



Compliance Audit Report 2011-2012 Education Career Alternatives Program, Ltd. (ECAP) 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 rules required by the Texas legislature for the regulation of all educator preparation programs in the state. Please see the complete Texas Administrative Code rules at www.tea.state.tx.us for details.

Contact Information: Ms. Sharon Fikes, Executive Director

County/District Number: 220-701

SBEC Approval Date: November 17, 2000

Program Specialists, Vanessa Alba and Mixon Henry, conducted a Texas Education Agency (TEA) Compliance Audit of Education Career Alternatives, Ltd. (ECAP), 6331 Grapevine Hwy, Bldg. 26, North Richland Hills, Texas 76180 on April 23-25, 2012, as required by Texas Administrative Code (TAC) §229.6(a). The focus of the compliance audit was the ECAP initial preparation program and the Generalist EC-6 and Special Education EC-12 certification. Because of concerns reported by ECAP in the draft report, a verifying audit was conducted on October 2 and 3, 2012, by Educator Preparation Program Manager, Sandra Jo Nix, and State Title II Director, Scott Lewis. This report is a combination of those findings and recommendations. Please be aware that the verifying audit was not a full audit and was conducted only to verify the original findings.

Scope of the Compliance Audit:

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

Data Analysis:

Information concerning compliance with TAC governing educator preparation programs was collected by various quantitative and qualitative methodologies. A self-report was submitted to

TEA on March 21, 2012. An on-site review of documents, candidate records, course materials, online courses, and curriculum correlations charts provided evidence regarding compliance. In addition, electronic questionnaires were sent to one hundred ninety-eight (198) ECAP stakeholders by TEA staff. A total of seventy-six (76) responses were received. They included: Nine (9) out of fourteen (14) advisory committee members; twenty-five (25) out of sixty-nine (69) clinical teachers and interns; ten (10) out of fourteen (14) field supervisors; twenty-five (25) out of seventy (70) campus principals; and seven (7) out of thirty-one (31) cooperating teacher/mentor responses. Qualitative methods of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. Evidence of compliance was verified using a rubric correlated to Texas Administrative Code.

Opening and Closing Session:

The opening session on April 24, 2012, was attended by Ms. Sharon Fikes, Executive Director; Mr. Scott Fikes, Deputy Executive Director; Mr. Micah Fikes, Coordinator for Technology and Curriculum; and Ms. Sheryl Woods, Online Learning Director. The ECAP team did not present an opening session presentation for the TEA auditors. The closing session on April 25, 2012, was attended by the same four members of the ECAP leadership staff.

COMPONENT I: COMMITMENT AND COLLABORATION - Texas Administrative Code (TAC) §228.20 – GOVERNANCE OF EDUCATOR PREPARATION PROGRAMS

FINDINGS:

Program support was indicated by the governing body of ECAP per TAC §228.20(c) as evidenced by the participation of the following members of the leadership team in various aspects of the on-site portion of the compliance audit: Ms. Sharon Fikes, Executive Director; Mr. Scott Fikes, Deputy Executive Director; Mr. Micah Fikes, Coordinator for Technology and Curriculum; and Ms. Sheryl Woods, Online Learning Director. The ECAP staff did not attend the compliance audit training held in August and September and as a result, the program had difficulty in organizing the evidence to support that the educator preparation program met all of the standards set by TEA. At the time of the verifying compliance audit, the program was much more prepared to provide documentation.

The self-report stated that the advisory committee consists of fourteen (14) members representing three (3) groups: twelve (12) members represent public/private local school districts; one (1) member represents higher education; one (1) member represents community/business interests. Advisory committee members reported in their TEA questionnaire that they represented the following groups: Public schools (89%) and business (11%). It was noted that the data provided for advisory committee representation comes from the following two data sources: The self-report and a review of that report with the leadership team and questionnaire results. ECAP meets TAC §228.20(b) requirements for advisory committee composition.

