



2017 – 2018 Continuing Approval Review Report

PURPOSE

Texas Education Agency (TEA) Program Specialist, Vanessa Alba, conducted a five-year Continuing Approval Review of the educator preparation program (EPP) for South Texas Transitions to Teaching EPP on July 3, 2018. Per 19 Texas Administrative Code (TAC) §228.10(b), "...An entity approved by the SBEC under this chapter shall be reviewed at least once every five years...". Gilbert Gomez was identified as the program Legal Authority and he was also identified as the primary EPP contact for the review process. South Texas Transitions to Teaching was approved as an EPP on July 29, 2005. At the time of the review, the EPP was Accredited. At the time of the review, South Texas Transitions to Teaching EPP was approved to certify candidates in the following classes: Teacher class only.

Per 19 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 TEA administers TAC required by the Texas legislature for the regulation of all EPPs in the state. (See the complete [TAC](#) for details.) The five-year Continuing Approval Review was conducted in a "Desk Review" format where EPP staff submitted requested documents to TEA for review.

The scope of this review included: 1) verifying compliance with Texas Administrative Code and Texas Education Code as applicable to all certification classes in all certification routes offered by the EPP; and 2) developing a plan for improvement based on review data, performance indicators identified in 19 TAC §229.4, and self-reported EPP information provided in the Status Report. A Compliance Plan was developed on August 20, 2018 to address plans for quality improvement. Evidence of compliance was measured using a rubric aligned to TAC.

EPP staff participating in the review at various stages were: Gilbert Gomez, legal authority, and Diana Lopez, certification officer.

DATA ANALYSIS

Information concerning compliance with TAC governing EPPs was collected by a variety of means. A Status Report and related program documents were submitted to TEA on May 29, 2018. Additional EPP documents, including records for 11 candidates, were submitted on June 11, 2018. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence.

FINDINGS, COMPLIANCE ISSUES and RECOMMENDATIONS

“Findings” indicate evidence collected during the review process. If the program is “not in compliance” with any identified component, the program should consult the TAC and correct the issue immediately. A “Compliance Plan” may be drafted during the review that identifies compliance issues to be addressed and a timeline for completion. “Recommendations” are suggestions for general program improvement and no follow up is required.

COMPONENT I: GOVERNANCE – 19 TAC §228

Findings

Component I: Governance was not reviewed in its entirety as a part of the desk review. TEA reviewed what South Texas Transitions to Teaching EPP self-reported in their Status Report.

- TEA reviewed the South Texas Transitions to Teaching website for a published calendar of program activities that must include a deadline for accepting candidates into a program cycle to assure adequate time for admission, coursework, training, and field-based experience requirements prior to a clinical teaching or internship experience. None was posted. The EPP did not meet the requirement as prescribed. [19 TAC §228.20(g)]
- South Texas Transitions to Teaching is currently rated Accredited and has met the requirements for continuing approval. [19 TAC §228.20(b)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §228.20(g) *South Texas Transitions to Teaching did not develop and implement a calendar of program activities that must include a deadline for accepting candidates into a program cycle to assure adequate time for admission, coursework, training, and field-based experience requirements prior to a clinical teaching or internship experience. If an EPP accepts candidates after the deadline, the EPP must develop and implement a calendar of program activities to assure adequate time for admission, coursework, training, and field-based experience requirements prior to a clinical teaching experience or prior to or during an internship experience.*

Action: Create a calendar of activities that meets all requirements of TAC stated above. Specify what requirements applicants must meet to be admitted; what coursework and field-based experiences must be completed prior to clinical teaching or internship (150 clock-hours + 30 clock-hours of field-based experiences); what criteria candidates must meet to be able to test and when they may test; the requirements for when candidates complete the remainder of coursework; and what criteria must be met for standard certification.

Recommendations:

- None.

Based on the evidence presented, South Texas Transitions to Teaching EPP was not in compliance with 19 TAC §228 – Governance of Educator Preparation Programs.

COMPONENT II: ADMISSION - 19 TAC §227.10

Findings

TEA reviewed the South Texas Transitions to Teaching EPP Status Report for evidence of compliance, verified information posted on the website, and cross-checked with candidate files selected for review to determine compliance with admission requirements.

