



2020 – 2021 Continuing Approval Review Report A+ Texas Teachers

PURPOSE

Texas Education Agency (TEA) Program Specialists, Lorrie Ayers, Angela Von Hatten, Leslie Anaya, and Guiomar Andujar conducted a five-year Continuing Approval Review of the A+ Texas Teachers educator preparation program (EPP) on March 30 – April 1, 2021. 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...". Linley Dieringer, was identified as the program Legal Authority and the primary EPP contact for the review. A+ Texas Teachers (ATT) was approved as an EPP on January 14, 2005. At the time of the review, the EPP was rated Accredited. The risk level was Stage 1 (high) due to an excessive number of complaints submitted by their candidates within the five (5) years since their last review. The EPP reported 6120 finishers for the 2018-2019 reporting year and 5620 finishers for 2019-2020.

At the time of the review, ATT was approved to certify candidates in the Teacher class in the alternative certification route.

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 Virtual On-site 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 the certification class and certification route 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. Evidence of compliance was measured using a rubric aligned to TAC. A Compliance Plan was developed to address plans for quality improvement.

EPP staff participating in the review at various stages were: Linley Dieringer, Ann Kucera, Ashley Arroyo, Lacey Labruzzo, Lauren Poe, Pamela W. Butler, Patrick Donlon, and Rachel Harless

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 March 15, 2021. Additional EPP documents, including records for 30 candidates, were submitted on March 29, 2021. 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 compliant” with any identified component, the program should consult the TAC and must correct the issue immediately. A “Compliance Plan” was 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 Chapter 228

Findings

- The Status Report and related documents were submitted to TEA on March 15, 2021 which meets the requirement in 19 TAC §228.10(b)(1).
- On January 27, 2021 ATT, or “Texas Teachers of Tomorrow”, received formal notification of full accreditation for 7 years from the Association for Advancing Quality in Educator Preparation (AAQEP).
- ATT uses a secure portal that allows candidates and others involved in candidate preparation and supervision to upload records which are then securely stored. EPP staff have efficient access to records and to notes of interactions with candidates when called upon by TEA or other entities for information.
- It was discussed with EPP staff that TEA receives a large volume of calls periodically regarding a variety of issues where callers state they have been referred by EPP staff. EPP staff are encouraged to try to limit referrals to TEA to the areas where TEA can assist. For example, EPP staff should not refer candidates to TEA for written permission to waive requirements, for permission to test, to approve a Statement of Qualifications or a Statement of Eligibility, and so forth. EPP directors are encouraged to provide periodic training to advisors so that they are current on requirements.
- Some information published on the website about clinical teaching is misleading to the reader. The clinical teacher promise suggests that candidates can become a teacher in 14 weeks which is not accurate because of the preservice requirement of 180 hours before clinical teaching can begin. Additionally, the information about clinical teaching inaccurately reflects that a clinical teacher candidate will be a “teacher of record” and will qualify for service This information must be updated for accuracy.
- There was no evidence that the EPP has an active advisory committee as required in 19 TAC §228.20(b).
- The governing body has provided sufficient support and resources. The legal authority participation in all aspects of the review served as evidence of compliance. [19 TAC §228.20(c)]



- The program has an exit policy for dismissing candidates which is published in the candidate handbook; however, there is no clear policy for determining when an inactive candidate is to be removed from the enrollment roster. The program is encouraged to implement some internal structures for tracking candidates that are active and inactive. It is suggested that a candidate that has been inactive for 5 years or more should be removed, or “exited” from the program due to changes over time in coursework and preparation requirements. This recommendation is based on the requirement that the EPP cannot accept prior coursework from new candidates if that coursework is older than 5 years per 19 TAC §228.35(a)(5).

Compliance Issues to be Addressed (see Compliance Plan)

1. [19 TAC §228.20(b)] Establish an active advisory committee that meets the requirements for membership and activity.
2. [19 TAC §247.2(1)(A)] Update the information about clinical teaching that is advertised on the website so that it accurately represents what a candidate can expect from the clinical teaching experience.

