Compliance Audit Report  
2013-2014  
A Career in Teaching - McAllen  
Alternative Teacher Certification Program

According to Texas Administrative Code (TAC) §228.10(c), “An entity approved by the SBEC under this chapter...shall be reviewed at least once every five years under procedures approved by the Texas Education Agency (TEA) staff; however, a review may be conducted at any time at the discretion of the TEA staff.” Per TAC §228.1(c), “All educator preparation programs are subject to the same standards of accountability, as required under Chapter 229 of this title.” The Texas Education Agency administers Texas Administrative Code rules required by the Texas legislature for the regulation of all educator preparation programs in the state. Please see the complete Texas Administrative Code rules at www.tea.state.tx.us for details.

Contact Information: Cynthia Rodriguez  
County/District Number: 108708  
SBEC Approval Date: January 1, 2009

Program Specialist, Mixon Henry, and Manager of Educator Preparation, Sandra Jo Nix, conducted a Texas Education Agency Compliance Audit of A Career in Teaching alternative teacher certification program located at 4421 McColl, McAllen, Texas, 78504 on March 4-6, 2014. The focus of the compliance audit was the alternative teacher certification program and the Generalist EC-6 certificate. The following are findings and recommendations for program improvement.

SCOPE OF THE COMPLIANCE AUDIT:

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

Data Analysis:

Information concerning compliance with Texas Administrative Code (TAC) governing educator preparation programs was collected by various quantitative and qualitative methodologies. A self-report was submitted to the Texas Education Agency on January 6, 2014. An on-site review of documents, student records, course material, and curriculum correlations charts provided evidence regarding compliance. In addition, electronic questionnaires were sent to A Career in Teaching - McAllen alternative certification program stakeholders by TEA staff. A total of five hundred thirty (530) questionnaires were sent to stakeholders. A total of eighty-four (84) responses out of the five hundred thirty (530) or 16% were received as follows: Zero (0) out of
five (5) advisory committee members; fifty-eight (58) out of three hundred sixty-one (361) educator candidates or 16%; one (1) out of five (5) field supervisors or 20%; three (3) out of forty-one (41) campus principals or 7%; and twenty-two (22) out of one hundred eighteen (118) cooperating teachers/mentors or 19%. Quantitative and qualitative methods of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. Evidence of compliance was measured using a rubric aligned to Texas Administrative Code.

Opening and Closing Session:

Cynthia Rodriguez attended the opening session on March 4, 2014, and the closing session on March 6, 2014.

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<th>COMPONENT I: COMMITMENT AND COLLABORATION - Texas Administrative Code (TAC) §228.20</th>
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FINDINGS:

Program support was indicated by the governing body of A Career in Teaching - McAllen alternative certification program per TAC §228.20(c) as evidenced by the participation and cooperation of Cynthia Rodriguez and Adrian Fernandez in all stages of the compliance audit.

According to the self-report and evidence found during the audit, the advisory committee met for the past two academic years. The advisory committee has not yet met during the 2013-2014 academic year. TEA was told that an advisory committee meeting would be scheduled in the near future. A Career in Teaching - McAllen alternative teacher certification program met TAC §228.20(b) requirements for advisory committee composition.

It was discovered that Advisory Committee Training on the member’s roles and responsibilities was last conducted in 2009. Since no advisory committee members responded to the questionnaires, the TEA auditors were unable to verify that the members understood their roles and responsibilities as advisory committee members.

In reviewing past agendas, it appears that the advisory committee provided input on policy and curriculum, but did not receive evaluative information or information on field based observations as required by TAC §228.35(d).

**Based on the evidence presented, A Career in Teaching - McAllen alternative teacher certification program is not in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.**
FINDINGS:

According to the self-report submitted by A Career in Teaching - McAllen alternative teacher certification program staff, to be admitted to the program, the applicant must meet the following criteria:

- A bachelors’ degree from a regionally accredited university [TAC §227.10(a)(2)];
- Achieve a GPA of 2.50 (overall or last 60 hours) [TAC §227.10(a)(3)(A)];
- Complete a minimum of twelve (12) semester credit hours in a content field [TAC §227.10(C)];
- Demonstrate basic skills proficiency noted with THEA, TASP, or course work noted in Texas Success Initiative [TAC §227.10(4)];
- Demonstrate adequate oral communication skills; TOEFL [TAC §230.413].
- Submit an application [TAC §227.10(a)(6)];
- Participate in an interview or complete other screening instrument to determine the educator preparation candidate’s appropriateness for the certification sought, Cornell Critical Thinking assessment is given to A Career in Teaching applicants; [TAC §227.10(a)(6)]; and this meets other screening instrument option and meets TAC rule.
- Meet any other academic criteria for admission that are published and applied consistently to all educator preparation candidates [TAC §227.10(7)].

