Compliance Report
for
Steps to Teaching, Pharr, Texas
September 21-23, 2010

The Texas Education Agency administers Texas Administrative Code rules required by the Texas legislature for the regulation of all educator preparation programs in the state. Please see the complete Texas Administrative Code rules at www.tea.state.tx.us for details contained in each rule.

A technical assistance visit for the alternative certification program Steps to Teaching in Pharr, Texas, was conducted on September 21-23, 2010 by Texas Education Agency (TEA) Program Specialists Dr. Mary S. Black and Ms. Sandra Nix in compliance with Texas Administrative Code (TAC) §228.10 (c). Based on the evidence reviewed during this visit, Steps to Teaching is out of compliance with TAC rules governing educator preparation programs in all five areas: 1) Governance, 2) Admissions Criteria, 3) Curriculum, 4) Program Delivery and On-going Support, and 5) Program Assessment and Evaluation.

This technical assistance visit concentrated on the area found to be out of compliance in a desk audit in summer 2009 by TEA: Component III Educator Preparation Curriculum. In addition, Component I Governance, Component II Admission Criteria, Component IV Program Delivery and Support, and Component V Program Evaluation were reviewed September 21-23, 2010, due to poor certification examination performance for the past four years and out-of-compliance notification in 2008, 2007, and 2006 during site visits.

It must be noted that owner Juan Maldonado received a letter from TEA dated June 30, 2009, stating that Steps to Teaching had received the rating of "Accredited," based on performance standards established by the State Board of Educator Certification. This rating was issued for the period of September 1, 2007 through December 31, 2008. The letter further noted that although the rating was "Accredited," one demographic group failed to meet the accreditation standards; therefore an Action Plan was required to be submitted by the program to TEA within 45 days.

Methods of Data Gathering and Analysis

Information concerning compliance with Texas Administrative Code rules governing educator preparation programs was collected by various qualitative and quantitative means for the review of Steps to Teaching. A review of documents, student folders, module schedules and curriculum materials, and a curriculum correlation chart provided evidence regarding compliance. A self-report was submitted to TEA by Steps to Teaching on August 31, 2010. Qualitative methods of content analysis, cross-referencing, and triangulation were used to evaluate the evidence. Informal interviews with Steps to Teaching staff were conducted by TEA program specialists during the visit to confirm or clarify data. Quantitative data from the Accountability System for

Educator Preparation (ASEP) was reviewed by TEA program specialists. The Education Testing Service (ETS) also provided quantitative data for the years 2005-2010.

Opening and Closing Sessions

The Opening Session September 21, 2010 was attended by 9 people, including Owner Juan J. Maldonado, Director Rey Sanchez, Program Coordinator Sergio Fermat, and Raudy Maldonado, office manager. Also attending were members of the advisory committee consisting of one retired university professor, two community representatives, and one local school district superintendent. The newly-hired educational technology coach for the program was also at the meeting. Dr. Mary S. Black provided advisory committee training to the group during the Opening Session.

Seven people attended the Closing Session September 23, 2010. In addition to the aforementioned owner, director, program coordinator and office manager, two members of the advisory board and the education technology coach were also present.

Owner Juan Maldonado did not participate in the review of documents, student folders or curriculum. Program Coordinator Sergio Fermat was only available one full day, September 21, 2010, due to other commitments. Director Rey Sanchez and Office Manager Raudy Maldonado were available at all times during the monitoring visits and participated in all discussions. Ramiro Vargas, the second instructor besides Mr. Sanchez, was out of town during the visit due to illness.

Steps to Teaching Original Proposal

Steps to Teaching was approved by the State Board for Educator Certification on November 7, 2003 to operate as an alternative certification program, specifically for Bilingual Generalist EC-4 -Spanish and Bilingual Education Supplemental EC-4 certifications. Originally the program sought to do business as the Rio Grande Valley Teachers Association, owned by Adrian Fernandez and Juan J. Maldonado. The proposal indicates that Steps to Teaching "is committed to providing the highest quality instruction and support for interns enrolled in the bilingual teacher certification program. " The proposal also states that an advisory committee had been established and "will advise on program design, implementation, [and] evaluation, as well as recruitment."

Admission Criteria

The proposal indicates that all candidates admitted must meet the standard admission criteria including 1)holding a bachelor's degree; 2) a minimum grade point average of 2.5; 3) submitting an official copy of transcripts; and 4) an evaluation of out-of-country transcripts. In addition, the proposal states that "interns from out-of-country must demonstrate a high level of written and oral proficiency in Spanish and English by successfully passing a 500 word essay on "why they [sic] want to become a teacher" (measured items will be fluency, grammar, subject-verb agreement) and a verbal interview on "what they [sic] want to accomplish as a teacher." The proposal also states that "interns must pass with a 70% or better on each exam." However, it is unclear which examinations are referenced in this statement. The proposal calls for applicants to "demonstrate a high level of oral proficiency in Spanish as measured by the Texas Oral Proficiency Test (TOPT). Finally, the proposal states that "interns who do not hold a valid Texas teaching certificate, but who have an accredited college degree must pass the Bilingual

Generalist Spanish EC-4 prior to being enrolled in the Steps to Teaching ACP." Page 22 of the proposal states that "a screening process will be used to ensure that qualified candidates are admitted into the program."

Curriculum

The curriculum is described in the original proposal as "designed to comply with the provisions of 19 TAC Chapter 228." The proposal contains a curriculum matrix listing standards, domains and TEKS. Narrative text also describes 16 workshops, which would be presented during the training period (pages16-20). The Pre-Training Institute is further described on page 21, listing the topics to be covered. The topics on page 21 do not match the descriptions of the workshops and are not included in the matrix. Therefore the originally proposed curriculum is not clear.

The proposal states that the "interns' mastery of knowledge and skills of the Bilingual Education standards will be measured using [a] variety of instruments including portfolio assessment, projects, research papers, among others. Examination instruments will be designed to resemble domains and competencies that will be assessed with the TExES."

Program Delivery and On-Going Support

The program intended to create a 30-hour Pre-Training Institute. The original proposal also speaks of a two week Training Institute with classes in the evening and on Saturdays. Further in the proposal a 30-hour Pre-Service Institute is referenced. Since no other training or coursework delivery is mentioned, these various names may all refer to the same two-week training period.

