Compliance Audit Report
2015-2016
ACT-Houston

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County/District Number:  101712

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Program Specialists, Lorrie Ayers and Mixon Henry, conducted this Texas Education Agency Training Compliance Audit of ACT-Houston at Education Service Center Region 4 in Houston, Texas, on January 12, 13, and 14, 2016. The focus of the compliance audit was the Pedagogy and Professional Responsibility and Core EC-6 curriculum required for initial teacher certification. The following are findings and recommendations for program improvement.

Scope of the Compliance Audit:

The scope of this audit is restricted solely to verifying compliance with Texas Administrative Code §227, §228, §229, §230 and §149.

Data Analysis:

Information concerning compliance with Texas Administrative Code (TAC) governing educator preparation programs was collected by various qualitative means. A self-report was submitted to the Texas Education Agency on December 14, 2015. A review of documents, student records, course material, online courses, and curriculum correlations charts provided evidence regarding compliance. In addition, electronic questionnaires developed by TEA were sent to ACT-Houston stakeholders and responses are as follows: Fifteen (15) out of seventeen (17) advisory committee member; one hundred two (102) out of seven hundred seven (707) clinical teachers/interns; ninety-eight (98) out of five hundred sixty-six (566) principals; and ninety-nine
(99) out of five hundred ninety-six (596) cooperating teachers/mentors responded. Qualitative and quantitative methodologies 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.

**Findings, Compliance Issues, and Recommendations:**

“Findings” indicate evidence that was collected during the compliance audit process. If the program is “NOT in compliance” with any identified component, the program should consult the Texas Administrative Code and correct the issue IMMEDIATELY. A “compliance plan” may be drafted during the audit that identifies compliance issues to be addressed and a timeline for completion. Program “recommendations” are suggestions for general program improvement and no follow up is required.

**Audit Process:**

TEA created an interactive training audit which required participation of ACT-Houston, Directors Debbie Dunlap and Vicki Johnston and instructional staff members Melissa Rosbert and Betty Ann Williams. They assisted Mr. Mixon Henry in the review of evidence. All documents, except for student records, were submitted in advance of the on-site audit. At the end of the review of the documents and student records, the audit rubric was scored and results shared with the ACT-Houston Directors Debbie Dunlap and Vicki Johnston. A Compliance Plan was created to address the compliance issues noted in the audit.

**COMPONENT I: Governance of Educator Preparation Programs- Texas Administrative Code (TAC) §228.20**

**FINDINGS:**

- Program support was indicated by the governing body of ACT-Houston per TAC §228.20(c) as evidenced by the participation and cooperation of ACT-Houston Directors and staff in various stages and steps of the compliance audit.

- The advisory committee consists of twelve (12) members: eight (8) members are from local school districts, one (1) members is from higher education, three (3) members represent community/business interests, and no (0) member is from Education Service Centers. ACT-Houston meets TAC §228.20(b) requirements for advisory committee composition.

- ACT-Houston provided evidence of six (6) advisory committee meetings over the last three academic years. Agendas, minutes, and sign in sheets were available as evidence of past advisory committee meetings. There was a discussion on ways to increase attendance at advisory committee meetings. Some recommendations included presenting meetings via webinars, phone conferences, or other technology formats. Additionally, it was suggested to send the recorded minutes to all members and request feedback. A suggestion of asking 2-3 questions per presentation for advisory committee assistance was provided. The program meets the requirements for conducting a minimum of two advisory committee meetings per academic year as required by TAC §288.20(b).
• ACT-Houston’s advisory committee addresses design, delivery, program evaluation, and major policy decisions as verified by discussion and input from the members reflected in the advisory committee minutes. The program meets requirements of TAC §228.20(b).

• ACT-Houston trains the advisory committee members on their roles and responsibilities by providing a handbook whose receipt was acknowledged by the members.

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

Compliance Issues to be addressed:
• No compliance issues noted in this component.

Recommendations:
• Consider rolling terms for advisory committee members in order to add new points of view;
• Establish what constitutes a quorum in order to conduct advisory committee business;
• Explore the use of technology to conduct the advisory committee meetings;
• Provide Continuing Professional Education (CPE) credit to the advisory committee members who need to earn hours toward certification renewal.
• Gather feedback through email exchanges to address deeper insight from members.

