



Compliance Audit Report 2014-2015 Education Service Center Region 12 Teacher Preparation Program

According to Texas Administrative Code (TAC) §228.10(c), "An entity approved by the SBEC under this chapter...shall be reviewed at least once every five years under procedures approved by the Texas Education Agency (TEA) staff; however, a review may be conducted at any time at the discretion of the TEA staff." Per TAC §228.1(c), "All educator preparation programs are subject to the same standards of accountability, as required under Chapter §229 of this title." The Texas Education Agency administers Texas Administrative Code required by the Texas legislature for the regulation of all educator preparation programs in the state. Please see the complete Texas Administrative Code at www.tea.texas.gov for details.

Contact Information: Betsy King

County/District Number: 161950

SBEC Approval Date: May 1992

Program Specialist, Mixon Henry, conducted this Texas Education Agency Compliance Audit of Education Service Center Region #12 (ESC #12), at TEA as a desk audit, in the summer of 2015. The focus of the compliance audit was Pedagogy and Professional Responsibility curriculum. The following are findings and recommendations for program improvement.

Scope of the Compliance Audit:

The scope of this audit is restricted solely to verifying compliance with Texas Administrative Codes §§227, 228, 229, 230 and Commissioner Rules §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 July 1, 2015. 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 ESC Region #12 stakeholders and responses are as follows: Seven (7) out of seventeen (17) advisory

committee member; forty-three (43) out of one hundred ninety-three (193) clinical teachers/interns; twenty-three (23) out of one hundred five (105) principals; and thirty-five (35) out of one hundred sixty (160) cooperating teachers/mentors 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 determine compliance -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 is required to correct the issue IMMEDIATELY. An action plan may be drafted 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.

Desk Audit Process: ESC #12 representative, Ms. Betsy King, assisted Mr. Mixon Henry in the review. All documents were submitted via email. The submitted documents were reviewed and clarification was provided by ESC #12 representative, Betsy King. At the end of the review of the documents and -candidate records, the audit rubric was scored and results shared with the ESC 12 representative.

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

FINDINGS:

- Program support was indicated by the governing body of ESC #12 per TAC §228.20(c) as evidenced by the participation and cooperation of Ms. Betsy King, in various stages and steps of the compliance audit.
- The advisory committee consists of eleven (11) members: five (5) members are from local school districts, one (1) member is from higher education, four (4) members represent community/business interests, and one (1) member from ESC #12. ESC Region #12 meets TAC §228.20(b) requirements for advisory committee composition.
- ESC #12 provided evidence of two advisory committee meetings for the past three academic year. Agendas, minutes, and sign in sheets were available as evidence of compliance. The program meets the requirements for conducting a minimum of two advisory committee meetings per academic year as required by TAC §288.20(b).
- ESC #12 advisory committee minutes could not verify the collaboration and input of advisory committee members in assisting with design, delivery, evaluation, and major policy decisions.
- ESC #12 had no documentation to verify training the advisory committee on their roles and responsibilities.

Compliance Issues:

- Take minutes at advisory committee meetings that reflect and verify the input by members in regard to assistance with design, delivery, evaluation, and major policy decisions,
- Maintain document of training for the advisory committee to instruct them on their roles and responsibilities.

Recommendations:

- Consider rolling terms for advisory committee members;
- 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 for certification renewal; and
- Consider adding membership to past graduates of the program.

Based on the evidence presented, Education Service Center Region #12 is not in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.

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

- All candidate had a baccalaureate degree or higher from an university or college approved by the Texas Higher Education Coordinating Board (THECB) and was verified by transcripts (10 of 10 candidate records),
- The transcripts identified a 2.5 or higher GPA (grade point average), in all but one candidate (9 of 10 candidate folders reviewed). The candidate, with the GPA below 2.5, did not have a letter written by the program director that identified career or training equal to the 2.5 GPA.
- Program worksheets noted 12 hours in the candidates' specific content field, 15 hours or more was documented in Mathematics and Science (10 of 10 candidate records),
- Ten out of 10 candidate folders had an application,

- Interviews with scoring rubrics were found in candidates' folders along with a writing sample (10 of 10 candidate records);
- Requirements for admission to the program are on the ESC #12 website and are applied consistently to all candidates, and
- No Out-of-country applicants have applied within the last three years of the review, but the requirements are known to the program. 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. 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)].
- 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:

- Provide a letter written by the program director explaining why the candidate's GPA is below 2.5 and the training or career experience equivalent to the 2.5.

Recommendations:

Consider additional screening device that identifies skills in reading.

Based on the evidence presented, Education Service Center Region #12 is not in compliance with TAC §227 - Admission and Certification Criteria.

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

FINDINGS:

- ESC #12 is approved to offer teacher certification in thirty-two (32) fields.
- In reviewing the content and Pedagogy and Professional Responsibilities (PPR) curriculum, it could not be verified that the educator standards were the curricular basis for instruction as required by TAC §228.30(a);
- The content and Pedagogy and Professional curriculum could not document that the relevant Texas Essential Knowledge and Skills (TEKS) are addressed as required by TAC §228.30(a);
- Instruction on the teacher standards were noted in the coursework as prescribed TAC §228.30(b);

- Sufficient evidence was presented to verify that all candidates received instruction in: reading, dyslexia, and mental and emotional health.
- Structured assessments were limited or missing from curriculum, thus not assessing the progress of candidates through the program.

Compliance Issues:

- Identify the educator standards addressed in the curriculum and verify that all educator standards are taught per content and PPR, thus making it the basis of the program curriculum.
- Document the relevant TEKS taught in curriculum per content area or relevant in PPR curriculum.
- Create assessments that denote the mastery and skill development required by the candidate.

Recommendations:

- Increase the number of lesson plans required to be created, critiqued, or expanded by the candidates in every course 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).
 - Ensure assessments reflect mastery of the performance standards (what the teacher can do) of the educator standards.
 - Develop a module which deals with data management and interpretation to determine 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 provided by the local mental health unit and arrange for them to deliver Mental Health First Aid Training (Face-to-Face – 8 hours – free) in addition to the Region IV Education Service

Center Texas Behavior Support Initiative (#1098115) (on-line 3 hours – free) = total of 11 clock hours with documentation can be credited toward the total 300 clock hours.

OR

2) Utilize At-Risk Kognito (online – one hour) <https://highschool.kognito.com/texas/> and the Region IV Education Service Center Texas Behavior Support Initiative (on-line 3 hours) (1098115) https://www.escweb.net/tx_esc_04/catalog/session.aspx?&session_id=1098115 – Four hours with documentation may be counted toward the 300 clock hours.

3) You may use any resources from any other mental health organization 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=PLYCCyVaf2q1vuF3qlz1NjEWFEMtxaBMvC> 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, Education Service Center Region #12 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 majority of Education Service Center Region #12 curriculum is delivered in a face-to-face and with some videos to support the curriculum.
- The total hours of training provided by ESC #12 is 300+ clock hours; the volume of hours varies with the certification field meeting TAC§228.35(a)(3) but all meet the minimum required hours.
- Forty clock hours of field-based experience (FBE) is required by the program, but the variety of settings is very limited and the interactive component is not documented which does not meet the requirements per TAC §228.35(d).
- Eighty hours of coursework prior to internship was verified meet TAC§228.35(a) (3)(B).
- Per TAC §228.35(d)(2)(C), an internship of 180 school days or an academic year is required for teaching candidates. 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 intern is issued the appropriate probationary certificate and is classified as “teacher” of record on the campus PEIMS data. This was also verified by the candidate records.
- According to TAC §228.35(e), ESC #12 provided mentors training that is scientifically – based or verifies that training has been provided by a school district or education service center. Mentor training materials were available for review, but there was not verification for mentors that did not attend the training.
- Supervision of each candidate is conducted with the structured guidance and regular ongoing support of three experienced educator who were trained as field supervisors which meets TAC§228.35 (f) and TAC§228.2 (10). Training material for field supervisors was provided for review.
- Initial contact by the field supervisor was not verified within the first three weeks of the assignment as required by TAC §228.35(f). Evidence found in the candidate - records was a blind copy of the email sent to all candidates; a read receipt was suggested to verify the initial contact.
- Three observation conducted by ESC #12 meets standards outlined in TAC §228.35(f)(3), during internship. Evidence of three observations was found in the candidate’s records.
- The three observations [TAC §228.35(f)(4)] were least 45 minutes in duration [TAC §228.35(f) documented by a start and stop time on the each observation form.
- The first observation was conducted within the first six weeks of internship as reflected in observation instrument in the candidate’s records which meets TAC§228.35(f) (2).

- The field supervisor did not document instructional practices observed. Discussions centered on changing the observation instrument to capture the instructional practices. Documentation of an interactive conference with the candidates was not provided which is required by TAC§228.35(f).
- The program could not verify that they provided a copy of the written feedback to the candidate's campus administrator verified by his/her signature or designee on the observation form as required by TAC §228.35(f).

Compliance Issues:

Require that field based experience is in a variety of setting to allow the candidate to see the additional characteristics of grade level students and diversity.

Verify the interactive component in for candidates in the field based experience.

Require that district training (50 clock hours) originates from the district, thus verifying their selected training.

Create a method of training the absentee mentors and document that training for future audits.

Consider a "read receipt" method to verify the first contact of candidate within the first three weeks of their practicum.

Redesign the observation instrument to document instructional practices observed and the interactive conference following the observation.

Verify that the campus administrator has received observation feedback by signing off on the observation form or email "read receipt".

Recommendations:

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

Based on evidence presented Education Service Center Region 12 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:

- ESC #12 benchmarks as a candidate progresses through the program as prescribed by TAC §228.40(a). Documentation was found in the candidates' records.

- Criteria to determine the candidate's readiness to test [TAC §228.40(b)] with a pre-test with an acceptable score and success with program curriculum.
- Stetson and Associates performs an - evaluation of the program's design and delivery per TAC §228.40(c). External feedback data is gathered from surveys from various school district personnel and internal feedback is secured from candidate evaluations at the end of each course.

Recommendations:

- Consider utilizing the T-CERT test preparation materials to determine the readiness of each candidate to take the appropriate TExES exam and maintain the certificate of completion in the candidate's record. The T-CERT address is <https://pact.tarleton.edu/TCERT> and for questions email weiss@Tarleton.edu. The hours awarded for the training cannot count toward the 300 clock hours.
- Collect more external data to use in the overall program evaluation such as surveys from principals, mentors, former candidates, etc.

Based on evidence presented, Education Service Center 12 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:

- ESC #12 presented evidence that instructors, staff, and candidates indicate by signature that they have read, understand, and will abide by Chapter 247 of this title (relating to Educators' Code of Ethics). Signed affirmations were available for review.

Standard 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 Certification & Standards to ensure that the program staff is knowledgeable about current requirements and changes in Texas Administrative Code;
- Continue to maintain communication with the program specialist assigned to the program for information on current requirements in TAC for Governance; Admissions; Curriculum; Program Delivery & On-Going Support; and Program Evaluation (TAC § 227-229);
- Ensure that TEA staff is notified in changes in staff and provide contact information by sending an email to the program specialist assigned

Based on evidence presented, Education Service Center 12 is in compliance with Texas Administrative Code §228.50 –Professional Conduct.

COMPONENT VII: Rules for Probationary Certificates TAC §230.37

Findings:

All candidates choosing an internship were on probationary certificate as verified by ASEP data and program records.

The probationary certificates match the content field and grade level of the certification sought.

Candidates have demonstrated content knowledge prior to entering the teaching position (internship) by either the appropriate content test or transcripts documenting 24 university hours in their content field, with 12 hours as upper division coursework.

Based on evidence presented, Education Service Center 12 is in compliance with Texas Administrative Code §230.37 –Probationary Certificates.