Recommendations

- Provide periodic training to EPP staff, including candidate advisors, so that they are current on requirements and are current on acceptable reasons for referring candidates to TEA for assistance.
- Establish internal structures for removing inactive candidates from the enrollment roster.
- Application A used for approval to add new certificate areas has changed – plan to review requirements to prepare for adding new certificate areas.
- Review all certificate areas that the EPP no longer plans to support and request, in writing, for TEA to remove them from inventory.
- Educator testing transition information posted on the EPP website appears to be outdated and reflects information on the ETS to Pearson transition in 2018. EPP staff are encouraged to review and update the information as needed.
- The test prep page “It’s Time for Test Prep” that is accessed via the Pricing link identifies 3 steps to take to register for a test: 1) set up a TEAL account; 2) set up a Pearson account; and 3) register for the test. These steps could be confusing to candidates because the candidate may already have a TEAL account since the common practice is for the EPP admission staff to set up the TEAL account for a candidate that does not have a TEA identification (ID) number. These instructions could result in candidates establishing duplicate accounts which will ultimately interfere with testing and thus, disrupt preparation for the candidate. The program is encouraged to update wording on the webpage to coincide with the practices of the EPP. Encourage candidates whenever



possible to set up their own educator accounts and provide the TEA ID number to the EPP.

- The “State Documentation” link on the EPP website connects to an old EPP map at TEA that is no longer supported. Program staff are encouraged to remove the link or redirect it.

Based on the evidence presented, A+ Texas Teachers is not compliant with 19 TAC Chapter 228 – Governance of Educator Preparation Programs.

COMPONENT II: ADMISSION - 19 TAC Chapter 227

Findings

- The website contains information about the program and details various processes for enrollment and for completing clinical teaching or internship. Additionally, the candidate handbook provides more detail than is found on the webpages.
- The program admission requirements that are posted on the website and in the candidate handbook are aligned with requirements in 19 TAC §227.10:
 - Hold a bachelor’s degree or higher from an accredited university;
 - Submit official transcripts reflecting a minimum overall GPA of 2.5 and the degree conferred date;
 - Complete an interview with program staff; and
 - Pay the enrollment fee.
- On the website there is a page called Pathfinder to Enroll that allows applicants to choose an admission pathway based on their credentials. The short questionnaire populates an electronic application that details additional requirements needed based on the credentials of the applicant:
 - A credential review by a TEA-approved credential evaluation service and TOEFL scores for an applicant with a degree from out of country;
 - A Pre-Admission Content Test (PACT) exam for an applicant with a GPA below 2.5; or
 - Instructions on contingency admission for an applicant in the final semester of earning a bachelor’s degree.
- Candidates are prepared in areas that require licensure and work experience. For applicants that do not have a degree but want to pursue a certificate category that requires licensure and work experience, it was noted that the application identifies information about the employer as “optional” and the application instructions require the applicant to contact the EPP for additional requirements. Employment details and licensure information are then collected separately on a Statement of Qualifications document.



- The electronic application contains a written notice that candidates will be required to complete a background check prior to certification and prior to employment which meets the requirement in 19 TAC §227.1(b). The application also details that a criminal history may jeopardize the individual's ability to teach and/or be employed. 19 TAC §227.1(d) requires notification that a criminal history may make a candidate ineligible for certification upon completion of an EPP and that the individual has a right to request a Preliminary Criminal History Evaluation (PCHE) from TEA. To be compliant with 19 TAC §227.1(d), the program must either update the information on the application to reflect the additional verbiage or must place the information in a conspicuous place on the website that is accessible to applicants and candidates.
- Program admission requirements were apparent via the Pathfinder to Enroll; however, completion requirements were not apparent on the website. Completion requirements are detailed in the candidate handbook which is not available to the applicant unless the applicant requests more information about the program. Additionally, information about the performance over time of the EPP and the effect of supply and demand on the workforce was not transparent on the website which does not meet requirements in 19 TAC §227.1(c)
- Records for 30 candidates were reviewed for evidence of compliance with admission requirements. The following was identified in these records:
 - Each of the records reviewed contained a completed application which meets the requirement in 19 TAC §227.10(a)(8).
 - Transcripts were identified in records for each of the 30 candidates reflecting that each held the degree required for the certificate sought, met the basic skills requirement, and 27 out of 30 met or exceeded the minimum GPA requirement. One (1) candidate admitted for Trade & Industrial Education 6-12 was admitted with an associates degree and a Statement of Qualifications reflecting the appropriate licensure and work experience. [19 TAC §227.10(a) and §227.10(d)]
 - Two (2) candidates were admitted with a GPA below 2.5. One (1) record contained the documentation of work experience, extraordinary circumstance and a passing score on a content pedagogy exam as required in 19 TAC §227.10(a)(3)(B). There was no related documentation for the second candidate which does not meet the requirement in 19 TAC §227.10(a)(3)(B) for admitting applicants with a GPA less than 2.5.
 - 19 TAC §227.10(a)(4) requires teacher applicants to demonstrate content knowledge prior to admission by having completed 12 or more semester credit-hours in the subject area of the certificate sought, or 15 or more credit-hours if the subject area is math or science at grade 7 or above. If transcripts do not reflect the required hours, the applicant must demonstrate content knowledge by passing a PACT prior to admission. Per information on candidates' transcripts, subject-specific content hours required for admission could not be verified or did not match the certificate area in which the candidate was presumed to be admitted for 9 of the 30 candidates which does not meet the requirement.



