



## Compliance Audit Report 2015-2016 ACT Houston - Dallas

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](http://www.tea.texas.gov) for details.

### **Contact Information: Dr. Bobette Dunn**

**County/District Number: 101723**

**SBEC Approval Date: January 1, 2009**

Program Specialists, Lorrie Ayers and Mixon Henry, conducted this Texas Education Agency Training Compliance Audit of ACT Houston - Dallas at Southern Methodist University in Dallas, Texas, on April 19-21, 2016. The focus of the compliance audit was the Pedagogy and Professional Responsibility curriculum required for initial teacher certification.

### **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 on March 22, 2016. A 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 ACT Houston - Dallas stakeholders and responses are as follows: Sixteen (16) out of twenty-nine (29) advisory committee member; two hundred two (202) out of four hundred ninety-four (494) clinical teachers/interns; eighty-seven (87) out of four hundred thirteen (413) principals; one hundred eight (108) out of three hundred thirty-two (332) cooperating teachers/mentors, and

eighteen (18) out of nineteen (19) field supervisors responded. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. Evidence of compliance was measured using a rubric aligned to Texas Administrative Code.

### **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 correct the issue IMMEDIATELY. A “compliance plan” may be drafted during the audit 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.

### **Audit Process:**

The TEA compliance audit is an interactive audit which required participation of ACT Houston – Dallas, Dr. Bobette Dunn, Sara Green, Janis Green, Vicki Aldridge, and Marylou Buntyn. They assisted Mr. Mixon Henry in the review of evidence. All documents, except for student records, were submitted in advance of the on-site audit. At the end of the review of the documents and student records, the audit rubric was scored and results shared with the ACT Houston – Dallas, staff. A Compliance Plan was created to address the compliance issues noted in the audit.

The following are findings and recommendations for program improvement.

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

### **FINDINGS:**

- Program support was indicated by the governing body of ACT Houston - Dallas per TAC §228.20(c) as evidenced by the participation and cooperation of Owner and Director Bobette Dunn and staff in various stages and steps of the compliance audit.
- The advisory committee consists of twenty-six (26) members: twenty-one (21) members are from local school districts, one (1) member is from higher education, four (4) member represent community/business interests. ACT Houston - Dallas meets TAC §228.20(b) requirements for advisory committee composition.
- ACT Houston - Dallas provided evidence of two (2) advisory committee meetings over the last three academic years. Agendas, minutes, and sign in sheets were available as evidence of past advisory committee meetings. The program meets the requirements for conducting a minimum of two advisory committee meetings per academic year as required by TAC §228.20(b).
- ACT Houston - Dallas addresses the required items of design, delivery, program evaluation, and major policy decisions in the advisory committee minutes. The minutes verified items were presented and discussed thus demonstrating assistance by the advisory committee in the areas required by TAC §228.20(b).

- ACT Houston - Dallas documented training of the advisory committee members on their roles and responsibilities using the TEA advisory committee training during the following meetings: October 25, 2012, June 13, 2013, October 24, 2013, June 12, 2014, November 6, 2014, June 10, 2015, and October 29, 2015.

**Compliance Issues to be addressed:**

- No compliance issues noted

**Recommendations:**

- Consider rolling terms for advisory committee members in order to add new points of view;
- Establish what constitutes a quorum in order to conduct advisory committee business;
- Explore the use of technology to conduct the advisory committee meetings;
- Provide Continuing Professional Education (CPE) credit to the advisory committee members who need to earn hours toward certification renewal.

Based on the evidence presented, ACT Houston - Dallas is **in compliance** with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.

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

**FINDINGS:**

- Requirements for admission to the program are posted on the ACT Houston - Dallas website. These requirements are applied consistently to all candidates (TAC§227.10(a)(7)).
- The program requirement was a 2.5 GPA for admission. When reviewing candidate files, one GPA was below the 2.5 GPA required by TAC rule. The candidate was admitted in 2009 prior to TAC rule denoting processes for admitting candidates with a low GPA. In discussions with program director and staff about future direction of the TAC rules, it was found there needed to be a policy in place with a letter in the candidate's file to provide the justification for the work experience being equivalent to the GPA and soon to be a required PACT exam. This currently is not considered a compliance issue.
- Transcripts from accredited universities and colleges verified a baccalaureate degree and the required 12 hours in the candidates' specific content field or 15 hours in Mathematics and Science (10 of 10 candidate folders) [TAC§227.10(a)(3)(C)].
- All candidate records reviewed had an application [TAC§227.10(a)(6)].

