



Compliance Audit Report 2014-2015 A Career in Education Initial Teacher Certification Program

According to Texas Administrative Code (TAC) §228.10(c), "An entity approved by the SBEC under this chapter...shall be reviewed at least once every five years under procedures approved by the Texas Education Agency (TEA) staff; however, a review may be conducted at any time at the discretion of the TEA staff." Per TAC §228.1(c), "All educator preparation programs are subject to the same standards of accountability, as required under Chapter 229 of this title." The Texas Education Agency administers Texas Administrative Code 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.texas.gov for details.

Contact Information: Mr. Bo Guajardo

County/District Number: 178701

SBEC Approval Date:

Program Manager, Sandra Jo Nix, and Program Specialist, Mixon Henry, conducted a Texas Education Agency Compliance Audit of A Career in Education ACP, San Antonio, TX. The focus of the compliance audit was the Pedagogy and Professional Responsibility curriculum required for initial certification. The following are findings and recommendations for program improvement.

SCOPE OF THE COMPLIANCE AUDIT:

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

Data Analysis:

Information concerning compliance with Texas Administrative Code (TAC) governing educator preparation programs was collected by various qualitative means. A self-report was submitted to the Texas Education Agency. An on-site review of documents, student records, course material, online courses, and curriculum correlations charts provided evidence regarding compliance. In addition, electronic questionnaires developed by TEA were sent to A Career in Education stakeholders. The following: Eight (8) out of twelve (12) advisory committee members; nine (9) out of thirty-four (34) clinical teachers/interns; four (4) out of six (6) field supervisors; four (4) out of thirty-four (34) principals; and seven (7) out of thirty-four (34) 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 alignment to determine compliance of Texas Administrative Code. Representing the program at the audit were Bo Guajardo and Andy Del Bosque.

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

FINDINGS:

- Program support was indicated by the governing body of A Career in Education per TAC §228.20(c) as evidenced by the participation and cooperation of Mr. Bo Guajardo and Mr. Andy del Bosque in various stages and steps of the compliance audit.
- The advisory committee consists of twelve (12) members: six (6) members are associated with the ACE program in some capacity such as field supervisor or instructors; four (4) members are from local school districts, and two (2) members represent community/business interests. Most of the attendees at the advisory committee meeting were associated with the program. The program must add additional members such as former candidates, additional principals, mentor teachers, and human resource directors. Because the advisory committee has representation from only two categories outside of the ACE staff members, A Career in Education does not meet TAC §228.20(b) requirements for advisory committee composition.
- A Career in Education provided evidence of two advisory committee meetings for the past two academic years. Agendas and sign in sheets were provided as evidence of the meetings. However, the agendas were not detailed enough to determine if program delivery, evaluation, policy or policy were discussed in the meetings. Detailed minutes should be taken at future meetings. Although attendance was very poor, agendas and sign in sheets were available for review. The program meets the requirements for conducting a minimum of two advisory committee meetings per academic year as required by TAC §288.20(b).

Based on the evidence presented, A Career in Education is not in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.

Compliance Issues:

- Identify at least four new advisory committee members not associated with the ACE program before the fall 2015 meeting; and
- Take detailed minutes of the advisory committee's discussion in order to determine that program delivery, etc. is addressed.

Recommendations:

- Seek creative ways to hold advisory committee meetings using technology;
- Provide minutes to advisory committee members;

- Consider rolling terms for advisory committee members so new viewpoints can be added;
- Establish what constitutes a quorum in order to conduct advisory committee business; and
- Use a handbook or detailed letter of invitation to explain roles and responsibilities of advisory committee members.

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

Findings:

- A Career in Education's website needs to be updated to correct admission information and grade levels of certificates among other general information.
- Candidates' records contained an application, official transcript, evidence of a minimum of 2.5 GPA, writing sample, and results of the Cornell Watson critical thinking test.
- No out-of-country candidates are currently in the program, but procedures are in place if needed.
- There was no evidence of an interview or scoring rubrics in the candidates' records. However, the Cornell Watson critical thinking test was used as another screening instrument.

