PURPOSE

Texas Education Agency (TEA) Program Specialist, Vanessa Alba, conducted a five-year Continuing Approval Review of the educator preparation program (EPP) for Training Via E-Learning on June 13, 2018. Per 19 Texas Administrative Code (TAC) §228.10(b), “…An entity approved by the SBEC under this chapter shall be reviewed at least once every five years…”. Dr. Delia Quintanilla was identified as the program Legal Authority and she was also identified as the primary EPP contact for the review process. Training Via E-Learning EPP was approved as an EPP on January 1, 2005. At the time of the review, the EPP was Accredited - Warned. At the time of the review, Training Via E-Learning was approved to certify candidates in the following classes: Teacher Class only.

Per 19 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 TEA administers TAC required by the Texas legislature for the regulation of all EPPs in the state. (See the complete TAC for details.) The five-year Continuing Approval Review was conducted in a “Desk Review” format where EPP staff submitted requested documents to TEA for review.

The scope of this review included: 1) verifying compliance with Texas Administrative Code and Texas Education Code as applicable to all certification classes in all certification routes offered by the EPP; and 2) developing a plan for improvement based on review data, performance indicators identified in 19 TAC §229.4, and self-reported EPP information provided in the Status Report. A Compliance Plan was developed on August 10, 2018 to address plans for quality improvement. Evidence of compliance was measured using a rubric aligned to TAC.

EPP staff participating in the review at various stages were: Dr. Delia Quintanilla, Betty Williams, Annette Stephens, Field Supervisors/Induction Program Coordinators, and Lynn Kirby, Course Development Collaborator. TEA staff participating in various stages were: Vanessa Alba, Lorrie Ayers, and Kerri Elzie.

DATA ANALYSIS

Information concerning compliance with TAC governing EPPs was collected by a variety of means. A Status Report and related program documents were submitted to TEA on May 14, 2018. Additional EPP documents, including records for eleven (11) candidates, were submitted on May 29, 2018. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence.
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FINDINGS, COMPLIANCE ISSUES and RECOMMENDATIONS

“Findings” indicate evidence collected during the review process. If the program is “not in compliance” with any identified component, the program should consult the TAC and correct the issue immediately. A “Compliance Plan” may be drafted during the review that identifies compliance issues to be addressed and a timeline for completion. “Recommendations” are suggestions for general program improvement and no follow up is required.

COMPONENT I: GOVERNANCE – 19 TAC §228

Findings

Governance was not an area of the review. TEA relied on the Status Report submitted by the EPP and areas of concern were noted based on submissions.

- It was noted in the Status Report that the Advisory Committee consists of twelve (12) members representing four (4) groups, including two (2) business/community representatives, one (1) university representative, seven (7) educators, one (1) EPP representative, and one (1) director. Meeting minutes and attendance records were provided as evidence of compliance. The advisory committee meets the requirement as prescribed. [19 TAC §228.20(b)]

- Training Via E-Learning EPP did not inform committee members of their roles and responsibilities. Per the Advisory Committee agenda dated December 20, 2017, members were “encouraged to engage with the training document”, which was an outdated Advisory Committee PowerPoint provided by TEA in 2016 prior to rule changes. The EPP did not meet the requirement as prescribed. [19 TAC §228.20(b)]

- Per the Status Report, the EPP holds two (2) Advisory Committee meetings per year in July and December. Dated minutes were provided as evidence of compliance for meetings from the past three (3) years. The EPP also provided sign-in sheets for the December 20, 2017 meeting as evidence of compliance because that was the only meeting that originally did not have a sign-in sheet. The EPP met the requirement as prescribed. [19 TAC §228.20(b)]

- Training Via E-Learning was originally approved as a hybrid EPP with a portion of the training offered online and a portion of the training offered in a face-to-face format. During the review, the EPP disclosed that the training is offered 100% online, but the EPP never notified TEA of the amendment 60 days prior to implementing the amendments, if “accredited or accredited, not rated” or 120 days prior to implementing the amendment, if “not rated accredited or accredited – not rated”. TEA had no knowledge of when the change was made. Currently, the EPP is rated Accredited – Warned and would be required to provide 120 days’ notice prior to implementing the
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amendment. Training Via E-Learning did not notify TEA of the amendment. The program did not meet the requirement as prescribed. [19 TAC §228.20(e); 19 TAC §228.20(f)]

- Training Via E-Learning EPP published a calendar of activities on the website. The EPP met the requirement as prescribed. [19 TAC §228.20(g)]

- Training Via E-Learning EPP met the requirements for approval when it was approved on January 1, 2005. [19 TAC §228.10(a)]

- Training Via E-Learning is currently rated Accredited – Warned for the 2016-2017 academic year. An Action Plan is required. The EPP Director requested a meeting with TEA staff to discuss the accountability rating and how to improve. That meeting was held on June 27, 2018 at TEA. In addition to Dr. Quintanilla and her legal counsel, Mike Maroney, the following TEA staff were in attendance: Dr. Tam Jones, Director of Educator Preparation Programs; Dr. Mark Olofson, Director of Educator Data and Program Accountability; Christie Pogue, Director of EPP Accreditation and Policy Development; Laura Moriaty, TEA Legal Counsel, Vanessa Alba, TEA Program Specialist; and Kerri Elzie, TEA Program Specialist. The topics of discussion included the need for an Action Plan, guidance that was provided by Ms. Alba regarding the Action Plan, data deficiencies by the program for the past three (3) years and the support that was provided to the EPP to correct those deficiencies, the current EPP Review and data deficiencies that were discovered as a part of the review, best practices for recording and reporting data to TEA, the fact that data for the Desk Review was not provided by the EPP in the manner requested by TEA, how to get to the root cause of the problem, and how the EPP perceived that the GPA spreadsheet requirement is when the problems began and reporting observations which compounded the problem. TEA offered guidance to the EPP regarding ASEP annual reporting and guidance regarding the EPP Review was provided to the EPP at TEA on June 29, 2018. The EPP did not meet the requirements for continuing approval as prescribed. [19 TAC §228.10(b)]

- Training Via E-Learning was approved to offer clinical teaching in 2006 and met the requirement as prescribed. [19 TAC §228.10(c)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §228.20(b): The advisory committee members have not been trained.

Action: Train advisory committee membership on their roles and responsibilities to assist in the design, delivery, evaluation, and major policy decisions of the EPP.
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- 19 TAC §228.20(b): The advisory committee did not assist in the design, delivery, evaluation, and major policy decisions of the educator preparation program.

  Action: For every advisory committee meeting, take minutes that reflect the advisory committee’s interactive involvement in the design, delivery, evaluation, and major policy decisions of the Training Via E-Learning program. Retain minutes in EPP records.

- 19 TAC §228.20(b): The approved EPP did not inform each member of the advisory committee of the roles and responsibilities of the advisory committee.

  Action: Provide information on the responsibilities of the members through an acknowledged invitation letter, handbook, or formal training each academic year. Retain evidence of training (attendance records, record in minutes) in EPP records.

- 19 TAC §228.20(e); 19 TAC §228.20(f): An EPP that is not rated “accredited” or “accredited-not rated” may amend its program, provided the program informs TEA staff of any amendments 120 days prior to implementing the amendments. An EPP must submit notification of a proposed amendment on a letter signed by the EPP's legally authorized agent or representative that explains the amendment, details the rationale for changes, and includes documents relevant to the amendment. The EPP will be notified in writing of the approval or denial of its proposal within 60 days following the receipt of the notification by the TEA staff.

  Action: Submit a letter on EPP letterhead no later than September 15, 2018 regarding the amendment to a 100% online EPP. That letter must explain the change to a 100% online EPP, the rationale for the change, and any documents that may be relevant to the amendment. TEA will notify the EPP in writing regarding approval or denial within 60 days.

- 19 TAC §228.10(b): The EPP has not met the requirements for approval. EPP is rated Accredited Warned with an Action Plan.

  Action: Require the EPP to accurately report all data during the 2017-2018 reporting date. TEA will review all submissions and check for accuracy. An Action Plan is required to be submitted within 45 days of notice with a 60-day check-in for compliance. The Action Plan specifically addresses the accuracy of data reported: Annual Performance Report (APR), GPA Spreadsheet, candidates admitted to the EPP, candidate status as Other Enrolled or Finisher, and formal observations.
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Recommendations:

• Utilize the current TEA Advisory Committee PowerPoint to train membership, which was provided to the EPP.

Based on the evidence presented, Training Via E-Learning EPP was not in compliance with 19 TAC §228 – Governance of Educator Preparation Programs.

COMPONENT II: ADMISSION - 19 TAC §227.10

Findings

TEA reviewed the Training Via E-Learning Status Report for evidence of compliance, verified information posted on the website, and cross-checked with candidate files selected for review to determine compliance with admission requirements.

