



## Compliance Audit Report 2011-2012 ACT San Antonio Special Education EC-12

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](http://www.tea.state.tx.us) for details.

**Contact Information:** Rae Queen, PhD.

**County/District Number:** 015-702

**SBEC Approval Date:** March, 2005

Program Specialists, Mr. Mixon Henry and Ms. Vanessa Alba, conducted a Texas Education Agency (TEA) Compliance Audit of ACT San Antonio's alternative teacher certification program on February 1-3, 2012. The following are findings and recommendations for program improvement.

### **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 January 2, 2012. An on-site review of documents, student records, course materials, online courses, and curriculum correlations charts provided evidence regarding compliance. In addition, electronic questionnaires were sent to ACT San Antonio stakeholders by TEA staff. Eight (8) out of eight (8) advisory committee members; sixty-four (64) out of one hundred eight (108) clinical teachers and interns, nineteen (19) out of nineteen (19) field supervisors, twenty-nine (29) out of ninety-three (93) principals, and forty-seven (47) out of one hundred eight (108) cooperating teachers/mentors responded. Qualitative methods of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. Evidence of compliance was measured using a rubric correlated to Texas Administrative Code.

## **Opening and Closing Session:**

The opening session on February 1, 2012, was attended by five (5) people, including Dr. Rae Queen, owner and director. The closing session on February 3, 2012, was attended by five (5) people including Dr. Rae Queen, owner and director.

## **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 ACT San Antonio per TAC §228.20(c) as evidenced by the participation of Dr. Rae Queen in various aspects of the compliance audit.

The advisory committee consists of eight (8) members: Three (3) members from local school districts; two (2) members from higher education; and three (3) members represent community/business interests. There are no members from an education service center. ACT San Antonio meets TAC §228.20(b) requirements for advisory committee composition.

The first meeting of the academic year was held on October 28, 2011. Six (6) members attended the meeting. The agenda reflected the following:

- Previous advisory committee meeting minutes;
- Recent decline of applicants and enrollment in the program; and
- Evaluation of the program with data from TExES exams and qualitative evaluations from teaching candidates, cooperating teachers, field supervisors, principals, and instructors.

The second meeting of the academic year was held on February 24, 2011. Four (4) members attended this meeting. The agenda reflected the following:

- Advisory committee roles and responsibilities, taken from National Center for Boards, Washington D.C., 1995;
- Review of testing data;
- Discussion of certification areas, two district advisory committee members provided input by suggesting candidates add English as Second Language (ESL) to the Generalist and also stated their district now have higher requirements for new applicants;
- Discussion of members providing input into continuing the annual job fair; and
- Request from a member that the program consider using Educational Research Group (ERG) to gather data to assist in program evaluation.

Two meetings from the previous academic year were also reviewed.

The July 13, 2010, advisory committee meeting had five (5) members attend and 16 additional attendees from school districts, all of which were invited to provide input. The agenda reflected that the following items were discussed:

- Program database provided and candidate placement;
- District members stressed the importance of continuing the current practices and preparing candidates for the interview process;
- Field –based experiences; and
- Training components and curriculum.

The February 24, 2010, advisory committee meeting agenda reflected that the following items were discussed:

- Members' roles and responsibilities;
- Candidate interviews;
- Review of testing data, noting the strengths and weaknesses;
- Possible partnerships with the following districts; Kerrville ISD, East Central ISD, and South San Antonio ISD;
- Opening TExES review sessions for non-candidates to help support districts; and
- District advisory committee member input requesting that the program consider sending resumes to districts instead of providing a list of possible candidates.

The agendas, minutes, and attendee records were available to substantiate that all advisory committee meetings were held. One hundred percent (100%) of the advisory committee members indicated that they did meet two times per academic year or more often. The program meets the requirements for conducting a minimum of two advisory committee meetings per academic year as required by TAC §288.20(b).

