr>
<tr>
<td>2006</td>
<td></td>
<td></td>
<td>Accredited</td>
<td>Action Plan due to Post-Approval Visit</td>
</tr>
<tr>
<td>2007</td>
<td></td>
<td></td>
<td>Accredited</td>
<td></td>
</tr>
<tr>
<td>2008</td>
<td></td>
<td></td>
<td>Accredited</td>
<td></td>
</tr>
<tr>
<td>2009</td>
<td></td>
<td>2</td>
<td>Accredited</td>
<td></td>
</tr>
<tr>
<td>2010</td>
<td></td>
<td></td>
<td>Accredited</td>
<td></td>
</tr>
</tbody>
</table>

### Texas Administrative Code §229 Compliance

In 2009, Senate Bill 174 was passed which established four standards for accreditation. The first standard had to do with the TExES pass rate. The use of the initial and final score was discontinued. In its place, the pass rate would be calculated for the academic year from September 1st to August 31st. A phase-in pass rate was determined. The pass rate for 2009-2010 was 70% overall and in each gender and demographic area and certification field. The pass rate for 2010-2011 is 75% and for 2011-2012 a score of 80% will be required. In the Table below, the breakdown for the 2009-2010 academic years shows a pass rate for Teacherbuilder.com of 85%. However upon looking further to tests in each individual certification examination, it was noted that Bilingual Generalist EC-4, Life Science 8-12, all levels of the Pedagogy and Professional Responsibilities were below the standard of 70%. Some of the certification areas had less than ten (10) candidates tested, so those percentages will roll over into the 2011-2012 year until a total of ten (10) candidates’ scores are available to determine the final pass rates. The second standard focusing on principal evaluation of teacher
preparation (pilot tested 2009-2010), the third standard connecting teacher preparation to student progress (not piloted as of this time), and the fourth standard focusing on the frequency, duration, and quality of field supervision (pilot tested in 2009-2010) will become reportable during the 2010-2011 academic year.

**Standard I: Results of Certification Exams**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>70%</td>
<td>80%</td>
<td>70%</td>
<td>80%</td>
</tr>
<tr>
<td><strong>Overall:</strong></td>
<td>I</td>
<td>F</td>
<td>I</td>
<td>F</td>
</tr>
<tr>
<td><strong>Demographics:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>78%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hispanic</td>
<td>77%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Certification Areas At Risk:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bilingual Generalist EC-4</td>
<td>57.9%</td>
<td>60%</td>
<td>57.9%</td>
<td>55.6%</td>
</tr>
<tr>
<td>Bilingual Generalist 4-8</td>
<td>0%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Life Science 8-12</td>
<td>0%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PPR EC-12</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PPR 8-12</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PPR 4-8</td>
<td>50%</td>
<td>33.3%</td>
<td>57.1%</td>
<td>55.6%</td>
</tr>
<tr>
<td>PPR EC-4</td>
<td>72.7%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>English Language Arts and Reading 4-8</td>
<td></td>
<td>75%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Science 4-8</td>
<td>0%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Science 8-12</td>
<td>0%</td>
<td>50%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Special Education EC-12</td>
<td></td>
<td>0%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Social Studies 4-8</td>
<td></td>
<td>0%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Educational Testing Service (ETS) became the TEA contractor for the development and delivery of the TExES exams in 2006. ETS provided further data in October, 2010, that presents a deeper analysis. Three types of data for the academic years (September-August each year) 2005 through 2010 are supplied: 1) First Time Examinees’ Combined Pass Rates on the Pedagogy and Professional Responsibilities (PPR EC-4; 2) Pass Rates by Attempt; and 3) Average Percent Correct by Domains. The complete tables for these data are included in the Appendix of this report. The next section will focus on reports for the certifications fields initially approved by TEA for this program in 2006: 1) Bilingual Generalist EC-4. Discussion will also include the required Pedagogy and Professional Responsibilities (PPR) EC-4 and the Texas...
Oral Proficiency Test [Spanish] (TOPT) exam. The table below displays data concerning First Time Examinees’ Combined Pass Rates on both the content and the PPR EC-4.

### First Time Examinees’ Combined Pass Rates on the PPR EC-4

<table>
<thead>
<tr>
<th>Year</th>
<th>Test Title</th>
<th>Number of Examinees</th>
<th>Passing Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006-2007</td>
<td>TOPT Spanish</td>
<td>18</td>
<td>44%</td>
</tr>
<tr>
<td>2006-2007</td>
<td>Bilingual Generalist EC-4</td>
<td>27</td>
<td>19%</td>
</tr>
<tr>
<td>2007-2008</td>
<td>TOPT Spanish</td>
<td>18</td>
<td>17%</td>
</tr>
<tr>
<td>2007-2008</td>
<td>Bilingual Generalist EC-4</td>
<td>9</td>
<td>33%</td>
</tr>
<tr>
<td>2008-2009</td>
<td>TOPT Spanish</td>
<td>12</td>
<td>50%</td>
</tr>
<tr>
<td>2008-2009</td>
<td>Bilingual Generalist EC-4</td>
<td>3</td>
<td>33%</td>
</tr>
<tr>
<td>2009-2010</td>
<td>TOPT Spanish</td>
<td>7</td>
<td>43%</td>
</tr>
<tr>
<td>2009-2010</td>
<td>Bilingual Generalist EC-4</td>
<td>2</td>
<td>50%</td>
</tr>
</tbody>
</table>

In the first year for which ETS has data, 2006-2007, candidates in the original certification fields for which the program was approved by TEA, showed very low passing rates on their first attempt to pass the Pedagogy and Professional Responsibilities (PPR) EC-4 exam. The fact that only eight (8) out of sixteen (16) candidates who took the PPR EC-4 and five (5) out of twenty-seven (27) who took the Bilingual Generalist EC-4 passed on the first attempt, indicates a lack of preparation by the program for the candidates taking this test. The same can be said for the following years, 2007-2011.