• Training Via E-Learning is required to inform applicants of required information. The following are posted on the website: Criminal history background check prior to teaching; Admission requirements; and the requirements for program completion, which included six (6) steps to certification. The effects of supply and demand and the performance of the EPP over the past five (5) years were not posted. The EPP did not meet the requirement as prescribed. [19 TAC §227.1(c)]

• TEA reviewed eleven (11) candidate files for a degree conferred prior to admission. Nine (9) out of eleven (11) files (82%) contained original transcripts as evidence that a bachelor’s degree or higher was conferred prior to admission. One (1) file had no degree on file and the other contained a degree conferred for a bachelor’s degree and master’s degree, but no transcripts. The program met the requirement as prescribed. [19 TAC §227.10(a)(1)]

• A transcript evaluation is required of out-of-country applicants. Three (3) out-of-country files were reviewed for evidence of a transcript evaluation. Two files (67%) contained evidence of a transcript evaluation by an approved service. The services used were Credentials, Inc. and World Education Services. One (1) file contained no evidence of a transcript evaluation. That candidate was listed as having been admitted in 2016-2017 as verified on the EPP’s GPA spreadsheet as a part of the EPP’s required annual performance reporting. The program did not meet the requirement as prescribed. [19 TAC §227.10(e)]
• Out-of-country applicants must demonstrate proficiency in English prior to admission. Of the three (3) files reviewed, only one (1) was required to submit TOEFL scores. If that applicant was admitted prior to October 17, 2017, they were required to take all portions of the TOEFL and score a 26 on the speaking. If admitted after that date, they were required to score a 24 in speaking, 22 in listening, 22 in reading, and 21 in writing. The applicant was admitted with a 23 in speaking, 22 in listening, 26 in reading, and 27 in writing. Because of the speaking score, the candidate was not eligible for admission. The program did not meet the requirement as prescribed. [19 TAC §227.10(a)(6)]

• The GPA at the time of admission was reviewed. Training Via E-Learning requires a 2.75 GPA for admission. A GPA range of 3.06-3.48 was noted in nine (9) out of eleven (11) files (82%) reviewed. Two (2) files had no GPA at the time of admission noted. The EPP met the requirement as prescribed. [19 TAC §227.10(a)(3)(A)]

• Applicants are required to demonstrate content knowledge prior to admission. Candidates seeking certification are required to have twelve (12) semester hours in a content area or fifteen (15) semester hours in math or science, if seeking math or science certification. It was noted that four (4) files calculated their own GPA, four (4) files had a completed GPA calculation by course by the EPP, and three (3) files had no GPA calculation at all. The EPP was 36% compliant, The EPP did not meet the requirement as prescribed. [19 TAC §227.10(a)(4)(A-B)]

• Basic skills prior to admission were determined by a degree conferred. Nine (9) out of eleven (11) files (82%) contained evidence in the form of a transcript noting bachelor’s degree or higher conferred. The EPP met the requirement as prescribed. [19 TAC §227.10(a)(5)]

• TEA reviewed the screening devices used for admission by Training Via E-Learning. The program requires an application and a phone interview. Nine (9) out of eleven (11) files (82%) contained a completed application. Eleven (11) files contained a phone interview scored on a rubric. Three (3) of those files contained phone interviews after formal admission and two (2) files had phone interviews that were not dated. It was discovered by TEA staff during the on-site curriculum review that math and science applicants are required to submit to a different interview based on math and science questions asked by the EPP staff. That information and requirement is not posted on the website and was not provided as a part of the records submitted for review. TEA requested those interview questions for the two (2) files that were math and science candidates. That information was not provided within the timeline requested. The program did provide a set of math and science questions, but the Dr. Quintanilla stated that they were geared toward someone that had content knowledge and not someone being admitted to an EPP. The documentation provided was not accepted. Training Via
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E-Learning was 60% compliant. The program did not meet the requirement as prescribed. [19 TAC §227.10(a)(7)]

- Training Via E-Learning has an additional admission requirement of two (2) letters of recommendation. Six (6) out of eleven (11) files reviewed (55%) contained two (2) letters of recommendation. One of those files contained a letter of recommendation addressed to the attention of another EPP. Three (3) files contained no letters of recommendation and one (1) file only had one letter of recommendation. The program did not meet the requirement as prescribed. [19 TAC §227.10(b)]

- Training Via E-Learning admitted one (1) transfer candidate. That file contained the required transfer document, application, and official transcripts. The EPP met the requirement as prescribed. [19 TAC §227.10(b)]

- All applicants are required to be formally admitted. Ten (10) out of eleven (11) files 91% reviewed contained an offer of formal admission in the form of an email. However, seven (7) out of eleven (11) files contained a discrepancy between what is documented in ECOS as the date of formal admission and what was documented in the email in the formal offer of admission document. The program was 36% compliant in terms of data integrity. That issue will be addressed in Component IX. The program met the formal admission requirement as prescribed. [19 TAC §227.17(a)]

- Candidates were not granted test approval until after they were formally admitted. Seven (7) out of eleven (11) files (64%) have either been made eligible to test or have taken content and pedagogy and professional responsibility (PPR) exams. They all have done so after being formally admitted to the program. The program met the requirement as prescribed. [19 TAC §227.10(e)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §227.1(c)(3)(A-B): The EPP has not informed applicants of the effects of supply and demand forces on the educator workforce in the state and the performance over time of the EPP for the past five (5) years.

Action: Post the information about the effects of supply and demand forces on the educator workforce in the state and the performance of Training Via E-Learning over the past five (5) years on the EPP website. For the performance of the EPP over the past five (5) years, include any EPP Compliance Reports and the EPP accountability ratings for the past five (5) years.
• 19 TAC §227.10(e): Out-of-country candidates have not met the required degree requirement and did not contain evidence of using an approved foreign credential evaluation service.

Action: Require all out-of-country applicants to have their credentials evaluated by an approved foreign credential evaluation service prior to admission.

• 19 TAC §227.10(a)(6): Out of country applicants did not demonstrate proficiency in English language skills prior to admission.

Action: Require all out-of-country applicants whose degree is not from a country listed in the figure in 19 TAC §230.11(b)(5) to submit TOEFL-iBT scores to the EPP using the EPP’s TOEFL code. A 24 in speaking, 22 in listening, 22 in reading, and 21 in writing are required for admission. Maintain TOEFL scores in each candidate’s file.

• 19 TAC §227.10(a)(4)(A-B): Applicants did not meet content knowledge requirement prior to admission

Action: Require the EPP to determine content knowledge by requiring PACT or by calculating GPA hours in the content area for which the applicant is seeking certification. If the applicant is seeking math or science certification, fifteen (15) semester hours are required in math or science. For all other certification areas, twelve (12) semester hours are required in the content area for which they are seeking certification.

• 19 TAC §227.10(a)(7): A screening device, specifically the phone interview, has been used after admission to determine applicant admission.

Action: Require the EPP to screen for admission using the phone interview prior to formally admitting each candidate.

• 19 TAC §227.10(b): Applicants have not met additional admission requirements, specifically not all files contained two letters of recommendation.

Require all applicants to submit two (2) letters of recommendation prior to formal admission, if it is an additional admission requirement. If an applicant does not meet the requirement, do not admit them.

Recommendations:

• Strongly consider designating staff member to calculate each applicant’s GPA hours in the certification area they are seeking. Train the individual about the document that will be used. Require the staff member to use a consistent document to track the GPA
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It is not advised that the EPP have candidates calculate their own GPA for the GPA spreadsheet.

- Strongly consider having more than one (1) person screen the telephone interviews scored on a rubric to avoid bias in admission. Three (3) reviewers are recommended, in case that one (1) person would admit the applicant and the other would not. The third person would serve as the tie-breaker.

Based on the evidence presented, Training Via E-Learning EPP is not in compliance with 19 TAC §227.10 - Admission Criteria.

COMPONENT III: CURRICULUM – 19 TAC §228.30

Because of the findings related to curriculum during the Desk Review, TEA staff conducted an on-site review of curriculum. TEA staff recommended conducting the on-site review at the EPP’s physical location, but Dr. Quintanilla advised TEA that it operates out of her home. TEA program specialists, Vanessa Alba and Lorrie Ayers, conducted the on-site review on July 18, 2018 at Smith Academy in Austin, Texas. Prior to the on-site review, the EPP was provided with documents on June 29, 2018 to assist with facilitation of the review. Dr. Quintanilla was asked to submit the documents via email to TEA staff prior to arrival on-site. The documents provided to Dr. Quintanilla were curriculum alignment charts and two Component III curriculum documents that would assist TEA staff in understanding the coursework, instructors, activities, and assessments for one (1) course for each certification field being reviewed. Dr. Quintanilla did not submit the documents prior to the review as requested and only provided the alignment charts in the TQ Portal at the time of the on-site review. EPP staff in attendance included Dr. Delia Quintanilla, Owner/Director; Betty Williams, Field Supervisor & Induction Program Coordinator; Annette Stephens, Field Supervisor & Induction Program Coordinator; and Lynn Kirby, Course Development Collaborator. TEA staff requested access to the program’s TQ Portal, which is the online coursework, as a candidate and an instructor. The EPP only provided TEA staff access as a candidate.

Findings

- Dr. Quintanilla identified the following “PPR” courses as required coursework for every candidate regardless of the certificate sought:
  - ACC 1000 Meeting the Needs of TX Classrooms, eHandbook (not for credit toward the 300 clock-hours)
  - ACC 1101 Creating the Optimum Teaching & Learning Experience
  - ACC 1152 Maneuvering Technological Resources for the 21st Century Learner & All TECs
  - ACC 1153 Establishing Classroom Instructional & Management Strategies
  - ACC 1155 Preparing the Teacher of Diverse Learners
ACC 1204 Creating Interdisciplinary Approaches Through Reading & Writing
ACC 2157 Framing Assessment Tools & Techniques

Several of the required courses had “Companion Courses” that were required additions to a specific course. The courses ACC1101, ACC1101c, and ACC1153 were reviewed. The contents were standards-based; however, some coverage was superficial and repetitive in places.