- Basic skills were satisfied through the completion a bachelor's degree as identified in the Texas Success Initiative (TSI) exemption. In addition, the program also had documentation on transcripts of past testing to identify basic skills has been met.
- The screening device used by the program is the Watson Glaser Critical Thinking Skills Test. Results of this test were identified in each candidate's folder. Additionally, a writing sample is required and is assessed with a rubric which has a cut score. The program does an interview, but it is an informal interview with no scoring rubric or cut score. The program meets the requirement of interview or other screening devices. The program's search for meaningful screening devices is a clear indicator of evaluating candidates prior to admissions which meets TAC§227.10(a)(6).
- Required references were found in the candidates' folders to verify the adherence to the program's additional requirements.
- There was one out-of-country applicant chosen in the folder review. Candidates' whose first language is not English must demonstrate competence in the English language by submission of an official minimum score on the written or computer-based Test of English as a Foreign Language (TOEFL) with a speaking score of 26. Addition requirements include having the applicant's transcripts from an out-of-country non-English speaking university evaluated by an approved evaluation service. The one candidate had the transcript reviewed, but was missing the TOEFL exam. [TAC §227.10(7)]. Since the out-of-country applicant had no language proficiency exam (TOEFL), the program was out of compliance on this issue.

**Compliance Issues to be addressed:**

- Require a language proficiency exam (TOEFL) for out-of-country candidates

**Recommendations:**

- Create policy and gain input from the Advisory Committee to determine what work experience would equate to a 2.5 GPA.
- Consider limiting the additional requirements to items that address the skills, knowledge, and disposition of successful applicants.

Based on the evidence presented, ACT Houston - Dallas is **not in compliance** with TAC §227 - Admission and Certification Criteria.

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

**FINDINGS:**

- ACT Houston - Dallas is approved to offer teacher certification in fifty-three (53) content fields and four (4) supplemental fields.
- In discussing the numerous certification fields that ACT Houston – Dallas is approved, it was shared that the program did not have content curriculum for each of the certification fields. ACT Houston – Dallas has curriculum for Core EC-6 and PPR, but no content curriculum for the 50+ other fields. This was discussed and noted as a compliance

issue. The resolution is to create curriculum for the other certification fields or require the Pre-Admission Content Test prior to admission.

- In reviewing the content and Pedagogy and Professional Responsibilities curriculum, it was noted that the educator standards were identified in the syllabi or modules, as well as identified specific topics required in the curriculum. This meets the requirement of TAC §228.30(a);
- The content and Pedagogy and Professional curriculum addressed the relevant Texas Essential Knowledge and Skills (TEKS). Additionally, TEKS are reflected in the activities and identified in candidates' lesson plans created in the courses. TEKS are woven into all courses so candidates' can implement TEKS in lessons plans. The module which directly addresses TEKS is *Curriculum & Instruction*. The program instructors focus on role modeling the classroom environment and create performance based activities. These activities are assessed formally or informally. This meets the requirements [TAC §228.30(a)];
- Assessments were noted in the curriculum. The majority of the activities were assessed with lesson plans and mini-teach opportunities. The program's term used to identify informal or formal assessments was tickets. This was identified when evaluations were used.
- Technology is addressed in two specific courses; *Foundations for Effective Teaching* and *Curriculum Planning and Instructional Strategies*.
- Sufficient evidence was presented to verify that all candidates received instruction in: dyslexia and mental and emotional health [TAC §228.30(a)(4)]. Dyslexia was taught in *Reading: Equity for the Exceptional Learner*. Mental Health & Emotional Disorders was presented in *Foundations*.
- Instruction in reading (phonetics, phonemic awareness, vocabulary, reading comprehension, and fluency) can be identified in *Reading and Instructional Strategies* and *Reading* (TAC §228.30(b)).
- The Educator Code of Ethics is taught in *Foundations for Effective Teaching*. Each candidate signs the code of ethics to verify to the understanding and adherence.
- Instructors for ACT Houston - Dallas are certified educators with a graduate degrees.

#### **Compliance Issues to be addressed:**

- Missing content curriculum for many certification fields.

#### **Recommendations:**

- Create more formal assessments per course/module to identify mastery of the knowledge and skills identified in educator standards
- Increase the number of lesson plans required to be created, critiqued, or expanded by the candidates in every course leading to certification in order to mirror the expectations for practicing classroom teachers to plan, instruct, and assess instruction. Provide an instructional scenario and have the candidate plan the lesson to adapt to several variables (learning style, differentiation, etc.) Provide a

completed lesson plan and have the candidates modify it according to several variables. Also, have candidates complete a series of interrelated lessons into a unit of instruction to develop the skill of building on knowledge.