The following table displays data concerning pass rates for the candidates’ first attempts on the various tests for the original certification for which the program was approved. The complete table showing passing rates is included in the Appendix. Please note that one student attempted the PPR EC-4 exam twenty-eight (28) times and still did not pass.
Pass Rate on First Attempt

<table>
<thead>
<tr>
<th>Test Title</th>
<th>Number of Examinees</th>
<th>Passing Rate on First Attempt</th>
</tr>
</thead>
<tbody>
<tr>
<td>TOPT Spanish</td>
<td>35</td>
<td>100%</td>
</tr>
<tr>
<td>Bilingual Generalist EC-4</td>
<td>94</td>
<td>26%</td>
</tr>
<tr>
<td>PPR EC-4</td>
<td>16</td>
<td>56%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Test Title</th>
<th>Number of Examinees</th>
<th>Passing Rate on First Attempt</th>
</tr>
</thead>
<tbody>
<tr>
<td>TOPT Spanish</td>
<td>68</td>
<td>100%</td>
</tr>
<tr>
<td>Bilingual Generalist EC-4</td>
<td>105</td>
<td>34%</td>
</tr>
<tr>
<td>PPR EC-4</td>
<td>27</td>
<td>44%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Test Title</th>
<th>Number of Examinees</th>
<th>Passing Rate on First Attempt</th>
</tr>
</thead>
<tbody>
<tr>
<td>TOPT Spanish</td>
<td>101</td>
<td>98%</td>
</tr>
<tr>
<td>Bilingual Generalist EC-4</td>
<td>83</td>
<td>39%</td>
</tr>
<tr>
<td>PPR EC-4</td>
<td>22</td>
<td>23%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Test Title</th>
<th>Number of Examinees</th>
<th>Passing Rate on First Attempt</th>
</tr>
</thead>
<tbody>
<tr>
<td>TOPT Spanish</td>
<td>208</td>
<td>99%</td>
</tr>
<tr>
<td>Bilingual Target Lang. Proficiency - BTLPT</td>
<td>5</td>
<td>60%</td>
</tr>
<tr>
<td>Bilingual Generalist EC-4</td>
<td>68</td>
<td>55.9%</td>
</tr>
<tr>
<td>PPR EC-4</td>
<td>18</td>
<td>50%</td>
</tr>
</tbody>
</table>

As is seen in the table, a high percentage of candidates who attempted the TOPT between 2006 and 2010 passed on the first attempt. This could be a result of home language acquisition rather than program preparation for the exam. The passing rates for the related certificate areas do not reflect a similar level of preparation. In 2010, the Test of Spoken Language was phased out and was replaced by the Bilingual Target Language Proficiency Test (BRTLPT). The new test is more of a literacy test both in the language and in English. The data in this abbreviated table reveals that the majority of candidates taking these examinations for the first time failed. Therefore, it is likely that the program did not provide adequate preparation for success on the exams. Yet that was the purpose of the program, according to Teacherbuilder.com’s proposal in 2006.

The final table below illustrates the average percentage correct for the domains of each test for all candidates recommended for testing by Teacherbuilder.com in any given year. The initial passing standard for each domain for each year is 70%. The final passing standard is 80%.
### Average Percent Correct by TExES Domains

#### 2006-2007

<table>
<thead>
<tr>
<th>Test Title</th>
<th># of Exam-stees</th>
<th>Domain I</th>
<th>Domain II</th>
<th>Domain III</th>
<th>Domain IV</th>
<th>Domain V</th>
<th>Domain VI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bilingual Generalist EC-4</td>
<td>136</td>
<td>57%</td>
<td>48%</td>
<td>55%</td>
<td>47%</td>
<td>63%</td>
<td>51%</td>
</tr>
<tr>
<td>PPR EC-4</td>
<td>31</td>
<td>71%</td>
<td>70%</td>
<td>61%</td>
<td>69%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### 2007-2008

<table>
<thead>
<tr>
<th>Test Title</th>
<th># of Exam-stees</th>
<th>Domain I</th>
<th>Domain II</th>
<th>Domain III</th>
<th>Domain IV</th>
<th>Domain V</th>
<th>Domain VI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bilingual Generalist EC-4</td>
<td>174</td>
<td>60%</td>
<td>49%</td>
<td>55%</td>
<td>48%</td>
<td>61%</td>
<td>55%</td>
</tr>
<tr>
<td>PPR EC-4</td>
<td>59</td>
<td>67%</td>
<td>68%</td>
<td>64%</td>
<td>68%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### 2008-2009

<table>
<thead>
<tr>
<th>Test Title</th>
<th># of Exam-stees</th>
<th>Domain I</th>
<th>Domain II</th>
<th>Domain III</th>
<th>Domain IV</th>
<th>Domain V</th>
<th>Domain VI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bilingual Generalist EC-4</td>
<td>135</td>
<td>59%</td>
<td>52%</td>
<td>56%</td>
<td>51%</td>
<td>65%</td>
<td>55%</td>
</tr>
<tr>
<td>PPR EC-4</td>
<td>76</td>
<td>62%</td>
<td>71%</td>
<td>59%</td>
<td>66%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### 2009-2010

<table>
<thead>
<tr>
<th>Test Title</th>
<th># of Exam-stees</th>
<th>Domain I</th>
<th>Domain II</th>
<th>Domain III</th>
<th>Domain IV</th>
<th>Domain V</th>
<th>Domain VI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bilingual Generalist EC-4</td>
<td>90</td>
<td>55%</td>
<td>48%</td>
<td>55%</td>
<td>47%</td>
<td>61%</td>
<td>53%</td>
</tr>
<tr>
<td>PPR EC-4</td>
<td>59</td>
<td>67%</td>
<td>74%</td>
<td>60%</td>
<td>66%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Keeping in mind that the original purpose of this program as stated in the 2006 proposal is to “Provide high-quality professional development that is sustained, intensive and classroom-focused,” the same pattern of low performance as seen in the other two data sets continues to be evidence of a lack of program preparation.
Financial Consequences for Candidates

In addition to low test performance, candidates from Teacherbuilder.com took repeated tests without improving their scores. For example, among those who were reported as finishers in 2009-2010, one candidate failed twelve (12) times before finally finding a content area that could be passed. Another candidate failed the Bilingual Generalist EC-4 test nine (9) times before switching over to Generalist EC-4 and failing that test before passing. Yet another candidate took the Science 8-12 test nine (9) times before passing. Other candidates failed anywhere from four (4) to twenty-eight (28) times before passing. These repeated failures indicate a lack of preparation and screening for testing readiness by Teacherbuilder.com. This lack of service not only affects academic achievement, it costs candidates additional money. For example, in 2009-2010, candidates paid an additional $14,640.00 in testing fees for tests they failed. The highest accumulated testing fee for one candidate was $1200.00, which amounts to ten (10) times what a well-prepared candidate would pay.

Complaints

Since its inception, there have been both informal and formal complaints made to TEA concerning its operation. The complaints have consisted of sending teachers out to school districts for jobs without 30 hours of field-observations (1), not providing appropriate field supervision (5), poor curriculum (2); inadequate test preparation (1); lack of support and guidance (6); and telling candidates they can prepare them for certification areas that they are not approved for (LOTE) (1). According to one candidate, “I feel like I was thrown into the classroom to sink or float, and I did sink.” According to another, “I feel that I was treated unfairly and scammed by Teacher Builder. They took my money and serve (sic) no purpose for it….”