- Four (4) candidates were admitted into certificate areas that require licensure and work experience. Statement of Qualifications (SOQ) documents were found in the records for three (3) of the candidates which does not meet the requirement in 19 TAC §227.10(d).
- Per 19 TAC §227.10(a)(7), all applicants must demonstrate proficiency in English language skills prior to admission. Twenty-eight of the 30 candidates whose records were reviewed met the requirement with transcripts reflecting a degree conferred in the United States (US). One (1) candidate admitted in the Trade & Industrial Education 6-12 area met the requirement with a transcript reflecting an associate's degree. One (1) candidate admitted with credentials from outside the US met the minimum proficiency scores on the TOEFL-iBT.
- 19 TAC §227.10(a)(8) requires an applicant to an EPP to be screened to determine if the "applicant's knowledge, experience, skills, and aptitude are appropriate for the certification sought". Published admission requirements identify that applicants are screened prior to admission using a phone interview with an admissions advisor. Records for 8 of the 30 candidates reflected evidence of a screen with the score identified which indicates the program inconsistently documents the screening process.
- The 21 candidates with admission dates in 2017 and after were expected to have been formally or contingently admitted as required in 19 TAC §227.17 or §227.15 as applicable. Records for each of the candidates contained written offers of admission that had been accepted by the candidate; however, the effective date of admission was not embedded in the offers. TEA had been notified within 7 days of the admission of 15 of the 21 candidates which does not consistently meet the requirement in 19 TAC §227.17(e) for formal admission or §227.15(c) for contingency admission. Transcripts for the 6 contingently admitted candidates provided evidence of a degree conferred within the semester of contingency admission as required in 19 TAC §227.15(a)(1).

Compliance Issues to be Addressed (see Compliance Plan)

1. [19 TAC §227.1(d)] Update verbiage regarding criminal history to reflect that a criminal history may make an individual ineligible for certification and add that the individual has the right to request a PCHE from the TEA.
2. [19 TAC §227.1(c)] Update information on the website related to a) program completion requirements; b) the performance of the EPP over 5 years; and c) the effect of supply and demand on the workforce so that applicants may access the information.
3. [19 TAC §227.15 and §227.17] Update the formal and contingency admission processes to include the date of formal admission in the offer letter and 2) to ensure an admission record is created for each admitted candidate within 7 calendar days of the formal date of admission.
4. [19 TAC §227.10(a)(4)] Update the admission process to qualify an applicant for admission into one or more certificate area(s) and then collect all requirements, including



subject-specific semester credit-hours for each certificate area identified at admission. Report the hours in the ECOS admission record as applicable for each admission area.

5. [19 TAC §227.10(a)(8)] Update the admission screening process to ensure all screeners score the screen and collect the evidence of the completed, scored screen. Establish a cut score that an applicant must meet for admission and/or to place the admitted candidate in the appropriate certificate area.
6. [19 TAC §227.10(d)] Update the admission process to ensure each candidate admitted into one of the three (3) areas requiring licensure and work experience has an SOQ on file that was approved prior to the date of formal admission.