After the Pre-Training Institute, candidates could be hired at a local school for a 10-month internship with a classroom teacher as mentor. The proposal states that Steps to Teaching will provide four hours of staff development for the mentors concerning policies and procedures for the overall program. The proposal does not discuss field supervision, observation or evaluation of interns. The proposal also discusses TxBESS, but does not say that mentors will be provided that training.

Program Evaluation

The original proposal states that the Steps to Teaching "established procedure or program evaluation" consists of the following: 1) assessing interns knowledge and skills through portfolios, projects, research papers and others; 2) an annual review of curriculum by program administers and the advisory committee; 3) course evaluation by interns using a satisfaction survey; and 4) an annual program review utilizing TExES scores.

Brief History of Texas Administrative Code Rules

Texas Administrative Code (TAC) rules governing educator preparation programs were adopted by the State Board for Educator Certification (SBEC) prior to the approval of the Steps to Teaching original proposal to operate in 2003. Steps toTeaching has been subject to these rules since the program began.

The Texas Administrative Code (TAC) rules requiring minimum standards for admission criteria to an educator preparation program in Texas (19 TAC §§227.1, 227.10, and 227.20) were

adopted by The State Board for Educator Certification (SBEC) on July 2, 1999. These rules were amended on December 5, 2008 to expand criteria, and implemented January 1, 2009.

SBEC adopted additional TAC rules governing requirements for educator preparation programs (19 TAC Chapter 228) on July 2, 1999. Amendments to these rules were adopted on December 5, 2008 and implemented January 1, 2009. Chapter 228 governs general operations of educator preparation programs including the advisory committee, admissions criteria, curriculum, program delivery and on-going support for candidates, and evaluation of candidate readiness for the TExES exam and overall program effectiveness.

The Accountability System for Educator Preparation (ASEP) was adopted as 19 TAC Chapter 229 on February 6, 1998. These rules were amended August 27, 1999, January 25, 2002, and April 9, 2010. ASEP concerns the accountability of educator preparation programs, accreditation ratings, required data submission, continuing approval, accreditation sanctions and procedures and other information. The Texas Education Agency is required to monitor all educator preparation programs in Texas for compliance with these TAC rules.

Monitoring History

The first visit to Steps to Teaching by TEA occurred June 16, 2004. On behalf of TEA, Dr. Bill Wale met with Juan and Mario Maldonado, Armando Garza and Gilbert Gomez in Pharr, Texas. Dr. Wale learned that Adrian Fernandez, the original director, had left the program and that currently, no trained director was in place. Dr. Wale concluded that 1) the infrastructure for the program and candidate support was lacking (i.e., the program did not know how many students were enrolled); 2) screening of applicants was questionable; 3) the program had no director and no one had SBEC or ASEP training; 4) the need for extensive technical assistance and monitoring was great.

The second visit occurred June 14-15, 2006. Phyllis Mikulak, Dr. Randy Palmatier, and Dr. Janice Reyna (now Dr. Janice Lopez, Director of Educator Standards) conducted the visit for TEA. The initial pass rate in the Accountability System for Educator Programs (ASEP) was 62% at that time, thus the program was rated Accredited-Under Review. The visit made 39 recommendations for improvement in the following areas: 1) governance (i.e. establish a functioning advisory committee and hire an experienced director); 2) curriculum (i.e. align curriculum and design appropriate scope and sequence); 3) systems for tracking student progress (i.e. attend ASEP training, and ensure that instructors are certified in the areas in which they teach); and 4) staff responsibilities (i.e., develop a program handbook, use ASEP data for program improvement). Steps to Teaching sent a response to this report to TEA which addressed these concerns and included an Intern Handbook. A letter was sent by TEA to Mr. Juan Maldonado on October 10, 2006 acknowledging the response.

The third visit was conducted by Dr. Jonella Britton and Tabita Gutierrez (now Director of Educator Certification) on June 15, 2007. At that time the initial pass rate for males in the program was 66% and for African Americans, 33%. The final pass rate for males was 76%, and the program was rated Accredited-Under Review. The same four areas as mentioned above received recommendations during this visit. Examples of these recommendations include: 1) aligning the advisory committee with Texas Administrative Code (TAC)§ 228.20; 2) submitting to TEA a curriculum chart indicating which workshops cover what content for each certification area; 3) improving record keeping on candidates to facilitate knowing which candidates are in which cohort; 4) sending staff members to TEA training. A response to this report was received at TEA September 28, 2007 from the program.

Director of Educator Standards Carla Valadez and program specialist Mixon Henry conducted the fourth visit to Steps to Teaching on November 3-4, 2008. At this time, the program was found to be out of compliance with 1) TAC §228.20 (b), governance; 2) TAC 228.40 (b), concerning assessment of candidate mastery of curriculum; and 3) TAC §228.30 (2) regarding on-going support such as field supervision. Twenty-six interviews with program participants and staff were also conducted on this visit by TEA staff.

A desk audit of Steps to Teaching documents by TEA during July 2009 was conducted by program specialist Mixon Henry. This audit found Steps to Teaching in compliance with all TAC rules except §228.30 concerning curriculum. No syllabi were sent by the program for this document review. On an electronic survey sent to program interns concerning mandated curriculum topics in TAC §228.30, approximately 50 % of the candidates responded that either the topic was not taught, or they did not know, for 13 of the 17 required topics. In addition documentation for the required minimum of 300 clock hours of coursework was unclear. Program Compliance Recommendations included creating a more collaborative advisory committee and adding any missing curriculum elements immediately.

A fifth site visit was originally scheduled for April 14-16, 2009 by TEA, but was cancelled.

COMPONENT I: GOVERNANCE OF EDUCATOR PREPARATION PROGRAMS-- Texas Administrative Code (TAC) §228.20 and 228.35 (d)

Findings:
Membership in the advisory committee is balanced with stakeholders from various local school districts, higher education, and community interests represented. Sign-in sheets, agendas, and minutes for advisory committee meetings were presented for the following dates: September 16, 2009, February 4, 2010, February 25, 2010, and September 8, 2010. The self-report also indicated that advisory meetings were held August 15, 2009 and August 25, 2010, but no documentation was evident. Advisory committee members understood their roles and responsibilities except in the area of program evaluation, for which no evidence of their participation was discovered. No evidence was available to document committee participation in decisions about field-based experiences, as required by Texas Administrative Code 228.35 (d). Because of the lack of evidence of advisory committee participation in discussion of field-based experiences and program evaluation, Steps to Teaching is not in compliance in this area.