The first advisory committee meeting of the 2011-2012 academic year was held on December 1, 2011. An agenda and minutes listing who attended was provided. The agenda reflects that the meeting was a joint advisory committee and field supervisors meeting. The items discussed as reflected in the agenda included the following: TEA audit in April 2012, survey results, and report on update to record-keeping. The second meeting for the academic year occurred on July 26, 2012. An agenda, minutes including those in attendance were presented as evidence of

compliance. Minutes were available from the 2010-2011 academic year to show consistent advisory committee involvement. The program meets the requirements for conducting a minimum of two advisory committee meetings per academic year as required by TAC §228.20(b).

Advisory committee training is available to the members on the ECAP Moodle and certificates of completion were available as evidence of making the members aware of their roles and responsibilities. The advisory committee members reported that they assist ECAP in the following areas: design (88%), evaluation (100%), and major policy decisions (100%). The advisory committee members also reported that they reviewed the curriculum (88%) and discussed field-based experiences (100%).

Based on the evidence presented, Education Career Alternatives Program, Ltd. (ECAP) 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:

According to the self-report submitted by ECAP staff, to be admitted to the initial alternative teacher certification program, the candidate must meet the following criteria:

- Provide evidence of a four degree from an accredited institution of higher learning [TAC §227.10(a)(2)];
- Achieve a GPA of 2.5 overall or in the last 60 hours [TAC §227.10(a)(3)(A)];
- Provide evidence of twelve (12) semester credit hours in a content field [TAC §227.10(a)(3)(C)];
- Pass the Pre-Admission Content Test (PACT) [TAC §227.10(a)(3)(C)];
- Demonstrate basic skills proficiency [TAC §227.10(4)];
- Exhibit adequate oral communication skills [TAC §227.10(5) and TAC §230.413(B)];
- Submit an application [TAC §227.10(6)];
- Participate in an interview [TAC §227.10(6)]; and
- Meet any other academic requirements for admission that are published and applied consistently to all educator preparation candidates [TAC §227.10(7)].

A total of twenty (20) candidates' records were reviewed to verify compliance with admission criteria. All records contained evidence that a four year baccalaureate degree had been issued prior to admission to the program and met the requirements of TAC §227.10(a)(2).

Of the twenty (20) candidates' records reviewed, seventeen (17) had a documented GPA of between 2.5 and 3.57. The documented GPA met the requirements of an overall GPA of at least 2.5 or 2.5 in the last 60 hours [TAC §227.10(a)(3)(A)]. It was noted and documented that three (3) out of twenty (20 or 15%) of candidates were admitted with a grade point average of less than 2.5 overall or in the last 60 hours. It was noted that the GPA range for the three candidates was from 2.23-2.44. In the self-report submitted by the program staff, 51 out of 674 candidates admitted or 8% had a GPA of less than 2.5. Of the twenty (20) candidates' records reviewed, it was verified that the number of candidates admitted did not exceed 10% of the cohort of candidates allowed by TAC §227.10(a)(3)(B).

During the review of the self-report with ECAP, it was noted that although a passing score on a Pre-Admission Content Test (PACT) was indicated as one of the program's admission criteria on their website [TAC §227.10(a)(3)(C)], not all applicants were admitted via the PACT route. It was also noted that a passing score on the PACT was not a requirement for admission. However, the admission criteria stated that PACT was a requirement and was published on the website, within the application, in a brochure provided by ECAP, and in the hard copy version of the Handbook for 2011-2012. Once this was brought to the program's attention, the program reviewed their admission policies and found that the admission statement was incorrectly worded and therefore confusing to potential applicants. ECAP admits candidates by taking the PACT test, but they also admit candidates with a transcript review of appropriate college/university hours. There was documentation in one candidate's file that the PACT route to admission was utilized and in another candidate's file the candidate was admitted by review of transcript.

Basic skills attainment [TAC §227.10(4)] was determined by the Texas Success Initiative (TSI) or the Texas Academic Skills Program (TASP). Three (3) of the candidates' records reviewed did not contain evidence of basic skills attainment. None of the out-of-country candidates has evidence of basic skills attainment.