Recommendations

- Some information posted on the website is not clear and does not reflect alignment with related information posted elsewhere. Consider reviewing and revising information across all areas including form letters sent to applicants and candidates, web pages, and handbooks so that messaging and information is consistent, accurately represents current program activities and requirements, and is aligned with requirements in TAC.
- Provide training to admissions staff regarding qualifying applicants for a specific certificate area to ensure candidates are prepared and certified in an area that they want to pursue and that they are qualified to pursue. Admission records should, overall, reflect the area in which the candidate is prepared, tested, and certified, unless the candidate submits a written request to change to a new certificate area after admission.
- The PACT changed effective January 27, 2020. Passing scores on TExES exams cannot be used to meet EPP admission requirements after 1/27/2020 but may be used for certification purposes until the expiration date of the test or the related certificate. The new PACT, or "TX PACT", is a content-pure assessment that cannot be used for certification purposes. Ensure EPP benchmarks and test readiness requirements have been updated to address the changes in PACT,
- Revise information about applicants/candidates from out of country and their ability to begin an internship with a P number. A candidate must hold a valid Intern or Probationary certificate when completing an internship. Issuance of the certificate requires the candidate to complete the fingerprinting process which requires a social security number and cannot be completed with a P number.
- Update the Statement of Academic Integrity document Testing Policy which identifies "Texas Teachers reserves the right to not issue a 24/12 highly qualified letter based on interns' GPA and or test attempts prior to admission to program". Highly qualified based on 24/12 is no longer an option unless it is an EPP requirement, and passing scores on one or more required exams is/are required for issuance of an Intern or Probationary certificate.



Based on the evidence presented, A+ Texas Teachers is not compliant with requirements in 19 TAC Chapter 227 - Admission Criteria.

COMPONENT III: CURRICULUM – 19 TAC §228.30

Findings

- The curriculum was reviewed for candidates seeking certification in the Core Subjects EC-6 certificate area which was identified as the area of highest enrollment and lowest performance that required the Science of Teaching Reading test effective January 1, 2021. The curriculum was evaluated using coursework, self-reported information, and course descriptors to determine if it met the requirements for alignment with a variety of educator standards as well as to ensure the coursework provided the additional curriculum requirements in 19 TAC §228.30(c) and (d) and in §228.35(a) and (b). The following was identified in course materials:
 - There was insufficient evidence to support the curriculum is research-based. Several sources were cited but most of them were sources of information for the Learning Theories module only which does not meet the requirement in 19 TAC §228.30(b). EPP staff identified that the coursework is research-based and will submit evidence of sources used to develop coursework.
 - The coursework appeared to align with most educator standards; however, standards related to The Science of Teaching Reading and content methodology standards were not evident in the curriculum. Additionally, for some courses the lesson objectives, assignments, and rubrics were misaligned with the standards in the coursework and with each other.
 - Elements of TEKS Instruction were present in coursework; however, understanding the intent of TEKS and their vertical alignment was not adequately taught or assessed.
 - 19 TAC §228.30(c) and (d) require additional topics to be covered in curriculum for candidates seeking certification as a teacher. The following required subject matter was found in coursework provided to candidates seeking certification in the Core Subjects EC-6 certificate area:
 - The Educators' Code of Ethics in 19 TAC Chapter 247;
 - Instruction regarding mental health, substance abuse, and youth suicide;
 - The Pre-Kindergarten guidelines;
 - The skills that educator are required to possess, the responsibilities educators are required to accept, and the high expectations for students in Texas;
 - The importance of building strong classroom management skills;
 - Appropriate relationships, boundaries, and communications between educators and students; and
 - The skills and competencies captured in the Texas Teacher standards in 19 TAC Chapter 149.
 - The following required instruction was either not identified in coursework materials or was not covered sufficiently:



- Instruction in digital learning that is aligned with International Society for Technology in Education (ISTE) standards, including a digital literacy evaluation followed by a prescribed digital learning curriculum;
- The English language proficiency standards (ELPS);
- Instruction in effective multisensory strategies for teaching students with dyslexia; and
- The framework for teacher and principal evaluation in Texas;

Compliance Issues to be Addressed (see Compliance Plan)