There were numerous optional courses that provided instruction in such topics as special education, poverty, and many others. Candidates are advised, but not required, to complete at least 75% of these courses. Dr. Quintanilla stated that she contacted candidates if they did not take the optional courses and further encouraged them to take them, but did not require them to do so. She stated the information learned in the optional courses would benefit the candidates in their internship and stated that she used that as motivation when encouraging reluctant candidates to complete the optional courses.

It was discussed with Dr. Quintanilla that all required courses contained limited training in special populations and that the optional courses focused on special populations should be required. Dr. Quintanilla was reminded that the Principal Survey and Teacher Satisfaction Survey contained sections on candidate preparedness in these areas. She was also reminded that because her existing required coursework does not meet the 300 clock-hour minimum requirement, making these optional courses part of the required coursework would help her to increase her coursework hours.

Some lessons within each course contained slides with notes that allowed candidates to engage with slide content in a deeper way. Other lessons such as Theories of Development in ACC 1101 and Poverty in UGR 4091e were slides with no additional explanatory notes. The outline format of the slides, with no related notes, represented a superficial and sometimes confusing exposure to the concepts. Because there are no instructors to provide verbiage to candidates as they read through the slides, it was discussed with Dr. Quintanilla that she should consider updating all lessons and adding notes where necessary to facilitate candidate understanding.

The Poverty lesson was originally designed for face-to-face delivery and still reflects verbiage to that effect, such as a slide that advised the reader to “turn to your shoulder partner”. It also refers to an activity but there is no activity to complete. It was discussed with Dr. Quintanilla that she should either revise the Poverty lesson or think about offering it either via webinar or a face-to-face workshop where candidates may be able to interact with each other and the instructor. It was also discussed with Dr. Quintanilla that her curriculum lacked an interactive component and this would add some required interaction into her curriculum.
The curriculum was not interactive. The only interactive component within the courses was when the candidates posted an answer to a prompt. In one course a candidate posted that a video was not accessible/available for viewing. There was not a response posted back to the candidate. There was no evidence of discussion between candidate and instructor or candidate and candidate regarding these postings. Because Dr. Quintanilla stated the program is no longer a hybrid but is now 100% on line, it is assumed there are no workshops that allow face-to-face interaction.

The curriculum reviewed had limited opportunity for candidates to practice skills prior to entering the classroom as interns or clinical teachers. The only identifiable performance tasks required of candidates were 1) periodically posting answers to prompts; and 2) completing a portfolio (Dr. Quintanilla stated that would be helpful for candidates seeking a teaching job).

- The Training Via E-Learning EPP curriculum is not based on the educator standards adopted by the State Board for Educator Certification (SBEC) and is not the curricular basis for all educator preparation and, for each certificate, does not address the relevant Texas Essential Knowledge and Skills (TEKS). One course, ACC 1000c Mapping Path Roadmap Benchmark-Standards Doc contained the following standards alignment charts: Commissioner’s Teacher Standards; PPR EC-12; TEKS; Science 4-8; and Math 7-12. It was not clear how a candidate would know how to apply the standards to the rest of the coursework taught. The remaining standards for all other certifications offered were not listed. It appeared that the program staff just added information that the EPP believed TEA would want to see for the EPP review.

TEA selected Math 7-12 and Science 4-8 as the certification areas to review. The program submitted an alignment chart for Math 7-12 and identified the following courses where the standards were taught: UGR 3005, SD Website [school district website], and CC. SD Website and CC were not listed in the online course selections. The program submitted an alignment chart for Science 4-8 and identified the following courses where the standards were taught: CC and SD Website [school district website].

TEA reviewed the Math 4-8 online curriculum. The three (3) courses identified on the alignment chart were: UGR 3005 TEKS information from Georgetown ISD and Leander ISD, SD Website [school district website], and CC. SD Website and CC were not listed in the online course selections. TEA found two (2) math courses: BEC EC-8 Math and BES 300 CM 4-8 Math. The first class reviewed was “Math BES 3000c EC-8 Math”. It was a Math TExES exam test preparation course. BES3000c was a math course called “Math 4-8 GISP Study Guide”, used for test preparation, accessed through Georgetown ISD website. Dr. Quintanilla stated she had permission from GISD for candidates to access this material.
The course had no assignments, projects, or exams required. Within the course, it was stated that candidates "will receive a handout". No handout was located. The Workshop was presented by Dr. Caroline Kyhl. It included an Introduction to Math Standards and TEKS for PK-4. The study group section had no topics. In BES 3000c EC-8 Math, candidates receive mathematics instruction which is test preparation. The course is not a required course. “Applying Math Across Curriculum” contained another test preparation question. “Math Yuck” was a mini PPT with information regarding left & right brain learners. “The Who” course did not work so reviewers could not evaluate it. “Themes 4th-8th grade Themes” was the next course. All courses were study guides. The direction provided to candidates was “Go to TQ portal, Portal Coach Gauri, or Delia for assistance or go to the tutoring room in the portal for test tutoring”. BES 300 CM course was a Math 4-8 GISD [Georgetown ISD] Study Guide. The course was a PPT that focused on tested competencies. The PPT refers candidates to TEA free resources and provides no instruction. During conversations with the program owner/director, TEA discovered that the EPP did not provide a complete interview for the two candidates that were selected for review in Math / Science. The owner/director stated that the EPP assumes that applicants have the right amount of math and /or science experience. She also stated that math and science candidates go to Cedar Academy for training. The EPP did not labor in a course for math or science, but it does give test preparation. Regarding TEKS instruction, candidates are referred by the EPP to the district for TEKS guidance and instruction.

TEA reviewed the Science 4-8 curriculum. The two (2) courses noted on the alignment chart for Science 4-8, CC and SD Website, were not listed in the online course selections. BES 3000d EC-8 Science was listed as a science course, but that course was a test prep manual for Generalist EC-6 or Science 4-8. It is also not a required course. The course also referenced TAKS for students and TAKS is no longer the state assessment for students. The PPT presentation consisted of sample test items and a discussion of those tested items. It also focused on tested competencies. There was no opportunity to practice any skills and there were no assessments for this course.

Dr. Quintanilla was advised to develop at least one course containing methodology instruction specific to each certificate she is approved to offer. She was reminded that this would also help her increase the number of coursework hours which currently do not meet the minimum. The program did not meet the requirement as prescribed. [19 TAC §228.30(a); 19 TAC §228.30(d)(1)]

- Some lessons within courses contained assessments. Many of the lessons within each course contained multiple choice quizzes or exams. Candidates were expected to achieve at least an 85% correct on each quiz or exam prior to entering an internship.
Candidates could retake an assessment multiple times, but after a third attempt below 85% threshold the candidate must attend phone tutoring with Dr. Quintanilla. A conversation with Dr. Quintanilla revealed that, in a worst-case scenario, a candidate could fall below the 85% target on all tests despite retakes and tutoring and still get credit for completing the coursework. Dr. Quintanilla stated that all tests are timed. When asked how the EPP determines that the candidate engages in the coursework and takes the required tests, she stated that there was no way for the EPP to know if the candidate participated in coursework or took the exams. The program did not meet the requirement as prescribed. [19 TAC §228.40(a)]

- The curriculum did rely on scientifically-based research, but it did not ensure educator effectiveness because candidates are not required to take all the coursework. TEA did find that within most online coursework, various textbooks and authors were cited. Candidates were encouraged, but not required, to engage in the material. The program did not meet the requirement as prescribed. [19 TAC §228.30(b)]

- The Code of Ethics and standard practices for Texas educators, pursuant to Chapter 247 of this title (relating to Educators' Code of Ethics) was addressed in a four-hour course called Empowering Teacher Leadership to Empower Students. Candidates are provided with the TEA ethics videos. This course is not listed in the online portal. The course was found in YTR 5000b Induction Year Program, eHandbook in the TQ Portal. It is also not a required course. There is no hour requirement listed for the course. There are three (3) pages devoted to the Code of Ethics and those pages are the actual 19 TAC §247.2 rule on EPP letterhead. The Status Report also states that the course is taught by EPP Directors, faculty, and supervisors. Candidates are also required to sign the statement of reading and understanding the Code of Ethics. The program met the requirement as prescribed. [19 TAC §228.30(c)(1)(A-C)]

- Instruction in detection and education of students with dyslexia, as indicated in the Texas Education Code (TEC), §21.044(b) was taught in UGR 3006.HSD by Patricia Rhem. This is also not a required course. No projects are required in the course. The course focuses on secondary special needs learners and contains four (4) slides in a three (3) hour course. There are no assessments. The Status Report also states that there is a TEA link and video, but it was not found. The program does not meet the requirement as prescribed. [19 TAC §228.30(c)(2)]

- Instruction regarding mental health, substance abuse, and youth suicide, as indicated in the TEC, §21.044(c-1) is taught in a two (2) hour TQ Portal Course, but that course was not specified in the Status Report. The program also refers candidates to the Program Provider Resources page on the TEA website in SPE 1157 Mental Health. There is no direction provided to candidates regarding what they are to do once they get to the Program Provider Resources page of the TEA website. Per Dr. Quintanilla’s admission,
The skills that educators are required to possess, the responsibilities that educators are required to accept, and the high expectations for students in this state are identified as being addressed in several courses on the TQ Portal, on TEA links, You Tube videos, and professional videos. The courses listed in the Status Report were not found within the TQ Portal. Those courses were Building Curriculum; Creating a High-Performance Learning Environment; Driving Student Performance; Diverse Learner Needs/Strategies; Empowering Teacher; Leadership to Empower Students; Integrating Technology; Focusing on All Middle/High School and Elementary School; and Focusing on Test-Taking. The program did not meet the requirement as prescribed. [19 TAC §228.30(c)(4)]