Conclusion

According to Texas Administrative Code (TAC) §229.6 (a) [effective April 18, 2010], the continuing approval of an educator preparation program is based upon 1) accreditation status; 2) compliance with SBEC rules regarding program operations; and 3) integrity of required data submissions. Teacherbuilder.com has continuously been out of compliance with Texas Administrative Code since its inception in 2006. The Texas Education Agency monitored the program repeatedly from 2006-2010 and made numerous recommendations that, if followed, would have brought the program into compliance with all requirements. While Teacherbuilder.com has maintained the status of “Accredited” for each year from 2006-2010, there have been issues in compliance with operations necessitating repeated technical visits. Finally data submitted to TEA has been inaccurate, as the conflict between the base-line data provided in 2009, self-report of October 12, 2010, and the on-site findings from the November 8-10, 2010, visit exemplifies.

PROGRAM RECOMMENDATION

The following are recommendations based on the findings of the Texas Education Agency Compliance Audit. If the program is NOT in compliance with any component, please consult the Texas Administrative Code and initiate actions to correct the issue IMMEDIATELY. A
Compliance Status Report will be required every sixty days until the program has met the requirements of Texas Administrative Code.

General program recommendations are suggestions for general program improvement and do not require follow-up.

**PROGRAM COMPLIANCE RECOMMENDATIONS:** A Compliance Status Report will be required every sixty (60) days until compliance is met.

**Component II - TAC §227.10 Admission Criteria:**

- Establish a method of documenting test scores in candidates’ records reflecting PACT scores (if applicable), basic skills, content, and PPR; (2005, 2009)
- For out of country candidates, require transcript review, TOEFL, and basic skills test scores and place these documents in the candidates’ folders; (2009)
- Place evidence of candidate interview documentation (questions, responses, and scoring rubric) indicating adequate oral communication skills in candidates’ records; (2009)
- Establish verifiable documentation signed by the program director to approved candidate’s admission under the 10% cohort rule and document the limitation of the cohort group to 10%.

**Component III - TAC §228.30 Curriculum:**

- Revise curriculum to add more content methodology coverage for each specific content area offered; (2005, 2006, 2009)
- Increase content covering the 17 curriculum topics in the online modules including reading methodology across the four core content areas and add an instructional technology integration module; (2005, 2006, 2009)
- Include content coverage of the TEKS in the online modules; (2005, 2006, 2009)
- Provide a certified content instructor who is the instructor of record for each certification area offered until the passing of the content PACT is required for all potential candidates (Science, Math, Social Studies, Generalist EC-6, English, Spanish, and Bilingual).

**Component IV - TAC §228.35 Program Delivery and Ongoing Support:**

- Make provisions in the online program for students with disabilities;
- Provide verifiable documentation that coursework and training for each candidate is completed prior to recommending them for a standard certificate (Field-based 30 hours; documented 50 clock hours from the school district, 220 clock hours of online or face-to-
face coursework, and internship time period of an academic year or 180 days or a minimum of 12 weeks of clinical teaching); (2005, 2006, 2009)

- Establish procedures to verify documentation of the 50 clock hours of staff development provided by the school district and place documentation in each candidate’s folder; (2009)

- Place in each candidate’s folder verifiable evidence that initial contact was made by the field supervisor within the first three weeks of assignment (face-to-face, phone call, email, etc.);

- Establish verifiable evidence that three formal observations per academic year for first, second, and third year probationary interns is provided. The observation form should include the field supervisor’s feedback, signatures of both field supervisor and intern, date of observation, time or duration of observation, and class content area observed, and identify a start and stop time for the interactive conference following the observation. (2005, 2009)

- Require a field-based observation log verifying the minimum 30 clock hours for all candidates and place it in the candidates’ records. Should video be used for 15 hours, the hours and reflections of the videos should also be documented on the observation logs; (2009)

- Require verifiable focused field-based observation activities to be completed during the 30 clock hours that are completed in private and public schools;

- Modify the observation form or create a modified observation report that can be provided to the campus administrator;

- Provide verifiable evidence that the first observation is completed within the first six weeks of the intern’s assignment.

Component V - TAC §228.40 Assessment and Evaluation of Candidates for Certification and Program Improvement:

- Establish multiple assessments and benchmarks to determine the candidates’ mastery of the content and skills; (2005, 2009)

- Establish and implement a verifiable systematic method of curriculum evaluation; (2009)

- Review on a yearly basis overall pass rates, demographic pass rates and certification area pass rates and report this information in a verifiable manner to your advisory committee members; and

- Create an annual formal written program evaluation report for the advisory committee members and other interested parties that include ASEP information, stakeholder (principals, mentors, human resource directors, etc.) input, and other pertinent data.
GENERAL RECOMMENDATIONS:

- Expand the advisory membership to cover all areas of the state where the candidates are located;
- Use technology as a means to communicate and conduct the required advisory committee members in the state;
- Reflect in agendas and minutes of the meetings specific discussions regarding curriculum design, policy decisions, program evaluation, and field-based experiences.
- Update the website and admission criteria to reflect current requirements for entry into the program;
- Convert program admissions requirements to accepting PACT candidates only into the program;
- Convert all paper files to electronic files;
- Use alternative technology such as blogs, and webinars to provide interaction for students in the program;
- Activate the use of the e-portfolio as a means of collecting, evaluating, and storing student work that is completed for assessment and benchmarking;
- Use multiple ways of assessing the mastery of content by the students;
- Use alternative technology such as blogs, forums, chats, and webinars to provide opportunities for the students to interact with each other, with the instructors, and with program staff. Feedback to the interactions should be consistently available within 48 hours;
- Establish a verifiable student advising schedule/timeline with the instructor and program staff (Suggestion: At the end of every domain, supplemental videos, and test prep);
- Reduce certification fields to be offered by the program so adequate curriculum coverage and instructor support can be provided; and
- Establish an Excel spreadsheet which records the date of interns’ school duties, the first contact with the intern by the field supervisor, the first observation within the first six weeks, the second observation of the first semester and the third observation of the second semester. This record should be maintained for all first, second, and third year probationary interns.
- Revise coursework in a format that meets the International Association for K-12 Online Learning (iNACOL) standards. Include projects, written response/reflections, lesson plan assignments or modeling of effective classroom management or instruction into the coursework.
Technical Compliance Audit 2012


Texas Education Agency (TEA) Education Preparation Manager, Sandra Jo Nix, and Program Specialist, Mixon Henry conducted a technical compliance audit of Teacherbuilder.com, 2524 West Freddy Gonzalez, Edinburgh, Texas, on May 16-18, 2012, as required by Texas Administrative Code (TAC) §229.6(a). Accompanying the Texas Education Agency team was Dr. Cheryl Harris from the Texas Comprehensive Center. The purpose of Dr. Harris' attendance was to review the TEA compliance audit process and follow the process through an actual audit. The focus of the technical compliance audit was the Generalist EC-6 certification area and to review progress on compliance issues identified from the previous visit conducted on November 8-10, 2010. The following are findings and recommendations for program improvement.

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

Findings:

Program support was evidenced by the involvement of Dr. Noe Sauceda and Saul Rodriguez and various other TeacherBuilder.com staff and advisory committee members in the technical compliance audit.

The TeacherBuilder.com advisory committee currently consists of eleven (11) members: five (5) members from school district, one (1) member from higher education, one (1) member from an education service center, and three (4) members from business and community [TAC §228.20(b)]. TeacherBuilder.com meets the requirements for advisory committee composition.

While the advisory committee meetings were not an issue to be addressed in the technical compliance audit, it was discovered that since the 2010 visit, no advisory committee meetings had taken place [TAC §228, 20(b)]. It was indicated that an advisory committee meeting would be held in July, 2012.

Since the advisory committee had not met, the advisory committee’s input for participating in program design, delivery, evaluation, and major policy decisions of the education preparation program was not available. This is unfortunate, since the program and its curriculum were undergoing some substantial revisions. In addition, lack of meetings has precluded the advisory committee from considering the relevance of field-based observations and experiences as required by TAC 228.35 (d). The program indicated that a handbook was under development for the advisory committee that would outline their roles and responsibilities.

Based on evidence presented, TeacherBuilder.com is not in compliance with COMPONENT I: COMMITMENT AND COLLABORATION - Texas Administrative Code (TAC) §228.20.
COMPONENT II: ADMISSION CRITERIA - Texas Administrative Code (TAC) §227.10

Findings:

Several areas dealing with admissions’ criteria were reviewed as a result of the previous technical assistance visit in 2010. It was noted that Teacherbuilder.com has experienced a reduction in the number of candidates enrolling in their program. The 2011-2012 Annual Performance Report indicated that 247 candidates were admitted and thirteen candidates were identified as finishers. This dropped from the 2010-2011 report of 255 admitted and 84 finishers. The program owners contributed this decline to current economic conditions.

Maintaining proper documentation was an issue during the last technical compliance audit. As a result, records for candidates admitted since June 11, 2011, were chosen for review to seek evidence of implementation of proper documentation procedures and practices. Nineteen (19) candidates’ records were selected at random for review.

The first issue noted in the previous technical compliance audit was that the program did not establish and use a systematic method of documenting test scores in candidates’ records reflecting PACT scores (if applicable), basic skills, content, and PPR (2005, 2009, 2010). Teacherbuilder.com created a form to be used to review applicants’ eligibility. However, its use was not evident in the records that were reviewed. It was also noted that copies and unofficial transcripts were still being accepted by the program and that general record keeping was not consistent in the folders. Proper documentation remains an issue.

Issue two pertained to acquiring the proper documentation for out-of-country candidates. In the Compliance Status Report required to monitor compliance issues after the last audit, the program provided a Foreign Educator Eligibility Review form. The form had a yes or no check list for the following items: 6 or more hours of English in transcripts, success interview with TBC staff, TOEFL score requirements, and successful completion of an approved ESL course. In addition, beneath the title Written English Proficiency, a yes or no check-off asked if the student had passed a content TExES exam. In the next section, under Oral Language Proficiency, the person collecting the data was to verify if the applicant had successfully completed a job interview. There was no evidence that the Foreign Educator Eligibility Review form was being used to qualify out-of-country applicants for admission. Documentation for out-of-country applicants required by TAC includes a transcript review [TAC §227.10(7) (e)], TOEFL score results [TAC §227,10(5)], and basic skills test scores [TAC §227,10(4)] (2009, 2010). Seven out-of-country candidates’ records were reviewed. Six of those records contained a transcript review from an approved TEA transcript review service. None of the seven candidates’ records contained TOEFL score results [TAC §227,10(5)]. In addition, none of the seven folders reviewed contained basic skills verification for the candidates [TAC §227,10(5)]. Documentation required for out-of-country candidates remains an issue.
Issue three had to do with conducting an oral interview in order to determine the candidate’s appropriateness for the certification being requested [TAC §227.10(6)]. The program developed eight interview questions and scoring guidelines. The scoring guidelines indicate that “a scale of 1-10 was used to score the applicants answers. A number score closer to 10 reveals a stronger/correct response; answers closer to 1 reveal an incorrect response or assisted response.” It was noted that while the interview questions and a scoring guidelines had been developed, its use was not evident in the candidates’ records. It was noted that 15 out of 19 records reviewed did not have any interview documentation in them. Included in that number are the seven out-of-country candidates. Documentation of an interview or other screening instrument remains an issue.

Issue four had to do with documentation signed by the program director to approved candidate’s admission under the 10% cohort rule and ensure that the program limited the cohort group to 10% [TAC §227.10(3)(b)]. The program indicated in their self-report that seventeen (17) candidates were admitted under the 10% rule and five (5) of those records were reviewed. None of the records had documentation of extraordinary circumstances. Documentation of the 10% extraordinary circumstances is still an issue.

**Based on the evidence presented, Teacherbuilder.com is not in compliance with Texas Administrative Code §227.10-Admission Requirements.**

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

Prior to the 2012 technical assistance audit, the Texas Education Agency again requested access to the Teacherbuilder.com online curriculum in order to review the status of the coursework from the perspective of the candidate. Teacherbuilder.com granted the request and has maintained to date an open account for TEA in order for periodic review the program’s progress in curriculum development. The last check-in date was in November, 2012. It was noted at that time that no substantial additions had been made to the curriculum since the 2012 audit.

The 2010 technical compliance report noted several major issues with the curriculum that was delivered to Teacherbuilder.com’s candidates (2005, 2006, 2009, and 2010). Much of the content that was viewed in the previous audits remains in place, namely the PPR modules including: Module 1: Domain 1; Module 2: Domain 2; Module 3: Domain 3; Module 4: Domain 4; Module 5: Final Test (90 clock hours) and the test preparation Module 8: Test Preparation Material (10 clock hours). There are several other pre-existing modules that include: Module 7: Observation Supplemental Video, Module 9: Flash Cards PPR Supplement; and Module 10: TxBess New Teacher/Mentor Training. Specific use of these last three modules was unclear. There were several formatting errors noted in the material during the 2010 visit that had not been corrected. A page-by-page review of the curriculum was conducted in order to identify where these errors exist and to encourage their correction.

Since the 2010 compliance audit, five (5) new modules have been developed: Getting Started or Program Orientation (10 clock hours), Code of Ethics (20 clock hours), Classroom Management (90 clock hours), Reading Across the Curriculum (40 clock hours), and
Technology in the Classroom (20 clock hours). It was indicated that Special Populations, Fine Arts in the Elementary School, and Using Data to Direct Student Learning would be developed in the future. In reviewing the course content present at the 2012 compliance audit, the clock hours for each module seemed inflated in comparison to the amount of content presented or work required by the candidate.

Another issue was the revision of the curriculum to add more content methodology coverage for each specific content area offered (2005, 2006, 2009, and 2010). The content continues to be one focused on Pedagogy and Professional Responsibilities (PPR) rather than focused on specific certification areas and content methodology associated with each. Teacherbuilder.com is responsible for providing content instruction since it does not require PACT (Pre-admission Content Testing) for all candidates prior to admission to their program. All candidates, no matter what certification area they are seeking, take the same courses. It was particularly noted that the educator standards were not addressed for any certification area and especially not for the Generalist EC-6 since it did not cover the required areas of art, music, theater arts, physical education or health [TAC §228.30 (a)].

Issue two concerned the lack of rigorous and in-depth coverage of the mandated 17 curriculum topics [TAC §228.30(b)]. Teaching Reading Across the Curriculum is one of the module additions. The candidate accrues forty (40) clock hours upon completing the module. In reviewing the module, it consisted of three parts: the first part identified the five areas of reading to be covered.

Reading with children and helping them practice specific reading components can dramatically improve their ability to read. Scientific research shows that there are five essential components of reading that children must be taught in order to learn to read. Adults can help children learn to be good readers by systematically practicing these five components:

1. **Comprehension**—ability to make meaning from print using background knowledge, making predictions, making connections (text-to-text, text-to-self, text-to-world), and making inferences.
2. **Vocabulary**—instruction and repeated contact with vocabulary words is important to the continued development of reading comprehension and fluency. Vocabulary instruction can also serve as a springboard for meaningful word study.
3. **Phonemic awareness**—awareness of the sounds that make up spoken words. There are 2 levels of phonological awareness. Phonemic awareness is the more advanced level and is characterized by sensitivity to large units of sound such as words, syllables, and syllable parts (onset and rime). According to the National Reading Panel, the 2 phonemic awareness skills that have the greatest impact on learning to read are segmenting and blending.
4. **Phonics**—a way of teaching beginning reading and spelling that emphasizes the relationship between letters and sounds.
5. **Fluency and expressiveness**—ability to read orally with speed, accuracy, and proper expression. There are two instructional approaches usually used to practice reading: guided repeated oral reading and independent silent reading. The National Reading Panel determined that guided repeated oral reading has a significant and positive impact on word recognition, reading fluency, and comprehension for students of all ages.

The second part of the reading across the content area curriculum was a PowerPoint presentation entitled Reading Across the Curriculum: How to Promote and Improve Reading Proficiency in the CTE
Classroom by Jessie Hayde, Georgia State University and Dr. Janet Burns, Georgia State University.
There are 26 PowerPoint slides that the candidates are asked to read. The PowerPoint presentation is
divided into three parts: Part I Overview of the Reading Process; Part II Experiencing the Reading
Process; Part III Tips for Promoting Reading in CTE Programs and Courses. This is not a recorded
session from a previous presentation. There is no narration or additional information available to
elaborate on the information other than what is on the slides. The candidate was not asked to interact
with this information in any way. The slides often refer to page numbers that access information the
candidates do not have access to.

The third and last part of the course content is called Unlocking Reading for All Students, another
PowerPoint presentation. The candidate will receive the following message when trying to access it.
This content cannot be viewed. Either it has been removed, or made private by its author.

In all reading content presented, there are no related topics listed, no glossary available, no
forum posts and no candidate interaction either in online discussions, reflections, projects, or
other related activities requiring the candidates to apply the information in order to show
mastery of the knowledge and skills. This format is consistent across the all of the
Teacherbuilder.com instructional modules.

Another new module is the Code of Ethics and Standard Practice Texas Administrative Code.
This module contains a Statement of Purpose and Enforceable Standards which is a copy of the
current Texas Educators Code of Ethics. The candidate again is not asked to interact with the
content in any way. At the time of the 2012 compliance audit, the educator received twenty (20)
clock hours of credit for reading the information.

Completion of the module Technology Integration in the Classroom allows the candidate to
accrue twenty (20) clock hours. This module contained a definition of technology integration;
the International Society for Technology in Education (ISTE) standards for students, teachers,
and administrators; Technological Pedagogical Content Knowledge (TPCK); State Board for
Educator Certification Technology Standards; campus and personal goals for technology
integration; Goals for Technology Integration Grades 3-5, 6-8, 9-12, instructional technology in
the classroom advantages and criticisms, technology impact on student achievement,
preparing students for technology (2 sentences), types of integrated technology focused solely
on social media. Again, the emphasis is on information and not implementation into classroom
practice.

The classroom management module covers Classroom Management Thoughts taken from
educatech.wordpress.com; The Key to Classroom Management by Robert J. Marzano taken
from bonfire.learn.org; appropriate levels of dominance taken from Wubbels & Levy, 1993;
Classroom Management: Dr. Bob Kizlik. There is one quiz after Classroom Management
Thoughts with four multiple choice questions (each worth 25 points) that are situational in
nature. When a TEA staff person took the quiz and submitted it for grading, no score was
immediately available and under the mark column, it said “unreleased” and under the
submission column, a “no results yet” message was provided. The candidate accrues ninety
(90) clock hours upon completion of this module. As with other modules, it did not require
candidates’ reflections, interactions such projects or activities, or adequate assessment to verify
mastery of knowledge.
The last addition to the Teacherbuilder.com curriculum is called Teacher Corner. The description of the module explains that the focus is on planning, class culture, behavior, engagement, differentiation, assessment, collaboration and being a new teacher. According to the website, the candidate is given credit for 120 clock hours for completing this module. This content consists of a free library of videos ranging from 4 to 15 minutes each that are available for public use from the Teaching Channel. In calculating the actual time of the all the videos the candidate is expected to view, the total time is 8.23 clock hours. This allows the candidate to accrue one hundred twelve hours and seventeen minutes for answering the quizzes. All video segments contain the same quiz with the same three questions asked with a possible score of 100%. The questions are open-ended: List three things that I have learned (33 points); List two things that I liked (34 points); and List one thing that I'll do immediately (33 points). There is no rubric used to evaluate the responses and it is unclear what would constitute an appropriate or inappropriate answer. Again, there was no opportunity for the candidate to interact with the material other than the quiz or practice any of the skills presented in the video lessons.

In the November 12 check in on the curriculum progress, it was discovered that in the reading material module, a comprehensive 324 page book entitled Educating Children with Autism copyrighted by The National Academies is available. This was not viewed at the 2012 compliance audit so it appears to have been added since the audit. However, no directions are provided as to what the candidate is to do with this material.