Additional information gathered from the advisory committee member stakeholder questionnaires was as follows:

- Signed attendance, agendas provided, received minutes of previous meetings – 100%
- Knowledgeable about TAC §227, 228, 229 – 100%
- Participation in designing or revising of program curriculum – yes - 67%
- Participation in policy decisions of program – yes - 67%
- Participation in overall program evaluation – yes - 83%
- Discussion of Field-based experiences for candidates – yes - 100%
- Participation in evaluating data and preparing an improvement plan – yes - 100%

All of the aforementioned questionnaire items were verified in the minutes and agenda of the advisory committee meetings.

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

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

### **FINDINGS:**

To enter the ACT San Antonio teacher certification program, the applicant must provide evidence of a four year degree from an accredited institution of higher learning [TAC §227.10(c)]; a GPA of 2.5 or greater [TAC §227.10(A)]; twelve (12) semester credit hours in a content field [TAC §227.10(C)]; mastery of basic skills proficiency using the Texas Success Initiative [TAC §227.10(4)]; adequate oral communication skills demonstrated in an informal interview [TAC 227.10 (a)(5)]; an application [TAC §227.10(6)]; an interview or other applicant screening which is satisfied with the Watson Glaser Critical Thinking Appraisal [TAC §227.10(6)]; and meet any other requirements the program determines and applies equally to all applicants, which includes a writing sample and watching an orientation video about the certification process and candidate responsibilities [TAC §227.10(7)].

There were no out-of-country applicants whose first language is not English enrolled in the program. The program is aware of the criteria for having out-of-country applicants 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) [TAC 227.10 (a)(5)]. 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(7)].

In a review of the twelve (12) candidates' records, it was found that all documents were present as verification of adherence to admission criteria. It was noted that two (2) candidates were admitted with a grade point average of less than 2.5. However, the number of candidates admitted did not exceed 10% of the cohort allowed by TAC §227.10(3)(b). Evidence was present that admission of the candidate(s) was approved by the program director.

The self-report submitted by ACT San Antonio stated that information about admission criteria to their program is available through their website, job fairs, visits to schools and community colleges, and meetings with Troops for Teachers [TAC §227.10(7)].

**Based on the evidence presented, ACT San Antonio is in compliance with TAC §227 - Admission and Certification Criteria.**

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

### **FINDINGS:**

ACT San Antonio is approved to offer teacher certification in fifty-six (56) fields. For the purpose of this compliance audit, the Special Education EC-12 certificate was selected as the field for in-depth review.

Qualifications necessary to be selected as a course instructor require a Bachelors' or Masters' Degree and certification in the field of instruction. Instructors' credentials were presented for review and criteria for selection were verified. It was verified that the instructors have the appropriate background or experience to provide instruction in this certification area. Several of

the instructors are also field supervisors and implement additional components of the curriculum and training when working in the field with the candidates. The field supervisors focus on how standards are implemented into district curriculum and require specific items within the candidate's lesson plans. The field supervisor meets with both candidates and mentors to provide guidance during this phase of training. This is an example of using previous coursework with proper directed guidance to create experiential training.

In reviewing the Special Education curriculum, syllabi, and alignment charts, it was found that the educator standards are the curricular basis for instruction as required by TAC §228.30(a). It was also noted that the curriculum did provide evidence that it addressed the relevant Texas Essential Knowledge and Skills (TEKS) as required by TAC §228.30(b). The seventeen (17) subject matter topics were included in the coursework as prescribed by TAC §228.30(b). Six hours of test preparation was provided for candidates prior to TExES testing as per TAC §228.30(b)(17) and TAC §228.35(a)(3)(C).

Clinical teachers and interns were asked to respond to a series of questions through a TEA created electronic questionnaire designed to verify aspects of the curriculum, its delivery, and effectiveness. Clinical teachers and interns felt that the program was doing an excellent job in preparing them in the following areas: Code of Ethics (96.8%); child and adolescent development (95.2%); developing lessons (96.8%); laws regarding students with special education needs (95.2%); and utilizing a variety of instructional strategies in the classroom (98.4%). Candidates indicated that they would like more emphasis placed on the following areas: reading across the curriculum for all grade levels; utilizing TEKS in the content areas; teacher responsibility for administering the State of Texas Assessment of Academic Readiness (STAAR); process of curriculum development; standards and teaching strategies for students designated as gifted and talented; and conducting parent conferences. Ninety-eight percent (98%) of the clinical teachers and interns indicated that they would recommend the teacher education program to others.

Cooperating teachers responded that they felt the clinical teachers and interns were well prepared in understanding the Texas Code of Ethics, child/adolescent development, Texas Essential Knowledge and Skills (TEKS) in the content areas, instructional methods for motivating students, developing a lesson, and using a variety of instruction strategies to meet individual student needs. However, they indicated that the student teachers would benefit from more emphasis on reading across the curriculum for all grade levels, teacher responsibilities for administering the STAAR, process of curriculum development, standards and strategies for students designated as gifted and talented, and parent conferencing.

Principals responding to their questionnaire reported that they felt the candidates were well prepared in classroom management, academic and behavioral needs of students with disabilities, and multimedia and other technology to support and extend student learning. However, they also expressed that the candidates would benefit from more emphasis on working with students with limited English proficiency and in interpreting formal and informal assessments.

**Based on evidence presented, ACT San Antonio is 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, ACT San Antonio's alternative teacher preparation program is delivered in a face-to-face format. The total program consists of 300 clock hours. There is a slight variance from one certification field to another, but all met the minimum clock hour requirement set forth in TAC §228.35(a)(3). Evidence of the clock hour performance was found in the self-report and in the program checklist included in the candidates' folders.

Completion of 30 clock hours of field-based experience prior to clinical teaching/internship was verified as required by TAC §228.35(d)(3)(A). Evidence was found in the candidates' records in the form of a field-experience log. The field-based experience offered by the program includes 15 clock hours of video or electronic transmission allowed by rule [TAC §228.35(a)(3)(A)].

ACT San Antonio's clinical teaching program [TAC §228.35(d)(2)(B)] consists of twelve consecutive weeks and is currently offered during the fall and spring semesters. The internship consists of a full academic year, unless the candidate is a late hire [TAC §228.35(d)(2)(C)]. Evidence presented in the form of clinical teacher and internship placement information verified that clinical teaching and internship took place in an actual school setting rather than a distance learning lab or virtual school setting prohibited by TAC §228.35(d)(2)(C)(ii).

According to TAC §228.35(e), ACT San Antonio is responsible for providing mentor/cooperating teacher training that is scientifically-based or verify that training was provided by a school district or education service center. Training is provided in two ways. The first method utilized is to conduct small group training facilitated by the field supervisor for the mentor/cooperating teacher and the intern/clinical teacher. The second method is offered as an online training session available to the intern/clinical teacher and mentor/cooperating teacher. Both of these training materials are an abridged version of TxBESS. ACT San Antonio produced evidence of training materials, sign-in sheets, user name and password, and agendas as compliance documentation for the training requirement.

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. Nineteen (19) individuals were identified by the program as field supervisors. All field supervisors have teaching certification and receive training monthly. ACT San Antonio produced evidence of compliance of training by providing agendas, training material, and sign-in sheets.

Initial contact within the first three weeks of the assignment by the field supervisor as required by TAC §228.35(f) was verified in a review of the candidates' files. Contact was made via a face-to-face meeting with the candidates at their district campus.