Based on the evidence presented above, Steps to Teaching is in not compliance with TAC §228.35 (d) and §228.20 (b).

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

Findings:
The self-report of August 31, 2010, indicates in question 26 that the Steps to Teaching admission criteria includes 1) a four-year degree from an accredited institution; 2) a 2.5 grade point average (GPA); 3) a passing score on the Pre-Admission Content Test (PACT); 4) a completed application; 5) an interview; 6) a written assessment; 7) 12 semester credit hours in a subject-specific content area; or 8) 24 credit hours in a subject-specific content area. The self-report further asserts in question 27 that no candidates are admitted with less than a 2.5 GPA.

In addition, in question 24, the self-report indicates that the program requires the Test of English as a Foreign Language (TOEFL) to determine an out-of-country candidate's oral English-language proficiency.

However, through a review of student files, several discrepancies were noted. A total of 65 student files were reviewed during the technical visit. Four of the 18 candidates in their first year of probationary certification did not meet the state mandated minimum cumulative grade point average (GPA) of 2.5, thus violating the 10% cohort rule in TAC 227.10 (3) (b). Of the 35 third-year probationary candidates nine were admitted with cumulative GPA's below 2.5.

Only two candidates out of 18 admitted for 2010-2011 tested prior to admission on the Pre-Admission Content Test from ETS. The self-report indicates that passing scores on the PACT are required for admission. Transcripts showed that six of the 65 candidates admitted did not have Texas Success Initiative basic skills scores on file. All candidates admitted had submitted a completed application. The application requires a 500-word or less writing sample, but no scoring rubric or scale was available. No record of any admission interviews was available. Transcripts in student folders revealed that the 11 out-of-country applicants had the appropriate transcript review and showed equivalency to U.S. counterparts. No TOEFL scores or other language measures for out-of-country applicants as required in TAC §227.10 (5) and §230.413, were available however.

The self-report of August 31, 2010, indicates in question 32 that admission criteria are publically available through a website, career fairs, brochures, and other media outlets. Up-to-date admission criteria were not publically available at the time of the visit, however. No current brochure, flyer or catalog was available listing admission criteria, nor was it posted in the building. TEA specialists collected one brochure, which does include admission criteria, but Steps to Teaching staff said was no longer available. A Google search in mid-September did not find any website for Steps to Teaching. During the visit, the office manager said Steps to Teaching was developing a new website at www.stepstoteachingacp.org. Information accessed October 4, 2010 on this website lists the following as program requirements:

> Bachelors degree from an accredited institution or the equivalent
> Minimum overall GPA of 2.5
> A minimum of 24 hours of coursework in the content area [sic] you are seeking certification
> Meet all of the district's hiring requirements

Because of 1) more than 10% of the Fall 2010 cohort being admitted with less than a 2.5 GPA, 2) missing basic skills scores, 3) the lack of TOEFL scores for out-of-country candidates, and 4) the lack of publically-available admission criteria on September 21, 2010, Steps to Teaching is out of compliance with TAC §227.10.

Based on the evidence presented above, Steps to Teaching is not in compliance with TAC §227.10.

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

Findings:

Insufficient curriculum for educator preparation in the Steps to Teaching program was noted by TEA monitoring visits on June 14-15, 2006, June 15, 2007, November 3-4, 2008, and November 23, 2009. Official reports by TEA concerning these visits were sent to Steps to Teaching each year with plentiful recommendations for improvement. The Steps to Teaching self-report of August 31, 2010, indicates in question 42 that all 17 topics required by TAC §228.30, which went into effect December 14, 2008, for educator preparation curriculum are currently taught in the program.

Several sources of evidence concerning curriculum were utilized during the monitoring visit and later during the analysis and report-writing. These sources include the 1) self-report of August 31, 2010; 2) the Steps to Teaching Curriculum 2010-2011 packet given to TEA program specialists on September 23, 2010; 3) the Spring and Fall 2010 schedule of curriculum modules (Spring 2010 as a Xerox copy only; Fall 2010 as Xerox copy and also from www.stepstoteachingacp.org); 4) a Curriculum Correlation Chart for the 17 Topics which Director/Instructor Rey Sanchez and Mary Black completed together during the visit.
No evidence of any content-test preparation was found during the site visit. A list of content tutors hired prior to January 2009 was available, but Steps to Teaching staff told the TEA program specialists that no content tutors were currently on staff.

TAC §227.10 (C) states that applicants can be admitted with "a minimum of 12 semester credit hours in the subject-specific content area for the certification sought, a passing score on a content certification examination, or a passing score on a content examination administered by a vendor on the TEA-approved vendor list published by the commissioner of education for the calendar year during which the candidate seeks admission." The examination "administered by a vendor on a TEA-approved vendor list" is known as the Pre-Admission Content Test (PACT) and is administered by the Educational Testing Service (ETS) under contract to TEA. TAC §228.30 (a) says that "the educator standards adopted by the State Board for Educator Certification (SBEC) shall be the curricular basis for all educator preparation, and for each certificate, address the relevant Texas Essential Knowledge and Skills (TEKS)." The "educator standards adopted by SBEC" are the standards for the testing frameworks for each certificate area.

Therefore educator preparation programs that admit candidates without successful scores on the Pre-Admission Content Text (PACT) are required to provided content-test preparation as well as preparation for the Pedagogy and Professional Responsibilities examination. According to Mr. Sanchez, Steps to Teaching has not provided any content-test preparation since January 2009, when PACT testing was first implemented (see TAC §228.60 for effective date). This practice is in violation of Texas Administrative Code rules.

The self-report indicates that all instructors' course syllabi contain standard information such as contact information, goals and objectives of the course, TExES standards and competencies, focused reading assignments, topics mandated by TAC §228.30, and other content. No syllabi were available for any curriculum module during the visit, however.
A chart for the Generalist 4-8 certification field showing correlation of TEKS and standards for this field in the Steps to Teaching curriculum was sent to the program in August 2010, but had not been completed at the time of the visit.