The importance of building strong classroom management skills was identified in the Status Report as being addressed in Creating a High-Performance Environment. TEA located the topic in ACC 1153 Establishing Classroom and Instructional Management Techniques. This is a 20-hour course and it is a required course. There is a 28-question multiple choice test at the end of the course and candidates are required to score an 85%. The program met the requirement as prescribed. [19 TAC §228.30(c)(5)]

The framework for teacher and principal evaluation was identified in the Status Report as being taught in Creating a High-Performance Learning Environment and Driving Student Performance. Faculty, Directors, Supervisors, TEA links/videos, and professional videos are listed as instructors. The course was found in YTR 5000b Induction Year Program, eHandbook in the TQ Portal. The course has no hours’ requirement and is not a required course. In reviewing the slides devoted to T-TESS, it was noted that they were focused on EPP requirements and not T-TESS. The program did not meet the requirement as prescribed. [19 TAC §228.30(c)(6)]

Reading instruction, including instruction that improves students' content-area literacy, was identified in the Status Report as being taught in Driving Student Performance. The faculty and TEA links/videos were listed as instructors for the six-hour course. No information or course was found in the TQ Portal. Reading instruction was found in ACC 1204 Creating Interdisciplinary Approaches through Reading & Writing - Phonological Awareness Course. This is a required course. The course is taught by Dr. Elizabeth Swanson. A phonological awareness Weebly project is required. The course is based on Michigan Standards. Candidates just review the content and no actual activity is required. Dr. Quintanilla was advised that the EPP needs a secondary level course for Literacy across the curriculum. The required reading instruction was focused on early childhood with no references to secondary reading instruction. Dr. Quintanilla was advised to build a literacy unit for secondary candidates that would meet the
requirements in 19 TAC §228.30(d)(2) for reading instruction. Dr. Quintanilla was provided examples of where reading was important in math (word problems) and science (vocabulary intensive Biology course). The program did not meet the requirement as prescribed. [19 TAC §228.30(d)(2)]

- For certificates that include early childhood and prekindergarten, the Prekindergarten Guidelines must be addressed. The Status Report stated that the EPP “Focusing on all Elementary”, but did not provide a specific course or faculty to teach the course within the TQ Portal. Dr. Quintanilla was advised that TEA would provide the EPP with a link to the PK guidelines, but that the EPP would be responsible for developing the coursework. The program did not meet the requirement as prescribed. [19 TAC §228.30(d)(3)]

- Instructional planning and delivery was not adequately addressed by the EPP. Dr. Quintanilla stated that candidates obtain information regarding instructional planning from their respective districts. She also stated that she does not provide candidates with a lesson plan guide. TEA did locate two courses in the TQ Portal that are not required, but where lesson planning is addressed. They are YTR 5007.UGR Dr. Y’s Lesson Plans and YTR 5041 Dr. Q’s Lesson Plan Discussion. Both courses are PPTs and no tests or activities are required. These courses would be better served as required courses with multiple opportunities for candidates to practice writing lesson plans and teaching in a safe environment with other candidates prior to clinical teaching or internship. The program did not meet the requirement as prescribed. [19 TAC 228.30(d)(4)(A)]

- Knowledge of students and student learning was addressed in ACC 1101 Creating the Optimum Teaching and Learning Environment. The course is taught by Dr. Quintanilla and is 20 hours in length. It is a required course. The major learning theorists are discussed in this course. There is a quiz at the end of the unit. The program met the requirement as prescribed. [19 TAC 228.30(d)(4)(B)]

- Content knowledge and expertise was not addressed by the program for any certificate offered. Dr. Quintanilla said the EPP only provided test preparation for content areas. TEA specifically reviewed Math 7-12 and Science 4-8 curriculum and only found test preparation material, none of which was required. The program did not meet the requirement as prescribed. [19 TAC 228.30(d)(4)(C)]

- Learning environment was addressed in ACC 1153 Establishing Instructional and Classroom Management Techniques. This is a required course. The instructors were identified as Dr. Elizabeth Swanson and Dr. Quintanilla. The course length in terms of hours earned was not identified. The course contained exams at the end of each unit. The program met the requirement as prescribed. [19 TAC 228.30(d)(4)(D)]
Data-driven practice was not adequately addressed. ACC 1101c Using Data to Plan Instruction was a 45-slide PPT with no activities or assessments required. This is not a required course. The program did not meet the requirement as prescribed. [19 TAC 228.30(d)(4)(E)]

Professional practices and responsibilities was addressed in ACC 1101 Creating the Optimum Teaching and Learning Experience. This is a required course. The modules called The Classroom According to Wong and Characteristics of the Teacher address the requirement. There is a quiz after each module. Dr. Quintanilla is identified as the instructor for the course. The program met the requirement as prescribed. [19 TAC 228.30(d)(4)(F)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §228.30(a): The curriculum is not based on the approved educator standards.

  Action: Submit a standard-based curriculum by submitting a completed Application A for each certification field approved to offer.

  Submit each application incrementally, rather than all at once. Submit the Application A for the certification fields most used by the EPP first. TEA will provide a list of certification fields offered and indicate the certification fields most often used by the program to assist the program to determine which certification fields are most often used.

  If the EPP is not PACT, all knowledge and skills statements must be addressed within the Application A for each certificate offered. If PACT, only the skills must be addressed.

- 19 TAC §228.30(a); 19 TAC §228.30(d)(1): The curriculum does not address the relevant TEKS, including the English Language Proficiency Standards.

  Action: Require the EPP to address the relevant TEKS and English Language Proficiency Standards within the curriculum taught. Do not rely solely on school districts to provide that training.

- 19 TAC §228.40(a) The EPP does not use assessments to measure candidate progress.

  Action: Create assessments based on standards taught for each certificate offered and require each candidate to achieve a mastery level of no less than 80%. These assessments will be noted in the completed Application A for each certificate offered.
Use assessments that are performance-based to measure candidate progress within each course and throughout the EPP.

Utilize a rubric used to evaluate the level of proficiency achieved by each candidate.

- **19 TAC §228.30(c):** The following subject matter shall be included in the curriculum for candidates seeking initial certification in any certification class.

  Require the EPP to provide instruction in all areas as noted in 19 TAC §228.30(c)-(e) as noted in [Texas Administrative Code §228.30](#).

- **19 TAC §228.30(c)(2):** Instruction in detection and education of students with dyslexia, as indicated in the Texas Education Code (TEC), §21.044(b).

  Action: Re-evaluate and revise the current dyslexia training to ensure that candidates receive the required training. That training must include the characteristics of dyslexia, identification of dyslexia, and effective multisensory strategies for teaching students with dyslexia. Provide candidates with specific training in dyslexia.

- **19 TAC §228.30(c)(3); TEC §21.044(b)** The EPP did not provide instruction regarding mental health, substance abuse, and youth suicide from an approved provider.

  Action: Require the EPP to provide training in mental health, substance abuse, and youth suicide from an approved provider. The approved providers can be accessed on the program provider resource page here: [Mental Health Training](#).

- **19 TAC §228.30(c)(6):** The EPP did not provide instruction in the framework in this state for teacher and principal evaluation.

  Action: Require the EPP to provide specific instruction in T-TESS and T-PESS.

- **19 TAC §228.30(c)(4):** The EPP did not provide instruction in the skills that educators are required to possess, the responsibilities that educators are required to accept, and the high expectations for students in this state.

  Action: Require the EPP to provide specific instruction in the skills that educators are required to possess, the responsibilities that educators are required to accept, and the high expectations for students in this state.

  This includes training in the state STAAR exams and the teacher’s responsibility for those exams and how they are connected to daily instruction.
• 19 TAC §228.30(d)(2): *The EPP did not teach reading instruction, including instruction that improves students' content-area literacy.*

  Action: Require the EPP to provide reading instruction, including instruction that improves students' content-area literacy.

  Provide candidates with specific training in reading instruction that focuses on phonics, phonemic awareness, fluency, vocabulary, and comprehension. Also, provide specific training in reading across the content areas.

• 19 TAC §228.30(d)(3): *For certificates that include early childhood and prekindergarten, the Prekindergarten Guidelines were not taught by the EPP.*

  Action: Require the EPP to provide training in the PK guidelines for all certificates that include early childhood and prekindergarten. The link to the PK Guidelines follows: [PK Guidelines](#).

• 19 TAC §228.30(d)(4)(A): *The EPP did not provide training in Instructional planning and delivery.*

  Action: Provide specific instruction in instructional planning and delivery. Candidates must have multiple opportunities to practice writing lesson plans prior to teaching in front of EC-12 students.

• 19 TAC §228.30(d)(4)(C): *Content knowledge and expertise was not taught by the EPP.*

  Action: Provide candidates specific instruction in the specific standards for the content area for which they will be certified. If a candidate is admitted via the PACT route, candidates are required to be instructed in the skills. If a candidate is admitted without having passed a content exam, all knowledge and skills for that content area must be addressed. For any supplemental areas for which the EPP provides test approval, the program must provide specific training in all knowledge and skills required for that certificate.