1. [19 TAC §228.30(a)] Update the curriculum to include more standards-based coursework including standards related to preparation in:
 - The Science of Teaching Reading; and
 - Content-specific methodology for all certificate areas.Revise related objectives, activities, and rubrics to align with the standards in the updated curriculum.
2. [19 TAC §228.30(a)] Update the curriculum to include more coursework and assessments in understanding and using TEKS to inform instruction and assessment in the K-12 classroom; and revise related objectives, activities, and rubrics to align with the updated coursework.
3. [19 TAC §228.30(b)] Submit documentation of research used in coursework development.
4. [19 TAC §228.30(c)(2)] Update the course containing dyslexia training to include more instruction in effective multisensory strategies for teaching students with dyslexia.
5. [19 TAC §228.30(c)(6)] Update curriculum to include instruction in the framework for Principal evaluation in Texas.
6. [19 TAC §228.30(c)(8)] Update coursework to include the required evaluation of a candidate's digital literacy, and the prescribed curriculum to address deficiencies uncovered by the evaluation.
7. [19 TAC §228.30(d)(1)] Update coursework to include the updated ELPS where appropriate.

Recommendations

- None

Based on the evidence presented, A+ Texas Teachers is not compliant with 19 TAC §228.30-Curriculum.



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

Findings

- Candidates are required to complete at least 300 hours of coursework per the benchmark documents and EPP transcript documents reviewed for candidates who had achieved standard certification. It was noted that different published sources identified different numbers of coursework hours required. It was also observed that all candidates appear to complete the same coursework regardless of the certificate sought and that candidates may select electives of interest that may be subject and grade level specific but there does not appear to be a requirement for them to complete the elective modules. Of the 24 candidates who had completed, or were in process of completing internships, five (5) had completed at least 150 hours which is the pre-service minimum requirement in 19 TAC §228.35(b)(2). Some of the candidates who had not completed 150 hours had admission dates prior to the implementation of that requirement. Others may have been deemed “late hires” so would have been expected to complete the pre-service requirements within 90 days of the assignment start date. The program is advised to ensure candidates complete the required pre-service hours and advised to review Late Hire rules to ensure candidates complete pre-service training as appropriate. Program literature identified up to 72 hours for test preparation and project completion. The program was encouraged to build in more hours of instructional coursework as “homework and projects” are independent practice. EPP staff were advised they must add content-specific methodology to their coursework for each certificate area per 19 TAC §228.30(a) which requires the educator standards to be the basis of instruction.
- While the coursework contained multiple formative assessments that were mostly quizzes at the end of each module, the coursework lacked, overall, performance-based activities and assessments. There were intern projects due at the end of the internship but coursework does not require candidates to demonstrate proficiency in skills in pre-service areas. All assessments of performance occur during or after clinical teaching or internship, which does not meet the requirement in 19 TAC §228.35(a)(2) which requires candidates to demonstrate proficiency in the prescribed pre-service areas prior to clinical teaching or internship.
- The coursework and training is offered online and is self-paced for candidates who are admitted on a rolling basis throughout the year. 19 TAC §228.35(a)(6) requires that courses offered online must meet, or the EPP must be making progress toward meeting, criteria set for accreditation, quality assurance, and/or compliance through one or more of the following options:
 - Accreditation or Certification by the Distance Education Accrediting Commission;
 - Program Design and Teaching Support Certification by Quality Matters;
 - 19 TAC Chapter 4, Subchapter P (relating to Approval of Distance Education Courses and Programs for Public Institutions); or
 - 19 TAC Chapter 7 (relating to Degree Granting Colleges and Universities Other than Texas Public Institutions).



The Status Report completed by EPP staff identified that, at the time of the review, two (2) staff members were completing peer reviewer training through Quality Matters (QM) and that, when they were finished in April 2021, EPP staff intended to apply for quality certification through QM. While technically the EPP is “making progress” toward meeting the requirement for quality of online coursework in 19 TAC §228.35(a)(6), they are currently at step one in that process. It was noted to EPP staff that the requirement became effective four (4) years ago on December 27, 2016 and that the EPP, as a fully online program, is expected to have progressed farther in the process of pursuing quality certification. EPP staff were encouraged to pursue quality certification of their online coursework with diligence from this point forward.