Director and Instructor Rey Sanchez and Mary Black completed a chart together on September 22, 2010 indicating in which module each of the 17 mandated topics in TAC §228.30 is taught. A schedule of modules for Fall 2010 served as a guide during this meeting. After several hours,

a schedule of modules for Spring 2010 was also brought to our attention as evidence of curriculum. Both schedules are attached as addenda to this report.

In the afternoon of September 23, 2010, TEA program specialists were given the Steps to Teaching Curriculum 2010-2011 document, which Mr. Sanchez declared "outlines the curriculum." This curriculum outline is attached as an addendum to this report. This curriculum outline consists of 18 single-sided pages with various topics listed on each page in a sparse style. No syllabi, references, reading list, activities, or any other standard curriculum elements are included. Please note that this curriculum packet was not available September 22, 2010, during the all-day discussion of curriculum between TEA program specialist Mary Black and Director Rey Sanchez. The chart below illustrates the evidence for curriculum discussed in further paragraphs.

Steps to Teaching Fall 2010 Evidence of Curriculum

Mandated Topic from TAC §228.30	Fall 2010 Module Schedule Number of Class Meetings Listed	Steps to Teaching Curriculum 2010-2011 document Received Sept. 23, 2010
Reading Instruction	2 class meetings	1 page
Texas Educators' Code of Ethics	Covered in orientation, according to Rey Sanchez	0
Child Development	0	2 pages
Motivation	0	1 page
Learning Theories	3 class meetings	2 pages
TEKS organization, structure, and skills	2 class meetings	0
TEKS in the content area	2 class meetings	0
State assessment of students	3 class meetings	0
Motivation	0	1 page
Curriculum development and lesson planning	2 class meetings	1 page
Classroom assessment for instruction/diagnosing learning needs	0	2 pages
Special populations Special education ESL/Bilingual Gifted/Talented	 4 class meetings 0 1 class meeting	 See discussion below 1 page 0
Parent conferencing/ communication skills	4 class meetings	1 page
Instructional technology	0	0
Pedagogy/instructional strategies	Possible 4 class meetings, see discussion below	Possible 1 page
Differentiated instruction	0	1 page
Classroom management	5 class meetings	1 page
Certification test preparation	2 class meetings	0

Instructional technology is the only required topic omitted from both the Fall 2010 Schedule and the Steps to Teaching Curriculum 2010-2011 document. A baseline survey requested by TEA in February 2009 from all educator preparation programs in Texas was returned to TEA by Steps to Teaching on August 8, 2010. Question 17 asks whether the program "provides instruction on classroom instructional technology." The program's response is "yes." In the self-report of August 31, 2010, the program indicated that they do not provide any type of technology training "beyond using a computer for word processing, presentations, email and the internet." The self-report further explains "we do not offer any of these trainings because we believe that the interns are capable of using their own resources and computer knowledge to implement ideas." This practice is in violation of TAC §228.30 (b) (14).

No module called child or human development, nor outline of child development materials was available September 22, 2010, nor could any module teaching child development be identified by Director Rey Sanchez. He verbally admitted that they do not offer it.

However one page of the Steps to Teaching Curriculum 2010-2011 document, which was received on September 23, 2010, lists the following:

Child Development

Half Way Up The Stairs
The Big First Grades
The Pre-Adolescent
Declaration of Independence
The Age of Rapid Changes
Growth Mile Stones

No explanation of these terms is included, no additional information is listed on the page, and no module is indicated. Indeed, these are the only words on the page. Another page in the outline lists the following additional information:

Child Development

Parenting 101
Child Development Tracker
Child Development—Wikipedia
Child Development Tracker
The Social Butterfly

Again, no explanation of terms is included, no module is indicated, and no further information or discussion is given. It is unclear what these terms mean or are intended to cover. No explanation was proffered by Mr. Sanchez or any others involved with Steps to Teaching. On October 4, 2010, an envelope from Mr. Sanchez arrived at TEA containing nine pages discussing Piaget's stage development theory and seven pages on Gardner's Multiple Intelligences theory. The pages contain no notation or reference as to the source of the information. Neither of these brief introductions relate these theories to the classroom nor discuss what to look for or expect from children in school. There is no cover letter or any indication of how these materials are incorporated into the modules or discussed and processed during classes. From this evidence, Steps to Teaching is in violation of TAC §228.30 (b) (3), requiring that child development be taught to beginning educators.

Nothing concerning teaching strategies for English language learners is noted in the Spring and Fall 2010-2011 module schedule. The Steps to Teaching Curriculum 2010-2011 document contains one page with these words only:

Fryer Modual [sic]
Sheltered Instruction
Language English Proficient
Lep[sic]-Students
    Limited English Proficient

The page has no title, no explanation, no other words at all. It is unclear what this page indicates concerning curriculum. Another page of the Steps to Teaching Curriculum 2010-2011 lists the following:

Bilingual Education

Bilingual Education
Foreign Lang. Immersion Programs
New Outcomes
Glossary of Terms
Framework
English As A Second Language
Tenets of Two-Way/Dual Language
Bilingual Education Goals and Outcomes
ESL-Instruction
Methods and Strategies
Review Bilingual Generalist EC-4 Test

No other information is included to explain these terms. No module for bilingual education or strategies for English language learners is indicated in either the Spring or Fall 2010 module schedules. Mr. Sanchez identified the module called Special Education Identification Process (scheduled for November 30, 2010) as covering information for ESL and bilingual students on the morning of September 23, 2010.
Differentiated instruction is also omitted from the Fall 2010 Schedule. Mr. Sanchez indicated on the morning of September 23, 2010 that the newly hired educational technology coach Suzanne Stephens would soon develop a module for this topic. When Ms. Stephens was asked if she had participated in developing or delivering any modules in Spring or Fall 2010, she said no, she had not. The last page of the Steps to Teaching Curriculum 2010-2011 does list the following:

Differentiated Instruction

Sheltered Content Instruction
Fryer Model
Content-Based Instruction

Again there is no explanation or other text included to explain how these terms are used or taught or where they might fit in the curriculum.