• 19 TAC §228.30(d)(4)(E): *Limited evidence was provided that data-driven practice was taught by the EPP.*

  Action: Require the EPP to provide training to all candidates in data-driven practice.
Recommendations:

- Strongly consider requiring applicants to take content exams via the pre-admission content test (PACT) route. This will allow the EPP to focus on instructing candidates how to teach the content.
- Strongly consider focusing on submitting the Application A for certification areas for which the EPP has the most candidates seeking certification first.
- Strongly consider submitting 1-2 Application A forms per month beginning October 1, 2018 until all certification fields have been submitted and approved by TEA.
- Strongly consider eliminating certification areas for which the EPP does not have qualified staff to train candidates or a curriculum.
- Strongly consider requiring EPP instructors come to TEA for curriculum alignment training so that they will know, understand, and be able to implement the current curriculum requirements when instructing candidates.
- Strongly consider clustering the standards knowledge and skills statements so that instructors can adequately teach all standards.
- Consider providing instruction in the standards using a “flipped classroom” model whereby candidates read material in advance of class to gain required knowledge and practice the knowledge acquired from readings by applying those skills during class time. This will maximize instruction time and provide many opportunities for candidates to practice skills.
- Strongly consider continuing to require a passing score of 85% or higher on all assessments.
- Strongly consider requiring candidates to complete the online training for dyslexia offered online by ESC 10. It is called Dyslexia: Characteristics, Identification, and Effective Strategies. Require a dated certificate of completion with 3 hours noted. Candidates would not earn CPE, but rather hours toward certification. The course can be found here: [Dyslexia at ESC 10](#)
- If the EPP selects Kognito as the provider for training, require candidates to select the grade appropriate training: Elementary, Middle, or High School and require a dated certificate of completion as evidence of completion.
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Based on evidence presented, Training Via E-Learning EPP is not in compliance with 19 TAC §228.30-Curriculum.

COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT – 19 TAC §228.35

Findings

- Training Via E-Learning did not provide evidence that candidates receive adequate preparation and training to prepare candidates for educator certification and ensure the educator is effective in the classroom. Acceptable evidence of compliance includes: a candidate testing history; a candidate benchmark document noting benchmarks achieved toward certification; syllabi or course outlines for each course required for certification; and a transcript of coursework completed. A testing history was not provided for any file reviewed. A benchmark document was not provided for any file reviewed. Course outlines were not provided in the online coursework reviewed. The program provided a list of courses completed by each candidate file reviewed. That served as evidence of a transcript. The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(1)]

- The coursework and training provided by the EPP is not sustained, rigorous, intensive, interactive, candidate-focused, and performance-based. A list of courses completed was provided for each file reviewed, but that information did not suffice as evidence regarding sustained, rigorous, intensive, interactive, candidate-focused, and performance-based coursework. The only interactive component within the courses was when the candidates posted an answer to a prompt. In one course a candidate posted that a video was not accessible/available for viewing. There was not a response posted back to the candidate. There was no evidence of discussion between candidate and instructor or candidate and candidate regarding these postings. The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(2)]

- TEA was able to verify that five (5) candidate files reviewed had reached the point of standard certification and one (1) file reached point of emergency certification for JROTC, but insufficient evidence was provided to verify that the candidates completed coursework and training prior to EPP completion and standard certification. The program provided a list of courses completed (transcript) for each of the files, but did not provide a benchmark document, attendance records noting time on task, or attendance policies that require a certain level of attendance for a passing grade. The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(3)]

- The program did not provide any evidence that it has procedures in place for allowing relevant military experiences. TEA could not locate the information on the website,
candidate handbooks, or in any other relevant material. The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(5)(A)]

- The program did not provide any evidence that it has procedures for allowing prior experience, education, or training. TEA could not locate the information on the website, candidate handbooks, or in any other relevant material. The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(5)(B)]

- Training Via E-Learning EPP is offered in a 100% online format. The program did not provide any evidence that it meets or is making progress toward meeting accreditation by the Distance Education Accrediting Commission (DEAC) or Quality Matters (QM). The coursework and training that is offered online does not meet standards because it is not seeking DEAC or QM accreditation. In additional submissions, the EPP provided a word document stating that it has selected DEAC, but did not provide evidence other than the statement from EPP that it has chosen DEAC. During the curriculum review, TEA staff noted that links did not work or sent the person viewing the curriculum to unrelated websites, content was too small to read in many courses in the TQ portal, and candidates wrote posts about the online curriculum videos were not accessible, but never received a response or assistance from the EPP. The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(6)]

- Candidates for initial certification do not receive 300 clock-hours of coursework and training. The EPP provided a document tracking courses required for certification and a course module schedule for various certification fields. TEA reviewed the document for Core Subjects EC-6, Bilingual Education, ESL, Special Education, Spanish EC-12, and French EC-12. The document stated that each course is equivalent to a university 15-week course at 3 hours per week, which equals 45 clock-hours. Each candidate had a course schedule (transcript) that noted a start and end date for each course completed. TEA noticed that for one candidate, the start and end dates were the same date for every course completed. Another candidate had two (2) courses that were completed within ten (10) days, but the remainder of courses had a start and end date that was the same date. A third candidate had a course that took five (5) months to complete, but the rest of the courses were started and completed on same date. The remainder of the files reviewed followed a similar pattern. While the EPP has a document that tracks hours for courses, it could not be verified that candidates completed 300 clock-hours of coursework/training. The program did not meet the requirement as prescribed. [19 TAC §228.35(b)]

- Candidates have not completed the field-based experience requirements prior to clinical teaching or internship. Three (3) files reviewed contained no field-based experience logs or reflections documentation. One (1) file contained field-based experience logs, but they were not dated and had no year noted. That file did contain the actual reflections. Three
(3) files contained field-based experience logs, but did contain the reflections. The remaining four (4) files contained field-based experience logs with reflections completed prior to internship or clinical teaching. The field-based experiences for any candidate did not include 15 clock-hours in which the candidate, under the direction of the EPP, is actively engaged in instructional or educational activities. The EPP also did not provide evidence that candidates experienced a full range of professional responsibilities that included the start of the school year during their field-based experiences. The start of the school year is defined as the first 15 instructional days of the school year. If these experiences cannot be provided through clinical teaching, they must be provided through field-based experiences, and they were not. The program did not meet the requirement as prescribed. [19 TAC §228.35(b)(1); 19 TAC §228.35(e)(1)(A); 19 TAC §228.35(e)(2)(F)]

- Field-based experience via electronic transmission or other video or technology-based method did not meet requirements. Up to 15 clock-hours of field-based experience may be provided by use of electronic transmission or other video or technology-based method. Three (3) files reviewed contained evidence of video-based field-based experiences, but it could not be verified when they were completed or they were out of range for being field-based experiences prior to clinical teaching or internship. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(1)(B)]

- Candidates did not complete the required coursework and/or training prior to clinical teaching or internship. Because it could not be verified that any candidate completed 80 clock-hours (for candidates prior to December 27, 2016) or 150 clock-hours (for candidates on or after December 27, 2016) of coursework and/or training plus 30 clock-hours of field-based experiences, the required hours for clinical teaching or internship could not be verified. The program did not meet the requirement as prescribed. [19 TAC §228.35(b)(2)]

- Candidates seeking initial teacher certification did not complete clinical teaching as prescribed. Three candidates were standard certified after completing clinical teaching. One file did not include a start or end date on the clinical teaching request document. The file did list two (2) potential campuses for clinical teaching. The second file contained a clinical teaching request document that also did not include a start or end date. This file also listed two (2) potential campuses. The third file also contained a clinical teaching request document that did not include a start or end date. That file also listed two (2) potential campuses. In all three files, the EPP did not include any evidence that the placement was accepted. The program did not meet the requirement as prescribed. In additional submissions provided by the program, the program provided three (3) additonal files. The first file did not contain any evidence to support that the candidate completed clinical teaching. The second file contained documents that indicated an internship was completed, but the documentation provided by EPP said
clinical teaching. A mentor was identified for the candidate. Candidates in clinical teaching assignments would have a cooperating teacher and not a mentor. There was a date on something called a “scope & sequence” for the candidate and that date stated 10/11/16-1/30/17. There was no internship eligibility form provided. The third file submitted was also identified by EPP as a clinical teacher, but the documents provided indicated internship and there was no internship eligibility form. The program provided insufficient additional documentation in the manner requested by TEA and TEA was unable to make a determination about compliance. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(2)(A)]

- The EPP did not provide evidence that candidates seeking initial teacher certification have completed an internship as prescribed. According to the documentation provided by the EPP, two (2) files completed an internship. The first file reviewed was in an internship on an intern certificate. That file contained no Statement of Eligibility (SOE). The documents state the candidate was seeking clinical teaching. The second file reviewed contained an Internship Eligibility noting that the internship began 8/7/2017 and the placement was ELAR 6-8. The school and district were noted. There was insufficient documentation provided by the EPP in the manner requested by TEA to make a determination about compliance. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(2)(C)(i)]

- Candidates held probationary or intern certificates while completing internship assignments. One file held emergency certificate and did not meet the requirement. Candidates on emergency certificates do so at the request of a district and not an EPP. One file contained a probationary certificate with validity dates as follows: 8/21/2017-8/21/2018. One file contained a probationary certificate with validity dates as follows: 8/7/2017-8/7/2018. TEA Records indicate that only 2 held a probationary certificate while in an internship. This information does not correlate to previous TAC items, but the two (2) files met the requirement. The program met the requirement as prescribed.  [19 TAC §228.35(e)(2)(C)(iv)]

- The EPP did not request and was not approved for an exception to the clinical teaching option. However, one file was exempted from clinical teaching. The EPP has not applied for any clinical teaching exceptions and has nothing on file saying that it is approved for exception to clinical teaching. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(2)(E)]

- The internship or clinical teaching experiences take place in setting that meets requirements. All candidate placements were in an accredited public or private school as determined from observation documents provided. The program met the requirement as prescribed. [19 TAC §228.35(e)(4)]
• The EPP applied and received approval for a candidate to complete field-based experience, clinical teaching or internship in an out-of-state or out-of-country placement. This rule was a topic of discussion with the EPP. While the program had no candidates in an out-of-state or out-of-country placement for clinical teaching or internship at the time of the EPP Review, the program had previously placed candidates out-of-state and out-of-country. The EPP was advised that prior to placement out-of-state or out-of-country, the EPP must submit an application, required fees, and gain approval for such a placement. [19 TAC §228.35(e)(7)]

• Candidates placed in clinical teaching or internship assignment were assigned cooperating teachers or mentors as appropriate. Eight (8) out of ten (10) files reviewed had cooperating teacher or mentor assigned. The eleventh (11) file did not reach that point. The program was 80% compliant. The documentation was found in the Mentor / Cooperating Teacher Agreement document. Highlighted information was found in each candidate file reviewed. Candidate placement information showing the date of placement, name of candidate, name of cooperating teacher or mentor assigned, subject area, grade level, supervising administrator name, campus name, and district name served as evidence of compliance. The program met the requirement as prescribed. [19 TAC §228.35(f)]

• The cooperating teachers and mentors were trained, but did not hold the required credentials. The EPP provided evidence of training for eight (8) out of ten (10) files reviewed. The evidence of training was a dated, signed mentor agreement stating that they would review mentor training documents and handbook. No evidence was provided that any cooperating teacher or mentor held the required credentials. The program did not meet the requirement as prescribed. [19 TAC §228.2(12); 19 TAC §228.2 (23)]

• The EPP provided scientifically-based training to cooperating teachers and mentors. The EPP provided evidence that eight (8) out of ten (10) were trained included training material, a handbook, and a signed acknowledgement of training. The program met the requirement as prescribed. [19 TAC §228.35(f)]

• Candidates were assigned to field supervisors who held the required credentials. Three (3) field supervisors were assigned to seven (7) candidates. The information was found on observation documentation and was not presented as requested by TEA. TEA did find the three (3) field supervisors listed in the EPP field supervisor list in ECOS. The EPP submitted additional documentation as evidence that the field supervisors held the required credentials. The field supervisors assigned to candidates reviewed held lifetime teacher and/or principal/administrator certification. The program met the requirement as prescribed. [19 TAC §228.35(g)]
• The field supervisors were not trained in accordance with 19 TAC §228.35(g). In additional submissions, the EPP provided evidence that three (3) field supervisors assigned to the candidates reviewed attended statewide field supervisor training. Two (2) out of three (3) field supervisors (67%) provided certificates of completion for that training. None of the field supervisors attended a local field supervisor training. The program did not meet the requirement as prescribed. [19 TAC §228.35(g)]

• Field supervisors did not make initial contact with the assigned candidates within the first three (3) weeks of assignment. Five (5) out of eight (8) files reviewed (62%) that contained observation documentation contained evidence that a first contact was made. The program did not meet the requirement as prescribed. [19 TAC §228.35(g)]

• For each observation, the field supervisor did not hold the required conferences with each candidate. There was no pre- or post-observation conference held for any observation conducted for any candidate file reviewed. The program did not meet the requirement as prescribed. [19 TAC §228.35(g)]

• The field supervisor did not provide a copy of the written observation feedback to the required individuals. From the documentation provided, TEA could not tell if the required individuals signed off on the observation documents. Eight (8) out of eleven (11) files reached point of observations. Only the first contact and final approval to certify documents had all required signatures. The program did not meet the requirement as prescribed. [19 TAC §228.35(g)]

• Candidates receive informal observations and ongoing coaching as appropriate. While not required for all candidates, evidence was provided that one (1) candidate received informal observations and coaching. Documentation was in the form of email correspondence. The program met the requirement as prescribed. [19 TAC §228.35(g)]

• The field supervisor and EPP director collaborated with required individuals [eight (8) out of ten (10) files reviewed] at the pre-observation conference before the candidate begins the clinical teaching placement or internship year and at the time candidates were to be recommended for certification. The program met the requirement as prescribed. [19 TAC §228.35(g)]

• Formal observations conducted by field supervisors did not meet the requirements for duration, frequency. They did meet the requirement for format. Eight (8) files had reached the point of clinical teaching or internship. Two (2) files had no end time on observations. There was no evidence provided that the field supervisor and candidate signed any observation documentation. All files contained evidence of instructional practices observed. There was a discrepancy in what was noted in observation documentation in terms of duration and frequency in five (5) out of eight (8) files (63%)
That issue will be addressed in Component IX because it pertains to 19 TAC §229.3(f)(1). The program did not meet the requirement as prescribed. [19 TAC §228.35(g)(1-8)]

- A candidate seeking certification as a teacher has been exempt from completing field-based experience, clinical teaching or internship, but did not meet requirements. Only one (1) file was a possible exemption, the JROTC candidate. That file met the exemption requirement, but a service record or record of current employment was not provided. The remainder of files were not eligible for any exemption. The program did not meet the requirement as prescribed. [19 TAC §228.35(i); 19 TAC §228.35(i)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §228.35(a)(1): The EPP does not provide candidates with coursework and/or training to adequately prepare candidates for educator certification and ensure the educator is effective in the classroom.

  Action: Require the EPP to provide standards-based coursework and/or training to all candidates to ensure the educator is prepared for the certificate sought and effective in the classroom.

  Utilize a benchmark document that describes the coursework that candidates are required to complete prior to clinical teaching or internship (150 clock-hours + 30 clock-hours of field-based experiences) and prior to standard certification. The total hours required for certification must equal 300 clock-hours.

  Require that a candidate testing history is maintained for each educator so that the EPP has documentation of the dates each exam required for certification was attempted and passed in relation to the date that clinical teaching or internship began and in relation to issuance of standard certificate.

- 19 TAC §228.35(a)(2): Coursework and/or training is not sustained, rigorous, intensive, interactive, candidate-focused, and performance-based.

  Action: Require the EPP to provide sustained, rigorous, interactive, candidate-focused, intensive coursework to all candidates.

  Also, maintain a dated candidate testing history for each file and a benchmark document that shows all coursework completed prior to standard certification.

  That coursework must be sustained, rigorous, intensive, interactive, candidate-focused, and performance-based.
The candidate testing history document must show the date of testing in relation to the date that internship or clinical teaching began and the date that 30 clock-hours of field-based experiences + 150 clock-hours of required coursework and training were completed and what that training consists of in relation to date that internship of clinical teaching began.

- **19 TAC §228.35(a)(3): Candidates do not complete coursework and training prior to EPP completion and standard certification.**

  Action: Require all candidates to complete a prescribed set of coursework/training prior to standard certification. That coursework/training must total at least 300 clock-hours and focus on the standards required for the certificate sought.

- **19 TAC §228.35(a)(5)(A): The EPP does not have procedures for allowing relevant military experiences.**

  Action: Require the EPP to implement procedures to allow relevant military experience. Include the requirements on the website, in the candidate handbook, on the application & on any admission material published by the EPP.

  Share the requirement with the advisory committee and maintain a dated copy of the minutes and sign-in sheets as evidence that the topic was discussed.

- **19 TAC §228.35(a)(5)(B): The EPP does not have procedures for allowing prior experience, education, or training.**

  Action: Provide applicants and candidates with a copy of the EPPs procedures for allowing prior experience, education or training. Post the information on the EPPs website and in all application material.

  Share the requirement with the advisory committee and maintain a dated copy of the minutes and sign-in sheets as evidence that the topic was discussed.

- **19 TAC §228.35(a)(6): Coursework and training that is offered online does not meet standards.**

  Action: Require the EPP to work toward QM or DEAC certification. This is a two-year process, at a minimum.

  The link to QM follows: [QM](#)
The link to DEAC follows: Applying for DEAC Accreditation

Require the EPP to select one entity for which it will be certified and notify TEA in writing of the entity selected for online certification.

- 19 TAC §228.35(b): Candidates for initial teacher certification do not receive the required number of hours (300 clock-hours) of coursework and training.
  
  Action: Require the EPP to add more relevant coursework to EPP requirements so that candidates receive at minimum 300 clock-hours of coursework and training.

- 19 TAC §228.2(15); 19 TAC §228.35(b)(1); 19 TAC §228.35(e)(1)(A)(i-v); 19 TAC §228.35(e)(2)(F) Candidates have not completed the field-based experience requirements prior to clinical teaching or internship.
  
  Action: Require candidates to complete 30 clock-hours of field-based experiences prior to clinical teaching or internship.

Field-based experiences must be:

Introductory experiences for a classroom teacher certification candidate involving, at the minimum, reflective observation of Early Childhood-Grade 12 students, teachers, and faculty/staff members engaging in educational activities in a school setting.

15 clock-hours of field-based experiences must meet the following requirements:

Under the direction of the EPP, candidates actively engaged in instructional or educational activities that include:

(i) authentic school settings in a public school accredited by the Texas Education Agency (TEA) or other school approved by the TEA for this purpose;

(ii) instruction by content certified teachers;

(iii) actual students in classrooms/instructional settings with identity-proof provisions;

   (iv) content or grade-level specific classrooms/instructional settings; and

   (v) written reflection of the observation.