- Field-based experience (FBE) logs and transcripts in each candidate’s record provided evidence that candidates complete at least 30 clock-hours of FBE prior to clinical teaching or internship which meets requirements in 19 TAC §228.35(b)(1). For candidates who are Late Hires, the program policy allows 90 days for completion of the pre-service requirements as allowed in 19 TAC §228.35(d). Candidates are provided guidance in the candidate handbook about how to complete FBE requirements. The EPP allows up to 15 clock-hours of FBE to be delivered electronically such as via videos. Of the 30 candidates whose records were reviewed, 24 had progressed to the point of having completed the FBE requirements. FBE logs reflected that 22 candidates had completed at least 30 clock-hours as required in 19 TAC §228.35(b)(1) and that all but the late hires had completed the FBE prior to internship.
- Although it was stated that the EPP has updated its FBE process since the last 5-year review, the evidence provided did not allow TEA staff to clearly identify which FBE requirements the 24 candidates met. It was noted that part of the observation and interaction time was spent providing written responses to EPP questions about the experience. As such, compliance with 19 TAC §228.35(e)(1) could not be determined.
- Per published materials on the website and in the candidate handbook, candidates are required to complete either 14 weeks of clinical teaching or an internship of one (1) full school year which meets the requirements in 19 TAC §228.35(e)(2). Of the 30 candidates whose records were selected for review, 24 had completed, or were in process of completing an internship and although the EPP reported 56 candidates completing clinical teaching in 2020-2021, none of the clinical teachers were randomly selected for review. Six of the 30 candidates had not progressed to that point in their training.
 - ECOS data and placement information in candidates’ records were evidence that candidates were appropriately certified for the placement and the certificate sought which meets requirements in 19 TAC §228.35(e)(2)(B). All internship assignments were in public schools per observation documentation provided which meets the requirement in 19 TAC §228.35(e)(6).
 - Candidates were not assigned qualified mentors during internship as required in 19 TAC §228.35(f).



- Each of the 24 candidates was assigned a field supervisor during the internship. Field supervisors for 22 of the 24 candidates met the qualification requirements in 19 TAC §228.2(18). Educator certificates and resume documents retained in EPP records provided evidence of qualifications. The EPP met the training requirements in 19 TAC §228.35(g). They have a trained trainer on staff to provide the TEA-approved observation training to field supervisors. Additionally, field supervisors attended EPP specific training regarding EPP policies and updates to field supervision requirements in TAC.
 - There was insufficient evidence that field supervisors consistently make first contact with candidates during the first three (3) weeks of the assignment or that field supervisors provide ongoing coaching and support to candidates throughout the internship assignment as required in 19 TAC §228.35(g).
 - The observation instrument used by field supervisors for formal observations allows the field supervisor to capture assignment information, date and duration of observation, evidence of pre- and post-conferences, evidence of educational practices observed, and a determination of proficiency in the standards observed. Completed observation instruments were found in the records for each of the 24 candidates who had completed internships which meets requirements for field supervision in 19 TAC §228.35(g). Observations were completed as required for duration and frequency; however, 7 of the candidates appeared to have observations conducted outside of the school day. Program staff identified that all observations should happen during the school day and for these observations, the post-conference time may have been mistakenly recorded as the observation time.
 - Candidate proficiency in the standards was captured during the internship for 19 of the 24 candidates. The remaining 6 candidates were evaluated with an old observation instrument that is no longer used. Twenty of the 24 candidates were expected to have a recommendation from the campus supervisor and the field supervisor that the candidate was proficient in the standards and was ready to be standard certified. Recommendations were identified in 17 of the 20 records which meets the requirement in 19 TAC §228.35(e)(2)(B)(vii).
 - Field supervisors could not provide copies of the observation documentation to mentors and could not collaborate with mentors throughout the candidate assignment because mentors were not assigned to candidates which does not meet the requirements in 19 TAC §228.35(g).
- Per 19 TAC §228.35(e)(2)(B)(vii) the EPP must notify TEA within a prescribed time period when a certificate must be deactivated because a candidate has left an assignment. Per the deactivation request log at TEA, 181 of the 342 certificates that were deactivated in the 8/13/2019-3/4/2021 time period did not meet the requirement.

Compliance Issues to be Addressed (see Compliance Plan)

1. [19 TAC §228.35(b)] Establish a concrete number of hours that must be completed by candidates in all certificate areas that equals 300 or more without including optional



electives. Additional hours could include the required addition of content-specific methodology (re: Component 3, Compliance Item #1).