Some modules listed on the Fall 2010 Schedule may offer some insight on differentiated instruction however. For example modules titled *Effective Teaching Practices, Special Education, Building Self-Esteem, Gifted and Talented, Grouping Practices, Autism, Student Behavior, Teaching Methods, Bloom's Taxonomy, Accommodations for Special Education,* and

Learning Styles could contain information on differentiated instruction as well. Without detailed syllabi or in-depth course materials to review, exactly how much is covered could not be determined. In conversation with Mr. Sanchez, however, he did not indicate that any of these modules included information about differentiated instruction.

Various other topics mandated by TAC §228.30 do appear in the Steps to Teaching Curriculum 2010-2011 and/or in the module schedule. Lesson Planning appears twice on the Fall 2010 in modules titled *Lesson Cycle* scheduled for six hours on October 23 and *Lesson Plans* for two hours on December 21. The Spring 2010 schedule lists *Lesson Cycles* once on February 27. One page in the Steps to Teaching Curriculum 2010-2011 lists the following:

Lesson Planning

Madeline Hunter's Lesson Plan
The Lesson Cycle
Lesson Framework
Plan Book
Sample Lessons

The rest of the page appears blank with no further explanation of terms provided. Mary Black asked Mr. Sanchez about curriculum planning and lesson development. When asked if candidates ever create unit plans covering two or more weeks, he replied "we're not there yet." Mr. Sanchez was unable to explain any specific teaching strategies that were taught or practiced during coursework. No specific instructional strategies are indicated in module curriculum materials. One page of the Steps to Teaching Curriculum 2010-2011 contains only the following notations with no other explanation:

- Pedagogy
- Principles of Learning
- Pedagogy Does Matter
- Pedagogical Patterns
- Critical Pedagogy
- Teaching from Different Perspectives

Without further evidence, it appears that specific instructional strategies for various content areas are omitted from the Steps to Teaching Curriculum, although cooperative learning is mentioned several times in the 2010-2011 Curriculum document in other contexts.
The six hours of test preparation required by rule is "embedded in all modules," according to Rey Sanchez. However, modules titled *Test Taking Skills* and *Test Review* are scheduled twice for Fall 2010 and once each for Spring 2010.

Reading instruction across the curriculum is offered in 2 two-hour blocks on November 16, 2010 and December 7, 2010. *The Reading Process* is offered once in the Spring 2010 schedule for two hours. The Steps to Teaching Curriculum 2010-2011 has one page with the following listing:

Reading Instruction

Reading Process
Effective Interventions
Teaching Reading
ELA-Best Strategies
ELA-Best Practice

Text Reading Initiative

As with other pages in the Steps to Teaching Curriculum packet, this one has no other explanation of any kind. Therefore it is unclear what exactly is being offered concerning reading instruction.

The outline for learning theories in the Steps to Teaching Curriculum 2010-2011 packet consist of two pages. The first page lists only the following:

Theories of Learning

Cooperative Learning
Activity Theory
Behaviorism
Theory of Multimedia Learning
Maslow's Hierarchy of Needs
Humanism
Constructivism

The second page lists the following, with no further explanation as seen in the rest of the packet:

Learning Theories

Effective Strategies for Cooperative Learning
Experiential Learning Theory
Meta cognition and Learning
Self-System Learning
Affective Learning
Non linguistic Learning
Linguistic Learning
Effective Strategies for Cooperative Learning

Analysis of these two pages raises various questions about the program's curriculum. For example, Maslow's Hierarchy of Needs and Humanism are not generally considered learning theories, but reference other areas of psychological concern. On the second page, it is unclear why Effective Strategies for Cooperative Learning is listed twice and how it might be connected to learning theory. Cooperative learning is often considered to be an instructional strategy, rather than a theory of learning itself. On the other hand, various influential learning theories such as Vygotsky's socio-cultural theory and Gardner's theory of multiple intelligences do not seem to be included at all.

The topic of learning theories is offered twice on the Fall 2010 schedule, once on October 9 for a six-hour Saturday session, and one again on October 21 for two hours. Learning Styles is scheduled for December 14, 2010 for two hours. On the Spring 2010 schedule, Learning Theories is offered once for two hours. It is unclear why there is inconsistency between the two semester offerings.

Instruction regarding formative and summative classroom assessment was identified by Mr. Sanchez as being taught in the module titled Special Education Identification Process which is offered November 30, 2010 for two hours. No mention of the topic of special education identification process is contained in the Steps to Teaching Curriculum 2010-2011 packet, however.

Two pages do list topics concerning classroom assessment. The first page lists the following in the same unembellished manner as previously described throughout this report:

Classroom Assessment for Instruction

Classroom Assessment for Learning
The Ecology of Classroom Assessment
Classroom Assessment Techniques
Elementary Education: Curriculum, Instruction and Assessment

The second page notes the following:

Classroom Assessment for Instruction/Diagnosing Learning Needs

Learning Contracts
Special Education/Learning Assistance Designation—Identification and Assessment
Diagnosing Career—Learning needs

It is unclear how learning contracts could be considered either summative or formative assessment strategies, or how diagnosing career learning needs is applicable to the Pedagogy and Professional Responsibilities exam.

Aside from a reference to "sheltered instruction" and another to "sheltered content instruction" in the 2010-2011 curriculum packet, the only other reference to special education in the Steps to Teaching Curriculum 2010-2011 document is that listed above. The Fall 2010 module schedule does list other class sessions concerned with special education however: *Special Education, Autism, Special Education Identification Process* and *Accommodations for Special Education*. The Spring 2010 schedule lists 3 two-hour sessions titled *Special Education*, and one session called D*yslexia* for six-hours. It is unclear why sessions vary from Spring to Fall, and why sessions are sequenced as they are.

The topic of classroom management was identified by Rey Sanchez as being taught in the module of the same title in Spring and Fall 2010. Other modules that might touch on this topic might include *Setting up the Classroom*, *Classroom Discipline*, *Student Behavior*, and possibly *Building Self-Esteem.* With no syllabi or any other course material, it is impossible to know for certain however.

Four class meetings for Fall 2010 address parent conferencing and/or parenting skills. Only one page in the curriculum document describes parent conferencing as follows:

Parent Conferences/Communication Skills

How to Create a Welcoming Classroom
Empowering Parents
Sample Letter to Parents

The remainder of the page is blank and nothing on parenting skills per se is included in the curriculum document. It is unclear what occurs during the four class meetings noted for these topics.