Out-of-country applicants 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). In addition, the applicant must have his/her transcripts from an out-of-country non-English speaking university evaluated by an approved evaluation service [TAC §227.10(5)]. Five (5) out-of-country ECAP candidates' records were reviewed to verify compliance. It was documented in the self-report that a Bachelors or graduate degree from an accredited U.S. institution, a degree from outside of the United States with a primary language of English, or the completion of a state-approved educator preparation program within the United States were being utilized to meet the requirements for being able to speak and understand the English language sufficiently to use it easily and readily in conversation and teaching as required in TAC §227.10(5) and TAC §230.413(5)(C). It was also documented in the self-report that between 6-19 candidates had been admitted to the program that required verification of the ability to speak and understand the English language at a level where they could readily participate in conversations and respond appropriately. In the review of the Texas Administrative Code §230.413 in effect at the time of the compliance audit, completion of an approved educator preparation program was one of the acceptable items of proof of English proficiency. That specific provision was removed from the TAC effective with the 2012-2013 academic year. Since the audit was conducted prior to the revision implementation date, the program meets the requirements of TAC §227.10(5) and TAC §230.413(B). The transcript evaluation service that the program utilized was International Academic Credential Evaluator, Inc. (IACE). Transcript evaluation met the requirements of TAC §227.10(7)(e).

Twenty (20) candidates' records were reviewed for evidence of an application. All of the candidates' records reviewed contained a signed and dated application [TAC §227.10(a)(6)].

In addition to the signed application, all applicants are required to participate in screening to determine the appropriateness for the certification sought. The instrument used was the online TeacherInsight™ Assessment. The results of the assessment are confidential and the completion of the assessment was documented on a cover page in the candidates' records. The online screening process meets the requirements of TAC §227.10(6). However, the program has discontinued the use of the Gallup TeacherInsight™ Assessment and will be using the Haberman Interview in its place.

In addition, applicants to the ECAP program are required to submit two letters of professional reference. All candidates' records reviewed contained evidence of two letters of reference and meet the requirements of TAC §227.10(6).

The self-report submitted by ECAP educator preparation program stated that information about admission criteria and its program is available to the public in the following locations: their website, career fairs, school and community college visits, brochures, and "word of mouth from former candidates and school personnel who are familiar with ECAP and recommend the program". The publication of admission criteria met the requirements specified in TAC §227.10(7).

Based on the evidence presented, Education Career Alternatives Program, Ltd. (ECAP) is in compliance with TAC §227 - Admission Criteria.

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

FINDINGS:

Education Career Alternatives, Ltd. (ECAP) is approved to offer teacher certification in fifty-seven (57) certification areas. The program is also approved to offer four (4) supplemental certifications which attach to the base certificates. For the purpose of this compliance audit, the Generalist EC-6 and Special Education EC-12 certificates were selected for in-depth review. It was noted that the program offers either an ESL Generalist EC-6 or Bilingual Generalist EC-6. The majority of candidates in the program are certified at the secondary level.

According to the self-report, qualifications necessary to be selected as a course instructor requires the following:

- An advanced degree;
- Texas or out-of-state teaching certification in corresponding content and grade level;
- More than five years of experience teaching content at the specific grade level in a public or private school;
- Principal/superintendent certification; and
- Other as written in the self-report - "Personal observation by Executive Director and staff of success on a campus or in a district by course instructors/trainers. Because of the

success of former interns and principals with whom we are in personal contact we lean heavily on personal observation. We look for those who demonstrate ability to lead teachers.”

Twenty-one (21) instructors’ credentials were presented for review and criteria for selection established by ECAP were verified. The syllabi contained the names of the instructors associated with the course.

For the online courses, the following was found in the course syllabi provided: Course/module content description; goals; objectives; 17 subject matter topics addressed by course; instructional strategies; online classroom policies; and assignments tied to calendar dates.

The online portion of the curriculum was reviewed prior to the on-site audit. The online modules were as follows:

- PROB 102 Survival Training – This module is required for late hires;
- PROB 111 Survival II - This module is required for late hires. In lieu of this 3 week module, candidates had the option of emailing 5 lesson plans. Once the plans were submitted in a specific lesson plan format, received, and approved, the candidate would be given full credit for the course;
- CONT 160 – PPR Online is required of all candidates; and
- INTN 341 Web 2.0 – This module is required for all candidates.