Out-of-country applicants whose first language is not English must demonstrate competence in the English language by submission of an official minimum score on the written or computer-based Test of English as a Foreign Language (TOEFL) with an oral speaking score of 26. In addition, the applicant must have his/her transcripts from an out-of-country non-English speaking university evaluated by an approved evaluation service [TAC §227.10(7)]. In reviewing an out-of-country candidate, it was found that the transcript had been evaluated but no TOEFL scores were available.

In twenty candidate records reviewed, it was noted that three (3) out of twenty (20) candidates were admitted with a grade point average of less than 2.5 [TAC §227.10(A)]. However, a letter of explanation of the exception was found in the candidates’ records. The number admitted under the exception did not exceed 10% of the cohort of candidates allowed by TAC §227.10(a)(3)(b).

An essay written by the candidates on “Why I want to be a Teacher” was cited in the website admission requirements. However, the essay was found in a limited number of candidate records reviewed and it was explained that it could be accepted after admission into the program. Since the essay is listed as a prerequisite for program admission, it must be accepted prior to formal admission or discontinued as an admission requirement.
Applicants are required to take the Cornell Critical Thinking Assessment to meet the other screening instrument. The other screening instrument utilized by the program meets the requirements of TAC §227.10(6). A face-to-face interview is also utilized but the associated scoring rubric asks the interviewer to evaluate items that cannot expressly be determined by an interview such as “Team Work” and “Attendance.” It was discussed how a face-to-face interviews could better evaluate the English language proficiency of candidates. If language is a factor in the lack of success on testing, the language issue could be identified and remediated or the candidate’s admission could be denied.

The self-report stated that information on their admission requirements was available through the A Career in Teaching - McAllen website and brochures.

According to TAC §228.40(d), an educator preparation program shall retain documents that evidence a candidate’s eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after program completion. The program has kept records for the past five years in paper format. The records are securely stored in locked cabinets located in locked offices located in office building. The retention of records meets the requirements of TAC §228.40(d).

Based on the evidence presented, A Career in Teaching - McAllen alternative teacher certification program is not in compliance with TAC §227.10 - Admission Criteria.

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

FINDINGS:

A Career in Teaching - McAllen alternative teacher certification program is approved to offer teacher certification in forty-one (41) certification fields. For the purpose of this compliance audit, the Generalist EC-6 certificate was selected for in-depth review.

It was documented in the self-report and verified in checking the qualification of the course instructors that all instructors have advanced degrees, and certification in the state of Texas.

In reviewing A Career in Teaching’s alternative teacher certification Generalist EC-6 curriculum, it was found that the educator standards were not the curricular basis for instruction as required by TAC §228.30(a). The alignment charts for music, art, and TEKS were the only ones submitted by the program for review. There was no course or module organizer. The auditors were presented with a series of notebooks which contained handouts, a calendar of class meetings, and the topic for discussion at that class. It was also noted that Generalist EC-6 curriculum did not provide evidence that it addressed the relevant Texas Essential Knowledge and Skills (TEKS) as required by TAC §228.30(a).

A review of the seventeen (17) subject matter topics prescribed by TAC §228.30(b) could not be verified because of the lack of alignment charts and organization of the curriculum in general.

Responses from the principal stakeholder group regarding curriculum, specifically candidate preparedness, in the TEA questionnaires are as follows: (2 principals responded)

- Candidates prepared in classroom management: yes - 100%
• Candidates prepared to meet academic and behavioral needs of students with disabilities: yes - 100%

• Candidates communicate clear expectations for achievement and behavior:
  yes - 100%

• Candidates use appropriate multimedia and other technology to support and extend student learning: yes - 100%

• Candidates collaborate with others in meeting the academic, developmental, and behavioral needs of students: yes - 100%

• Candidates prepared to address academic and behavioral needs of limited English proficient students: yes - 100%

• Candidates prepared to develop and interpret formal and informal assessments that track students’ progress: yes - 100%

Responses from cooperating teachers/mentors in regards to curriculum preparation from TEA questionnaires: (22 cooperating teacher/mentor responded)

Of the nineteen (19) identified curriculum areas, no curriculum area received more than 85% of the positive responses to denote strengths in preparing candidates in the curriculum areas. The areas of need or weakness indentified by cooperating teachers/mentors are as follows:

• Reading strategies across the curriculum for all grade levels:
  yes – 66.7%  no – 33.3%

• Teacher’s responsibility for administering the STARR: yes – 71.4%  no – 28.6%

• How to use formative assessments to diagnose student learning needs:
  yes – 66.7%  no – 33.3%

• Modeling and methodologies in classroom management: yes – 61.9%  no – 38.1%

• Law and standard regarding students with special needs: yes – 42.9%  no – 57.1%

• Standards and strategies for student designated as gifted and talented:
  yes – 61.9%  no – 38.1%

• Standards and strategies for student with limited English proficiency:
  yes – 61.9%  no – 38.1%

• Parent conferencing: yes – 71.4%  no – 28.6%
Responses from clinical teachers/interns in regards to curriculum preparation from TEA questionnaires: (58 clinical teachers/interns responded)

Of the nineteen (19) identified curriculum areas, four (4) areas of curriculum gained 90% to denote strengths in the curriculum areas. The areas identified as areas to improve are as follows:

- Reading strategies across the curriculum for all grade levels:
  yes – 68.6%  no – 31.3%
- Utilizing TEKS in the content areas:  yes – 78.3%  no – 21.7%
- Teacher’s responsibility for administering the STARR:  yes – 75.6%  no – 24.4%
- How to develop a lesson:  yes – 72.9%  no – 27.1%
- Process of curriculum development:  yes – 76.6%  no – 23.4%
- Parent conferencing:  yes – 69.6%  no – 30.4%
- Instructional technology in the classroom:  yes – 78.3%  no – 21.7%

The specific concerns of TEA centered upon that fact that the educator standards for the Generalist EC-6, TEKS, and 17 mandated topics could not be verified because of lack of necessary documentation.

Programs are required to provide content curriculum unless a program admission requirement is to utilize the Pre-Admission Content Test (PACT) prior to enrollment in the program. The program’s leadership was encouraged to discuss the potential of requiring the PACT and focusing their curriculum on pedagogy and professional responsibilities only with their advisory committee.

Based on evidence presented, A Career in Teaching – McAllen’s alternative teacher certification program 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:

Currently, A Career in Teaching – McAllen’s alternative teacher certification program is delivered in a face-to-face format. In reviewing the self-report and in discussions with staff, the training hours offered by the program totaled 300 clock-hours for Generalist EC - 6 certification. Evidence was found in the student records which contained a tracking sheet of hours.
completed. The total clock-hours met the minimum requirements set forth in TAC §228.35(a)(3).

The program provided verifiable evidence that six clock-hours of test preparation that is not embedded in any other curriculum elements per TAC §228.35(a)(3) is offered to all candidates. Evidence was provided with attendance records signed by the candidates.

Thirty clock-hours of field-based experience were verified in candidates' records. Specifics of the field experience provided school, classroom, subject taught, and reflections by candidates to specific questions. Documentation verified that the field-based observations occurred in a variety of educational settings with diverse student populations including observation, modeling, and demonstration of effective practices to improve student learning. In addition to the 30 clock hours, the program requires the candidates to complete a Scavenger Hunt which requires the candidate to attend a PTA meeting, school board meeting, attending professional development workshops, and other school associated activities.

Fifty (50) clock-hours of training provided by a school district and/or campus were utilized toward the total number of program hours. This was verified through certificates of completion found in candidates' records [TAC §228.35(a)(5)].

The internship consist of one academic year, or a minimum of 180 days, assignment at a TEA approved school [TAC §228.35(d)(2)(C)]. Information, requirements, and policies concerning internship are provided to candidates. In the students’ records, the Statement of Qualifications form, along with their school district contracts, mentor and field supervisor assignment, and mentor agreement form were found.

All internship placements occur in local independent school districts. The placements met the requirements as prescribed by TAC §228.35(d)(2)(C)(ii).

According to TAC §228.35(e), A Career in Teaching – McAllen’s alternative teacher certification program is responsible for providing mentor training that is scientifically–based or verify that training has been provided by a school district or education service center. Training was provided through a Mentor Handbook although no evidence of delivery to the mentor was available. The program did not meet the requirements of TAC §228.35(e).

TAC §228.35(f) states that supervision of each candidate shall be conducted with the structured guidance and regular ongoing support of an experienced educator who has been trained as a field supervisor. There were a total of five (5) field supervisors assigned to the candidates within the program. The program did not provide verifiable evidence that the field supervisors had been trained. The program did not meet the requirements of TAC §228.35(f).

Initial contact by the field supervisor with the candidate could not be verified within the first three weeks of the assignment as required by TAC §228.35(f). The field supervisors go out to the campus to meet candidates and their mentors at their assigned school.