2. [19 TAC §228.35(a)(2) and (b)(2)] Update coursework to provide more opportunities for candidates to apply knowledge and practice skills. Add performance assessments to allow candidates to demonstrate proficiency in skills in pre-service coursework as applicable to the standard assessed.
3. [19 TAC §228.35(e)(1)(A)-(C)] Although it was stated that the EPP has updated its FBE process, the evidence provided does not allow TEA staff to clearly identify which FBE requirements the 30 candidates selected for review had completed. Provide evidence of the EPP requirements that candidates must meet to complete FBE.
4. [19 TAC §228.2(26), §228.35(f), and §228.35(g)] Implement a process to ensure candidates are assigned mentors during internship. Ensure each mentor meets the qualification requirements and receives the appropriate training. Establish a process to collect evidence of qualifications and training for each mentor. Additionally, establish a process for documenting collaboration between mentors and field supervisors and a process for ensuring mentors receive observation feedback for assigned candidates.
5. [19 TAC §228.35(g)] Update the requirements for field supervisors to ensure they a) make the required first contact with the candidate; and b) provide ongoing coaching and support to candidates completing clinical teaching or internships. Update the collection of evidence related to candidate contact so that contacts are documented.
6. [19 TAC §228.35(g)(1)] Update field supervisor requirements and training so that observations are completed during the school day/assignment or the time of the observation is accurately recorded on the observation document.
7. [19 TAC §228.35(e)(2)(B)(vi) and (vii)] Review new requirements in TAC related to certificate deactivation, including new notifications required prior to the start of the internship, and update the process for requesting certificate deactivations from TEA.

Recommendations

- EPP staff are encouraged to review feedback on principal and teacher surveys and update program areas where necessary to increase the number of candidates who are sufficiently or well-prepared to be effective in the classroom.
- Quality certification of online courses should be pursued with diligence from this point forward. ATT has been an online program for 10 years or more and the quality certification requirement has been effective for at least 4 years. The EPP should be farther along in the process of seeking quality certification for the online courses.
- Develop and implement more performance assessments in all programs. Evidence of performance assessments is a requirement for adding new certificates using the new Application A.



Based on the evidence presented, A+ Texas Teachers is not compliant 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

- ATT uses information from a variety of sources to evaluate program design and delivery. The report “Standard One Candidate and Completer Performance” identifies that, based on Principal and Teacher survey data, the program will strengthen content pedagogy instruction for all certificate areas by summer of 2021. [19 TAC §228.40(e)]
- The EPP has established benchmarks to measure candidate progress. Each candidate record contained a benchmark document which charted candidate progress through coursework and other program requirements. [19 TAC §228.40(a)]
- As required in 19 TAC §228.40(b) and §228.40(d), ATT requires candidates to complete at least 6 hours of test preparation to ensure that candidates are prepared to be successful on their certification exams. There are a variety of test preparation resources posted on the website including a variety of strategies for each of several certificate areas. Additionally, testing policies are published in the candidate handbook. Based on admission dates and test approval dates, none of the 30 candidates were given approval to test prior to admission which meets the requirement in 19 TAC §228.40(d) that says the EPP cannot grant test approval to an individual until he or she has been contingently or formally admitted.
- 19 TAC §228.40(c) allows the EPP to prepare a candidate and grant test approval for a classroom teacher certificate category other than the category for which the candidate was initially admitted to the EPP if the candidate requests it in writing. At admission, candidates sign a general authorization allowing the EPP to grant additional test approvals as deemed in the best interest of the candidate.
- The EPP collects and retains candidate records through a secure portal. The EPP provided candidate records as requested for the review which served as evidence that the EPP consistently retains records as required for a period of five (5) years from admission to completion or withdrawal from the program. [19 TAC §228.40(f)]

Compliance Issues to be Addressed

- None

Recommendations

- None



Based on the evidence presented, A+ Texas Teachers is compliant with 19 TAC §228.40 – Assessment and Evaluation 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 EPP shall ensure that the individuals preparing candidates and the candidates themselves understand and adhere to 19 TAC Chapter 247 (relating to Educators' Code of Ethics).