Based on the evidence presented, A Career in Education is in compliance with TAC §227 - Admission and Certification Criteria.

Recommendations:

- Ensure that all admission and certification information on the ACE website are kept current;
- Develop an exception letter in case a student is accepted with a GPA of less than a 2.5 GPA. Candidate must pass PACT test prior to enrollment;
- Move signing of Ethics Code and FERPA to enrollment process;
- Reorganize candidate files for ease of use. Place all admission documents in one place;
- Conduct applicant interviews using a uniform set of questions and scoring rubric. Place scoring rubric in each candidate's record;
- Add a reading passage to the interview to determine reading ability of the candidate;
- Set an initiation date for the program to transfer to electronic record keeping;

- Add an admissions date to the enrolment letter and place in the candidate's record;
- Have an enrollment letter signed and dated by new candidates indicating when they accept admission;
- Add enrollment date on Standard Certification checklist. Place in student file;
- Create a document reflecting that the student's transcript has been reviewed and accounted for at least 12 (or 15 if Math or Science 7th Grade or above) semester credit hours within the content area. Place in each candidate's record; and
- Develop an exception letter for candidates who do not have the required GPA but who can be admitted under the 10% rule after taking and passing the Pre-Admission Content Test. The letter should state the extraordinary circumstances for admission and be signed by the legal authority.

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

Findings:

- A Career in Education is approved to offer teacher certification in sixteen (16) certification areas.
- In reviewing the content and Pedagogy and Professional Responsibilities curriculum, it was verified that the educator standards were not the curricular basis for instruction as required by TAC §228.30(a).
- In reviewing the content of the Pedagogy and Professional Responsibilities, it was noted that the assessments did not assess the mastery of the educator standards.
- The content and Pedagogy and Professional Responsibilities curriculum addressed the relevant Texas Essential Knowledge and Skills (TEKS) as required by TAC §228.30(a).
- Instruction on the teacher standards were included in the coursework as prescribed TAC §228.30(b).
- Sufficient evidence was presented to verify reading instruction for all candidates, dyslexia, mental and emotional health, and Educator's Code of Ethics.
- Bo Guajardo indicated that the curriculum was scheduled to be revised beginning in the summer of 2015.

Based on evidence presented, A Career in Education is not in compliance with Texas Administrative Code Section §228.30 – Educator Preparation Curriculum.

Compliance Issues:

- Incorporate the educator standards into the current coursework as well as in new coursework to be developed;
- Ensure assessments reflect mastery of the knowledge and skills outlined in the educator standards and incorporate use of multiple levels of Bloom's Taxonomy;
- Increase the rigor and depth for all coursework; and
- Add content methodology for all certification areas that the program is approved to offer. The methodology should address unique specific skills needed by a teacher to be effective in that content area. I.E. use of math manipulatives, etc.

Recommendations:

- Develop a module which deals with data management and interpretation to determine and address the learning needs of students;
- Identify essential content that must be covered in the first 80 hours of coursework prior to start of Internship;
- Increase the number of lesson plans required to be created, critiqued, or expanded in every course in order to mirror the expectations for practicing classroom teachers to plan, instruct, and assess instruction;
- Provide a classroom instructional scenario (total number of students, number of boys and girls, various learning styles, students with learning challenges, etc.) and have the candidates use this classroom to create, modify, critique lesson plans;
- Provide a model completed lesson plan for each EPP training session. Have candidates critique or modify it according to several variables;
- Expand the reading instruction to include practice on teaching reading-phonics, phonetic awareness, fluency, vocabulary, and comprehension;
- Develop the new coursework into modules based on teaching standards;
- Have candidates take a released STAAR test in order to understand how the TEKS are tested and to use as a guide to how their instruction should be structured;
- Utilize the TEA developed training for meeting "Teachers' Responsibilities for the STAAR test administration at <http://texas.testsecuritytraining.com/TestAdministratorTraining.aspx>. It may be used for a whole group or individually. A certificate can be printed upon completion. This is the same training that teachers must complete prior to STAAR testing;