In conclusion, both the Steps to Teaching Curriculum 2010-2011 document and the Spring and Fall 2010 schedules of class meetings present several issues of concern. 1) Some required curriculum topics appear to be completely omitted, such as instructional technology and child

development. 2) Some required topics appear to be thinly covered, with little depth or practice, such as lesson planning and instructional strategies. 3) Some topic outlines seem to contain material that is either incorrect or non-applicable, such as learning theories and classroom assessment. 4) Instruction appears to vary widely from Spring to Fall, with no explanation. 5) Sequencing of instruction seems random rather than strategically planned for understanding. For instance, in Spring 2010, modules titled *Teacher Evaluations* are presented the first two sessions in January, while the modules titled *Teaching Methods and The Reading Process* are not taught until late April.

Based on the evidence presented above, Steps to Teaching is not in compliance with TAC §228.30.

Steps to teaching was also found to have an inadequate curriculum during TEA site visits in 2006 and 2007,and out of compliance with TAC rules concerning curriculum in 2008 and 2009.

COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT -– PREPARATION PROGRAM COURSEWORK AND/OR TRAINING -- Texas Administrative Code (TAC) §228.35

Findings:
The self-report indicates that Steps to Teaching requires 30 clock-hours of field-based experience prior to internship and that "we are using 15 hours of video training as stipulated in Texas Administrative Codes" (question 52). Question 54 notes that candidates document field-based experience with time logs and focused observation activities. The program accepts 50 clock hours or less of professional training from school districts toward intern training, as documented by continuing professional education (CPE) certificates (questions 57 and 58). Questions 61 and 62 of the self-report indicate that intern mentors receive yearly scientifically-based training which addresses how to work effectively with candidates, and that school districts and Steps to Teaching provide this training. For struggling interns, question 77 elaborates that "We work with individual interns schedules and provide material that will help them in the classroom settings. We e-mail and call the individual interns whom [sic] are not meeting program requirements and ask that they set up a meeting to discuss their status."

The Educator Preparation Program Compliance Monitoring Handbook for 2010-2011 was sent by TEA to Steps to Teaching along with their notification letter of August 9, 2010 for this monitoring visit. The handbook contains various documents all programs are asked to complete prior to the visit, as well as a list of materials to prepare for review, including a chart of program hours. This chart had not been completed at the time of the visit, however. Mary Black asked Director Rey Sanchez how many clock-hours the program required, and he replied "104." The website www.stepstoteachingacp.org, which was accessed by Mary Black on October 5, 2010, lists the total number of class hours for the program as 104 on the Fall 2010 schedule.
No evidence was available in student folders or elsewhere to document the required 30 clock-hours of field-based experiences. No time logs or focused observation activities or records were found in student folders or elsewhere. Two short DVDs of about 20-minutes each according to Mr. Sanchez, were the only evidence of any video or other electronic media that could be used for part of the field-based experience, as allowed by TAC 228.35 (A). No sign-in sheets were available to document that candidates attended class sessions. Nor was any documentation available of CPE credit which the self-report indicated was counted by the program as part of the required 300 hours. TAC 228.35 (3), effective December 14, 2008, requires a minimum of 300 clock-hours for all educator preparation programs in the state of Texas. With no further

documentation available as evidence for the total number of hours provided, Steps to Teaching is out of compliance in this area.

One agenda was provided as evidence of an orientation meeting for interns and mentors on September 4, 2010. This meeting is also noted on the Fall 2010 schedule. A spiral-bound notebook titled *Creating a Purposeful Classroom: Techniques for Behavior Planning* was presented by Mr. Sanchez as the handbook for mentors. However the goals listed in the book indicate that understanding 1) "how our behavior affects our students," 2) "how our expectations and classroom structure make a difference in student behavior," and 3) how "we will work together to leave with strategies, attitudes, and plans to create a classroom with purpose." The goals do not mention strategies for mentoring novice teachers. No policies or procedures for mentors are contained in the handbook, nor any specific information about the Steps to Teaching program. Therefore it is uncertain that this is actually a handbook for intern mentors. No list of field supervisors assigned to specific interns was available during the visit. Mr. Sanchez indicated that he and Ramiro Vargas are the only two field supervisors in the Fall of 2010. The self-report indicates in question 76 that from 8 to 11 interns are assigned to each of the two field supervisors. Mr. Sanchez also confirmed this. Since there are 18 candidates currently in their first year of the probationary certificate from Steps to Teaching, this number seems accurate for beginning interns. Observation forms in student folders revealed that field supervisors had made contact with all beginning interns during the first three weeks of their assignment, but had not completed the first formal observations for all beginning candidates, as to be expected the third week of September. Observation forms were also found for the first probationary year of candidates currently in their second or third year of the probationary certificate.

However no evidence was found for any continuing observations of interns in the second or third probationary year. Since there are a total of 274 persons enrolled in Steps to Teaching, with at least 35 in their third year of the probationary certificate, it seems likely that not all candidates are receiving the field supervision and "regular on-going support" required by TAC §228.35 (f).

Mr. Sanchez explained that he and Mr. Vargas generally gave copies of the completed observation forms to elementary campus principals as required in TAC §228.35 (f), but gave them to the department heads or secondary supervisors at the secondary level, as per custom in that area.

Steps to Teaching is out of compliance with TAC §228.35 because of the following: 1) lack of documentation for the 300 required clock-hours that an educator preparation provide must minimally provide; 2) lack of documentation for field-based experiences; 3) lack of evidence of continued observations for candidates in the second and third probationary years; 4) and failing to give all campus principals copies of intern observations.

Based on the evidence presented above, Steps to Teaching is not in compliance with TAC §228.35.

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

Findings:

The self-report of August 31, 2010, states in questions 79 and 82 that the program evaluates curriculum and overall performance once every 12 months. Specific internal and external data is identified in question 80 as being used to analyze the program, including: ASEP data; advisory committee input; qualitative evaluations from candidates, instructors, and mentors; the number of candidates passing TExES on the first attempt; and the number of testing attempts by each candidate. Question 81 then states that the program does not have a system in place to evaluate the curriculum design and delivery based on performance data, scientifically-based research practices, and results of internal and external assessments. Thus the response to question 81 contradicts the response to question 80 in the self-report.