A portion of the field-based experiences shall include: The start of the school year. The start of the school year is defined as the first 15 instructional days of the school year. If these experiences cannot be provided through clinical teaching, they must be provided through field-based experiences.
Document field-based experiences completed on the field-based experience observation log reflecting date, subject area, grade level, campus, district, time in and time out, and interactions with students; verifying signatures of observed teacher; and reflections of observations completed by the candidate.

- 19 TAC §228.35(b)(2)(A-J): Candidates have not completed the required coursework and/or training prior to clinical teaching or internship.

Action: Require all candidates to complete 150 clock-hours of coursework and training + 30 clock-hours of field-based experiences prior to clinical teaching or internship. Document the requirement on a benchmark document for each candidate.

The 150 clock-hours of coursework and training must include the following:
(A) designing clear, well-organized, sequential, engaging, and flexible lessons that reflect best practice, align with standards and related content, are appropriate for diverse learners and encourage higher-order thinking, persistence, and achievement;
(B) formally and informally collecting, analyzing, and using student progress data to inform instruction and make needed lesson adjustments;
(C) ensuring high levels of learning, social-emotional development, and achievement for all students through knowledge of students, proven practices, and differentiated instruction;
(D) clearly and accurately communicating to support persistence, deeper learning, and effective effort;
(E) organizing a safe, accessible, and efficient classroom;
(F) establishing, communicating, and maintaining clear expectations for student behavior;
(G) leading a mutually respectful and collaborative class of actively engaged learners;
(H) meeting expectations for attendance, professional appearance, decorum, procedural, ethical, legal, and statutory responsibilities;
(I) reflect on his or her practice; and
(J) effectively communicating with students, families, colleagues, and community members.
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• 19 TAC §228.35(e)(1)(B): *Field-based experience via electronic transmission or other video or technology-based method did not meet requirements.*

  Action: Require that candidates completing field-based experiences via electronic transmission do so prior to clinical teaching or internship.

  Document the number of hours completed via electronic transmission on the field-based observation log reflecting the date, subject area, and grade level observed; verifying signatures of program staff; and reflections of observation completed by the candidate.

• 19 TAC §228.35(e)(2)(A) and (B): *Candidates seeking initial teacher certification have not completed clinical teaching.*

  Action: Require the EPP to maintain the following as evidence of candidates completing clinical teaching: Clinical teaching placement lists with placement information including the start and end dates; start and end times; grade level; subject area; cooperating teacher name; and field supervisor assigned.

• 19 TAC §228.35(e)(2)(C)(i): *Candidates seeking initial teacher certification have not completed an internship.*

  Action: Require the EPP to maintain the following as evidence of candidates completing internship: A completed statement of eligibility; internship placement lists with placement information including tests passed prior to internship; start and end dates; start and end times; district; campus; grade level; subject area; mentor assigned; and field supervisor assigned.

• 19 TAC §228.35(e)(2)(E): *The EPP did not request and was not approved for an exception to the clinical teaching option.*

  Action: If the EPP seeks an exception to clinical teaching, require the EPP to seek approval for an exception to clinical teaching for any candidate that is seeking the exception prior to granting the exception.

• 19 TAC §228.2(12) and (23): *The cooperating teachers and mentors did not hold the required credentials.*

  Action: Require that the EPP to maintain a service record and teaching certificate noting three years of teaching experience and current certification for each cooperating teacher and mentor assigned to a candidate.
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- 19 TAC §228.35(g): Field supervisors have not been trained.

  Action: Require the EPP to train all field supervisors at the local level each year. Require any field supervisor who is assigned to a candidate to attend state-wide field supervisor training. All trainings must be conducted within three weeks of assignment. Maintain dated sign-in sheets and dated certificates of completion as evidence of compliance.

- 19 TAC §228.35(g): Field supervisors did not make the required initial contact within the first three weeks of assignment.

  Action: Require field supervisors to make initial contact with the assigned candidate within the first three weeks of assignment. Document the date that the initial contact was made and the method of contact: field supervisor log; email; phone records; in person.

- 19 TAC §228.35(g)(1-8): For each observation, the field supervisor has not held the required conferences with each candidate. Each candidate has not received written feedback that meets the requirements.

  Action: Require the field supervisor to conduct a pre- and post-observation conference with each candidate (clinical teachers and interns) prior to and after each formal observation. Document the date that each conference was held for each observation conducted.

  Ensure that each candidate signs for and receives a copy of instructional practices observed by the field supervisor for each formal observation.

  Candidates in clinical teaching must be observed three times during the clinical teaching assignment as follows: 1st third, 2nd third, 3rd third.

  Candidates on an intern certificate must be observed 5 times as follows: 1st six weeks; 2nd and 3rd observation during the first half of assignment; 4th and 5th during the second half of assignment.

  Candidates on a probationary certificate must be observed as follows: 1st observation during 1st six weeks; 2nd observation during 2nd third of assignment; 3rd observation during 3rd third of assignment.

  All observations must be 45 minutes in duration.
• 19 TAC §228.35(g): *The field supervisor has not provided a copy of the written observation feedback to the required individuals.*

Action: Require the field supervisor to provide a copy of each formal observation to the candidate, campus administrator if in an internship, and the EPP. Maintain a copy of the observation documentation as evidence of compliance.

• 19 TAC §228.35(g)(1)-(8): *Formal observations conducted by field supervisors did not meet the requirements for duration or frequency.*

Action: Require that each formal observation be a minimum of 45 minutes in duration, indicate the start and end times of each observation, require observations to be conducted as follows:

Candidates in clinical teaching must be observed three times during the clinical teaching assignment as follows: 1" third, 2" third, 3" third.

Candidates on an intern certificate must be observed 5 times as follows: 1" six weeks; 2" and 3" observation during the first half of assignment; 4" and 5" during the second half of assignment.

Candidates on a probationary certificate must be observed as follows: 1" observation during 1" six weeks; 2" observation during 2" third of assignment; 3" observation during 3" third of assignment.

Require the candidate, campus administrator (if in an internship assignment) and field supervisor to sign for each observation completed.

• 19 TAC §228.35(i): *A candidate seeking certification as a teacher has not been exempt from completing field-based experience, clinical teaching or internship by meeting requirements.*

Action: For a candidate to be exempt from field-based experiences, clinical teaching, or internship, the EPP must have a letter from THECB documenting the exemption eligibility. Because the EPP is not an institution of higher education, this is not an option for Training Via E-Learning EPP.
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- 19 TAC §228.35(i)(2): *A candidate that currently is or was a JROTC instructor has not been exempt from completing field-based experience, clinical teaching, or internship by meeting requirements.*

  Action: For a candidate that was or currently is a JROTC instructor to be exempt from field-based experiences, clinical teaching, or internship, the EPP must have a service record or record of current employment for each candidate that may meet the requirement.

  Place the requirements on any application material, in candidate handbooks, and the website.

**Recommendations:**

- The EPP’s policy can be that it does not accept any prior experience, education, or training, but the EPP must state that specifically. If that is the case, place that information on the EPP website and any admission documents.

- Any field supervisor assigned to candidates who has not had state-wide field supervisor training must do so within three weeks of being assigned to a candidate.

- If providing local field supervisor training via electronic transmission, require a read receipt and maintain email sent as evidence of completion.

- The requirement for a field supervisor to make first contact with each candidate assigned within the first three weeks of assignment should be a part of the yearly local field supervisor training.

- Consider including a place on the observation document to annotate the date that the pre- and post-observation conferences have occurred.

- The requirement of the field supervisor providing copies of observation documentation to the candidate, mentor or cooperating teacher, as applicable, and campus administrator should be a part of the local field supervisor training.

- Consider sending an electronic copy of each observation to required individuals via email with read receipt.

- Strongly consider reviewing all TAC rules to ensure that the EPP knows, understands, and can operationalize all TAC that pertains to teacher certification.
Based on evidence presented, Training Via E-Learning is not in Compliance with 19 TAC §228.35 – Program Delivery and On-Going Support.

COMPONENT V: ASSESSMENT AND EVALUATION OF CANDIDATES AND EPP – 19 TAC §228.40

Findings

- Training Via E-Learning EPP does not have established benchmarks to measure candidate progress. The program provided a coursework history denoting courses completed for ten (10) out of eleven (11) files reviewed. A coursework history is not a benchmark. The program did not meet the requirement as prescribed. [19 TAC §228.40(a)]

- The EPP does not have processes to ensure candidates are prepared to be successful on their content examinations. The EPP did not have a specific document reflecting the date each candidate met the criteria for testing in the eleven (11) files reviewed. The program did not meet the requirement as prescribed. [19 TAC §228.40(b)]

- The EPP had two (2) candidates that were certified in a different area than which they were admitted. There was no documentation on file for either candidate to document that they had requested in writing to be certified in a different area than which they were admitted. The program did not meet the requirement as prescribed. [19 TAC §228.40(c)]

- The EPP does not have a process for determining that formally admitted candidates are prepared to take certification examinations. There was no dated record on file with criteria that each candidate met for testing. Six (6) out of eleven (11) files reviewed had reached the point of testing, but none of the files contained evidence that they had met any criteria for testing or what the criteria for testing is required to be met. There was a “roadmap to certification” posted on the Training Via E-Learning website, but it did not list any specific criteria for testing. The program did not meet the requirement as prescribed. [19 TAC §228.40(d)]

- The EPP does not use information from a variety of sources to evaluate program design and delivery. Per the Status Report submitted by the EPP, the only tool used by the program for evaluation purposes are an EPP created teacher exit survey that each candidate must complete in order to be standard certified. The program did not meet the requirement as prescribed. [19 TAC §228.40(e)]
Compliance Issues to be Addressed (see Compliance Plan):

- **19 TAC §228.40(a):** *The EPP does not have established benchmarks to measure candidate progress.*
  
  Action: Require the EPP to maintain established benchmarks that measure a candidate’s progress through the EPP.

