



## Compliance Audit Report Summer of 2009 Teachers for the 21<sup>st</sup> Century Alternative Certification Program

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

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Program Specialist staff members conducted a Texas Education Agency Compliance Desk Audit of Teachers for the 21<sup>st</sup> Century Alternative Certification Educator Preparation Program during the Summer of 2009. The focus of the compliance audit was the initial teacher certification program. The following are findings and recommendations for program improvement.

### SCOPE OF THE COMPLIANCE AUDIT:

The scope of the audit was restricted solely to verifying compliance with Texas Administrative Code §227, §228, and §229.

### Data Analysis:

Information concerning compliance with Texas Administrative Code (TAC) governing educator preparation programs was collected by various qualitative means. A self-report was submitted to the Texas Education Agency via Survey Monkey along with requested verifying documents. Because student records contain confidential information and could not be transmitted to TEA, student records were checked by the program using a check list supplied by TEA. In addition, electronic questionnaires developed by TEA were sent to Teachers for the 21<sup>st</sup> Century alternative certification program stakeholders. Fifteen (15) stakeholders responded to the questionnaires as follows: No advisory committee members; One (1) program staff member; Ten (10) student teachers, clinical teachers, interns; No field supervisors; Two (2) campus

principals; and Two (2) cooperating teachers/mentors responded. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. Evidence of compliance was measured using a rubric aligned with Texas Administrative Code. After the review of the information, the program specialist arranged a telephone debrief to cover the findings of the audit. The findings were incorporated into the original survey monkey form and sent to the program. This summary report provides the findings and recommendations resulting from the audit.

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

### **FINDINGS:**

Teachers for the 21<sup>st</sup> Century is not in compliance with Texas Administrative Code (TAC) §228.20(b) because it does not have balanced Advisory Committee membership. The advisory committee is missing three categories of representation: Higher Education, business/community, and Education Service Center. Another concern is the collaboration of the advisory committee and the program. Question #21 of the self-report asks: "Do advisory committee members participate in the analysis of program performance and improvement?" To which the self-report answered "no". The self-report seems to indicate that there is input from the advisory committee on this issue, but no electronic questionnaires were returned from the advisory committee members to substantiate this matter. Areas of concern: Six questions were not answered in this section of the self-report. No questionnaires were returned from any advisory committee members, nor was the separate director's questionnaire returned. There was no response to the question about advisory committee involvement in major policy decisions in the self-report. The self-report also stated that the Advisory Committee is not involved in analysis of program performance and improvement. From this limited evidence, it appears that the program is in non-compliance with rule.

**Based on the evidence presented, Teachers for the 21<sup>st</sup> Century Educator Preparation Program is not in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.**

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

### **FINDINGS:**

Teachers for the 21st Century is in compliance with TAC §227.10 concerning admissions criteria. Teachers for the 21st Century educator preparation program requires the minimum standards set by the state for admissions according to the self-report. Admission requirements include an application with written response to program generated questions, bachelor's degree from a regionally accredited university, official transcripts, 2.5 GPA, and an interview. English proficiency of the candidate is determined by an interview. Recruitment is by word of mouth. All student records are in hard copy, according to the self-report, and kept for five years in a secure location. No records are stored electronically except test scores. While the program appears to be in compliance with rule, there are nonetheless some areas of concern. No information was provided in the self-report about the 12 semester college hours required in content specific areas for certification in those areas. There appears to be conflicting information between the student folders and the self-report in the placement of interns. The self-report states that this information is not available, but field observation documents are available in student folders.

Another issue is the documentation of 50 clock hours of district training that may be allowed by programs if desired. The director's checklist indicates that such training is documented in student folders, but no student folders were actually reviewed by TEA staff. Such documentation should be by CPE certificates or attendance records from the district. Of the 10 electronic surveys from interns received by TEA, 7 replied that they either did not know or thought no documentation of such training was required by the program. The program website and application say that the program will accept A's and B's in college English and Mathematics rather than THEA scores. The review of documents included the oral proficiency rating scale for ACTFL as the way non-native English speakers were evaluated. However, this educator training program is located on the Mexican border in El Paso, and ACTFL is not used for Spanish speakers. Therefore ACTFL does not seem to apply. TEA policy requires the TOEFL or similar instrument be used to determine English language proficiency for foreign applicants.

**Based on the evidence presented, Teachers for the 21<sup>st</sup> Century Educator Preparation Program is in compliance with TAC §227 - Admission Criteria.**

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

### **FINDINGS:**

Teachers of the 21st Century is not in compliance with TAC rule 228.30, program curriculum, which went into effect January 1, 2009. There are 53 questions in the curriculum section of the self-report. Since this program does not offer online courses, 13 questions concerning online courses were omitted. Forty questions applied to the newly mandated Pedagogy and

Professional Responsibilities (PPR) curriculum. Of those 40, 34 responses either did not address the specific question or provided insufficient information. Only six responses adequately addressed the question asked. For example question #70 asked how the program teaches learning theories. The self-report responds with four descriptions of learning theories but does not address how the program actually teaches these theories, which is what the question asked. Another example is question #83, which asks how the program teaches curriculum structure and development. The response in the self-report says that the program uses the TEKS to study for the test and the six levels of Blooms taxonomy. This response does not address how curriculum structure and development are taught by the program. Another example is question #86, which asks how the program teaches differentiated instruction. The response in the self-report is "TEKS vs. Blooms taxonomy." Again, the response does not actually address the question about differentiated instruction.