- Utilize the dyslexia information found on the TEA website at <http://www.tea.state.tx.us/index2.aspx?id=4434> or at <http://www.region10.org/dyslexia/>; and
- Utilize the TEA developed Ethics training at <https://www.youtube.com/playlist?list=PLYCCyVaf2g1vuF3qlz1NjEWFEMtxaBMvC>.

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

Findings:

- The A Career in Education ACP is delivered in a face-to-face format which is documented by sign-in sheets which are maintained by the EPP.
- The program offers the internship option only.
- Each candidate is assigned a campus mentor and a field supervisor. There is no evidence of mentor training or of a mentor handbook.
- Instruction is consists of 302 clock hours completed in two phases – Phase I (105 clock-hours plus 30 clock-hours of field-based observations) and Phase II (117 clock hours plus 50 hours of documented professional development from the campus or school district).
- Thirty clock hours of field-based experience with fifteen (15) being interactive with students prior to internship were verified as per TAC §228.35(d). Observations via technology were available, but rarely used. However, the observations were not conducted at a variety of grade levels with a variety of students.
- Per TAC §228.35(d)(2)(C), an internship of 180 school days or an academic year is required for teaching candidates. This was verified in candidate records. All assignments matched the certification field for which the individual was accepted into the program and trained. In addition, according to TAC §228.35(d)(2)(C), the intern is issued the appropriate probationary certificate and is classified as “teacher” of record on the campus PEIMS data. Only two candidates were issued probationary certificates at the secondary level without passing a content examination. According to their transcripts, each candidate has the required 24/12 for probationary certification.
- Supervision of each candidate is conducted with the structured guidance and regular ongoing support of three experienced educators who were trained as field supervisors. The last field supervisor training was held on September 16, 2014.
- Initial contact by the field supervisor was not verified within the first three weeks of the assignment as required by TAC §228.35(f).
- According to §228.35(f)(3), during internship, the program provided three formal observations. The observation form is one that allows the field supervisors to record their observations in the classroom. This may lead to inequities in evaluation of candidates.

- Three observations [TAC §228.35(f)(4)] were at least 45 minutes in duration as documented with a start and stop time on the observation form.
- [TAC §228.35(f)]. The first observation was conducted within the first six weeks of the internship.
- The field supervisor documented instructional practices observed and provided written feedback through an interactive conference with the candidates verified by signature on the observation form.
- The program provided a copy of the written feedback to the candidate's campus administrator by signature on the observation form as required by TAC §228.35(f).
- Additional informal observations and coaching were not documented by the field supervisors [TAC §228.35(f)].
- The program accepts 50 clock-hours of school district training toward the required 300 clock-hours with verification from the school district or campus.

Based on evidence presented, A Career in Education is not in compliance with Texas Administrative Code Section §228.35 – PROGRAM DELIVERY AND ON-GOING SUPPORT.

Compliance Issues:

- Document first contact within the first three weeks of candidate placement in the internship. This can be done on the observation form or it can be verified through the field supervisor's contact log or it can be scheduled at the first class meeting of the training series with field supervisors in attendance. Document method of contact [TAC 228.35(f)];
- Create and utilize a field supervisor's contact log in order to record all contacts with the intern throughout the internship. Upon completion of the academic year, the contact log for that individual intern should be placed in the candidate's record; and
- Establish a process for the 30 clock-hours of observation to require observations at a variety of grade levels and content areas. Change the observation reflection requirements to focus on various aspects of classroom instruction and management.

Recommendations:

- Facilitate candidate fingerprinting for field-based observations by having the candidate sign up for substitute teaching;
- Revise the questions on the 30 clock-hours field-based observation form so that candidate can express observations in more detail. Do not allow "yes or no" replies. Focus the candidate's attention to various aspects of instructional practices and management;
- Revise the formal observation form to reflect a more focused observation of classroom practices. This will allow uniformity among the field supervisors' scoring of candidates; and

- Have field supervisors maintain an electronic log of contact and observation dates of their teacher interns.

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

Findings:

- A Career in Education created a checklist of benchmarks for candidate process during the audit as prescribed by TAC §228.40(a).
- Readiness for testing [TAC §228.40(b)] was outlined in the Student Handbook. This involves taking a practice test and scoring a 70.
- Evaluation of the program's design and delivery of the curriculum is continuous per TAC §228.40(c). The long-term plan for evaluation was included in the self-report.
- According to TAC §228.40(d), the program retains documents that evidence a candidates' eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after the candidate's program completion. The records are stored in a secure environment.

Based on evidence presented, A Career in Education is in compliance with Texas Administrative Code §228.40 – ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT.

Recommendations:

- Use more external data in the program evaluations; and
- Establish additional criteria to determine the candidate's readiness to test. Consider utilizing the T-CERT test preparation to determine the readiness of each candidate to take the appropriate TExES exam and ensure that the program maintains the certificate of completion verifying (6) clock-hours of test preparation that is not embedded in any other curriculum areas or create another indicator for test prep not embedded in any other curriculum areas and ensure that the program maintains the certificate of completion verifying (6) clock-hours of test preparation. The T-CERT address is <https://pact.tarleton.edu/TCERT> and for questions email weiss@Tarleton.edu.

COMPONENT VI : Professional Conduct (TAC) §228.50

Findings:

- A Career in Education requires that candidates indicate by signature that they have read, understand, and will abide by Chapter 247 of this title (relating to Educators' Code of Ethics). Signed affirmations by candidates were available for review in the candidates' records.
- No records could be produced that the staff had indicated by signature that they have read, understand, and will abide by Chapter 247 of this title (relating to Educators' Code of Ethics).

Compliance Issues:

- Document that the staff has read, understood, and will abide by Chapter 247 ((relating to Educators' Code of Ethics). Retain documentation for audit purposes. As new staff members are added, ensure that all sign the Code of Ethics [TAC §228.50].

Recommendations:

- Consider utilizing the TEA approved Ethics training for both candidates and staff within the program to ensure that this topic is adequately addressed by the program. Maintain evidence that that the training has occurred. For more information visit <http://www.tea.state.tx.us/ethics/>.

Based on the evidence presented, A Career in Education is not in compliance with Texas Administrative Code §228.40 – ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT.

PROGRAM RECOMMENDATIONS

Standard Program Recommendations are made to all programs and are for suggestions for program improvement only.

Standard Program Recommendations:

- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about current Texas Administrative Code;
- Participate in Annual Deans/Directors Meetings to ensure that the program director is knowledgeable about current Texas Administrative Code and future changes to Texas Administrative Code (Webinar Series);

- Continue to participate in webinars provided by the Division of Educator Certification & Standards to ensure that the program staff is knowledgeable about current requirements and changes in Texas Administrative Code;
- Continue to maintain communication with the program specialist assigned to the program for the purpose of asking questions about current requirements in TAC for Governance; Admissions; Curriculum; Program Delivery & On-Going Support; and Program Evaluation (TAC § 227-229);
- Align the verbiage of the program to that of current Texas Administrative Code. For example: Applicant / Candidate / Field Supervisor / Internship / Clinical Teacher;
- Ensure that the staff utilizes the Program Providers Resources page on the TEA website http://tea.texas.gov/Texas_Educators/Preparation_and_Continuing_Education/Program_Provider_Resources/ to access pertinent information that EPPs frequently request; and
- Ensure that TEA staff has the most current & up-to-date contact information by sending an email with all contact information to your program specialist.