According to Mr. Sanchez, the program uses representative forms of the TExES examinations as benchmarks through the program [see TAC 228.40 (a)]. The representative forms are administered repeatedly during course modules to help familiarize candidates with testing procedures, format, and content. The program does not have a written policy concerning cut scores on the representative forms to indicate readiness to take the actual test. Also, no tutoring is available for the content-area exams, as mentioned earlier in this report.

Student folders did not contain any dates of admission for candidates into the program. Program staff indicated that new candidates are admitted throughout the year, in a rolling admission process. Because of the lack of definite admission dates and the lack of tracking for students progressing through course modules, TEA staff are unable to determine at what point permission to test is given by the program, as required in TAC §228.40 (b).

No evidence was discovered of evaluation of curriculum or overall program effectiveness, as required by TAC §228.40 (c). Program and curriculum evaluation is not mentioned in advisory committee minutes. No documents were presented to TEA program specialists that deal with program or curriculum evaluation. In conversation with Mr. Sanchez, Mr. Fermat, and Mr. Raudy Maldonado, no one could explain exactly how the program or curriculum was evaluated.

Candidate Testing and Pass Rates

According to the State Board for Educator Certification (SBEC) Accountability System for Educator Preparation (ASEP), Steps to Teaching has been rated as Accredited-Under Review from 2005 through 2009. This rating is based on candidate pass rates on the TExES certification examination. Texas Administrative Code (TAC) 229.2 (70 (8) require that cohorts of candidates score at least 70% on the initial and at least 80% on the final examination. These scores are calculated based on the number of successful (i.e., passing) attempts made by the cohort divided by the total number of last attempts made by the cohort. Further scores are reflected by demographic categories; all, female, male, African American, Hispanic, Other, and White. If one category scored below the cut-off score, the program was assigned the rating of Accredited-Under Review. If any program was rated Accredited-Under Review, the program was required to submit an Action Plan to TEA by TAC 229.3 (i) effective February 3, 2002. The only year an Action Plan was received by TEA was 2006. The table below shows this information.

Steps to Teaching ASEP Scores 2005-2009

Year	Number of Categories Below Cut Score on	Number of Categories Below Cut Score on	Accreditation Status	Action Plan

	Initial	Final		
2005	1	1	Accredited-Under Review	no
2006	1	1	Accredited-Under Review	yes
2007	1	4	Accredited-Under Review	no
2008	0	2	Accredited-Under Review	no
2009	4	4	Accredited-Under Review	no

ASEP scores by demographic category cannot tell the whole story, however. The Educational Testing Service (ETS), which is the TEA contractor for development and delivery of the TExES exams, provided further data in September, 2010, that presents a deeper analysis. Three types of data for the academic years (September-August each year) 2006 through 2010 are supplied:1) First Time Examinees' Combined Pass Rates on the Pedagogy and Professional Responsibilities (PPR) EC-4 ; 2) Pass Rates by Attempt; and 3) Average Percent Correct by Domains. ETS became the TEA contractor for testing in 2006. The complete tables for these data are included in the Appendix of this report. The next section will focus on reports for the certification fields initially approved by TEA for this program in 2003: 1) Generalist EC-4.; 2) Bilingual Generalist EC-4; and 3) Bilingual Education Supplemental EC-4. Discussion will also include the required Pedagogy and Professional Responsibilities (PPR) EC-4 and the Texas Oral Proficiency Test [Spanish] (TOPT) exam. The table below displays data concerning First Time Examinees' Combined Pass Rates on the both the content test and the PPR EC-4.

Steps to Teaching First Time Examinees' Combined Pass Rates on the PPR EC-4

2006-2007		
Test Title	**Number of Examinees**	**Passing Rate**
TOPT Spanish	3	33%
Generalist EC-4	10	40%
Bilingual Generalist Supp. EC-4	5	40%
Bilingual Generalist EC-4	3	33%
2007-2008		
Test Title	**Number of Examinees**	**Passing Rate**
TOPT Spanish	10	40%
Generalist EC-4	6	50%

Bilingual Generalist Supp. EC-4	3	0%
Bilingual Generalist EC-4	1	0%
2008-2009		
Test Title	**Number of Examinees**	**Passing Rate**
TOPT Spanish	6	67%
Generalist EC-4	2	0%
Bilingual Generalist Supp. EC-4	2	100%
Bilingual Generalist EC-4	0	0
2009-2010		
Test Title	**Number of Examinees**	**Passing Rate**
TOPT Spanish	1	0%
Generalist EC-4	0	0
Bilingual Generalist Supp. EC-4	2	50%
Bilingual Generalist EC-4	0	0

In the first year for which ETS has data, 2006-2007, candidates in the original certification fields for which the program was approved by TEA, showed very low passing rates on their first attempt to pass the Pedagogy and Professional Responsibilities (PPR) EC-4 exam. The fact that only 1 of 3 candidates who took the TOPT, 4 out of 10 candidates for the Generalist EC-4, 2 of 5 for the Bilingual Generalist Supplemental, and 1 of 3 for Bilingual Generalist EC-4 passed the PPR exam on the first attempt, indicates a lack of preparation by the program for the candidates taking this test. The same thing can also be said for the following year, 2007-2008. The year 2008-2009 showed some improvement. For 2009-2010, not only were there fewer examinees, but the pass rates showed the same low trend.

The following table displays data concerning pass rates for the candidates' first attempts on various tests for the original certificates for which the program was approved. The complete table showing pass rates for up to four attempts is in the Appendix. Please note that some students took up to 10 total attempts before passing these particular tests, although those outliers are not included in this discussion.