- Provide more differentiating instruction strategies in special populations' coursework (Gifted and Talented and Limited English Proficiency identified in mentor questionnaires).
- Develop additional coursework which deals with data management and interpretation to determine and address the learning needs of students.
- 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 and counted toward the required 300 clock hours. 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/>.
- Utilize the mental and emotional health training approved by the Department of Human Resources and TEA. You may use any resources from other mental health organizations that you feel addresses the requirements of the law.
- Utilize the ethics training and the assessment of the training found at <https://www.youtube.com/playlist?list=PLYCCyVaf2g1vuF3qIz1NjEWFEMtxaBMvC> or use the information below.

A breakdown of the [ethics training](#) (outside source) is available.

The training is located on our TEA YouTube channel, and a playlist called "Texas Education Agency Teacher Ethics Training" is available to stream the ten video segments. Assessment for the training is available [here](#), and while it is not required, it is recommended.

**Module 1 (3 video segments)** - Boundaries, approximately 25 minutes in length

**Module 2 (2 video segments)** - Social Media, approximately 10 minutes in length

**Module 3 (3 video segments)** - Anger Management, approximately 10 minutes in length

**Module 4 (2 video segments)** - Behavior off Campus, approximately 10 minutes in length

The purpose of this training is to make teachers aware of their actions and hold them accountable for their behavior. Organizations are encouraged to keep a

record signed by the educator that they have been trained on ethics. We also encourage teachers and education organizations to revisit ethics regularly to ensure that educators know and understand the district procedures in case an issue ever arises.

Based on evidence presented, ACT Houston - Dallas is **not in compliance** with Texas Administrative Code Section §228.30 – Educator Preparation Curriculum.

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

### **FINDINGS:**

- The program’s curriculum is presented in a face-to-face format.
- The total program consists of 315 clock hours as required in TAC §228.35(a)(3). The program has a system that tracks course and date of completion.
- In reviewing the program hours, it was noted ACT Houston – Dallas accepts district or campus training hours (50 clock hours) which is allowed by Texas Administrative Code with appropriate documentation from the district or campus. The documentation was supplied by the candidate without district verification.
- Thirty clock hours of field-based experience (FBE) are required by the program. The FBEs logs identified reflections of the experience and documentation of a student interactive component; however, there was lack of a variety of settings. The program does not meet the requirements of TAC §228.35(d). Discussions were held with program staff on how to clarify and document the variety of setting to enhance the field-based experience.
- Eighty hours of coursework prior to clinical teaching or internship was provided as per TAC §228.35(a)(3)(B). The program tracks the courses and FBEs, prior to recommending for a probationary certificate. In reviewing folders, all candidates had the required hours.
- Candidate that were identified as a clinical teachers were required to complete a minimum of 14 weeks per TAC §228.35(d)(2)(A). This was verified by review of the candidate records.
- Per TAC §228.35(d)(2)(C), in the alternative certification program, an internship of 180 school days or an academic year is an option for teaching candidates. This was also verified by review of the candidate records.
- In review of the candidate records, all candidate assignments matched the certification field for which the individual was accepted into the program and trained. This was verified by review of the candidate records.
- According to TAC §228.35(e), ACT Houston - Dallas candidates were assigned cooperating teachers or mentors. ACT Houston – Dallas provided face-to-face training

for cooperating teachers and mentors. Sign-in sheets and training materials were provided by the program verified the training was provided by the ACT Houston - Dallas. Additionally, the program representative, cooperating teacher or mentor, and candidate meet three (3) times during the candidate's practicum experience to support the candidate in the field.

- Supervision of each candidate is conducted with the structured guidance and regular ongoing support of experienced educators. Training of field supervisors took place in a meeting which was held in August. This satisfies TAC §228.35(f) for training of field supervisors.
- Initial contact by the field supervisor was verified as completed by email or phone within 48 hours of the candidate's placement. This meets the required by TAC §228.35(f).
- Four observations conducted by ACT Houston - Dallas meets standards outlined in TAC §228.35(f)(3), during internship or clinical teaching. Observation forms were found in the candidates' records.
- All four observations forms [TAC §228.35(f)(4)] indicated a start and stop time reflecting at least 45 minutes in duration [TAC §228.35(f)].
- The first observation was conducted within four to five weeks of clinical teaching or internship placement as recorded on the observation forms in candidates' records and field supervisor logs TAC §228.35(f)(2).
- The field supervisor denoted specific instructional practices observed during the observation. The interactive conference with the candidates was documented on the observation forms located in candidates' records TAC §228.35(f).
- The program provided a copy of the written feedback to the candidate's campus administrator or designee which is required by TAC §228.35(f).

**Compliance Issues to be addressed:**

- Require a candidate FBE log of field base experiences verifying that the observation took place in a variety of settings with a variety of students populations (15 clock hours) required by code. Maintain the FBE logs in the candidates' records for audit purposes.
- Require that district training (50 clock hours) be verified by documentation directly from the district. Maintain the documentation in the candidates' records for audit purposes.