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

FINDINGS:
• The required grade point average (GPA) for admission to ACT-Houston is 2.5 overall or for the last 60 hours of coursework. When reviewing candidate files, no GPA was below the 2.5 GPA requirement. Transcripts served as documentation of the required 12 hours in the candidates’ specific content field or 15 hours in Mathematics and Science (10 of 10 candidate folders). In reviewing the transcripts, the content hours could be found. (TAC§227.10(a)(3)(C).

• Ten of ten candidate records had an application (TAC§227.10(a)(6).

• Evidence of interviews were found in candidates’ records along with the rubric with a cut score indicated to determine whether the applicant met the program’s criteria. Additionally, the program requires all candidates to take the Watson Glaser Critical Thinking Test as a screening device (10 of 10 candidate folders). With both the
Requirements for admission are posted on the ACT-Houston’s website. These requirements were verified as being applied consistently to all candidates (TAC§227.10(a)(7)).

There were three out-of-country applicants selected to be reviewed. Candidates whose first language is not English must demonstrate competence in the English language by submission of an official score on the written or computer-based Test of English as a Foreign Language (TOEFL) with a minimum speaking score of 26. In the review, no TOEFL score was found in the candidates’ records. ACT-Houston does not meet compliance with TAC §227.10(7). However, the program initiated steps after the audit to require the TOEFL for admission. Addition requirements for out-of-country applicants include a transcript review by an approved evaluation service. Evaluated transcripts were located in the candidates’ records and were reviewed by a TEA approved vendor. The program is in compliance for having transcripts reviewed [TAC §227.10(7)].

Based on the evidence presented, ACT-Houston is not in compliance with TAC §227 - Admission and Certification Criteria.

Compliance Issues to be addressed:

- Require all out-of-country candidates score a 26 on the speaking section of the TOEFL prior to admission into the program.

Recommendations:

- Consider an oral reading assessment to determine the articulation, fluency, and comprehension.

- Consider a writing sample, with an evaluative rubric, to determine the writing skills of the candidates.

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

FINDINGS:

- ACT-Houston is approved to offer teacher certification in fifty-two (52) content fields and four (4) supplemental fields.

- In reviewing the Core EC-6 content and Pedagogy and Professional Responsibilities curriculum, it was noted that the educator standards were identified in the syllabi or modules, as well as identified specific topics required in the curriculum. The program meets the requirements of TAC §228.30(a);

- The content and Pedagogy and Professional curriculum addressed the relevant Texas Essential Knowledge and Skills (TEKS). Additionally, TEKS are reflected in the activities and identified in candidates’ lesson plans created in the courses. It would better serve the candidate, if the syllabi reflected TEKS applications [TAC §228.30(a)];
Sufficient evidence was presented to verify that all candidates received instruction in: dyslexia and students with mental and emotional health issues [TAC §228.30(a)(4)].

Instruction in reading (five elements: phonetics, phonemic awareness, vocabulary, reading comprehension, and fluency) can be identified in the Core EC-6 and 4-8 curriculum and content areas; i.e. 7-12 and EC-12 content areas TAC §228.30(b).

Assessments used do not adequately address the mastery of the knowledge and skills of the educator standards.

Based on evidence presented, ACT-Houston is not in compliance with Texas Administrative Code Section §228.30 – Educator Preparation Curriculum.

Compliance Issues to be addressed:

- Create additional assessments to evaluate the acquisition of knowledge and application of skills.

Recommendations:

- Increase the number of lesson plans required to be created, critiqued, or expanded by the candidates in every course leading to certification in order to mirror the expectations for practicing classroom teachers to plan, instruct, and assess instruction.

- Provide an instructional scenario and have the candidate plan the lesson to adapt to several variables (learning style, differentiation, etc.)

- Provide a completed lesson plan and have the candidates modify it according to several variables.

- Have candidates develop a series of interrelated lessons into a unit of instruction to develop the skill of building on knowledge.

- Provide more differentiating instruction strategies in special populations’ coursework (Gifted and Talented and Limited English Proficiency identified as a need by mentors).

- Develop additional coursework which deals with data management and interpretation of data to determine and address the learning needs of students.

- Utilize the TEA developed training for meeting “Teachers’ Responsibilities for the STAAR test administration at http://texas.testsecuritytraining.com/TestAdministratorTraining.aspx. It may be used for a whole group or individually. A certificate can be printed upon completion and counted toward the required 300 clock hours. This is the same training that teachers must complete prior to STAAR testing.