- South Texas Transitions to Teaching EPP informs individuals about the criminal history background check in the candidate handbook, the admission application, and on the website. Individuals are notified about the requirements for testing in the candidate handbook and on the website. Individuals are notified about the requirements for certification in the candidate handbook and on the website. Individuals are notified of the EPP performance over the past five (5) years on the website. Individuals are not informed of the effects of supply and demand [19 TAC §227.1(c)(3)(A)]. The program did not meet the requirement as prescribed. [19 TAC §227.1(c)]
- All candidates admitted to South Texas Transitions to Teaching EPP must have a minimum of a bachelor's degree from an accredited institution of higher education recognized by the Texas Higher Education Coordinating Board (THECB). Ten (10) out of eleven (11) candidate files reviewed (91%) contained an official transcript and have met the degree requirement. The program met the requirement as prescribed. [19 TAC §227.10(a)(1)]
- Out-of-country applicants must have an official transcript evaluated by an approved transcript evaluation service. One (1) candidate file reviewed was for an out-of-country candidate and the transcript evaluation was provided. The service used was Foreign Credentials Services of America. The program met the requirement as prescribed. [19 TAC §227.10(e)]
- Out-of-country applicants must demonstrate proficiency in English language skills prior to admission. The one (1) out-of-country file met the requirement by taking the Test of English as a Foreign Language (TOEFL-iBT). Applicants are required to score a 24 in speaking, 22 in listening, 22 in reading, and 21 in writing. The candidate took all parts and scored a 28 in speaking, 22 in listening and reading, and a 21 in writing. The program met the requirement as prescribed. [19 TAC §227.10(a)(6)]
- Applicants must have a 2.5 minimum GPA to be admitted to the EPP. TEA noted a GPA range of 2.7-3.90 in ten (10) out of eleven (11) files reviewed. The program met the requirement as prescribed. [19 TAC §227.10(a)(3)(A)]
- Applicants demonstrated content knowledge prior to admission. Ten (10) out of eleven (11) files contained an official transcript and a record of GPA calculation by course noting content hours earned [12 hours or 15 hours, if math or science at grade seven (7) or above]. Six (6) out of eleven (11) files (55%) were admitted based on passing a pre-admission content test (PACT) and a passing score on the content test prior to admission was noted in the Educator Certification Online System (ECOS). The program met the requirement as prescribed. [19 TAC §227.10(a)(4)]

- Applicants demonstrated basic skills prior to admission. Ten (10) out of eleven (11) files reviewed (91%) contained official transcripts with a bachelor's degree conferred per 19 TAC §4.54(a)(4). The program met the requirement as prescribed. [19 TAC §227.10(a)(5)]
- There was limited evidence that a screening device was used to determine applicant admission. All eleven (11) files contained a completed application, but no file contained evidence of an interview scored on a rubric to distinguish the criteria applicants admitted met as compared to those that were not admitted. All eleven (11) files contained evidence of a writing sample, but there was no evidence of a cut score or rubric to distinguish the criteria that applicants admitted met as compared to those that were not admitted. The program did not meet the requirement as prescribed. [19 TAC §227.10(a)(7)]
- South Texas Transitions to Teaching EPP has an additional admission requirement. All applicants are required to submit a resume. Ten (10) out of eleven (11) files reviewed (91%) contained a resume. The program met the requirement as prescribed. [19 TAC §227.10(b)]
- Applicants have been formally admitted to South Texas Transitions to Teaching EPP. All eleven (11) files were formally admitted prior to beginning coursework, training, or being given approval to test. All files contained a formal letter with an offer of admission and the applicants' acceptance. TEA also verified within ECOS that the EPP did not grant test approval or provide coursework until applicants were formally admitted. The program met the requirement as prescribed. [19 TAC §227.17(e)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §227.1(c)(3)(A) *South Texas Transitions to Teaching EPP did not inform applicants and candidates of the effects of supply and demand.*

Action: Post information regarding the effects of supply and demand on the EPP website, on any application material, and in candidate handbooks. The purpose for doing this is so that applicants and candidates may make informed decisions about the certification areas they may pursue.

- 19 TAC 227.10(a)(7) *South Texas Transitions to Teaching EPP did not require a cut score or rubric for the required writing sample and did not require a cut score or rubric on the required interview.*

Action: Require the writing sample used by the EPP to contain a cut score for admission and utilize a rubric to determine if each applicant met the requirement. Require applicants to meet the minimum cut score to be admitted. Post the requirement and cut score on the EPP website and on any published admission material to ensure transparency.

Action: Require the EPP to require applicants to meet a prescribed cut score on the interview. Utilize a rubric to evaluate the interview. Post the requirement on the EPP website and any admission material to ensure transparency.

Recommendations:

- Strongly consider having more than one person interview applicants to eliminate bias in admission processes. It is advisable that three (3) people interview applicants in the event that two (2) do not agree on the outcome of the interview.
- Strongly consider having more than one (1) person evaluate the writing sample to eliminate bias in admissions processes. It is advisable that three (3) people review the writing sample in the event that two (2) do not agree on the outcome of the written submission.

Based on the evidence presented, South Texas Transitions to Teaching EPP is not in compliance with 19 TAC §227.10 - Admission Criteria.

COMPONENT III: CURRICULUM – 19 TAC §228.30

Component III: Curriculum was not reviewed in its entirety as a part of the desk review. TEA reviewed what South Texas Transitions to Teaching EPP self-reported in their Status Report and issues noted were addressed.