Steps to Teaching Pass Rates by First Attempt

2006-2007		
Test Title	**Number of Examinees**	**Passing Rate on First Attempt**
TOPT Spanish	12	100%
Generalist EC-4	43	42%

Bilingual Generalist Supp. EC-4	12	33%
Bilingual Generalist EC-4	18	33%
PPR EC-4	30	23%
2007-2008		
Test Title	**Number of Examinees**	**Passing Rate on First Attempt**
TOPT Spanish	26	100%
Generalist EC-4	30	43%
Bilingual Generalist Supp. EC-4	14	29%
Bilingual Generalist EC-4	12	33%
PPR EC-4	15	47%
2008-2009		
Test Title	**Number of Examinees**	**Passing Rate on First Attempt**
TOPT Spanish	26	100%
Generalist EC-4	17	35%
Bilingual Generalist Supp. EC-4	17	65%
Bilingual Generalist EC-4	1	100%
PPR EC-4	3	33%
2009-2010		
Test Title	**Number of Examinees**	**Passing Rate on First Attempt**
TOPT Spanish	18	100%
Generalist EC-4	10	40%
Bilingual Generalist Supp. EC-4	11	55%
Bilingual Generalist EC-4	0	0%
PPR EC-4	3	67%

As is seen in the table all students who attempted the TOPT during 2006 to 2010 passed on the first attempt. This could be a result of home language acquisition rather than program preparation for the exam. The passing rates for the related certificate areas do not reflect a similar level of preparation. For example, only 18 of 43 (42%) first-time test-takers for the Generalist EC-4 exam in 2006-2007 passed. From 2007-2010, no improvement in this percentage is reflected. An even lower passing rate is seen for those taking the Bilingual Generalist EC-4 in 2006 -2007 and 2007-2008. The best passing rate for the PPR EC-4 occurred in 2009-2010 when 2 of 3 first time test-takers (67%) passed, still below the standard of 70% in ASEP. The data in this abbreviated table reveals that the majority of candidates taking these examinations for the first time failed. Therefore it is likely that the program did not provide adequate preparation for success on the Generalist EC-4, Bilingual Generalist Supplemental EC-4, Bilingual Generalist EC-4, and PPR EC-4 exams. Yet that was the purpose of the program, according to the proposal in 2003.

The final table below illustrates the average percentage correct for the domains of each test for all candidates recommended for testing by Steps to Teaching in any given year. The initial passing standard for each domain for each year is 70%. The final passing standard is 80%.

Steps to Teaching Average Percent Correct by Domains

2006-2007							
Test Title	**# of Exam-nees**	**Domain I**	**Domain II**	**Domain III**	**Domain IV**	**Domain V**	**Domain VI**
Generalist EC-4	57	55%	75%	51%	65%	71%	
Bilingual Generalist Supp. EC-4	18	65%					
Bilingual Generalist EC-4	21	58%	56%	63%	50%	64%	59%
PPR EC-4	61	67%	73%	61%	71%		
2007-2008							
Test Title	**# of Exam-nees**	**Domain I**	**Domain II**	**Domain III**	**Domain IV**	**Domain V**	**Domain VI**
Generalist EC-4	55	57%	73%	51%	64%	64%	
Bilingual Generalist Supp. EC-4	30	61%					
Bilingual Generalist EC-4	15	56%	53%	58%	52%	67%	56%
PPR EC-4	52	65%	73%	60%	70%		
2008-2009							
Test Title	**# of Exam-nees**	**Domain I**	**Domain II**	**Domain III**	**Domain IV**	**Domain V**	**Domain VI**
Generalist EC-4	37	55%	61%	52%	63%	65%	
Bilingual Generalist Supp. EC-4	31	68%					
Bilingual Generalist EC-4	1	80%	73%	53%	47%	47%	67%

PPR EC-4	15	69%	69%	58%	67%		
2009-2010							
Test Title	**# of Exam-nees**	**Domain I**	**Domain II**	**Domain III**	**Domain IV**	**Domain V**	**Domain VI**
Generalist EC-4	24	59%	67%	50%	64%	66%	
Bilingual Generalist Supp. EC-4	18	68%					
Bilingual Generalist EC-4	2	61%	48%	43%	47%	57%	40%
PPR EC-4	11	68%	76%	60%	77%		

One of the most striking observations of the data in the table above is that Steps to Teaching never reached the final passing standard for any domain on any test over this four-year period. Keeping in mind that the original purpose of this program as stated in the 2003 proposal is to provide "the highest quality instruction and support for interns enrolled in the bilingual teacher certification program." The same pattern of low performance as seen in the other two data sets, indicating lack of preparation, is evident here.

Financial Consequences for Candidates

In addition to low test performance, candidates from Steps to Teaching took repeated tests without improving their scores. For example, among those who received Standard Certificates in 2009-2010, one candidate failed the PPR EC-12 20 times before passing. Another candidate failed the PPR EC-4 14 times before passing. Yet another candidate failed PE EC-12 9 times before passing. Two candidates failed Math 8-12 5 times each before passing. These repeated failures indicate a lack of preparation and screening for testing readiness by the program. This lack of service not only affects academic achievement , it costs candidates money. For example, in 2009-2010, candidates paid an additional $16,678.00 in testing fees for tests they failed. The highest accumulated testing fee for one candidate was $1792, almost 10 times what a well-prepared candidate would pay.

Student Files

Even though some student files may be incomplete, Raudy Maldonado indicated that the program was making progress towards improved record-keeping. There is sufficient evidence to indicate that student information is kept for a minimum of five years in a secure environment.

Because of the lack of evidence for curriculum and overall program evaluation, the program is out of compliance with TAC §228.40.

Based on the evidence presented above, Steps to Teaching is not in compliance with TAC §228.40.

Conclusion

According to Texas Administrative Code (TAC) 229.6 (a) [effective April 18, 2010], the continuing approval of an educator preparation program is based upon 1) accreditation status; 2) compliance with SBEC rules regarding program operations; and 3) integrity of required data submissions. Steps to Teaching has continuously been out of compliance with TAC rules since its inception in 2003. The Texas Education Agency monitored the program repeatedly from 2003-2010 and made numerous recommendations that, if followed, would have brought the program into compliance with all rules. In addition Steps to Teaching has maintained the status of "Accredited-Under Review" for each year from 2005-2009, indicating low test performance. Finally data submitted to TEA has been inaccurate, as the conflict between the self-report of August 31, 2010 and the on-ground findings from the September 21-23, 2010 visit exemplifies.

Therefore it is recommended that the State Board for Educator Certification revoke the approval of Steps to Teaching to operate as an alternative educator certification program in Texas.

PROGRAM RECOMMENDATIONS

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

PROGRAM COMPLIANCE RECOMMENDATIONS: In order to come into compliance with all Texas Administrative Code rule governing educator preparation programs, the following recommendations are made:

GENERAL RECOMMENDATIONS: