

### Compliance Audit Report 2014-2015 TNTP Academy – Ft. Worth

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.state.tx.us for details.

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#### County/District Number: 220707

#### SBEC Approval Date: 2005

Program Specialists, Lorrie Ayers, and Mixon Henry conducted a Texas Education Agency Compliance Audit of TNTP Academy – Ft. Worth on April 21 – 23, 2015. The focus of the compliance audit was the Pedagogy & Professional Responsibilities EC-12 certification program. 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, and §230.

#### 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 staff were sent to TNTP Academy – Ft. Worth stakeholders. The following responses were recorded: two (2) out of four (4), 50%, from advisory committee members; twenty-eight (28) out of seventy-eight (78), 36%, from educator candidates; four (4) out of seven (7), 57%, from field supervisors; twelve (12) out of thirty-eight (38), 32%, from principals; and two (2) out of twenty-eight (28), 7%, from cooperating teachers/mentors. Qualitative and quantitative methodologies of content analysis, cross-

referencing, and triangulation of the data were used to evaluate the evidence. Compliance was measured using a rubric aligned to Texas Administrative Code.

#### Findings, Compliance Issues, and Recommendations:

"Findings" indicate evidence 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. "Compliance Recommendations" provide input for correcting compliance issues. An Action Plan may be drafted during the visit that identifies compliance issues to be addressed and a timeline for completion. If no Action Plan is drafted during the audit visit, the EPP will be expected to submit a Compliance Status Report to provide evidence of corrective action taken to remedy all 'out of compliance' issues. "General Recommendations" are suggestions for general program improvement and no follow up is required.

#### **Opening and Closing Session:**

Both the opening session on April 21, 2015 and the closing session on April 23, 2015 were attended by Stacy Miles, Taylor Noyes, and Jarred Gibson. During the Opening Session, TNTP Academy – Ft. Worth staff presented an overview of the program form and function. TEA staff presented general information about the audit process followed by information and data collected specifically for the TNTP Academy – Ft. Worth program, including official and unofficial pass rates and stakeholder feedback.

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

#### Findings:

- 1) Staff participation in the opening and closing sessions as well as their assistance in the audit are evidence that TNTP Academy-Ft. Worth personnel are actively engaged in the success of the educator preparation program. [TAC §228.20]
- The Advisory Committee for TNTP Academy is composed of two (2) staff members, two (2) members representing business/community, two (2) members representing K-12 public schools, and one (1) representative from higher education. [TAC §228.20(b)]
- 3) Advisory committee meeting minutes indicate the members are trained in, and perform, their roles and responsibilities. [TAC §228.20(b)]
- 4) Advisory committee meeting minutes document two (2) meetings per year in which program design, delivery, and evaluation are discussed. [TAC §228.20(b)]
- 5) TNTP Academy Ft. Worth is currently approved for the following certification fields: four (4) primary/EC-6; seven (7) middle school/4-8; sixteen (16) secondary/6-12/7-12/8-12; two (2) all level/EC-12; and two (2) supplemental certificates.

Based on the evidence presented, TNTP Academy – Ft. Worth is IN COMPLIANCE with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.

#### **GENERAL RECOMMENDATIONS:**

- Implement a process for annual training of advisory committee members.
- Develop a process for documenting committee member input in the meeting minutes.

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

#### FINDINGS:

- 1) All requested candidates' records were available for review.
- According to the TNTP Academy website, the program requires a minimum GPA of 2.5 for admissions. Candidates' records verify that the program admits candidates with a 2.5 or higher GPA. [TAC §227.10(a)(3)(A)]
- 3) Per candidates' records, candidates are required to hold at least a bachelor's degree for admission into the program. [TAC §227.10(a)(2)]
- 4) Texas Administrative Code (TAC) §227.10(a)(3)(C) requires that candidates admitted into an educator preparation program must have completed 12 semester credit hours in the subject-specific content area for which certification is sought (15 semester credit hours in math/science if the candidate intends to teach those subjects at grade seven and above) or must have received a passing score on the relevant content certification test. Historically candidates' records contained inconsistent documentation of compliance with this rule, however current candidates' records contain evidence of compliance.
- 5) Candidates with a non-English speaking background who are seeking admission into an EPP are required to score a 26 or better on the speaking portion of the TOEFL. None of the candidates reviewed for this audit qualified for the TOEFL requirement. [TAC §227.10(a)(5)]
- 6) All applicants are required to complete an application and an interview. Interview responses are evaluated by staff that are normed in the evaluation process. The final results of the interview evaluation are reviewed by an additional person. [TAC §227.10(a)(6)]
- 7) As an additional admission requirement, candidates are required to submit a lesson plan. [TAC §227.10(a)(7)]

Based on the evidence presented, TNTP Academy – Ft. Worth is IN COMPLIANCE with Texas Administrative Code §227 – Admission.

#### **GENERAL RECOMMENDATIONS:**

• Develop a system for maintaining complete and organized candidate records.

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

#### FINDINGS:

- The candidate degree plan is divided into modules: an Enrollment Course, Pre-Service Training, the Gear Up module, and Content Seminars. Assessments of mastery are used in each module. A curriculum review indicates the curriculum is aligned with educator standards and relevant TEKS instruction is noted in the syllabi and/or coursework. [TAC §228.30(a)]
- 2) Course syllabi, lesson plans, daily activities, and assessments detail coursework that is research-based, interactive and performance-based. The Pre-Service Training (PST) modules address research-based techniques for behavior management. This curriculum employs role playing, case study evaluations, and lesson plan development as opportunities for candidates to practice skills. Candidates are given feedback on progress toward mastery. [TAC §228.30(b) & TAC §228.40(a)]
- The curriculum review indicates the curriculum addresses the following mandatory standards: a) instructional planning and delivery; b) knowledge of students and student learning; c) content knowledge and expertise; d) learning environment; e) data-driven practice; and f) professional practices and responsibilities. [TAC §228.30(b) & TAC §149]
- 4) The 5 components of mandatory reading instruction (phonetics, vocabulary, fluency, comprehension, and phonemic awareness) are taught in both the Generalist EC-6 and Bilingual Generalist EC-6 curricula. Other content area curricula do not address phonemic awareness or phonetics and do not have substantive vocabulary instruction. [TAC §228.30(b)]
- 5) Texas Administrative Code (TAC) §228.30(b)(4) requires that educator candidates receive instruction in detection and education of students with dyslexia. The TNTP Academy curriculum does not address dyslexia training. A discussion with program staff revealed they did not understand that this rule, based on the wording, applied to Alternative Certification programs.
- 6) According to TEC §21.044(c-1) and (c-2), candidates must receive instruction in the detection of students with mental or emotional disorders, including characteristics and identification of common disorders and strategies for teaching students with mental or emotional disorders. TNTP Academy Ft. Worth provides this training in a content seminar. At Risk Kognito training and Region IV Texas Behavior Support Initiative are used for this purpose.
- 7) Candidates receive instruction in child development but each candidate receives instruction only in the grade levels identified in the certification field.

- 8) Results from surveys sent to educator candidates revealed that 68% or fewer TNTP Academy candidates felt adequately prepared in the following areas: reading strategies, dyslexia training, learning theories, STARR test administration, the curriculum development process, differentiating instruction for special education, gifted and talented, and limited English proficient students, conducting parent conferences, using instructional technology in the classroom, and identifying students with mental and emotional disorders.
- Principal feedback indicated that candidates were not well prepared to meet the needs of diverse learners such as limited English proficient students and students with disabilities.
- 10) Results from surveys sent to educator candidates revealed that 92% or more of candidates felt well prepared in the following areas: instructional methods for motivating students, using TEKS in instruction, developing lessons, using a variety of classroom assessments, using formative assessments to diagnose student learning needs, instructional strategies, and classroom management techniques.

#### COMPLIANCE ISSUES TO BE ADDRESSED:

- The 5 elements of mandatory reading instruction including phonics, fluency, comprehension, vocabulary, and phonemic awareness, must be provided for candidates in all content areas including Generalist EC-6 and Bilingual Generalist EC-6. [TAC §228.30(b)]
- Mandatory instruction in characteristics of dyslexia and in identifying and teaching students with dyslexia must be provided for candidates in all content areas. [TAC §228.30(b)(4)]
- 3) Candidates do not receive instruction in development of children at all ages as required by the Pedagogy & Professional Responsibilities EC-12 standards.

## Based on evidence presented, TNTP Academy – Ft. Worth is NOT IN COMPLIANCE with Texas Administrative Code Section §228.30 – Educator Preparation Curriculum

#### COMPLIANCE RECOMMENDATIONS:

- 1) Review and update curriculum for all content areas to insure the 5 components of mandatory reading instruction, including phonics, fluency, comprehension, vocabulary, and phonemic awareness, are effectively taught to all candidates.
- 2) Add mandated dyslexia training to the curriculum so that all educator candidates receive instruction in: characteristics of dyslexia, identifying students with dyslexia, and strategies for teaching students with dyslexia.
- Modify curriculum for all content areas so all candidates receive instruction in child development at all age levels.

#### **GENERAL RECOMMENDATIONS:**

- Review candidate feedback and update curriculum to provide more instruction in those areas in which candidates have said they feel deficient.
- Consider updating curriculum to add more information on differentiating instruction earlier in the year to give candidates more tools to use in the classroom during the internship.

#### COMPONENT IV: PREPARATION PROGRAM COURSEWORK AND/OR TRAINING – Texas Administrative Code (TAC) §228.35

#### FINDINGS:

- Coursework is well-planned, sequential, and organized. Behavior management and classroom structure are emphasized. Training is focused on teacher effectiveness. [TAC§228.35(a)(1)]
- 2) Per the Pre-Service Training (PST) course schedule, candidates learn a technique during direct instruction and then practice the technique in a classroom the following day. Candidates are rated and counseled on their implementation of the technique.
- 3) According to TAC §228.35(a)(3), the EPP shall provide each candidate with a minimum of 300 clock hours of coursework and training. Review of the TNTP Academy course schedule revealed only 281.5 hours of coursework in the following courses: 1) Enrollment course (20 hours); 2) PST course (198.5 hours); 3) Gear Up course (18 hours); and 4) Content Seminars (45 hours). Combined hours completed in the Enrollment Course (20), in Pre-Service Training (198.5), and in Gear Up (18), insure that candidates complete a minimum of 236.5 hours of coursework and training prior to internship [TAC §228.35(a)(3)(B)]
- 4) TNTP Academy Ft. Worth educator candidates complete 50 hours of field-based experience through practice teaching and observations in summer school classes. This occurs as part of Pre-Service Training prior to beginning internship. Time logs, signed by instructors and retained in candidates' records, document candidate completion of this requirement. There is no documentation to verify the specific content of the Fieldbased experiences or that they occur in a variety of settings. [TAC §228.35(a)(3)(A) and §228.35(d)]
- 5) Review of the candidates' records reveals evidence that the candidate internships are completed according to TAC, including correctly issued probationary certificates, placements as 'teacher of record', and completion of the required 180 days. [TAC §228.35(d)(2)]
- Appropriate 'late hire' documentation was found in candidates' records [TAC §228.35(d)(2)(B)]
- 7) Documentation of completed benchmarks in Teacher Track is evidence that candidates complete all program requirements prior to being recommended for certification.

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- 8) Candidates are assigned on-site mentors during the internship. Mentors are trained using the Fort Worth ISD mentor teacher training. Documentation of mentorship and training is found in candidates' records. [TAC §228.35(e)]
- 9) Candidates are supervised formally and informally during the internship by certified and experienced Field Supervisors. Review of teaching certificates and resumes provides evidence of Field Supervisor credentials. Field Supervisors are trained through online training given across multiple states. Online attendance logs document attendance at training. [TAC §228.35(f)]
- 10) Field Supervisors conduct three to five (3-5) observations of each candidate per intern year as verified in the candidates' records. In the survey responses, Field Supervisors verified that three observations are also provided for candidates on second and third year probationary certificates. Field Supervisors are required by TNTP Academy to conduct the observation for the duration of a class period. The time is documented in Teacher Track. [TAC §228.35(f)]
- 11) TNTP Academy Ft. Worth employs Program Coaches to provide timely and ongoing informal coaching and mentoring to candidates while in the internship. A review of credentials revealed that, while many of the Program Coaches had significant teaching experience, several Program Coaches have minimal (less than 3 years) classroom teaching experience.
- 12) According to TAC §228.35(f), Field Supervisors must make initial contact with candidates within the first three weeks of the internship assignment. The TNTP Academy candidates meet with "Program Coaches" but not with Field Supervisors during this time period.
- 13) The first formal observation of the candidate must occur within the first six weeks of the internship assignment. Historical candidates' records revealed inconsistent compliance with this rule. Current candidates' records provide evidence that the program is consistently compliant with this rule. [TAC §228.35(f)(2)]
- 14) According to TAC §228.35(f), Field Supervisors should document instructional practices observed during the formal observation time period. In addition, the Field Supervisor must conduct an interactive conference with the candidate observed and provide a copy of the observation record to the campus administrator. A review of Field Supervisor documentation revealed that instructional practices are effectively recorded however feedback is not given directly to candidates but instead is routed through Program Coaches and is often not provided in a timely or interactive fashion. There is no documentation to support that campus administrators receive copies of the formal observation results.
- 15) In survey responses, Field Supervisors indicated they never communicate with Mentor teachers regarding the performance or progress of the educator candidate.
- 16) TNTP Academy Ft. Worth currently has no candidates in out-of-state or out-of-country placements.

#### COMPLIANCE ISSUES TO BE ADDRESSED:

- 1) Coursework hours do not equal a minimum of 300 clock hours. [TAC §228.35(a)(3)]
- There is no documentation that field-based experience hours occur in a variety of settings and no documentation regarding candidate experiences within the field-based experience hours. [TAC §228.35(d)]
- 3) Field Supervisors do not make initial contact with candidates within the first three weeks of the internship. [TAC §228.35(f)]
- Field Supervisors do not hold interactive conferences with candidates following an observation. Feedback from the observation is not relayed to the candidate in a timely fashion. [TAC §228.35(f)]
- 5) There is no documentation to support that campus administrators are given a copy of the candidate's observation results. [TAC §228.35(f)]

Based on evidence presented, TNTP Academy – Ft. Worth is NOT IN COMPLIANCE with Texas Administrative Code Section §228.35 – Preparation Program Coursework and/or Training.

#### **COMPLIANCE RECOMMENDATIONS:**

- 1) Review coursework and add direct instruction to bring total coursework hours up to a minimum of 300 clock hours.
- 2) Require candidates to document specific time spent in each grade level and content area during field-based experience hours. Include a summary of the activities in each setting as evidence that experiences are interactive and under the supervision of experienced educators. Retain documentation in candidates' records. [TAC §228.35(d)]
- Build 'meet and greet' time into one of the courses so that candidates and Field Supervisors can complete the initial meeting requirement, such as during the Gear Up course which occurs immediately prior to internship. [TAC §228.35(f)]
- 4) Discontinue the practice of using the Program Coach to deliver feedback generated by the Field Supervisor during the formal observations. Train Field Supervisors to hold timely interactive conferences with candidates following observations. Develop a process for documenting the interactive conference such as altering the observation form to reflect observation and conference dates and times which can then be signed by both the Field Supervisor and the candidate. [TAC §228.35(f)]
- 5) Develop a process for ensuring that campus administrators are given copies of the formal observation results. Some options for documentation are: 1) send the observations electronically and request a 'Read Receipt' as evidence of receipt; or 2) require Field Supervisors to hand deliver the observation form and obtain a signature from the administrator or designee on a copy of the observation form.

#### **GENERAL RECOMMENDATIONS:**

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- Insure that personnel employed to coach candidates have enough classroom experience to be able to provide effective coaching.
- Create lines of communication between Field Supervisors, the EPP, and mentor teachers to maximize the internship experience for the candidate.

#### COMPONENT V: ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT – Texas Administrative Code (TAC) §228.40

#### FINDINGS:

- Numerous benchmarks are in place to track candidate progress through the TNTP Academy program. Candidates first complete the Enrollment course and the Pre-Service Training course. Upon completion of the PST, candidate receives a notification letter and an exit interview. Candidates must then complete the Gear Up course and the Content Seminars. Following completion of coursework and internship, candidates are given an End of Year Review which consists of a) Program Completion; b) Essential Traits Review; and c) ACE Screen (student surveys, principal survey, observations results). [TAC §228.40(a)]
- Candidates are given six (6) hours of test preparation either in a face-fo-face format or online. [TAC §228.40(b)]
- 3) TNTP Academy uses multiple tools to measure and monitor program effectiveness. Information is gathered from two (2) candidate surveys each year. In addition, an IES Impact Study conducted in 2013 and a Louisiana Value Add Study conducted in 2012 have been accessed to identify areas for program improvement. [TAC §228.40(c)]

Based on evidence presented, TNTP Academy – Ft. Worth is IN COMPLIANCE with Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates for Certification and Program Improvement.

# COMPONENT VI: PROFESSIONAL CONDUCT – Texas Administrative Code (TAC) §228.50

#### FINDINGS:

 Historically, candidates received training regarding ethics in education but candidates were not required to sign agreements to "abide by" those ethics. Current candidates watch TEA ethics training videos and sign agreements of adherence to the Educator Code of Ethics. [TAC §228.50]  Signed agreements of adherence to the Educator Code of Ethics were on file for all instructors except Content Seminar instructors. Signed agreements from the Content Seminar instructors were presented to auditors prior to close of the audit.

Based on evidence presented, TNTP Academy – Ft. Worth is IN COMPLIANCE with Texas Administrative Code §228.50 – Professional Conduct.

COMPONENT VII: RULES FOR PROBATIONARY CERTIFICATES – Texas Administrative Code (TAC) §230.37

#### FINDINGS:

- Review of the candidates' records revealed that each candidate placed in an internship held a probationary certificate that was appropriate to the grade level and content area in which certification was being sought. [TAC §230.37(a)(2) & TAC §230.37(b)(3)(B)]
- 2) A records review revealed that all candidates in EC-6 placements had passed the appropriate content test prior to issuance of the probationary. [TAC §230.37(e)(1)(A)]
- All candidates in secondary placements qualified for a probationary certificate by either passing the relevant content test or by having 24/12 hours in the relevant content area. [TAC §230.37(e)(1)(B)]
- 4) There are no candidates placed in Special Education assignments.

Based on evidence presented, TNTP Academy – Ft. Worth is IN COMPLIANCE with Texas Administrative Code §230.37 – Rules for Probationary Certificates.

#### **GENERAL PROGRAM RECOMMENDATIONS:**

#### **General Recommendations**

- Align EPP terminology with TEA terminology found in Texas Administrative Code (TAC).
- Review data entry and reporting procedures with staff to ensure that candidate information reported to state and federal government entities is accurate.

#### **Standard Recommendations for all Educator Preparation Programs:**

- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about current Texas Administrative Code;
- Continue to participate in webinars provided by the Division of Educator 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.
- Ensure that TEA staff has the most current contact information by sending updates to the assigned program specialist.