Another recommendation in the 2011 report was to include content coverage of the TEKS in the online modules (2005, 2006, 2009, and 2010). There was no evidence presented in the 2012 audit that indicated that this area had been addressed [TAC §228.30(a)].

The last issue identified in the 2011 report was the need to provide a certified content instructor who is the instructor of record for each certification area offered until the passing of the PACT is required for all applicants (Science, Math, Social Studies, Generalist EC-6, English, Spanish, and Bilingual). In the Compliance Status Report provided on May 23, 2011, six individuals signed an Online Instructor Agreement stating that they were certified Texas Teachers and were willing “to serve as an online instructor to provide content methodology and support to TeacherBuilder.com candidates in the area(s) of: Insert certification here.” However, on the website and in the instructional modules, Dr. Noe Sauceda was the only instructor listed for the 13 modules. No contact information or reference of the other five individuals was located anywhere on the website.

Based on evidence presented, Teacherbuilder.com is not in compliance with TAC §228.30 Educator Preparation Curriculum.

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

**Findings:**

The 2010 Compliance Audit identified several areas to bring Teacherbuilder.com into alignment with TAC including modifying the online platform to accommodate candidates with disabilities. In
an earlier audit, Teacherbuilder.com indicated that it did not use any specific online standards in the development of their platform or curriculum. The program was asked to review and use the INACOL standards since these had been adopted by Commissioner’s Rule. In the Compliance Status Report that was submitted, Dr. Sauceda indicated that the Teacherbuilder.com would follow all INACOL standards for online program development. In a review of their online coursework, there was no indication that this had been addressed.

The second issue was to provide a verifiable system of documenting 300 clock hours of coursework and training for each candidate prior to recommending them for a standard certificate (Field-based 30 hours; documented 50 clock hours from the school district, 220 clock hours of online coursework (2005, 2006, 2009, 2010)[TAC §228.35(a)(4)]. A Curriculum Program Hours/300 Total form was developed and submitted with the Teacherbuilder.com Compliance Status Report. However, its use in tracking candidates’ hours was not evident at the 2012 audit. In addition, the form listed modules that contained a different name from the one listed on their online module menu. As such, it was unclear which were required modules and which were supplemental in nature.

Another issue was to establish procedures to verify documentation of the 50 clock hours of staff development provided by the school district and place appropriate documentation in each candidate’s folder (2009, 2010) [TAC §228.35(a)(5)]. In the nineteen (19) records reviewed, there was no documentation of completion of the 50 clock hours. Therefore, documentation of these hours remains an issue.

Teacherbuilder.com was asked to place in each candidate’s record verifiable evidence that initial contact was made by the field supervisor within the first three weeks of assignment (face-to-face, phone call, email, etc.) [TAC §228.35(f)]. In the nineteen (19) candidates’ records reviewed, it was determined there was no verifiable evidence of contact within the first three weeks of placement. In review of the candidates’ records, several inconsistencies existed between the enrollment date and the start date (i.e. start date in the school setting preceded the identified Teacherbuilder.com enrollment date.)

Teacherbuilder.com was to develop and require the use of a field-based observation log by the candidates in order to verify the minimum 30 clock hours of field-based observations for all candidates. This information was to be maintained in the candidates’ records [TAC §228.35(d)(3)(A)]. Should video be used for 15 hours, the hours and reflections of the videos should also be documented on the observation logs (2009. 2010) [TAC §228.35(a)(3)(A)]. A new field-based observation log was developed that required the date of the observation, time of the observation in minutes, subject and grade level observed, and the observed teacher’s name and signature. However, again, use of this form was not evident. In addition, a Clearance for Classroom Observations release was developed to be delivered to the campus to act as an introduction of the candidate to the campus administrator. However, seven out of nine candidates who should have had verification of the 30 clock hours of field-based experiences because they had completed requirements to be placed in a classroom did not have documentation for such. It was also noted that several candidates completed their 30 clock hours of field-based observation in the same classroom at the same grade level. TAC states that it should be done in a variety of educational settings with diverse student populations [TAC 228.35(d)].
Teacherbuilder.com was asked to provide verifiable evidence of three formal observations [TAC 228.35(f) (3)]. Out of ten (10) candidates who had indicators of being in an internship with the potential of thirty (30) total observations, only documentation for a total of four (4) observations was present. No intern had three observations required by TAC. One PDAS observation by a principal was counted as one of the formal observations. A new observation form was included in the handbook but was not found in the candidates’ records. A new observation form does have a place for the candidate to sign as having received the observation and interactive conference. There was still no documentation of the interactive conference between the field supervisor and the candidate or that the campus administrator received a copy of the formal observation.

Based on evidence presented, Teacherbuilder.com is not in compliance with TAC §228.35 Preparation Program Coursework and/or Training.

**COMPONENT V: ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT**

Texas Administrative Code (TAC) §228.40

Several issues concerning program assessment and evaluation were identified in the 2010 technical compliance audit. The first had to do with Teacherbuilder.com including appropriate assessments in their coursework that were both formative and summative. The current coursework assessments exist in the PPR modules and are quizzes and one eighty question comprehensive test. There have been some additions of open-ended questions in the Teacher Corner module. However, there does not appear to be any performance type assessments which are so critical for the development of a teacher. There is no evidence of case studies, lesson plan development, projects, or mini-teaching sessions in order to ensure that the candidate has acquired the necessary knowledge and skills to be an effective teacher.

As requested by TEA, Teacherbuilder.com identified the benchmarks to determine the candidates’ mastery of the content and skills (2005, 2009, 2011). The Teacherbuilder.com (TBC) curriculum consists of four content domains, practice assessments after each domain and a comprehensive final exam. All program participants must complete all curricular components beginning with domain number 1 and ending with successful completion of the final exam. The content provided within each domain is reflective of all the competencies found in the TExES Pedagogy and Professional Responsibilities (PPR) EC-12 exam. The breakdown per domain is as follows:

<table>
<thead>
<tr>
<th>Domain</th>
<th>Competencies</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>L, 2, 3, 4</td>
</tr>
<tr>
<td>2</td>
<td>5, 6</td>
</tr>
<tr>
<td>3</td>
<td>7, 8, 9, 10</td>
</tr>
<tr>
<td>4</td>
<td>1L, 12, L3</td>
</tr>
</tbody>
</table>

Upon completion of each domain, all candidates are required to challenge a 5 question quiz (benchmark) in order to demonstrate mastery in that particular domain. The candidate must attain a minimum score of 70% in order to proceed to the next domain. All benchmark results are placed in the candidate’s electronic folder. Successful completion of all domains and benchmarks allows for the candidate to challenge the comprehensive final exam. (benchmark)
The final exam or final benchmark consists of 80 comprehensive questions directly related to content found in the previous four domains and benchmarks. The candidate must attain a minimum score of 75% in the final exam. Successful completion of all domains, quizzes, and final exam will result in the candidates’ approval to challenge the TExES PPR EC-12. In addition, Teacherbuilder.com has created Requirements for the Standard Certificate form which lists items that must be completed prior to receiving final standard teacher certification. In addition, a Curriculum Program Hours/300 Total chart was developed to benchmark the candidate’s completion of coursework modules. However, use of these documents was not evident during the audit.