Some responses from intern questionnaires provide evidence that the PPR curriculum is being taught, however. Ten interns responded to the questionnaire. All ten stated they had been taught child development, motivation and TEKS. Nine stated that had been taught reading strategies. Eight stated they had been taught the Texas Educators' Code of Ethics. According to the self-report, little assessment of candidate learning appears to occur prior to the TExES. From the self-report it is unclear 1) how the program insures instructors have expertise; 2) how the program teaches reading strategies, TAKS responsibility, classroom management, a variety of lesson planning methods, differentiated instruction, ELPS, GT, Special Education, Parent Conferencing, Instructional Strategies, and Integration of Technology into Instruction. The document review had no course syllabi or other materials to substantiate the self-report or intern questionnaire responses.

**Based on evidence presented, Teachers for the 21<sup>st</sup> Century Educator Preparation Program is not in compliance with Texas Administrative Code Section §228.30 – Educator Preparation Curriculum.**

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

##### **FINDINGS:**

Teachers for the 21st Century is not in compliance with TAC §228.35 concerning program delivery and support. The program appears to offer less than the state mandated 300 clock hours of training. There is no documentation to provide evidence of 50 clock- hours of professional development training from the school districts that can be allowed. Question #113 of the self-report asks: "Does the program accept 50 hours or less of professional training from the school district toward program credit?" The response in the self-report is "no." In the schematic of program hours in the document review, 50 training hours from the school district are shown as counted toward the 300 clock hours, which conflicts with the response to questions # 113. The program website and application both indicate that approximately 216 hours of training are offered by the program. It appears from the self-report and document review that the program offers 228 clock hours of training, short by 72 clock hours in meeting the minimum requirements. As a result, it is unclear to TEA how many hours of training are actually provided by the program. This should be very clear and consistent, however. No training appears to be provided by the program for campus mentors, nor is there documentation

that training is provided by the district. The self-report states that training for field supervisors takes place but no documentation was provided in the document review or the questionnaires to substantiate this as well. Initial contact by field supervisors with interns is required to take place within 3 weeks of placement. In the 10 intern questionnaires returned, 30% reported that this did not take place. Also 30% of intern questionnaires indicated that they did not receive copies of the field observation evaluations from the field supervisors. The self-report also stated that campus administrators do not receive the intern observation evaluation forms from the field supervisors. TAC rule requires that such evaluation forms be shared with campus administrators. It should be noted, however, that 7 of the 10 intern questionnaires revealed that students felt the field supervisor was very effective.

**Based on evidence presented, Teachers for the 21<sup>st</sup> Century Educator Preparation Program is not in compliance with Texas Administrative Code Section §228.35 – Program Delivery and On-Going Support.**

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

#### **FINDINGS:**

Teachers for the 21st Century is not in compliance of program assessment and evaluation, TAC §228.40. The only response on the self-report concerning evaluation of curriculum is student pass rates on the TExES. Program evaluation by the candidates consists of an exit survey. According to the document review, there are no specific questions on the student exit survey about overall curriculum, specific training modules, field supervision, or assessments. In addition, the only feedback the program receives from Campus Administrators is a TxBESS questionnaire, according to the document review. According to the self-report, there is no assessment of curriculum other than the TExES pass rate; no assessment of candidate readiness for the TExES; no identification of trends in ASEP data. The response to question # 157 on the self-report does not address the question about trends in ASEP data at all. The only field evaluation instrument appears to be the PDAS from the document review. It is unclear if each observation of each intern has focused objectives or major points to address as experience is gained in the classroom. The self-report states that no student grievances have been encountered, but there appear to be no policies or procedures in place for candidate grievances, should they arise. Since no questionnaires were received from advisory committee members, the only evidence that TEA has is the self-report.

**Based on evidence presented, Teachers for the 21<sup>st</sup> Century Educator Preparation Program is not in compliance with Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates for Certification and Program Improvement.**

## PROGRAM RECOMMENDATIONS

Program Compliance Recommendations are based on the findings of the Texas Education Agency compliance audit. If the program is out of compliance with any component, please consult the Texas Administrative Code (TAC) and correct the issue IMMEDIATELY. General Recommendations are suggestions for program improvement only.

**PROGRAM COMPLIANCE RECOMMENDATIONS:** In order to meet requirements of Texas Administrative Code governing educator preparation programs, the following recommendations must be implemented immediately:

Teachers for the 21st Century is out of compliance in four out of five areas. The following recommendations should be implemented immediately in order to move towards compliance in all areas.

- TAC §228.20 (a) - Add members from other categories (higher education, Education Service Center, and business/community) to the Advisory Committee to seek greater input on curriculum, internship, and overall evaluation process;
- TAC §228.35 A (3) - Expand clock-hours of training to adhere to the required minimum of 300 clock hours;
- TAC §228.30 B (14) - Add instructional technology to the curriculum as required;
- TAC §228.35 (C) (5) - Document district professional development hours for interns with CPE certificates or district attendance sheets;
- TAC §228.35 (3)(e) - Train all campus mentors in mentoring techniques and expectations or document district mentor training; and
- TAC §228.35 (3)(f) - Train the field supervisors in program expectations and TAC requirements.

### **OTHER PROGRAM RECOMMENDATIONS:**

None at this time.