The three observations [TAC §228.35(f)(4)] conducted during internship must be at least 45 minutes in duration [TAC §228.35(f)]. TAC also states that the first observation must be conducted within the first six weeks of internship. The observation forms signed by the teaching candidate, mentor, and field supervisor provided evidence that the program met the requirements of TAC §228.35(f).

Furthermore, TAC §228.35(f) requires that the field supervisors document instructional practices observed and provides written feedback through an interactive conference with the candidates.
There was no verifiable evidence that an interactive conference followed the observation. The program did not meet the requirements of TAC §228.35(f).

It is also the responsibility of the A Career in Teaching – McAllen’s alternative teacher certification program to provide a copy of the written feedback to the candidate’s campus administrator as required by TAC §228.35(f). The observation instrument is a multi-copy document and according to discussions with staff, one copy is left with the campus administrator or his/her representative. However, there was no evidence that the documentation was delivered. The program does not meet the requirements of TAC §228.35(f). With interns on an extended probationary certificate, observations were not completed which is required by TAC rule.

Emails between program staff and field supervisors served as verifiable evidence that additional observations or coaching occurred. These emails were provided by the program and the A Career in Teaching-McAllen met the requirements as specified in TAC §228.35(f).

**Based on evidence presented, Education A Career in Teaching – McAllen’s alternative teacher certification program is not in compliance with Texas Administrative Code Section §228.35 – PROGRAM DELIVERY AND ON-GOING SUPPORT.**

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**COMPONENT V: Assessment and Evaluation of Candidates for Certification and Program Improvement – Texas Administrative Code (TAC) §228.40 –**

**FINDINGS:**

A Career in Teaching – McAllen’s alternative teacher certification program has a candidate assessment and benchmarking process as prescribed by TAC §228.40(a). Evidence provided by the program was found in the candidates’ records. The documents met the requirements of TAC §228.40(a).

According to TAC §228.40(b), the program shall not grant test approval for the pedagogy and professional responsibilities test until the candidate has met all the requirements for admission to the program and has been fully accepted into the educator preparation program. Readiness for testing [TAC §228.40(b)] is noted by completion of test preparation sessions. The program met the requirements of TAC §228.40(b).

Evaluation of the program’s design and delivery of the curriculum should be continuous per TAC §228.40(c). There are limited external evaluations coming from cooperating teachers, mentors, principals, and other school district personnel. The program does not meet the requirements of TAC §228.40(c).

**Based on evidence presented, A Career in Teaching-McAllen’s alternative teacher certification program is not in compliance with Texas Administrative Code §228.40 – ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT.**

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**COMPONENT VI: Professional Conduct (TAC) §228.50**
TAC §228.50(a) states that during the period of preparation, the educator preparation entity shall ensure that the individuals preparing candidates and the candidates themselves demonstrate adherence to Chapter 247 of this title (relating to Educators’ Code of Ethics). Signed Code of Ethics was presented for instructional staff. The program curriculum addresses the Code of Ethics in the coursework and each candidate signs a statement, which states that they have read and understood the Educator’s Code of Ethics. This documentation was found in the candidates’ records. This served as verifiable evidence of adherence to TAC §228.50(a) and TAC §228.30(b)(2).

Based on evidence presented, A Career in Teaching’s alternative teacher certification program is in compliance with Texas Administrative Code §228.50 – Professional Conduct.

**Texas Administrative Code §229**

**PROGRAM RECOMMENDATIONS**

Program Compliance Recommendations are based on the findings of the Texas Education Agency compliance audit visit. If the program is out of compliance with any component, please consult the Texas Administrative Code (TAC) and correct the issue IMMEDIATELY. General recommendations are suggestions for program improvement only. Failure to comply with TAC rules governing educator preparation programs may result in action by the State Board for Educator Certification (SBEC) per TAC §229 beginning in 2010.

**PROGRAM COMPLIANCE RECOMMENDATIONS:** In order to meet requirements of all Texas Administrative Code rule governing educator preparation programs, the following recommendations are made:

**TAC §228.20 Governance of Educator Preparation Programs**
- Re-establish and train the advisory committee, include member of the following categories: approved TEA public and private school, higher education, education service center, and business or community. Meet twice yearly and seek a collaborative effort and input for design, delivery, evaluation, major policy, and field based experience.