Findings

- South Texas Transitions to Teaching EPP curriculum is not research-based. The EPP self-reported in the Status Report that it uses ETS test prep manuals to teach content area curriculum. Test prep manuals are not a research-based curriculum. The program did not meet the requirement as prescribed. [19 TAC §228.30(b)]
- South Texas Transitions to Teaching EPP does not use an approved provider to teach mental health, substance abuse, and youth suicide. The EPP uses its own material and staff for the training. The EPP does not meet the requirement as prescribed. [19 TAC §228.30(c)(3)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §228.30(b) *The curriculum for South Texas Transitions to Teaching EPP did not rely on scientifically-based research to ensure educator effectiveness.*

Action: Require the EPP to provide a research-based curriculum to ensure educator effectiveness.

- 19 TAC §228.30(c)(3) *Mental health, substance abuse and youth suicide training is not provided by an approved provider.*

Action: Require the EPP to provide mental health, substance abuse & youth suicide training from an approved provider. Select a provider from the [Program Provider Resources](#) page. Require candidates to provide a dated certificate of completion with hours earned noted.

Recommendations:

- If the EPP uses Kognito as the provider for mental health training, ensure that candidates select the grade appropriate training: Elementary, middle or high school.

Based on evidence presented, South Texas Transitions to Teaching EPP is not in compliance with 19 TAC §228.30-Curriculum.

COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT – 19 TAC §228.35

Findings

- South Texas Transitions to Teaching EPP did not provide adequate preparation and training to candidates. The EPP owner/director self-reported in the Status Report that 300 clock-hours of coursework and training are required. Ten (10) out of eleven (11) files reviewed (91%) contained an “Academy Sessions” document listing coursework completed noting the 150 clock-hours prior to internship. TEA did not know what the rest of coursework entails. The EPP also provided evidence of 30 clock-hours of field-based experiences (FBEs). The EPP provided on candidate documentation information that a part of the training required included training in new hire orientation; non-renewal contracts; certified interns; test preparation; school nurse; and interview questions. Those topics are not a part of required coursework. Additional coursework included an essay; fears/concerns; and school mission/vision. Those topics are also not a part of required coursework for certification. The program also provided a candidate testing history for ten (10) out of eleven (11) files reviewed (91%) noting the date that practice exams were passed as evidence. The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(1)]
- The EPP provided limited evidence that coursework and/or training is sustained, rigorous, intensive, interactive, candidate-focused, and performance-based for any files reviewed (11). Ten (10) out of eleven (11) files reviewed (91%) contained an “Academy Sessions” document listing coursework completed prior to internship which equaled 150 clock-hours, but New Hire Orientation, Non-renewal contracts, Certified Interns, Test Prep, School Nurse & Interview questions are not in TAC which reduces hours from 150 to 129 and TEA did not know what the rest of the coursework entails. The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(2)]
- South Texas Transitions to Teaching EPP candidates complete coursework and training prior to program completion and standard certification. Three (3) out of eleven (11) files reviewed (27%) had reached the point of standard certification. The remaining eight (8) are still in process. The program provided teacher training hour documents, school district training letters, and documents called “audit for standard certification” as evidence of compliance. While the program provided documentation to support that the candidates met coursework and training requirements prior to standard certification, the documentation provided was not consistent across all candidates. The program met the requirement as prescribed. [19 TAC §228.35(a)(3)]

- Four (4) files reviewed were late-hire candidates. Those files contained either a school district transcript or a letter from the campus administrator stating that the candidate completed 50 clock-hours of school district training. One of the files provided school district hours for the entire year, but the hours earned within the first ninety (90) days were not dated and it could not be determined if fifty (50) clock-hours were earned within the first ninety (90) days of assignment. The other three files stated that the candidates earned school district hours during the entire year, but it did not state that fifty (50) clock-hours were earned within ninety (90) days of assignment. The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(4)]
- The program provided evidence on the website that its policy regarding military experience is that the EPP does not allow relevant military experiences. The program met the requirement as prescribed. [19 TAC §228.35(a)(5)(A)]
- The program does not have procedures in place for allowing prior experience, education, or training. Information was not found in candidate handbooks, admission material, or on the website. The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(5)(B)]
- Per the candidate handbook, “Some course and program information is delivered via the internet. Program participants must own or have daily access to a computer, printer, internet, and email.” South Texas Transitions to Teaching EPP is not accredited or seeking accreditation from Quality Matters (QM) or Distance Education Accrediting Commission (DEAC). The program does not meet the requirement for online coursework as prescribed. [19 TAC §228.35(a)(6)]
- South Texas Transitions to Teaching EPP candidates for initial certification do not receive the required number of hours (300 clock-hours) of coursework and training as required. The owner/director self-reported in the Status Report that candidates earn 300 clock-hours of coursework and training. While candidates do earn 300 clock-hours, they are not in the areas required in TAC. Ten (10) out of eleven (11) files (91%) contained an “Academy Sessions” document listing coursework completed, which equaled 150 clock-hours, prior to internship. The program also provided evidence of 30 clock-hours of field-based experiences (FBEs). The remainder of the coursework included new-hire orientation, non-renewal contracts, test preparation, school nurse, and interview questions. These topics, while useful, are not required in TAC and may be used to supplement, but not supplant TAC requirements. Additional coursework called essay, fears/concerns, and school mission/vision are also not required in TAC. A candidate testing history was obtained from the Educator Certification Online System (ECOS) and the EPP provided a date that candidates passed practice exams for nine (9) out of eleven (11) files (91%) reviewed as evidence that a probationary or intern certificate was not issued until required exams were passed. The program did not meet the requirement as prescribed. [19 TAC §228.35(b)]
- Candidates did not complete the field-based experience requirements prior to clinical teaching or internship. The EPP provided evidence that eight (8) out of eleven (11) files (73%) completed FBEs, but none of the files included 15 clock-hours of hands-on interaction with students. The program provided the start date of internship, field-based experience observation logs reflecting the date, subject area, grade level, campus, district, time in/out, and signatures by the observed teacher. One file did not contain any

FBE information at all, one file has not had any training, and one file only had 20 clock-hours of FBEs. The program did not meet the requirement as prescribed. [19 TAC §228.35(b)(1)]

- Eight (8) out of eleven (11) files contained evidence of field-based experiences completed. All files completed between three (3) to twenty-six (26) reflections and the variety of settings ranged from one (1) to four (4) settings. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(1)(A)]
- There were not any candidate files that contained evidence of FBEs including the start of the school year. Nine (9) out of eleven (11) files were reviewed. One file had no FBEs and one file had not started training. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(2)(F)]
- Candidates either completed eighty (80) clock-hours of coursework and training plus 30 clock-hours of FBEs or 150 clock-hours of coursework and training plus 30 clock-hours of FBEs based on what the EPP thought was required in terms of coursework prior to internship; however, not all of the hours provided in the 150 are required in TAC. The evidence provided included the start date of internship for applicable files, documents tracking hours for courses, and EPP transcripts. The program did not meet the requirement of completing required coursework and/or training prior to internship as prescribed. [19 TAC §228.35(b)(2)]
- South Texas Transitions to Teaching EPP had four (4) files that were late-hires. Those candidates completed required FBEs within ninety (90) days of assignment. The program met the requirement as prescribed. [19 TAC §228.35(d)]
- Eight (8) out of eleven (11) candidate files reviewed reached the point of internship. The EPP only offers internships. Each file contained a statement of eligibility and placement information with start/end dates of internship assignment, grade level, campus, subject area, mentor and field supervisor assigned. The program met the requirement as prescribed. [19 TAC §228.35(e)(2)(C)(i)]
- Two (2) candidate files reviewed had additional internship extensions. Only one (1) out of two (2) files (50%) received appropriate field supervision during the additional internships. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(2)(C)(iii)]
- Both files that had additional internships did have statements of eligibility and probationary certificates issued as recommended by the EPP. The record of additional internship required was provided, but no deficiency plan was provided. One (1) out of two (2) files reviewed (50%) received appropriate field supervision during the additional internships. The program did not meet the requirement as prescribed. [19 TAC §228.35(e)(2)(C)(v)]

- All eight (8) files reviewed that reached the point of internship were placed in public school assignments. The statement of eligibility noting school placement served as evidence of compliance. The program met the requirement as prescribed. [19 TAC §228.35(e)(4)]
- South Texas Transitions to Teaching EPP had a Mentor Handbook with a training signature page provided. Five (5) out of eight (8) mentors (63%) assigned to candidates placed in internship assignments were trained by the school district. Certificates (credentials) were provided for three (3) of the eight files reviewed. The program provided additional evidence that all mentors were trained, but did not provide evidence that all held the required credentials. The program did not meet the requirement as prescribed. [19 TAC §228.2(23)]
- Five (5) out of eight (8) mentors (63%) of files reviewed contained evidence that the school district provided mentor training. Mentor training certificates and a mentor handbook were provided as evidence. The remaining three (3) files contained no evidence. The program did not meet the requirement as prescribed. [19 TAC §228.35(f)]
- While candidate placement information showing the date of placement and the field supervisor assigned was provided, there was no evidence of credentials for the field supervisors provided or evidence of continuing professional education (CPE) earned if the field supervisor held a standard certificate. The program did not meet the requirement as prescribed. [19 TAC §228.35(g)]
- The program provided a field supervisor handbook. Three (3) field supervisors provided certificates of completion for statewide field supervisor training from Region 1 and Region 13 Education Service Centers (ESCs). While the EPP provided evidence of statewide field supervisor training for those supervising candidates on or after September 1, 2017, there was no evidence that any field supervisor received local field supervisor training. For the files reviewed, nine (9) field supervisors were assigned to eight (8) candidates that had reached the point of internship. The program did not meet the requirement as prescribed. [19 TAC §228.35(g)]
- There was no evidence that any field supervisor made an initial contact with candidates assigned within the first three (3) weeks of assignment. The program did not meet the requirement as prescribed. [19 TAC §228.35(g)]
- There was no evidence that the field supervisor provided a pre- or post-observation conference for any file reviewed. All that was provided were the observation documents signed by the field supervisor and candidate for the eight (8) files reviewed. The program did not meet the requirement as prescribed. [19 TAC §228.35(g)]
- Field supervisors provided a copy of the written feedback to the candidate, but not to the campus administrator. There was also no evidence that the mentor collaborated with the field supervisor. The program did not meet the requirement as prescribed. [19 TAC §228.35(g)]
- Of the eleven (11) files reviewed, seven (7) out of nine (9) files (78%) that had reached the point of internship did not meet the requirements for duration and frequency. The first

observation did not occur within the first six (6) weeks of assignment for four (4) files reviewed. One (1) file did not contain any observation documents for the probationary extension. One (1) file contained one (1) hard copy of an observation, but that document was not dated and TEA could not determine if that observation matched what was reported in ECOS. The program did not meet the requirement as prescribed. [19 TAC §228.35(g)(1-8)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §228.35(a)(1) *South Texas Transitions to Teaching EPP does not provide candidates with adequate preparation and training.*

Action: Provide candidates with 300 clock-hours of standards-based coursework and training.

- 19 TAC §228.35(a)(2) *Coursework and/or training is not sustained, rigorous, intensive, interactive, candidate-focused, and performance-based.*

Action: Require all training to be sustained, rigorous, intensive, interactive, candidate-focused, and performance-based.

- 19 TAC §228.35(a)(5)(B) *South Texas Transitions to Teaching EPP did not have procedures for allowing prior experience, education, or training.*

Action: Post the EPP procedures for allowing candidates to use prior experience, education or training on the website, on any admission material, and in the candidate handbook.

- 19 TAC §228.35(a)(6)(A-C) *Coursework and/or training that is offered online does not meet Quality Matters or Distance Education Accrediting Commission (DEAC) standards.*

Action: Require the EPP to seek QM or DEAC accreditation for all online coursework.

Information re: QM accreditation can be found at the [QM website](#). The contact person is Melissa Poole at mpoole@qualitymatters.org.

Information re: DEAC accreditation can be found at [DEAC Accreditation](#). The contact person is Nan Ridgeway at nan.ridgeway@deac.org.

Action: If the EPP does not have any online curriculum, then the reference must be removed from the handbook and anyplace that it is stated.

- 19 TAC §228.35(b); 19 TAC §228.35(b)(2)(A-J) *Candidates do not receive a minimum of 300 clock-hours of coursework and training and 150 clock-hours do not occur prior to internship.*

Action: Require South Texas Transitions to Teaching EPP to provide a minimum of 300 clock-hours of coursework and training that is standards-based.

Action: One hundred-fifty (150) clock hours of that coursework and training must occur prior to internship (unless the candidate is a late-hire) and candidates must demonstrate proficiency in:

(A) designing clear, well-organized, sequential, engaging, and flexible lessons that reflect best practice, align with standards and related content, are appropriate for diverse learners and encourage higher-order thinking, persistence, and achievement;

(B) formally and informally collecting, analyzing, and using student progress data to inform instruction and make needed lesson adjustments;

(C) ensuring high levels of learning, social-emotional development, and achievement for all students through knowledge of students, proven practices, and differentiated instruction;

(D) clearly and accurately communicating to support persistence, deeper learning, and effective effort;

(E) organizing a safe, accessible, and efficient classroom;

(F) establishing, communicating, and maintaining clear expectations for student behavior;

(G) leading a mutually respectful and collaborative class of actively engaged learners;

(H) meeting expectations for attendance, professional appearance, decorum, procedural, ethical, legal, and statutory responsibilities;

(I) reflect on his or her practice; and

(J) effectively communicating with students, families, colleagues, and community members.

- 19 TAC §228.35(b)(1); 19 TAC §228.35(e)(1)(A); 19 TAC §228.35(e)(2)(F) *South Texas Transitions to Teaching EPP did not provide a minimum of 30 clock-hours of field-based experiences.*

Action: Require the EPP to require 30 clock-hours of field-based experiences (FBEs). Fifteen (15) clock-hours of FBEs must include a candidate, under the direction of the EPP, actively engaged in instructional activities that include:

authentic school settings in a public school accredited by TEA or other school approved for this purpose;

instruction by content certified teachers;

actual students in classrooms / instructional settings with identity-proof provisions; and

content or grade-level specific classrooms / instructional settings; and

written reflection of the observation.

Action: Candidates also need to experience a full range of professional responsibilities that shall include the start of the school year. The start of the school year is defined as the first 15 instructional days of the school year. If these experiences cannot be provided through clinical teaching, they must be provided through field-based experiences.

- 19 TAC §228.35(e)(ii)(C)(iii)(III) *Candidates completing additional internship assignments that meet requirements for an internship were not appropriately supervised by the EPP.*

Action: Require the EPP field supervisors to supervise candidates in additional internships. Candidates on a probationary certificate are required to have a first observation within the first six (6) weeks of assignment, a second observation during the second third of the assignment, and a third observation during the last third of the assignment.

- 19 TAC §228.35(e)(2)(C)(v) *South Texas Transitions to Teaching EPP did not provide ongoing support for the full term of the additional internship.*

Action: Require the EPP to provide ongoing support during the additional internship assignments.

- 19 TAC §228.2(23) *Mentors did not hold the required credentials.*

Action: Require mentors to be certified in the certification class for which they are mentoring candidates.

- 19 TAC §228.35(f) *Mentors were not trained.*

Action: Require the EPP to provide mentor training to all mentors assigned to candidates or allow the training to be provided by the school, district, or regional service center.

Action: Require the EPP to maintain dated sign-in sheets if the EPP provides the training or dated certificates of completion if the school, district, or ESC provides the training.

- 19 TAC §228.35(g); 19 TAC §228.2(16) *Field supervisors do not hold the required credentials.*

Action: Require the field supervisors to be certified in the category for which they are supervising / observing candidates. Maintain a copy of each field supervisor's credentials in each candidate file.

- 19 TAC §228.35(g) *Field supervisors have not been trained.*

Action: Require South Texas Transitions to Teaching EPP to locally train all field supervisors within the first three (3) weeks of assignment.

The purpose of local training is to ensure that the field supervisors know, understand, and implement the current requirements for frequency, duration, and format of field supervision. It is also to ensure that each field supervisor know what documentation must be completed for each candidate.

Action: Require any field supervisor assigned to candidates after September 1, 2017 to receive state-wide field supervisor or T-TESS training. Maintain documentation of that training in candidate files.

- 19 TAC §228.35(g) *The field supervisor did not make the required initial contact with candidates within the first three (3) weeks of assignment.*

Action: Require each field supervisor assigned to a candidate to make initial contact with the candidate within the first three (3) weeks of assignment. Initial contact may be made in person, via phone, or email communication.

Action: Require the EPP to maintain documentation of initial contact for every candidate.

- 19 TAC §228.35(g) *The field supervisor did not hold the required conferences (pre- and post-observation conferences) before and after each formal observation.*

Action: Require each field supervisor to conduct a pre- and post-observation conference before and after each formal observation. Maintain dated documentation of those conferences in each candidate file.

- 19 TAC §228.35(g) *The campus administrator did not receive a copy of formal observation documentation.*

Action: Require the EPP to provide formal observation documentation to the campus administrator for each candidate on a probationary or intern certificate for every observation conducted by the field supervisor. Maintain dated documentation in each candidate file. The purpose for providing the campus administrator a copy of the observation documentation is because the campus administrator makes recommendations for hire each year and needs to see the progress each candidate is making.

- 19 TAC §228.35(g)(1-8) *Formal observations conducted by the field supervisor did not meet the requirement for frequency and duration.*

Action: Require field supervisors to conduct formal observations as follows:

Each observation must be 45 minutes in duration.

The initial contact must be made within the first three (3) weeks of assignment.

The first formal observation must occur within the first six (6) weeks of all internship assignments.

Action: For the intern certificate: The EPP must provide a minimum of three (3) observations during the first half of the internship and a minimum of two (2) observations during the last half of the internship.

Action: For the probationary certificate or additional internships on a probationary certificate: The EPP must provide a minimum of one formal observation during the first third of the assignment, a minimum of one formal observation during the second third of

the assignment, and a minimum of one formal observation during the last third of the assignment.

Action: For clinical teaching: For clinical teaching (14 weeks full day): The EPP must provide a minimum of one formal observation during the first third of the assignment, a minimum of one formal observation during the second third of the assignment, and a minimum of one formal observation during the last third of the assignment. For an all-level clinical teaching assignment in more than one location, a minimum of two formal observations must be provided during the first half of the assignment and a minimum of one formal observation must be provided during the second half of the assignment.

Recommendations:

- Strongly consider using a consistent form or method to document each benchmark completed by candidates to reach standard certification.
- Strongly consider requiring late-hire candidates to submit their school district transcripts noting the fifty (50) clock-hours of specific standards-based training earned. Consider allowing trainings such as T-TESS, GT training, bilingual training, and classroom management training to be used as a portion of the training that late-hire candidates may use for training completed within ninety (90) days of assignment.
- If the EPP does not want to add a procedure for allowing prior experience, the statement on the website, admission material, and the handbook, could be that the EPP does not allow candidates to use prior experience, education, or training.
- Strongly consider making the initial contact requirement a part of the local field supervisor training.
- Strongly consider making the pre- and post-observation conference requirement a part of the local field supervisor training.
- Consider providing a copy of the observation documentation to the campus administrator via email with read receipt. Maintain that dated documentation as evidence of compliance.

Based on evidence presented, South Texas Transitions to Teaching EPP is not in compliance with 19 TAC §228.35 – Program Delivery and On-Going Support.

COMPONENT V: ASSESSMENT AND EVALUATION OF CANDIDATES AND EPP – 19 TAC §228.40

Findings

- South Texas Transitions to Teaching EPP did not have established benchmarks to measure candidate progress. The EPP only provided a practice test summary sheet with date the practice exam was passed for each file reviewed. That is one benchmark. Examples of benchmarks were provided to the EPP. Examples include: Criteria for admission met with date met; Date 150 clock hours of coursework + 30 FBEs completed:

Date criteria for testing was met; Date criteria for internship eligibility were met; Date internship started and completed; and date all requirements for standard certification were met and certificate was issued. The program did not meet the requirement as prescribed. [19 TAC §228.40(a)]

- The EPP has processes to ensure candidates are prepared to be successful on their content examinations. Ten (10) out of eleven (11) files reviewed (91%) contained a document with multiple choice responses selected on a practice test and a pass/fail score noted. Candidates are not allowed to test until a passing score is achieved. The program met the requirement as prescribed. [19 TAC §228.40(b)]
- A candidate who is prepared in different certification in which the candidate was admitted must request to change certification fields in writing. One (1) candidate file reviewed was a candidate that requested to switch certification fields. The written request to switch fields was provided for that candidate. The program met the requirement as prescribed. [19 TAC §228.40(c)]
- The EPP does not process for determining that formally admitted candidates are prepared to take certification examinations. A dated record verifying that candidates had passed a practice exam was provided for ten (10) out of eleven (11) of files reviewed (91%) was provided, but the criteria for testing was not published on website. The program did not meet the requirement as prescribed. [19 TAC §228.40(d)]
- The EPP uses information from a variety of sources to evaluate program design and delivery. South Texas Transitions to Teaching EPP self-reported that internal/external assessments were used to evaluate program design & delivery. The program met the requirement as prescribed. [19 TAC §228.40(e)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §228.40(a) *South Texas Transitions to Teaching EPP does not have established benchmarks to measure candidate progress.*

Action: Require the EPP to develop a standard set of benchmarks to measure candidate progress through the EPP. Those benchmarks should include: criteria for admission and date met by each candidate; criteria for testing and date met by each candidate; 150 clock-hour requirement of coursework & training prior to clinical teaching or internship and date met by each candidate; 30 clock-hours of field-based experiences requirement prior to clinical teaching or internship and date met by each candidate; if a candidate was a late-hire, date that 150 clock-hours of coursework plus 30 clock-hours of field-based experiences were completed within 90 days of assignment; if candidate was a late-hire, the 50 clock-hours of school district training accepted by the EPP; internship eligibility documentation in candidate file and date intern or probationary certificate was issued for each candidate. Include the date the remaining required coursework is completed for each candidate and the date 300 clock-hours of coursework / training complete and standard certificate issued.

- 19 TAC §228.40(d) *South Texas Transitions to Teaching EPP does not have a process for determining that formally admitted candidates are prepared to take certification exams, specifically the criteria for testing are not published.*

Action: Require the EPP to publish the criteria for testing on the EPPs website, on any admission material, and in candidate handbooks.

Recommendations:

- For candidates that request in writing to switch certification fields, ensure that the written request is signed and dated.

Based on evidence presented, South Texas Transitions to Teaching EPP is not in compliance with 19 TAC §228.40 – Assessment and Evaluation of Candidates of Candidates for Certification and Program Improvement.

COMPONENT VI: PROFESSIONAL CONDUCT - 19 TAC §228.50

Findings

19 TAC §228.50 requires that during the period of preparation, the educator preparation program shall ensure that the individuals preparing candidates and the candidates themselves understand and adhere to Chapter 247 of this title (relating to Educators' Code of Ethics).

- Seven (7) out of eleven (11) files reviewed (64%) had a signed Texas Educator's Code of Ethics on file with the EPP, but nine (9) out of eleven (11) files (81%) signed a document indicating that they had received training regarding the Texas Educator's Code of Ethics.
- Nine (9) EPP staff signed a Texas Educator's Code of Ethics. Signature documents were submitted for all staff.

Compliance Issues to be Addressed (see Compliance Plan):

- None.

Recommendations:

- None.

Based on evidence presented, South Texas Transitions to Teaching EPP is in compliance with 19 TAC §228.50 - Professional Conduct.

COMPONENT VII: COMPLAINTS PROCESS – 19 TAC §228.70

Findings:

- Per 19 TAC §228.70(b)(1), the South Texas Transitions to Teaching EPP complaints process is on file at TEA.
- South Texas Transitions to Teaching EPP reported in the Status Report that the complaints policy is posted on the website and TEA verified that it was posted. The EPP met the requirement as prescribed. [19 TAC §228.70(b)(2)]
- The EPP self-reported in the Status Report that the complaints policy is posted at the physical site. The EPP met the requirement as prescribed. [19 TAC §228.70(b)(3)]

- The EPP self-reported in the Status Report that it provides written documentation about filing complaints to all. The program met the requirement as prescribed. [19 TAC §228.70(b)(4)]

Compliance Issues to be Addressed (see Compliance Plan):

- None.

Recommendations:

- Consider placing the EPP complaint policy in the South Texas Transitions to Teaching Candidate Handbook where any candidate can easily access it.

Based on evidence presented, South Texas Transitions to Teaching EPP is in compliance with 19 TAC §228.70 – Complaints Process.

COMPONENT VIII: CERTIFICATION PROCEDURES - 19 TAC §228 and §230

Findings

- Official transcripts were found in ten (10) out of eleven (11) files reviewed (91%) as evidence that the candidates met the appropriate degree requirements for certification. Candidates are required to hold a bachelor's degree from an accredited institution of higher education at the time of admission. The program met the requirement as prescribed. [19 TAC §230.13(a)(1)]
- Candidates met the appropriate preparation, experience, and/or licensure certification, or registration requirements. Candidates seeking an intern, probationary, or standard certificate all met the requirements and passed required exams prior to issuance. All eleven (11) files held an intern and/or probationary certificate and three (3) out of eleven (11) files had reached the point of standard certification. While the EPP did not maintain a record of exams passed, TEA verified within the Educator Certification Online System (ECOS) that the required exams were passed prior to issuance of certificates. The program met the requirement as prescribed. [19 TAC §230.13(b)(2)]
- Three files reached the point of standard certification. The program provided a record of EPP completion and the testing history for those three (3) files as evidence of compliance. The program met the requirement as prescribed. [19 TAC §230.13(a)(2)]
- South Texas Transitions to Teaching EPP originally did not provide a testing history for any of the eleven (11) files reviewed. During a second submission of documentation requested by TEA, the program provided the testing history for the three (3) files (27%) that had reached the point of standard certification. The program did not meet the requirement as prescribed. [19 TAC §230.13(a)(3)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §230.13(a)(3) *South Texas Transitions to Teaching EPP did not maintain documentation of passing scores on comprehensive examinations prescribed by the*

State Board for Educator Certification (SBEC) as specified in §230.21 of this title (relating to Educator Assessment) for all candidates.

Action: Require the EPP to maintain a testing history for each candidate that shows the date that the candidate took each exam required for certification and the date that the candidate passed the exam.

Recommendations:

- Strongly consider maintaining the testing history for each candidate on the benchmark document as a record of the testing benchmark being achieved and completed.

Based on evidence presented, South Texas Transitions to Teaching EPP is not in compliance with 19 TAC §228 and §230 – Certification Procedures.

COMPONENT IX: INTEGRITY OF DATA REPORTED - 19 TAC §229

Findings

South Texas Transitions to Teaching EPP has not reported required data in an accurate manner. Six (6) out of eight (8) files that were in an internship had issues with observations reported. The first file contained a Statement of Eligibility that showed a hire date prior to the certificate start date and the last observation was not entered into ECOS. The second file had two probationary certificates: a probationary and a probationary extension. The EPP only provided field supervision and observations during the first probationary certificate. The third file had a probationary start date of August 10, 2017, but the first observation was not until November 16, 2017, as documented in ASEP. The first observation did not occur within the first six (6) weeks of assignment. The fourth file contained a probationary certificate that began on August 16, 2017, but the first observation did not occur until November 3, 2017, as documented in ASEP. The first observation did not occur within the first six (6) weeks of assignment. The fifth file contained an intern certificate that began on October 20, 2017, but the first observation did not occur until December 17, 2018, as documented in ASEP. Only three (3) observations were reported in ASEP. Observations four (4) and five (5) will occur in the fall of 2018. The sixth file contained one hard copy observation that was not dated and it could not be determined if the observation occurred on September 28, 2016, as was documented in ASEP. The program did not meet the requirement as prescribed. [19 TAC §229.3(f)(1)]

Compliance Issues to be Addressed (see Compliance Plan):

- 19 TAC §229.3(f)(1) *South Texas Transitions to Teaching did not accurately report the frequency and durations of formal observations conducted by the field supervisor.*

Action: The EPP will accurately report the frequency and duration of all observations conducted for candidates in an internship assignment on an intern certificate, probationary certificate, and clinical teaching, as applicable.

Recommendations:

- None.

Based on evidence presented, South Texas Transitions to Teaching EPP is not in compliance with 19 TAC §229 – Integrity of Data Reported.

GENERAL PROGRAM RECOMMENDATIONS

- To ensure continuity in record keeping and other related processes, consider creating a procedure manual documenting EPP processes.
- Implement quality control procedures to ensure ASEP reports, including GPA spreadsheets, are submitted accurately during state reporting each year.
- Align the verbiage of the program to the verbiage of Texas Administrative Code (TAC) (ex. Field supervisor, cooperating teacher, mentor, candidate, etc.);
- 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.

SUMMARY

A Compliance Plan was created collaboratively with the South Texas Transitions to Teaching EPP staff on August 20, 2018 and the first check-in date for compliance items is October 15, 2018.