**Recommendations:**

- Provide mentor teachers continuing professional education credit (CPE) for assisting a beginning teacher. (45 clock hours)

Based on evidence presented, ACT Houston – Dallas **is not in compliance** with Texas Administrative Code Section §228.35 – PROGRAM DELIVERY AND ON-GOING SUPPORT.

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

### FINDINGS:

- ACT Houston - Dallas has benchmarks documenting a candidate's process through the program as prescribed by TAC §228.40(a). The benchmarks are records of completion of: Preparation Program Institute; 30 hours of FBEs; Professional Readiness and Behavior Management Workshop; remaining coursework; and internship/clinical teaching. This is tracked per candidate and documented in the candidates' folders.
- Criteria to determine the candidate's readiness to test [TAC §228.40(b)] is outlined in policies and procedures for candidates. The candidate must complete six (6) hours of test preparation which includes "Certified Teacher" and a release test. This is followed by a feedback session prior to being recommended for a TExES exam.
- ACT Houston – Dallas' program evaluation reviews internal and external information gathered from principals, mentors/cooperating teachers, field supervisors, completers and candidates. The program has documented the presentation of the yearly evaluation to the advisory committee. This meets TAC §228.40(c) for program evaluation.
- 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 program completion in a secure environment.

### Compliance Issues to be addressed:

- No compliance issues were noted

### Recommendations:

- Contact past graduates (1-2-3 years removed from program) for feedback and insight to what are their perspective of the strengths and weaknesses of the program.

Based on evidence presented, ACT Houston - Dallas is **in compliance** with Texas Administrative Code §228.40 – ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT.

## COMPONENT VI: Professional Conduct (TAC) §228.50

### Findings:

- ACT Houston - Dallas provided evidence that instructors and staff working with candidates have signed the Educator Code of Ethics. ACT Houston - Dallas provided the signed code of ethics form per staff member.
- Candidates are provided instruction about the Educator Code of Ethics in coursework, along with the TEA ethics training, and each candidate signed a copy of the Educator Code of Ethics. By the candidate's signature, they indicate that they have read, understand, and will abide by Chapter 247 of this title (relating to Educators' Code of Ethics).

**Compliance Issues to be addressed:**

No compliance issues noted

Based on evidence presented, ACT Houston - Dallas is **in compliance** with Texas Administrative Code §228.50 – Professional Conduct.

**COMPONENT VII: Complaints and Investigations Procedures TAC§228.70**

**Findings:**

- ACT Houston - Dallas adopted and sent to TEA staff, for inclusion in their EPP's record, a complaint procedure that requires the EPP to timely attempt to resolve complaints at the EPP level before a complaint is filed with TEA staff. [TAC 228.70 (1)]
- ACT Houston - Dallas has posted on its website a link to the TEA complaints website and information regarding how to file a complaint under the EPP's complaint policy [TAC 228.70 (2)]
- ACT Houston - Dallas has posted a notification at all of its physical site(s) used by employees and candidates, in a conspicuous location, information regarding filing a complaint with TEA staff in accordance with subsection (c)(1) of this section [TAC 228.70(3)]. Photos were provided to verify the postings.
- Upon request of an individual, the EPP shall provide information in writing regarding filing a complaint under the EPP's complaint policy and the procedures to submit a complaint to TEA staff in accordance with subsection (c)(1) of this section [TAC 228.70(4)].

**Compliance Issues to be addressed:**

No compliance issues noted

Based on evidence presented, ACT Houston - Dallas is **in compliance** with Texas Administrative Code §228.70(a) regarding Complaint Policy.

**COMPONENT VIII: Rules for Issuances of Certificates (TAC) §230**

**Findings:**

- ACT Houston - Dallas requires candidates to pass the TExES exam Generalist EC-6, Generalist 4-8, Core EC-6 or Core 4-8 prior to recommendations for a probationary certificates.
- Secondary candidates must pass the content test in their certification field prior to their recommendation for the probationary certificate.

- Candidates in the EC-12 certification areas must pass the TExES exam for their content area prior to the recommendation for the probationary certificate.
- For the recommendation for a standard certificate, ACT Houston - Dallas requires all coursework be completed, pass both the content exam and PPR exam, and have a successful clinical teaching or intern experience Texas Administrative Code §230.37.
- In review of the candidate records, all candidate 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 interns were issued the appropriate probationary certificate and classified as “teacher” of record on the campus PEIMS data. This was verified by review of the candidate records.

**Compliance Issues to be addressed:**

No issues identified

Based on evidence presented, ACT Houston - Dallas **is in compliance** with Texas Administrative Code §230.37 regarding issuance of certificates.

**General 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;
- Continue to participate in webinars provided by the Division of Educator Preparation 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.