A total of three observations [TAC §228.35(f)(4)] must be conducted during the clinical teaching/internship assignment and must be at least 45 minutes in duration [TAC §228.35(f)]. TAC §228.35(f) also states that the first observation must be conducted within the first six weeks of clinical teaching/internship. In review of the candidates' folders, evidence verified that four observations were conducted on the schedule prescribed. ACT San Antonio adopted the use of an adapted version of the Professional Development and Appraisal System (PDAS). The

observation rubric is a quadruplicate document with each individual receiving a copy: clinical teacher/intern; campus administrator; field supervisor; and program office. The observation instrument is divided into the following sections: student participation; learner centered instruction; evaluation/feedback on student progress; management of discipline/strategies/time/materials; and professional communication. The observation rubric requires the date of the observation, beginning time/ending time and comments and target areas for improvement. The observation form is signed by clinical teacher/mentor and field supervisor. In addition to the required observations, two conferences are held that include the intern, field supervisor, mentor teacher, and principal. These conferences were created to provide the candidate with other opportunities to receive feedback and understand areas of strength and weakness.

Furthermore, TAC §228.35(f) requires that the field supervisors document instructional practices observed and provide written feedback through an interactive conference with the candidates. On the observation rubric, the field supervisor acknowledges the interactive conference by signing his/her name on a specific line following the classroom observation.

It is also the responsibility of ACT San Antonio to provide a copy of the written feedback to the candidate's campus administrator as required by TAC §228.35(f). Evidence was presented to support that the field supervisor provided the feedback to the campus administrator. The campus administrator or his/her representative receives one of the four copies of the observation instrument. Questionnaires revealed that eighty six percent (86%) of the principals acknowledged they received the observation, with only seven percent (7%) indicating they had not.

Additional informal observations and coaching is provided by the program as specified in TAC §228.35(f). Evidence was presented in the form of additional observation forms and emails.

**Based on evidence presented, ACT San Antonio is 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:**

ACT San Antonio has a candidate assessment and benchmarking process as prescribed by TAC §228.40(a). Evidence indicated most of the assessments are performance based which are evaluated with a specific rubric for that assignment.

Readiness for testing [TAC §228.40(b)] is determined by success in the course modules, assessments, and a representative test during test preparation. 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.

Evaluation of the program's 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.

Data used by ACT San Antonio to evaluate the program and curriculum include: ASEP data and qualitative evaluations from candidates, campus administrators, mentors/cooperating teachers, and field supervisors. This information is presented to the advisory committee for further input and evaluation and documented in the meeting agendas and minutes.

According to TAC §228.40(d), the program retains 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. Candidate files are kept in a locked room in a locked office.

**Based on evidence presented, ACT San Antonio 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). At ACT San Antonio each student is required to sign an acknowledgment of reading and understanding the Code of Ethics. A copy of the acknowledgment was found in the candidates' records reviewed.

### **Senate Bill 174/Texas Administrative Code §229**

#### **Current Accreditation Status**

ACT San Antonio is currently "Accredited".

#### **Standard I: Results of Certification Exams**

<b>Pass Rate Performance:</b>	2008-2009 Final 80% Standard	2009-2010 70% Standard	2010-2011 75% Pass Rate
Overall:	100%	100%	100%

## **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 the compliance issues are totally corrected.

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

## **GENERAL PROGRAM RECOMMENDATIONS:**

### Component I:

- Consider expanding the depth of the advisory committee by including human resource directors, principals, and possibly a cooperating teacher/mentor or past candidate. This will allow greater input when some of the members are unable to attend the meeting; and
- Continue advisory committee training on an annual basis to prepare any new members for their roles and responsibilities and to familiarize the members with TAC rules.

### Component II:

- Consider having students sign a FERPA letter, upon admission, stating that information on field observations can be provided to the campus administrator.

### Component III:

- Review the curriculum for the special populations, and adding more depth and rigor to the curriculum. The curriculum should identify the subgroups within the population and provide more specific methodology for informal assessments and remediation to enhance the success of the population;
- Consider more assessments that provide content reflection prior to performance based assessments. This will provide the instructor insight into the candidates' knowledge and allow for remediation, prior to the performance of specified activities; and
- Provide a copy of the alignment charts to the candidates to inform them where specific required content is being covered to prepare them for the TExES exam and to reinforce terms.

### Component V:

- Ensure that all documents are secure at the program facility and readily available for review or clarification.