



Compliance Audit Report ASTEP - Brownsville 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.

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County/District Number: 031701

TEA Approval Date: January 13, 2002

A compliance audit of the teacher certification program at Alternative-South Texas Educator Program (ASTEP) Brownsville, Texas, was conducted on November 4 - 6, 2014, by Texas Education Agency (TEA) Program Specialists, Mixon Henry and Lorrie Ayers, in compliance with Texas Administrative Code (TAC) §229.6(a). During the same time period, Manager Sandra Nix and Director Dr. Tim Miller were at the ASTEP -Laredo site. As the compliance audit unfolded, it was determined that the Laredo site functioned more as a candidate support site than a stand-alone program since the instruction was provided from the Brownsville site. Discussions were held as to the options to merge these sites. This report is written with the understanding that the ASTEP – Laredo site will merge with the ASTEP – Brownsville site. The compliance audit was conducted per Texas Administrative Code (TAC) §228.10(c) which states that educator preparation programs "shall be reviewed at least once every five years." The program's accreditation status is "Accredited".

Data Collection and Analysis:

The audit used information from a self-report completed by ASTEP – Brownsville staff, past compliance audit information, a review of documents, syllabi, and curriculum correlation charts as evidence to determine compliance with Texas Administrative Code. In addition, electronic questionnaires were sent to ASTEP – Brownsville and Laredo initial certification program stakeholders. A total of one hundred four (104) responses out of the four hundred sixty-two (462) questionnaires sent or 22.5% were received as follows: Three (3) out of seven (7) advisory committee members or 42.8%; seventy-two (72) out of two hundred ninety-five (295)

clinical teachers and interns or 24%; six (6) out of six (6) field supervisors or 100%; eleven (11) out of eighty-eight (88) campus principals or 12.5%; and twelve (12) out of sixty-six (66) cooperating teachers or 18%. Qualitative methods of content analysis, cross-referencing, and triangulations were used to evaluate the evidence. Evidence of compliance was measured using a rubric correlated to Texas Administrative Code §227, §228, §229 and §230.

Findings, Compliance Issues, and Recommendations:

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

Opening and Closing Sessions:

An Opening Session was held on November 4, 2014. The meeting was attended by Eva Alejandro and staff. The meeting focused on test data, stakeholder questionnaires, and involved discussion by the group of the perceived strengths and weaknesses of the program. The closing session was held on the morning of November 6, 2014. The same people attended the closing session. During the closing session, ASTEP and TEA staff developed an action plan to address compliance issues.

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

FINDINGS:

ASTEP's advisory committee is comprised of the appropriate categories represented in the membership: two (2) higher education members; three (3) school district members; two (2) community/business; and the owner which totals eight (8) members. Minutes and agenda verifies two meeting during the past academic year (2/7/14 and 9/13/13) and documentation a consistent pattern in past years. Training of the membership's role and responsibilities was verified in minutes of past meetings. Additionally, minutes and agendas confirm that the advisory committee assists in design, delivery, evaluation, and major policy decisions.

General Recommendations:

- 1) Consider additional membership in the category of schools and district personnel, i.e. principals, Human Resource personnel. Additionally, teacher graduates are another source to gain insight into the effectiveness of the program.
- 2) Reward members of the advisory committee for their involvement and assistance with the ASTEP teacher preparation program by providing Continuing Professional Education (CPE) hours to members who need hours for the renewal of their Texas certificates.
- 3) Rotate the terms of the advisory committee members to bring fresh ideas and insights to the group.

- 4) Use the advisory committee template provided by TEA to document the proceedings of the meetings and assure all topics are covered as per TAC rule.
- 5) Use the advisory committee training power point provided by TEA to train the advisory committee on specifics of their roles and responsibilities.

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

COMPONENT II: ADMISSION CRITERIA - Texas Administrative Code (TAC) §227.10 – Admission and Certification Criteria

FINDINGS:

The ASTEP's admission criteria as identified on the website consists of the following:

- An application;
- A degree from an THECB approved university,
- Transcripts demonstrating the completion of 60 hours with a GPA of 2.5;
- 24 hours of coursework in the combination of subjects which shall include English, Math Science, and Social Studies with a combination of a GPA of 2.5,
- A writing sample that is embedded in the application, but is not formally evaluated;
- Qualifying scores for basic skills with TASP, AccuPlacer, GRE, THEA, Compass or A's or B's in specific coursework; and
- Meet all of the district's hiring requirements.

A review of twenty (20) candidates' records verified that admission requirements were followed. Candidate records are retained in a secure location for five years.

Compliance Issues:

1. **Out-of- country candidates**, though no candidates are currently enrolled, candidates from non-English speaking countries or schools are required by TAC to take all sections of the TOEFL and to receive a minimum score of 26 on the oral proficiency section. Documentation of the TOEFL test results should be retained in the candidates' records for audit purposes. In review of past candidates' records, no documentation of the TOEFL was present.
2. Lack of a formal interview or other screening instrument for admission into the program.
3. Candidates with a GPA below 2.5 are required to have a letter from the program director on file and retained in the candidate's record that identifies the extraordinary circumstance that allowed the candidate to be admitted to the program.

Compliance Recommendations:

- 1) Require all out-of-country applicants who do not meet the exceptions to take the TOEFL and achieve a score of 26 on the oral language proficiency portion.
- 2) Create and document the admission's interview with applicant's responses and rubric for evaluation. Retain the interview rubric in the candidates' records.
- 3) Document by memo from the program director identifying the extraordinary circumstances which allowed a candidate to be admitted with a GPA below 2.5.

General Recommendations:

1. Consider requiring the PACT as part of the admissions criteria, so the focus of the curriculum is pedagogy and specific content methodology.
2. Review and reflect on additional requirements for admissions such as a writing sample, references, Spanish oral interview, etc.
3. Consider having the candidate sign a FERPA agreement upon admission into the program.
4. Consider using a reading comprehension test as a screening instrument to identify the applicant's reading ability needed to be successful on the TExES.

Based on the evidence presented, ASTEP is not in compliance with TAC §227.10 - Admission Criteria.

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

FINDINGS:

In reviewing the credentials of the instructors, it was noted that they have graduate degrees and have principal or superintendent certificates. Modules for all courses listed, which lead to the standard certificate, were available for examination. In review of the Pedagogy and Professional Responsibility (PPR) and specific subject content methodology, the information found was organized but unclear as to whether the educator standards and TEKS were fully addressed. The curriculum lacked depth and rigor in content and the assessments did not address mastery of the educator standards. Candidates were not allowed to practice skill development prior to entering the classroom. TEKS utilization was not found in all content areas. Reading an article and answering the questions does not guarantee mastery of knowledge or development of skills required by the educator standards. Language and/or educational terminology should be focused upon as a factor in the lack of testing success of candidates. There was no formal method to track the academic progress of candidates through the curriculum. .

Compliance Issues:

- 1) The modules for all certification coursework were inconsistent in containing educator standards and TEKS related to the content.
- 2) The curriculum lacked the required reading components required for all candidates no matter the certification area: phonetics, phonemic awareness, vocabulary, fluency, and comprehension.
- 3) The curriculum lacked sufficient pedagogy suitable for the secondary level.
- 4) Curriculum is aligned to the TAC §228.30 (17 identified topics) and should shift to the new “teacher standards” identified in Commissioner Rules Chapter 149, Subchapter AA. Teacher Standards.
- 5) The curriculum is not aligned to Technology Application Standards for beginning teachers.
- 6) The online curriculum is neither interactive nor student-focused for candidates that are not in the face-to-face presentations. Candidates can attend face-to-face sessions if they are located in Brownsville. The candidates attending via online are not drawn into the discussions and the questions submitted from them are not addressed during the session.
- 7) The online curriculum is lecture and not performance-based to evaluate candidates’ development of skills by applying knowledge presented. There should be more opportunities for candidates to do lesson plans and lesson presentations and role playing to develop skills needed in the classroom.
- 8) The curriculum assessments do not assess mastery of knowledge and skills required by the educator standards.

Compliance Recommendations:

- 1) Review and update the curriculum to ensure alignment to educator standards and TEKS;
- 2) Ensure the reading content required for all candidates has all five reading components: phonetics, phonemic awareness, vocabulary, fluency, and comprehension;
- 3) Provide secondary pedagogy;
- 4) Ensure that the curriculum makes the conversion to the new teacher standards as its bases;
- 5) Establish curriculum that is aligned to Technology Application Standards for new teachers;
- 6) Alter the online curriculum to become interactive and student focused by adjusting online presentation format or adding face-to-face sessions;
- 7) Review online presentations to limit the volume of lectures as method of instruction; instead, redirect the curriculum and method of instruction to focus on knowledge and practice of skills; additionally, create more deliverables in activities that provide the opportunity to demonstrate the mastery of skills;

- 8) Implement assessments that evaluate the candidate's knowledge and skill development as they progress through the program, and;
- 9) Utilize test questions in all courses using the format that candidates will encounter on the TExES examinations.

General Recommendations:

- 1) Use the TEA resources for Ethics, dyslexia, STARR, and mental and emotional health training requirements
- 2) Consider having candidates assembling a resources booklet for their certification field that includes grade level TEKS, Educator Certification Standards for their area, STARR testing, and ETS pre- testing material and continuously use this material in the coursework.
- 3) Administer the STARR representative (release) test to the candidates for better understanding of expectation for the students

Based on evidence presented, ASTEP is not in compliance with Texas Administrative Code Section §228.30.

COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT - Texas Administrative Code (TAC) §228.35 – Preparation Program Coursework and/or Training

FINDINGS:

ASTEP's curriculum is provided online. Some participants can participate in face-to-face sessions at the Brownsville location. However, candidates viewing the online lessons are neglected and do not get the full benefit of interactions. It states in the self-report that the online curriculum meets the iNACOL standards. ASTEP has been approved for forty-three (43) certification fields.

In trying to identify specific items in candidates' records required by TAC rule, it became problematic due to poor record keeping and missing items. During the audit an employee of the program (ASTEP) reviewed the candidates' records with auditors and became aware of TAC documentation requirements. The program could not verify the required 300 clock hours of direct instruction. Many of the hours counted by the program were assignments, (i.e. homework) not direct instruction hours. The program did provide documentation from candidates detailing the 50 clock hours of staff development from the school district or campus which can count toward the 300 hours. Additionally, the thirty (30) clock hours of field experience were inconsistently documented and did not document the required 15 clock hours of interactive field experience. The lack of a documenting process continued when trying to identify the 80 clock hours of training required prior to entering the classroom or the required 110 clock hours for a late hire. There were some irregularities in issuing probationary certificates especially in the Career and Technology area.

In reviewing the candidates' records, it was noted that record of placement, assigned field supervisors, and mentors were documented. However, there was no evidence of training/handbooks for the mentors. The field supervisors are certified educators as required by

TAC, except for one field supervisor who had allowed his/her certificate to become “inactive”. Documentation of field supervisors making contact within the required first three weeks of candidate placement was not consistent. Documentation of first observations conducted within the first six (6) week timeframe was again inconsistent. In most cases, a total of three observations were conducted during the internship. The observation instrument notes date, length of the observation, but instructional practices demonstrated by the candidate were not included. Furthermore, verification of an interactive conference following the observation and delivery of a copy of the observation to the campus administrator could not be verified. Additional support for struggling candidates was verified by evidence such as emails, phone records, and informal conference notes.

Compliance issues:

- 1) Candidates are not provided a minimum of 300 clock hours of training and no method to document each candidate’s progress exists to track pursuit of the 300 clock hours.
- 2) No consistent method of identifying the 30 clock hours of field experience including the 15 clock hours of interactive engagement during the field experience.
- 3) Field supervisors did not consistently make initial contact within the first three (3) weeks of placement.
- 4) Field supervisors were not consistent in conducting the first observation within the first six (6) weeks of placement.
- 5) No interactive conference with candidates after observation
- 6) No evidence of delivery of the observation results to the campus administrator
- 7) No documentation of training for mentors or cooperating teachers by the program or districts.
- 8) No checking to ensure that all field supervisors are currently certified educators.
- 9) No documentation of the required 80 clock hours of training and 30 hours of field based observations for late hires (110 clock hours) within 90 days from assignment.

Compliance Recommendation:

- 1) Create a method of documenting the 300 clock hours of training that identifies the progress of the candidate through the program;
- 2) Create a method of documenting the 30 clock hours of field experience including the 15 clock hours of active engagement with students to verify it has been accomplished;
- 3) Ensure all field supervisors document first contact within the first three weeks of placement;
- 4) Require that field supervisors conduct the first observation within the first six (6) weeks of placement, document observation, and keep in candidates’ records;
- 5) Require that during candidate observation that all field supervisors document instructional practices observed, conducts an interactive conferences, and provides a

copy of the observation to the campus administrators; keep individual records in candidates' folders for future audits;

- 6) Create a training program for mentors and field supervisors, conduct, and verify the training for future audits;
- 7) Require all field supervisors to maintain current certification, and;
- 8) Create a method to tracking the clock hours of training to meet the required 80 clock hours prior to entering the classroom and late hires requirement of 110 clock hours within 90 days.

General Recommendations:

- 1) Expand the field observations requirements to include a variety of educational settings with diverse student populations and focus the field observations forms to identify specific areas to observe (i.e. classroom management, transitions, lesson delivery).

Based on evidence presented, ASTEP is not in compliance with Texas Administrative Code Section §228.35 – Program Delivery and On-Going Support.

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

FINDINGS:

ASTEP has benchmarks, which is an Access spreadsheet to denote completion of coursework and progress in the program. Additionally, six (6) hours of test preparation is also provided to assist candidates with the TExES. All admission requirements are completed by ASTEP prior to recommending candidates for the PPR test.

The program evaluation gathers data from internal and external sources. This data is reviewed and shared with the staff and advisory committee for program improvement.

Compliance Issues: None

General Recommendation:

- 1) Consider a benchmark for content testing prior to internship or clinical teaching. Create a second test benchmark requiring passing the PPR test prior to the completion of the internship or clinical teaching experience.
- 2) Create a remediation program for candidates that are not successful on the representative content TExES exam.

- 3) Only provide “approval” for TExES testing which allows the candidate to test one time. This allows the program to provide remediation for candidates who were unsuccessful before their next testing attempt.
- 4) Monitor the pass rate on a regular basis by using “Data Manager” by ETS.
- 5) Expand the Internal and External program evaluations to include data from principals, HR directors, mentors, and completers; additionally share information provided by TEA

Based on evidence presented, ASTEP in compliance with Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates of Candidates for Certification and Program Improvement.

COMPONENT VI: Professional Conduct (TAC §228.50)

TAC §228.50(a) states that during the period of preparation, the educator preparation entity shall ensure that the individuals preparing candidates and the candidates themselves demonstrate adherence to Chapter 247 of this title (relating to Educators’ Code of Ethics). Program curriculum covers the topic of Educators’ Code of Ethics, but no candidates verify that they understand and will abide by the code of ethics.

Instructional staff is provided a handbook that addresses program policy, but it lacks the Educator Code of Ethics.

Compliance Recommendation:

- 1) Require all staff working with teacher candidates sign the Educator Code of Ethics and keep the documentation for future audits.
- 2) Require all candidates sign the Educator Code of Ethics to ensure the adherence to the code of ethics and provide the program the authority to dismiss any candidate that does not abide by it.

Based on evidence presented, ASTEP is not in compliance with Texas Administrative Code §228.50(a) regarding Professional Conduct.