- **19 TAC §228.40(b); 19 TAC §228.40(d):** *The EPP does not have processes to ensure that formally admitted candidates are prepared to be successful on their content examinations.*
  
  Action: Require the EPP to document the date that each candidate has met the criteria for testing.
  
  Require the EPP to develop a test preparation and readiness process that includes an opportunity for candidates to demonstrate readiness.

- **19 TAC §228.40(c):** *A candidate was not prepared in different certification in which the candidate was admitted.*
  
  Action: Require the EPP to obtain written permission from any candidate requesting to be certified in a different certification area than which they were admitted.
  
  Maintain the dated request signed by the candidate in their file. The EPP will then be required to train the candidate in the standards required for the certification areas sought.

- **19 TAC §228.40(e):** *The EPP does not use information from a variety of sources to evaluate program design and delivery.*
  
  Action: Require the EPP to use information from a variety of sources to evaluate program design and delivery.
  
  Document that information on the evaluation plan detailing the activity, timeline, and person responsible. Utilize data from internal and external sources.
  
  Discuss with the advisory committee and document that it has been discussed in dated minutes. Maintain minutes and sign-in sheets as evidence of compliance.

**Recommendations:**

- Strongly consider placing the testing requirement on the benchmark document, noting the dates that the candidate tested and passed each exam required for certification.
Based on evidence presented, Training Via E-Learning EPP is not in compliance with 19 TAC §228.40 – Assessment and Evaluation of Candidates of Candidates for Certification and Program Improvement.

COMPONENT VI: PROFESSIONAL CONDUCT - 19 TAC §228.50

Findings

19 TAC §228.50 requires that during the period of preparation, the educator preparation program shall ensure that the individuals preparing candidates and the candidates themselves understand and adhere to Chapter 247 of this title (relating to Educators’ Code of Ethics).

- Each candidate acknowledges receipt of a copy of the Texas Educator’s Code of Ethics. In addition, a signed copy of the Texas Educator’s Code of Ethics was found in nine (9) out of eleven (11) files reviewed (82%). The program met the requirement as prescribed. [19 TAC §228.50]
- Training Via E-Learning staff signed a Texas Educator’s Code of Ethics. Signature documents were submitted for twelve (12) staff. The program met the requirement as prescribed. [19 TAC §228.50]

Compliance Issues to be Addressed (see Compliance Plan):

- None.

Recommendations:

- None.

Based on evidence presented, Training Via E-Learning EPP is in compliance with 19 TAC §228.50 - Professional Conduct.

COMPONENT VII: COMPLAINTS PROCESS – 19 TAC §228.70

Findings

- Per 19 TAC §228.70(b)(1), the EPP complaints process is on file at TEA.
- The EPP has a complaints process posted on the website. [19 TAC §228.70(b)(2)]
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- Training Via E-Learning self-reported in their Status Report signed by Dr. Quintanilla that the complaint policy is posted at the physical site. The EPP later disclosed that it had no physical site. TEA requested to conduct an on-site curriculum review and that is when the EPP disclosed that it is no longer had a physical presence. The EPP currently operates out of the Dr. Quintanilla’s home. Because there is no physical location, there is no place to post the complaint policy at the physical site. The program does not meet the requirement as prescribed. [19 TAC §228.70(b)(3)]

- The EPP self-reported in the Status Report that written information about filing complaints is provided at scheduled information gathering meetings. The program met the requirement as prescribed. [19 TAC §228.70(b)(4)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §228.70(b)(3): The EPP did not post a notification at its physical site(s) used by employees and candidates, in a conspicuous location, information regarding filing a complaint with TEA staff in accordance with subsection (c)(1) of this section. Action: As soon as training Via E-Learning has a physical site, post the complaints policy in a conspicuous location.

Recommendations:

- None.

Based on evidence presented, Training Via E-Learning EPP is not in compliance with 19 TAC §228.70 – Complaints Process.

COMPONENT VIII: CERTIFICATION PROCEDURES - 19 TAC §228 and §230

Findings

- Every candidate must meet the appropriate degree requirements prior to standard certification. Ten (10) out of eleven (11) files (91%) reviewed met the degree requirements for certification. All candidates are required to hold a bachelor’s degree at the time of admission. One (1) file had no degree. The program met the requirement as prescribed. [19 TAC §230.13(a)(1)]

- Five (5) files reviewed had reached point of standard certification and of the five (5), one (1) file had a JROTC emergency certificate. Documentation of preparation was provided for all five (5) files (100%) reviewed. Licensure certification was not provided for the JROTC file. The program met the requirement as prescribed. [19 TAC §230.13(b)(2)]
Five (5) files reached point of standard certificate and each file contained a document that courses were completed. Each file also contained a signature page noting that all (field supervisor, mentor or cooperating teacher, and campus administrator were able to agree with the recommendation for standard certification. The program met the requirement as prescribed. [19 TAC §230.13(a)(20; 19 TAC §230.13(b)(3)]

Candidates are required to have passing scores on required certification examinations prior to standard certification. TEA reviewed information reported in ECOS by the EPP to determine that candidates had passed required exams prior to probationary and/or standard certification. The EPP did not provide the documentation of testing history. Seven (7) out of eleven (11) files (64%) had a testing history in ECOS and the remainder of the files (36%) were eligible for testing as reviewed in ECOS. The program met the requirement as prescribed. [19 TAC §230.13(a)(3); 19 TAC §230.13(b)(4)]

Compliance Issues to be Addressed (see Compliance Plan):

- None.

Recommendations:

- Strongly consider putting processes in place to document each candidate’s testing history at the EPP level.

- Strongly consider a benchmark that shows the date that each required item has been met by each candidate: The date admitted; The date 150 clock-hours of coursework and training +30 clock-hours of field-based experiences are completed; The dates content exam, supplemental exams, and PPR exams are passed; the date that the remainder of hours for completion of 300 total clock-hours required; and the internship start and end dates. The method of EPP record-keeping needs to be improved.

Based on evidence presented, Training Via E-Learning is in compliance with 19 TAC §228 and §230 – Certification Procedures.

COMPONENT IX: INTEGRITY OF DATA REPORTED - 19 TAC §229

Findings

- Training Via E-Learning EPP has not reported required data in an accurate and timely manner. Seven (7) out of eleven (11) files contained a discrepancy between what was listed in ECOS as a formal admission date and what was listed as the date of admission in the formal offer of admission email letter. The program was 36% compliant in terms of
data integrity. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1); TEC 21.045(b)(3)]

- There was also a discrepancy in what was noted in the actual observation documents as compared to what was entered into ECOS in terms of duration and frequency in five (5) out of eight (8) files (63%) reviewed. The eight (8) files were the candidates that had reached the point of formal observations by the field supervisor. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1)(4)]

**Compliance Issues to be Addressed (see Compliance Plan):**

- **19 TAC §229.3(f)(1); TEC 21.045(b)(3): The EPP did not accurately report data for candidates admitted to the EPP during the academic year from September 1-August 31.**
  
  Action: Accurately admit candidates into the ECOS system in Test Approval within seven (7) calendar days of formal admission.

- **19 TAC §229.3(f)(1)(4): The EPP did not accurately report the frequency and duration of field supervision guidance.**
  
  Action: Accurately report frequency and duration of formal observations by the field supervisor in ECOS by September 15th of each academic year.

For each candidate on an intern certificate, there must be five (5) observations in ECOS: 1 during the first six weeks of assignment, 2nd and 3rd during the first half of the assignment, the 4th and 5th during the 2nd half of assignment.

For each candidate on a probationary certificate, there must be three (3) observations in ECOS: 1 during the 1st third during of assignment, 1 during the 2nd third of assignment, and one during the 3rd third of assignment.

For each candidate in clinical teaching, there must be three (3) observations in ECOS: 1 during the 1st third within the 1st six weeks of assignment, 1 during the 2nd third, and one during the 3rd third of the assignment.

All candidates are required to be supervised and observations reported in ECOS for any additional internships or clinical teaching assignments.
Recommendations:

- Because the EPP has a rolling admission and candidates can begin teaching on an intern or probationary certificate or clinical teaching at any time, it is strongly recommended that the EPP continuously update observations in ECOS so that it does not have to be done at one time at the end of each academic year.

Based on evidence presented, Training Via E-Learning is not in compliance with 19 TAC §229 – Integrity of Data Reported.

GENERAL PROGRAM RECOMMENDATIONS:

- To ensure continuity in record keeping and other related processes, consider creating a procedure manual documenting EPP processes.

- Implement quality control procedures to ensure ASEP reports, including GPA spreadsheets, are submitted accurately during state reporting each year.

- Align the verbiage of the program to the verbiage of Texas Administrative Code (TAC) (ex. Field supervisor, cooperating teacher, mentor, candidate, etc.);

- 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.

SUMMARY

A Compliance Plan was created collaboratively with the Training Via E-Learning staff on August 10, 2018. The first check-in date is in 60 days on November 5, 2018.