Another issue identified in the 2010 technical compliance audit was the lack of a verifiable systematic method of curriculum evaluation (2009, 2010). As required in the TEA Compliance Audit Report, Teacherbuilder.com provided a plan of curriculum evaluation indicating that “curriculum evaluations will be done twice a year with one session occurring in early fall and one late spring. Participants in the curriculum process will include the following the Executive Director, Program Director, Program Supervisors, Content Online Instructor(s), active program participants and all available advisory board members. The data utilized for curriculum evaluation will include but is not limited to the following: ASEP data, online survey, curriculum domain benchmark scores, final exam benchmark scores and candidate success rate on TExES exam. Curriculum revisions will be implemented based on suggestions from all stakeholders at the completion of each evaluation session. The Program Director will revise the curriculum and align it to the pedagogical competencies as well as the 17 topics identified in the curriculum correlation chart provided by the state. This will be done in a manner so as to ensure the candidates success in meeting state certification requirements.” Teacherbuilder.com is required to involve the advisory committee in program design and delivery. Since the advisory committee has not met, their input on the curriculum revisions has not been formally requested or documented. Since the advisory committee has not met, no evaluative data has been shared with them.

Based on evidence presented, Teacherbuilder.com is not in compliance with TAC §228.40 Assessment and Evaluation of Candidates for Certification and Program Improvement.
### Teacherbuilder.com Accreditation Statuses 2005-2011

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of Demographic Categories Below Cut-off Score on Initial</th>
<th>Number of Demographic Categories Below Cut-off Score on Final</th>
<th>Accreditation Status</th>
<th>Action Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>2005</td>
<td></td>
<td></td>
<td>Accredited</td>
<td></td>
</tr>
<tr>
<td>2006</td>
<td></td>
<td></td>
<td>Accredited</td>
<td>Action Plan due to Post-Approval Visit</td>
</tr>
<tr>
<td>2007</td>
<td></td>
<td></td>
<td>Accredited</td>
<td></td>
</tr>
<tr>
<td>2008</td>
<td></td>
<td></td>
<td>Accredited</td>
<td></td>
</tr>
<tr>
<td>2009</td>
<td></td>
<td>2</td>
<td>Accredited</td>
<td></td>
</tr>
<tr>
<td>2010</td>
<td></td>
<td></td>
<td>Accredited</td>
<td>Compliance Status Report</td>
</tr>
<tr>
<td>2011</td>
<td></td>
<td></td>
<td>Accredited</td>
<td>Compliance Status Report</td>
</tr>
</tbody>
</table>
# Pass Rate on First Attempt

## All Certification Tests

<table>
<thead>
<tr>
<th>Test Title</th>
<th>Number of Examinees</th>
<th>Passing Rate on First Attempt</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bilingual Education Supplement</td>
<td>24</td>
<td>45.8%</td>
</tr>
<tr>
<td>Bilingual Generalist 4-8</td>
<td>4</td>
<td>50%</td>
</tr>
<tr>
<td>Bilingual Target Language Proficiency Test</td>
<td>25</td>
<td>76%</td>
</tr>
<tr>
<td>Business Education</td>
<td>8</td>
<td>50%</td>
</tr>
<tr>
<td>ESL Supplemental</td>
<td>6</td>
<td>50%</td>
</tr>
<tr>
<td>English Language Arts 4-8</td>
<td>10</td>
<td>40%</td>
</tr>
<tr>
<td>English Language Arts 9-12</td>
<td>14</td>
<td>57.1%</td>
</tr>
<tr>
<td>Generalist 4-8</td>
<td>17</td>
<td>52.9%</td>
</tr>
<tr>
<td>Generalist EC-6</td>
<td>84</td>
<td>15.5%</td>
</tr>
<tr>
<td>History 8-12</td>
<td>4</td>
<td>25%</td>
</tr>
<tr>
<td>Journalism 8-12</td>
<td>2</td>
<td>50%</td>
</tr>
<tr>
<td>Life Science 8-12</td>
<td>9</td>
<td>22.2%</td>
</tr>
<tr>
<td>Math 4-8</td>
<td>12</td>
<td>50%</td>
</tr>
<tr>
<td>Math 8-12</td>
<td>10</td>
<td>0%</td>
</tr>
<tr>
<td>Trade and Industrial 8-12</td>
<td>5</td>
<td>80%</td>
</tr>
<tr>
<td>PPR EC-12</td>
<td>170</td>
<td>66.5%</td>
</tr>
<tr>
<td>Physical Education EC-12</td>
<td>10</td>
<td>60%</td>
</tr>
<tr>
<td>Science 4-8</td>
<td>5</td>
<td>60%</td>
</tr>
<tr>
<td>Social Studies 4-8</td>
<td>7</td>
<td>57.1%</td>
</tr>
<tr>
<td>Social Studies 8-12</td>
<td>11</td>
<td>46.7%</td>
</tr>
<tr>
<td>Special Education EC-12</td>
<td>15</td>
<td>46.7%</td>
</tr>
<tr>
<td>Tech. Applications EC-12</td>
<td>3</td>
<td>66.7%</td>
</tr>
<tr>
<td>Theatre EC-12</td>
<td>2</td>
<td>50%</td>
</tr>
<tr>
<td>TExES Total</td>
<td>547</td>
<td>48.4%</td>
</tr>
</tbody>
</table>
Standard I: Results of Certification Exams

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>70%</td>
<td>80%</td>
<td>70%</td>
<td>80%</td>
<td>70%</td>
</tr>
<tr>
<td></td>
<td>I</td>
<td>F</td>
<td>I</td>
<td>F</td>
<td>I</td>
</tr>
<tr>
<td>Overall:</td>
<td>94%</td>
<td>95%</td>
<td>85%</td>
<td>96%</td>
<td>83%</td>
</tr>
<tr>
<td>Demographics:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hispanic</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Certification Areas At Risk:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bilingual Generalist EC-4</td>
<td>57.9%</td>
<td>60%</td>
<td>55.6%</td>
<td>66.7%</td>
<td></td>
</tr>
<tr>
<td>Bilingual Generalist 4-8</td>
<td>0%</td>
<td>57.9%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Life Science 8-12</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PPR EC-12</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PPR 8-12</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PPR 4-8</td>
<td>50%</td>
<td>33.3%</td>
<td>55.6%</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>57.1%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PPR EC-4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>English Language Arts and Reading 4-8</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Science 4-8</td>
<td>0%</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Science 8-12</td>
<td>0%</td>
<td>50%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Special Education EC-12</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Social Studies 4-8</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Conclusion