- Utilize the mental and emotional health training approved by the Department of Human Resources and TEA. You may use any resources from other mental health organizations that you feel addresses the requirements of the law.
• Utilize the ethics training and the assessment of the training found at https://www.youtube.com/playlist?list=PLYCCyVaf2q1vuF3glz1NjEWFEmtxaBMvC or use the information below.

A breakdown of the ethics training (outside source) is available.

The training is located on our TEA YouTube channel, and a playlist called "Texas Education Agency Teacher Ethics Training" is available to stream the ten video segments. Assessment for the training is available here, and while it is not required, it is recommended.

**Module 1 (3 video segments)** - Boundaries, approximately 25 minutes in length

**Module 2 (2 video segments)** - Social Media, approximately 10 minutes in length

**Module 3 (3 video segments)** - Anger Management, approximately 10 minutes in length

**Module 4 (2 video segments)** - Behavior off Campus, approximately 10 minutes in length

The purpose of this training is to make teachers aware of their actions and hold them accountable for their behavior. Organizations are encouraged to keep a record signed by the educator that they have been trained on ethics. We also encourage teachers and education organizations to revisit ethics regularly to ensure that educators know and understand the district procedures in case an issue ever arises.

**COMPONENT IV: Preparation Program Coursework and/or Training (TAC) §228.35**

**FINDINGS:**

- The ACT-Houston curriculum is delivered in a hybrid format. The majority of the curriculum is face-to-face, but technology is integrated into the curriculum.

- The total program consists of less than 300 clock hours for primary and secondary candidates TAC §228.35(a)(3).

- Thirty clock hours of field-based experience were noted, but the required 15 clock hours of interactive activities with students were not documented prior to internship per TAC §228.35(d). Additionally, the variety of settings were not identified by the field base experience log.

- Eighty hours of coursework prior to clinical teaching or internship was provided as per TAC §228.35(a)(3)(B).
• District training (up to 50 clock hours) is accepted by ACT-Houston that is documented on district records or district paperwork.

• Several candidate were identified as a clinical teachers and were required to complete a minimum of 14 weeks in length TAC §228.35(d)(2)(A).

• Per TAC §228.35(d)(2)(C), in the Alternative Certification Program, an internship of 180 school days or an academic year is an option for teaching candidates. In review of the candidate records, all candidate assignments matched the certification field for which the individual was accepted into the program and trained. In addition, according to TAC §228.35(d)(2)(C), the interns were issued the appropriate probationary certificate and classified as “teacher” of record on the campus PEIMS data. This was also verified by the candidate records.

• According to TAC §228.35(e), ACT-Houston provided mentors training by providing a handbook identifying expectations and roles and responsibilities. It was documented by a signed receipt by the mentor or cooperating teacher.

• Supervision of each candidate is conducted with the structured guidance and regular ongoing support of experienced educators serving as Field Supervisors. Field supervisor training was verified by dated attendance records per TAC §228.35(f).

• The field supervisor contacted the assigned candidate within the first three weeks of the assignment as required by TAC §228.35(f). The field supervisor logs documented face-to-face meetings, emails, and phone calls.

• Three observations for each candidate were found in the candidate’s records. ACT-Houston meets standards outlined in TAC §228.35(f)(3) during internship.

• The three observations [TAC §228.35(f)(4)] recorded a start and stop time reflecting an observation of at least 45 minutes in duration [TAC §228.35(f)].

• Observation forms in candidates’ records and notes in the field supervisors’ logs verified that the first observation was conducted within the first six weeks of placement [TAC §228.35(f)(2)].

• The field supervisor provides and documents instructional practices observed during the observation. The required interactive conference with the intern after the observation was not documented on the observation form, in the field supervisor’s log, or in candidates’ records [TAC §228.35(f)]. After the audit, the program revised their observation forms to reflect the interactive conference.

• The program provided a copy of the written feedback to the candidate’s campus administrator which is required by TAC §228.35(f). This was verified with the campus administrator’s signature on the observation form.

Based on evidence presented, ACT-Houston is not in compliance with Texas Administrative Code Section §228.35 – PROGRAM DELIVERY AND ON-GOING SUPPORT.
Compliance Issues to be addressed:

- Require field base experiences to take place in a variety of settings, in a variety of subject areas and types of schools (urban, suburban, rural) and document the interactive component (15 clock hours) required by law,

- Expand and document the training and coursework to 300 clock hours of direct instruction, and

- Document by signatures of candidate and field supervisor the interactive conferences following each observation. Keep documentation for audit purposes.