In reviewing both the Generalist EC-6 and Special Education EC-12 certificates’ curriculum syllabi and alignment charts, it was verified that there was limited evidence that the educator standards were the curricular basis for instruction as required by TAC §228.30(a). This was particularly evident in the Generalist EC-6 certificate. Content methodology provided in the social studies and science areas need to be strengthened. Content methodology in art, physical education, music, health, and theater either need to be added or strengthened.

It was noted that the curriculum presented provided evidence that it addressed the relevant Texas Essential Knowledge and Skills (TEKS) as required by TAC §228.30(a). TEA program specialists reviewed all of the alignment charts. The alignment charts reflected what was provided as “more intense training” or that the standard was just “introduced”. The TEKS were stressed in the reading and math courses and other more content specific TEKS in the lesson planning courses.

TEA staff was provided with one copy of the face-to-face curriculum, which included the following: Academy 2011: Elementary Training; Academy 2011: Special Education Training; and Summer Academy Connections. Instruction in all of the seventeen (17) subject matter topics was verified in the face-to-face coursework as prescribed by TAC §228.30(b). Reading instruction was verified for all elementary and secondary candidates in a review of the candidates’ Internship Individual Progress Reports. The ECAP staff cited that they were weak in providing instruction in the process of curriculum development and in providing strategies for gifted and talented students.

There were 24 hours of test preparation provided for candidates prior to TExES testing as per TAC §228.30(b)(17) and TAC §228.35(a)(3)(C). This was verified in the online portion of the training. The specific online module was “CONT PPR Online”.

Clinical teachers/interns were asked to respond to a series of questions prepared by TEA and sent electronically to them in order to verify aspects of the curriculum, its delivery and its effectiveness. Four candidates commented that they felt that the program was convenient and

flexible. Three candidates commented that the summer training was informative. Individual candidate comments included responses that the curriculum in the following areas could be improved: Elementary language arts; reading instruction. The candidates also felt that the online coursework is repetitive as compared to the benefits that it provides.

Cooperating teachers/mentors responded in their questionnaire that they felt that the candidates were prepared in the following areas: Texas Educator Code of Ethics (100%); child and/or adolescent development (100%); theories of how people learn (100%); TEKS organization/structure/skills, utilizing TEKS in the content area(s) (100%); and how to develop a lesson (100%). However, they responded that the candidates were not as prepared in the following areas: reading strategies across the curriculum for all grade levels (71%); laws and standards regarding students with special education needs (71%); standards and teaching strategies for students designated as Gifted & Talented (71%); and using a variety of instructional strategies to meet individual student needs (71%).

Principals responded in their questionnaire that they felt the candidates were prepared in two areas: the use of appropriate multimedia/technology to support/extend student learning (83%) and collaboration with others to meet the academic, developmental, and behavioral needs of students (83%). They also felt that the candidates were not as well prepared in the following areas: classroom management (71%), communicating clear expectations for student achievement & behavior (71%), addressing the academic & behavioral needs of limited English proficient students (67%), meeting the academic and behavioral needs of students with disabilities (63%), and developing & interpreting formal/informal assessments that track students' progress (63%).

The campus principals also reported an overall evaluation of how well that ECAP prepared the candidates:

- Well prepared 33%
- Sufficiently prepared 25%
- Prepared in a few areas with a few areas to work on 17%
- Prepared in a few areas with many areas to work on 25%

Based on evidence presented, Education Career Alternatives Program, Ltd. (ECAP) is not in compliance with Texas Administrative Code Section §228.30 – Educator Preparation Curriculum.

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

FINDINGS:

Currently, the ECAP program is delivered in a hybrid format. The Summer Academy and the 30 hours of field-based instruction meet the requirement of a minimum of 110 clock hours prior to clinical teaching or internship. Late hires are required to complete field-based observations and coursework within 90 days of assignment via ECAP's online modules. This was verified in the individual's profile maintained by the program where the candidate was identified as a tier 2

candidate. The late hires candidates are required to complete Survival Training I and Survival Training II.

The face-to-face format courses include the following:

- Academy 2011: Special Education Training
- Summer Academy Connections

The online format courses include the following:

- PROB 102: Survival Training which is required of “late hires”;
- PROB 111: Survival II which is required of “late hires”;
- CONT 160: PPR Online which is required of all candidates; and
- INTN 341: Web 2.0 which is required of all candidates. (This class will be broken into three different classes in the future.)

Based on the information provided in the self-report and in formal conversations with the program leadership team, the total clock-hours for the program were verified through an audit of thirty-five (35) candidate Internship Progress Report. The total program clock-hours meet the required 300 clock hours set forth in TAC §228.25(a)(3). The program is in the process of reviewing their courses and clock hours and have discontinued the following: INTM 320 Intern Observations (16 clock hours), and INTN325 Additional Professional Development (30 clock hours).

Based on the information provided in the self-report, 30 clock-hours of field-based observations are required prior to clinical teaching or internship and that up to 15 clock hours of field-based experience may be provided by electronic transmission, or other video or technology-based methods [TAC §228.35(a)(3)(A)]. Using this information, TEA program specialists looked for evidence in candidates’ records of documentation of these hours. Eight (8) candidates’ records had 30 clock-hours of field-based observations documented on a cover sheet and checked as completed; four (4) candidates’ records had field-based observations documented on a cover sheet and checked as completed with a combination of classroom observations and videos; three (3) candidates’ records reviewed had documentation of more than 30 clock-hours of field-based observations documented on a cover sheet and checked as completed; one (1) out-of-country candidate’s file contained no evidence of field-based observations; one (1) transfer candidate’s file contained no evidence that any field-based observations had been completed; one (1) late-hire candidate’s file reviewed contained no documentation of any field-based observations; and one (1) candidate’s file contained evidence that 30 clock-hours of field-based observations were completed while working as a substitute teacher. The field-based observation form requires the observation date, length of observation, type of observation (video or in-school), name of teacher observes, observed teacher’s email, and school phone and responses to eight (8) additional questions to be completed during the observation. The candidate turns in the original form and its content is input into the candidate’s electronic record. Completion of the 30 clock hours of field based observations is then reflected on the Internship Progress Report. This process for field-based observations is being revised to utilize only video and in-school observations. No previous experience of any type will be considered as a replacement for field-based observations. Field-based observations meet the requirements set forth in TAC §228.35(a)(3)(A) as verified by the original candidate observation form and the program’s cumulative electronic records.

With appropriate documentation, 50 clock-hours of training may be provided by a school district and/or campus per TAC §228.35(a)(5). These hours may count toward the total 300 clock hours. At the time of the compliance audit, ECAP accepted 30 clock-hours of school district and/or campus training toward the total program hours. The program tracks documentation electronically which was reviewed. The database contained the date of training, length of training, the title of training, the name of the training provider and if a certificate was issued. The majority of the training was delivered by the school district in cooperation with the regional education service centers. The program meets the requirements of school district and/or campus training clock-hour requirements per TAC §228.35(a)(5). It should be noted that the program has discontinued allowing school or campus district training to count toward their total program hours.

TAC §228.35(a)(6) allows an educator preparation program to develop and implement specific criteria and procedures that allow candidates to substitute prior on-going experience and/or professional training for part of the educator preparation requirements, provided that the experience or training is not part of internship or clinical teaching, and is directly related to the certificate being sought. Because of a lack of documentation, it could not be verified that ECAP has appropriate policies and procedures in place.

Completion of 80 clock-hours of coursework is required prior to clinical teaching or internship. Documentation of completion of this coursework was verified on the Internship Progress Report [TAC §228.35(a)(3)(B)]. The Summer Academy for the Tier 1 candidates (the regular hires) and the Survival I and II for the Tire 2 candidates (late hires) meet these requirements. The Internship Progress Report is currently being revised to make identification of the 80 clock hours of coursework and the 30 clock hours of field based observations hours more transparent.

Clinical teaching [TAC §228.35(d)(2)(B)] consists of fourteen (14) weeks. Evidence presented in the form of clinical teacher placement information verified that clinical teaching took place in public, private, or charter schools. All placements are actual school settings rather than a distance learning lab or virtual school setting prohibited by TAC §228.35(d)(2)(C)(ii).

Per TAC §228.35(d)(2)(C), internship is required for a minimum of one academic year or 180 school days in an content area that matches the certification field for which the individual is accepted into the program. It was verified that all interns had probationary certificates and were classified as a “teacher” as reported on the campus PEIMS data [TAC §228.35(D)(2)(C)]. In reviewing the Internship Progress Reports, it was noted that one section of the report listed all the TExES examinations that many candidates had taken and passed. In checking the candidates’ TEA profiles, it was discovered that the candidates were issued probationary certificates in all of the areas where they successfully tested and were eventually recommended by ECAP for standard certificates in all of the tested areas. Candidates that experienced this irregularity could not have been supervised by the program in all of these tested areas, much less experienced an internship in all of these areas. Receiving certification is more than taking a test. The EPP should only certify in the area where the candidate has been prepared, completed an internship or clinical teaching, and successfully tested. By recommending candidates for multiple certification areas in one standard certificate recommendation, in effect, ECAP was subverting statute that allows for those certified educators to add certification by examination. By recommending candidates for multiple certifications in one standard certificate recommendation, candidates were not required to pay the fee designated for each additional certification.

Internship for the program’s candidates was verified by the internship placement records in the candidates’ files reviewed. In addition, according to TAC §228.35(d)(2)(C), the program may

permit an internship of up to thirty (30) school days less than the minimum if it is due to maternity leave, military leave, illness, or a late hire date. ECAP did not have candidates who utilized this option.

According to TAC §228.35(e), ECAP is responsible for providing cooperating teacher/mentor teacher training that is scientifically-based or verify that training has been provided by a school district or education service center. Evidence that cooperating teachers had been trained was verified by a log provided by the Deputy Executive Director. The log reflected that seven (7) cooperating teachers had been trained for the 2010-2011 academic year and fourteen (14) mentors were trained for the 2011-12 academic year. During 2010-11, the training was provided via an orientation visit by the Deputy Executive Director with each individual cooperating teacher/mentor at his/her respective campus. The log contained the name of each clinical teacher, the cooperating teacher assigned, the orientation date the name of the trainer. During the 2011-12 academic training was done in rolling sessions of a webinar conducted by Scott Fikes. This documentation of training meets the requirement per TAC §228.35(e).

Evidence in the form of a log provided by the Executive Director verified that mentor teachers had been provided for the most interns. It was also documented that thirteen (13) probationary teachers did not have a mentor assigned. The log contained the name of each probationary teacher, the mentor teacher assigned, the date of mentor training, and the type of training that was provided. It was documented that fifty-eight (58) mentor teachers received mentor training by the campus, district, ESC, and that the TxBESS training was utilized in the ECAP online mentor training module. ECAP has developed a form that asks each cooperating teacher and mentor to identify where they received their mentor training. The program meets the requirements for mentor training set forth in TAC §228.35(e).

TAC §228.35(f) states that supervision of each candidate shall be conducted with the structured guidance and regular ongoing support of an experienced educator who has been trained as a field supervisor. In a review of the fourteen (14) field supervisor vitas and credentials, it was verified that the field supervisors had Master's degrees or higher. It was also verified that each held Texas teaching certification. Training certificates were provided as evidence of 2010-2011 field supervisors training. The field supervisors were included in the advisory committee meetings for 2011-12 where training was provided. ECAP meets the requirements of TAC §228.35(f).

Texas Administrative Code §228.35(f) requires that initial contact with the candidate is made by the field supervisor within the first three (3) weeks of the candidate's assignment. First contact was verified and documented in a variety of ways and included telephone calls, emails, and face-to-face contact.

A total of three 45 minute observations must be conducted by the field supervisor during the 14 week clinical teaching assignment [TAC §228.35(f)(4); TAC §228.35(f)]. During the internship year [TAC §228.35(f)(3)], two observations must be conducted the first semester and one observation the second semester. TAC §228.35(f)(2) also states that the first observation must be conducted within the first six weeks of placement in an assignment. The length of the observations for clinical teaching and internship conducted by ECAP could not be verified because there was not a start or end time consistently noted on the reviewed observation forms. However, for the intern candidates, observations were documented in the electronic log which is maintained for TEA reporting purposes. It also could be determined by the TEA log that the date of the first observation was conducted within the first six weeks of the candidate's assignment. In addition, ECAP issued multiple probationary certificates without the required

observations and recommended candidates for multiple certification areas without meeting TAC requirements.

However, for clinical teaching, the field supervisors were not required by the program to conduct the required observations for candidates in clinical teaching. The evidence presented to support the aforementioned statement was found in the Handbook Addendum for candidates on page six. Field supervisors are required to “observe clinical teachers in the classroom setting and provide technical assistance as needed; conduct one formative evaluation and one summative evaluation of the clinical teacher; and submit the summative evaluation to ECAP for placement in the clinical teacher’s file.” The cooperating teacher was expected to provide one of the formal observations. As a result of the information presented by the program, it was determined that the field supervisors were not conducting the observations per TAC §228.35(f) for clinical teaching candidates.

TAC §228.35(f) requires that the field supervisors document observed instructional practices and provide written feedback through an interactive conference with the candidates. After the observation and conference, the candidate is required to complete a written reflection summarizing the conference and the changes that they will make as a result of the observations. The written reflection verifies that the observation and conference did occur.

It is also the responsibility of ECAP’s field supervisors to provide a copy of the written feedback to the candidates’ campus administrators as required by TAC §228.35(f). The observation form is a three (3) part form and there is a place for the field supervisor to put the date of delivery to the campus administrator or his/her designee. Copies of observations forms were available that had a date entered on the delivered principal’s line.

Documentation of informal observations and coaching were provided by the program as specified in TAC §228.35(f). In addition, if the candidate is struggling in the internship experience, the candidate is placed on a growth plan by ECAP.

A late-hire for a teaching position shall complete 30 clock-hours of field-based experiences as well as 80 clock-hours of initial training within 90 school days of assignment. Up to 15 clock-hours of field-based experience may be provided by use of electronic transmission, or other video or technology-based method [TAC §228.35(c)]. In the self-report submitted by the program, ECAP reported that they had eleven (11) or more candidates classified as late hires. Completion of training and field-based experiences for the late-hires was documented by an audit of the Individual Progress Report for the late hire candidates reflecting completion of Survival I and Survival II and a record of field-based observations.

Based on evidence presented, Education Career Alternatives Program, Ltd. (ECAP) 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:

ECAP utilizes the Internship Progress Report for candidate assessment and benchmarking as prescribed by TAC §228.40(a). The Individual Progress Report is monitored by the ECAP staff at 18 and 36 weeks. Evidence of the benchmarking was presented in numerous records

containing the progress reports of the candidates. In addition, a variety of assessments was used to evaluate the mastery of the knowledge and skills of the candidate such as case studies, lesson plans, and quizzes. The program meets the requirements of TAC §228.40(a).

According to TAC §228.40(b), the program shall not grant test approval for the pedagogy and professional responsibilities test until the candidate has met all the requirements for admission to the program and has been fully accepted into the educator preparation program. In conversations with the program leadership team, it was determined that readiness for PPR TExES testing [TAC §228.40(b)] is determined by completion of the PPR face-to-face and online coursework. ECAP meets the requirements of TAC §228.40(b). It must be noted that in reviewing the Internship Progress Report, it was noted that candidates were being given test approval for multiple areas, not necessarily ones that reflected sufficient college coursework neither on their transcript nor for the one that the candidate was admitted into the ECAP program.

Evaluation of the program's overall design and delivery of the curriculum should be continuous per TAC §228.40(c). Information such as performance data, scientifically-based research practices, and the results of internal and external assessments should be included in the evaluation process. ECAP provided an overall plan for evaluation in their self-report listing indicator, timeline and person responsible. In addition, the program gathers data on the curriculum and the overall program from the candidates, field supervisors, cooperating teachers. Sufficient evidence exists that the program evaluates the program's design and delivery of curriculum on an ongoing basis [TAC §228.40(c)].

According to TAC §228.40(d), the program will retain documents that evidence a candidate's eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after program completion. ECAP provided evidence of compliance per TAC §228.40(d) by retaining documentation in file cabinets in a locked file room.

Based on evidence presented, Education Career Alternatives Program, Ltd. (ECAP) 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

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). Candidates were exposed to and provided instruction in the Texas Code of Ethics as follows: the Handbook and the Web 2.0 online training / Legal Requirements course. The program meets the requirements of TAC §228.50(a).

Texas Administrative Code §229

Current Accreditation Status

Education Career Alternatives Program, Ltd. (ECAP) currently has an accreditation status of "Accredited".

Standard I: Results of Certification Exams

Pass Rate Performance:	2008-2009 Final 80% Standard	2009-2010 70% Standard	2010-2011 75% Pass Rate
Overall:	100%	100%	100%
Test Areas:			
• Bilingual Generalist (EC-6)	NA	NA	50%
• ESL Generalist (EC-6)	NA	NA	0%
• PPR (8-12)	NA	NA	0%

A different view of the ECAP testing record of candidates for completion year 2011 was also presented during the opening session presentation. The following data shows the number of people testing, the number of tests taken, the number of multiple tests taken, and the percent of tests passed for the PPR, Special Education EC-12, and Generalist EC-6. The data presented in the table is for candidates who tested while they were in the ECAP program.

Completion Year 2011	PPR (ALL)	Sped EC-12	Generalist EC-6
# of people testing	379	44	30
# of tests taken	409	60	35
# of multiple testers	(20)	(13)	(5)
% tests passed	93%	73%	86%

Program Recommendations:

The following are recommendations based on the findings of the compliance audit. If the program is NOT in compliance with any identified component, please consult the TAC rules and correct the issue IMMEDIATELY. A Compliance Status Report will be required every sixty days until all the compliance issues are corrected.

Program recommendations are suggestions for general program improvement and no follow-up is required.

PROGRAM COMPLIANCE RECOMMENDATIONS:

TAC §228.30 Educator Preparation Curriculum

- Require that the educator standards are the curricular basis for all educator preparation per TAC §228.30(a); and
- Require that the seventeen (17) subject matter topics are included in the curriculum per TAC §228.30(b).

TAC §228.35 Preparation Program Coursework and/or Training

- Require and document that the field supervisors conduct three formal evaluations of 45 minutes each in the clinical teaching/internship assignment;
- Develop and implement specific criteria and procedures that allow candidates to substitute prior on-going experience and/or professional training for part of the educator preparation requirements, provided that the experience or training is not part of internship or clinical teaching, and is directly related to the certificate being sought.
- Refrain from recommending candidates for probationary certificates in areas where the candidate has not been prepared and is not completing clinical teaching or internship. This must be implemented immediately.
- Recommending candidates for standard certification only in the area where they were prepared, experienced a successful practicum, and successfully tested. This must be implemented immediately.

GENERAL PROGRAM RECOMMENDATIONS:

Overall Program General Recommendations:

- 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 executive program director is knowledgeable about current Texas Administrative Code and future changes to TAC;
- 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 TAC rules;
- Align the verbiage of the ECAP Educator Preparation Program to that of current Texas Administrative Code. For example: Applicant / Candidate / Field Supervision / Internship / Clinical Teacher / Cooperating Teacher/ etc.;
- Maintain communication with the program specialist assigned to the EPP 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); and

Component III General Recommendations:

- Review all certification fields content to ensure that the educator standards are the curricular basis for educator preparation; and
- Review all certification fields' content to ensure that the 17 subject matter topics are addressed for all certification fields offered.

Component IV. General Recommendations:

- Require and document that the field supervisors conduct three formal observations of candidates in internships while on probationary certificates per TAC §228.35(f)(3);