According to Texas Administrative Code (TAC) §229.6 (a) [effective April 18, 2010], the continuing approval of an educator preparation program is based upon 1) accreditation status; 2) compliance with SBEC rules regarding program operations; and 3) integrity of required data submissions. Teacherbuilder.com has continuously been out of compliance with Texas Administrative Code since its inception in 2006. The Texas Education Agency monitored the program repeatedly from 2006-2012 and made numerous recommendations that, if followed, would have brought the program into compliance with all requirements. While Teacherbuilder.com has maintained the status of "Accredited" based on exam pass rates for each year from 2006-2011, there have been issues in compliance with operations necessitating repeated technical visits. Curriculum modules have been added; however, there still remains a lack of rigor and depth in content, candidate involvement and interaction in the learning process, or appropriate assessments for mastery of knowledge and skills. Finally data submitted to TEA
has been inaccurate and late, as the conflict between the base-line data provided in 2009, self-report of October 12, 2010, the filing of the Compliance Status Report in 2012.

**PROGRAM RECOMMENDATION**

The following are recommendations based on the findings of the Texas Education Agency Compliance Audit. If the program is NOT in compliance with any component, please consult the Texas Administrative Code and initiate actions to correct the issue IMMEDIATELY. A Compliance Status Report will be required every sixty days until the program has met the requirements of Texas Administrative Code.

General program recommendations are suggestions for general program improvement and do not require follow-up.

**PROGRAM COMPLIANCE RECOMMENDATIONS: A Compliance Status Report will be required every sixty (60) days until compliance is met.**

**Component I - Texas Administrative Code 228.20 – Governance of Education Preparation Programs**

- Conduct two advisory committee meetings each academic year. Maintain agendas, minutes, and attendance rosters to verify compliance.

**Component II - TAC §227.10 Admission Criteria:**

- Utilize the form that was created to document test scores in candidates’ records reflecting PACT scores (if applicable), basic skills, content, and PPR; (2005, 2009, 2010)
- For out-of-country candidates require the TOEFL exam, and basic skills testing and place documentation of such in the candidates’ folders; (2009, 2010)
- Place evidence of a candidate interview (questions, responses, and scoring rubric) indicating adequate oral communication skills in candidates’ records. (2009, 2010)

**Component III - TAC §228.30 Educator Preparation Curriculum:**

- Revise curriculum to add content methodology for each specific certification area offered; (2005, 2006, 2009, 2010)
- Increase content coverage of the 17 curriculum topics in the online modules especially reading methodology across the content areas; (2005, 2006, 2009, 2010)
- Include content coverage of the TEKS in the online modules; (2005, 2006, 2009, 2010)
- Involve certified content instructors identified by the program in content development, delivery, and assessment for each certification area offered until the passing of the Pre-
Admission Content Text (PACT) is required for all potential candidates (Science, Math, Social Studies, Generalist EC-6, English, Spanish, and Bilingual) (2010);

- Increase the amount of candidate interaction with the content in order for the candidate to practice the skills necessary for effective instruction (2010);
- Add more performance assessments to modules to ensure the candidate has acquired the skills for effective instruction including projects, written response/ reflections, case studies, hypothetical situations, lesson plan assignments, or modeling of effective instruction into the coursework (2010).

Component IV - TAC §228.35 Program Delivery and Ongoing Support:

- Make provisions in the online program for students with disabilities (2010);
- Utilize developed documentation that coursework and training for each candidate is completed prior to recommending them for a standard certificate and is present in their candidate’s records for auditing. (Field-based 30 hours; documented 50 clock hours from the school district, 220 clock hours of online or face-to-face coursework, and internship time period of an academic year or 180 days or a minimum of 12 weeks of clinical teaching); (2005, 2006, 2009, 2010)
- Establish procedures to verify documentation of the 50 clock hours of staff development provided by the school district and place documentation in each candidate’s folder; (2009, 2010)
- Place in each candidate’s folder verifiable evidence that initial contact was made by the field supervisor within the first three weeks of assignment (face-to -face, phone call, email, etc.) (2010). Ensure that all dates recorded for enrollment date, start date of internship, and first contact are accurate;
- Utilize the developed field-based observation log verifying the minimum 30 clock hours for all candidates and place it in the candidates’ records. Should video be used for 15 hours, the hours and reflections of the videos should also be documented on the observation logs; (2009, 2010)
- Utilize the developed observation form or create a modified observation report that can be provided to the campus administrator; (2010)
- Utilize the developed observation form to document that the first observation is completed within the first six weeks of the intern’s assignment. (2010)
Component V - TAC §228.40 Assessment and Evaluation of Candidates for Certification and Program Improvement:

- Establish multiple types of assessments to determine the candidates’ mastery of the knowledge and skills in the educator standards for each certification area and PPR; (2005, 2009, 2010)

- Create an annual formal written program evaluation report for the advisory committee members and other interested parties that include ASEP information, stakeholder (principals, mentors, human resource directors, etc.) input, and other pertinent data (2010).

GENERAL RECOMMENDATIONS:

- Expand the advisory membership to cover all areas of the state where the candidates are located and seek members who have specific expertise in areas such as reading, special education;

- Provide advisory committee training yearly;

- Complete the advisory committee handbook;

- Seek creative ways to conduct advisory committee members to increase involvement;

- Reflect in agendas and minutes of the meetings specific discussions regarding curriculum design, policy decisions, program evaluation, and field-based experiences.

- Update the website and admission criteria to reflect current requirements for entry into the program;

- Convert program admissions requirements to accepting PACT candidates only into the program;

- Convert all paper files to electronic files;

- Use alternative technology such as blogs, and webinars to provide interaction for students in the program;

- Activate the use of the e-portfolio as a means of collecting, evaluating, and storing student work that is completed for assessment and benchmarking;

- Use alternative technology such as blogs, forums, chats, and webinars to provide opportunities for the students to interact with each other, with the instructors, and with program staff. Feedback to the interactions should be consistently available within 48 hours;

- Establish a verifiable student advising schedule/timeline with the instructor and program staff (Suggestion: At the end of every domain, supplemental videos, and test prep);
• Encourage field supervisors to provide observations in a timely manner so they can be uploaded into the TEA system;

• Reduce certification fields to be offered by the program so adequate curriculum coverage and instructor support can be provided; and

• Conduct a student exit survey evaluating the new course modules as they are completed seeking information on its relevance and delivery.