Recommendations:

- Provide mentor teachers continuing professional education credit (CPE) for assisting a beginning teacher.

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

**FINDINGS:**

- ACT-Houston utilizes benchmarks to document a candidate’s process through the program as prescribed by TAC §228.40(a). Documentation was found in the candidates’ records.

- Policies and procedures include criteria that must be met in order to allow the candidate to test [TAC §228.40(b)]. The candidate must complete a methodology course and test review to demonstrate content knowledge prior to being recommended for the PPR exam.

- ACT-Houston performs an evaluation yearly. The program reviews internal and external information gathered from testing, surveys from candidates, principals and mentors. The program meets TAC §228.40(c) for program evaluation.

- According to TAC §228.40(d), the program retains documents that evidence a candidates’ eligibility for admission and evidence of completion of all program requirements for a period of five years after program completion in a secure environment.

Based on evidence presented, ACT-Houston is **in compliance** with Texas Administrative Code §228.40 – ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT.

Compliance Issues to be addressed:

- No compliance issues noted in this section.

Recommendations:

- Use more external data in your overall program evaluations such as surveys from principals, mentors, former candidates, etc.
COMPONENT VI: Professional Conduct (TAC) §228.50

Findings:

- ACT-Houston has all instructors and staff working with candidates signed the Educator Code of Ethics.

- Candidates are provided instruction about the Educator Code of Ethics in coursework, along with the TEA ethics training. Each candidate has signed a copy of the Educator Code of Ethics indicating that they have read, understand, and will abide by Chapter 247 of this title (relating to Educators’ Code of Ethics).

Based on evidence presented, ACT-Houston is in compliance with Texas Administrative Code §228.50 – Professional Conduct.

Compliance Issues to be addressed:

No compliance issues noted

COMPONENT VII: Complaints and Investigations Procedures TAC§228.70

Findings:

- ACT-Houston adopted and sent to TEA, for inclusion in the EPP's records, a complaint procedure that requires the EPP to timely attempt to resolve complaints at the EPP level before a complaint is filed with TEA [TAC 228.70 (1)].

- ACT-Houston posted on its website a link to the TEA complaints website and information regarding how to file a complaint under the EPP's complaint policy [TAC 228.70 (2)].

- ACT-Houston has posted a notification at all of its physical site(s) used by employees and candidates, in a conspicuous location, information regarding filing a complaint with TEA in accordance with subsection (c)(1) of this section [TAC 228.70(3)].

- Upon request of an individual, the EPP shall provide information in writing regarding filing a complaint under the EPP's complaint policy and the procedures to submit a complaint to TEA in accordance with subsection (c)(1) of this section [TAC 228.70(4)].

Based on evidence presented, ACT-Houston Preparation Program (EPP) is in compliance with Texas Administrative Code §228.70(a) regarding Complaint Policy.

Compliance Issues to be addressed:

No compliance issues noted
Based on evidence presented, ACT-Houston Preparation Program (EPP) is in compliance with Texas Administrative Code §228.70(a) regarding Complaint Policy.

**COMPONENT VIII: Rules for Issuances of Certificates (TAC) §230**

**Findings:**

- ACT-Houston requires candidates to pass the TExES exam Generalist EC-6, Generalist 4-8, Core EC-6 or Core 4-8 prior to recommendations for a probationary certificates.

- Secondary candidates must qualify by demonstrating 24 hours of content coursework of which 12 hours must be upper division or pass the content test in their certification field.

- Candidates in the EC-12 certification areas must pass the TExES exam for their content area prior to the recommendation for the probationary certificate.

- For the recommendation for a standard certificate, ACT-Houston requires all coursework be completed, pass both the content exam and PPR exam, and have a successful clinical teaching or internship experience. This issue discovered during the audit was that candidates were being recommended and certified in more than one certification area. The candidate should only be recommended in the area where he/she were prepared, completed clinical teaching or internship, and successfully tested. Multiple content recommendations do not meet Texas Administrative Code §230.37.

Based on evidence presented, ACT Houston Educator Preparation Program (EPP) is not in compliance with Texas Administrative Code §230.37 regarding issuance of certificates.

**Compliance Issues to be addressed:**

- Recommend the standard certification only in the area where a candidate has spent 60% of the teaching day in the internship or clinical teaching.

**General 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 webinars provided by the Division of Educator Preparation 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 the program.
• Ensure that TEA staff has the most current contact information by sending updates to the assigned program specialist.