**TAC §228.10 Admissions Criteria**
- For any of the out of country applicants, require the TOEFL with a minimum score of 26 on the oral speaking section.
TAC §228.30 Educator Preparation Curriculum

- Require that all Generalist EC-6 candidates’ coursework include the appropriate educator standards. This curriculum must be based on the educator standards and must be implemented immediately. The curriculum that is delivered should be presented in a logical module format.

TAC §228.35 Program Delivery and Support

- Document first contact in the first three weeks of the candidates’ placement in the clinical teaching or internship,
- Provide and document training for the field supervisors and cooperating teachers/mentors,
- Provide and document observations for candidates with the extended probationary certificates (2nd and 3rd years),
- Provide and document the interactive conference, following the observations and,
- Provide and document the delivery of the candidate’s observation results to the campus administrator.

TAC §228.40 Assessment and Evaluation of Candidates for Certification and Program Improvement

- Create an evaluation method in which internal and external sources are used to support program improvement, include design and delivery of curriculum based on performance data and scientifically based research practices.

GENERAL PROGRAM RECOMMENDATIONS:

Component I: Governance of Educator Preparation Programs - General Recommendations:

- Create a method to accurately identify attending members and minutes (per discussion, assistance, and input from members) to provide verification to adherence to TAC rule; additionally use the TEA training power point to establish roles and responsibilities of members;
- Use the advisory committee meeting template to capture of the required information needed for TAC rule;
- Expand the advisory committee membership to gather more input from local districts and network placement for candidates.

Component II: Admission Criteria – General Recommendations:

- Consider a face-to-face interview with potential candidates to determine the English proficiency and score the interview with a rubric to demonstrate objectivity. It will give
the program the option to reject the candidate’s application for admittance or provide remediation for English proficiency. It is possible that the multi-test takers have language issues that factor into the lack of success in testing;

- Consider an entry requirement of a test of reading skills; there is a correlation between reading and test taking success;
- Review and reflect on the additional admissions materials; writing sample, Spanish interview;
- Have candidates sign a FERPA agreement upon entry into the program;
- Consider requiring the PACT prior to admissions, so the focus of instruction is pedagogy and methodology.

Component III: Educator Preparation Curriculum – General Recommendations:

- Implement content curriculum for each certification field offered by A Career in Teaching or require the PACT as part of the admissions criteria;
- Consider adding more rigor and depth to the program curriculum; requiring more course time would allow instructors the opportunity to provide a deeper understanding of the coursework and create assessments to evaluate the content knowledge and an assignment to implementation of the knowledge;
- Acquire permission to use “copyright” material in coursework;
- Add more opportunities for candidates to do lesson plans to enhance the skill;
- Use the TEA resources for Ethics, STARR, and mental and emotional health requirements;
- Consider have candidates assembling a resources book for certification field sought, TEKS, Educator Standards for specific certification field, and STARR and ETS pre-testing material and continuously use this material in the training;
- Administer the STARR representative (release) test to the candidates for better understanding of expectation for the students;
- Map-out the 270 clock hours and decide the amount of time each topic will require to cover.

Component IV: Program Delivery and On-Going Support - General Recommendations:

- Expand the field observations to include multi-grade level sites and vary the field observations forms to specifically identify areas to observe;
- Set up a system in place to meet with candidates (within the 3 week period), train the mentor, and arrange the first observation (six weeks);
- Correct or add a conference time (feedback from observation) and principal signature line to the form;
- Set up and use a field supervisor log to track various contacts and support.

Component V: Assessment and Evaluation of Candidates for Certification and Program Improvement – General Recommendations:

- Consider additional assessments to evaluate candidates’ knowledge of curriculum and their ability to implement the knowledge into assignments or follow-up course work;
- Expand the Internal and External program evaluations to include principals, human resource directors, mentors, and completers; additionally share information provided by TEA.

**General Overall Program Recommendations:**

- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about current Texas Administrative Code;

- Continue to participate in Annual Deans/Directors Meetings to ensure that the program director is knowledgeable about current Texas Administrative Code and future changes to Texas Administrative Code (Webinar Series);

- Continue to participate in webinars provided by the Division of Educator Certification & Standards to ensure that the program staff is knowledgeable about current requirements and changes in Texas Administrative Code;

- Continue to maintain communication with the program specialist assigned to A Career in Teaching alternative teacher certification program for the purpose of asking questions about current requirements in TAC for Governance; Admissions; Curriculum; Program Delivery & On-Going Support; and Program Evaluation (TAC § 227-229); and

- Align the verbiage of A Career in Teaching alternative teacher certification program Educator Preparation Program to that of current Texas Administrative Code (For example: Applicant / Candidate / Field Supervisor / Student Teacher / Cooperating Teacher).