- Candidates do not consistently provide clear assurances of understanding and abiding the ECOE. At admission, candidates electronically sign a document that contains a variety of EPP policies and expectations, including a Statement of Academic Integrity that identifies the ECOE and the expectation that candidates follow it. A signed document was found in 23 out of the 30 candidate records reviewed. The document does not get an attestation from the candidate of understanding and abiding the ECOE. The EPP was advised to update the wording on this document to collect that agreement from the candidate.
- It was noted that the Statement of Academic Integrity document contained several other policies and/or requirements that were based on out of date information, such as references to 24/12 highly qualified requirements for being issued a Probationary extension, and references to PPR approval only granted to candidates who are holding Probationary certificates. EPP staff are encouraged to update this document as it appears to be a legal agreement between the candidate and the EPP.
- All associated staff and field supervisors signed an agreement of reading, understanding, and abiding the ECOE.

Compliance Issues to be Addressed (see Compliance Plan)

1. [19 TAC §228.50] Update the language in the Academic Integrity Agreement or add an element into the coursework and training in ethics to capture evidence the candidate understands and agrees to adhere to the ECOE. Ensure a copy of the signed document is retained in the records for each candidate.

Recommendations

- EPP staff are encouraged to update the policies and requirements represented on the document that also contains the Statement of Academic Integrity so that they reflect current information.

Based on the evidence presented, A+ Texas Teachers is not compliant with 19 TAC §228.50 - Professional Conduct.



COMPONENT VII: COMPLAINTS PROCESS – 19 TAC §228.70

Findings

- Per 19 TAC §228.70(b), the EPP complaints process is on file at TEA. The policy is posted under the Complaints link on the EPP website and is available in written form in the candidate handbook, but there is no link to the TEA complaints process as required.

Compliance Issues to be Addressed (see Compliance Plan)

1. [19 TAC §228.70(b)(2-4)] In all areas where the EPP complaints process is posted electronically, add a link to the TEA complaints process.

Recommendations

- None

Based on the evidence presented, A+ Texas Teachers is not compliant with 19 TAC §228.70 – Complaints Process.

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

Findings

- Eighteen of the 30 teacher candidates whose records were reviewed had achieved standard certification at the time of the review.
 - Candidates met degree requirements for certification. Each certified candidate either held a degree or an approved SOQ. Transcripts and SOQ documents in records were evidence. [19 TAC §230.13(a)(1), §230.13(b)(1), and §230.13(b)(2)]
 - Benchmark documents containing EPP transcripts of coursework completed reflected that candidates completed EPP requirements prior to standard certification as required in 19 TAC §230.13(a)(2) & §230.13(b)(3)
- Twenty-four of the 30 candidates were issued either Intern or Probationary certificates for the purpose of completing an internship or an internship extension. Candidates met the coursework and field-based experience requirements prior to issuance except it was noted that some candidates with admission dates that were in the past were still being held to the pre-service requirement of 80 hours of coursework and 30 hours of FBE and not the current requirement of 150 hours of prescribed coursework and 30 hours of FBE. The EPP was strongly encouraged to create an exit policy that provides a clear point of exit from the program for candidates that are inactive for extended periods of time and that requires them to be readmitted to continue the program to prevent candidates from being currently certified under “old” requirements. Alternatively, update the policy document signed by candidates to identify that if the program is not completed within a specific amount of time, new requirements may need to be met.

Compliance Issues to be Addressed

- None



Recommendations

- The transition from test #291 to test #391 for issuance of the Core Subjects with STR EC-6 certificate is in process. December 31, 2021 is the last administration date for test #291. Candidates can use test #291 for issuance of the certificate through December 2022. TEA strongly encourages EPPs to begin reminding candidates and past finishers of these timelines. For candidates who have not attempted testing on the #291, approve testing on the #391.
- The EPP was strongly encouraged to create an exit policy that provides a clear point of exit from the program for candidates that are inactive for extended periods of time and that requires them to be readmitted to continue the program to prevent candidates from being currently certified under “old” requirements. Or alternatively, consider updating the policy document signed by candidates at admission to identify that if the program is not completed within a specific amount of time, new requirements may need to be met.

Based on the evidence presented, A+ Texas Teachers is compliant with 19 TAC Chapters 228 and 230 – Certification Procedures.

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

Findings

- ATT has submitted ASEP data each year within the timeline required by TEA. Requested corrections to data were also made by the program within the required timeline which meets the requirement for reporting by September 15 in 19 TAC §229.3(e).
- Candidate admission dates are reflected in the Test Approval screen. Six of the 30 candidates were reported in Test Approval with two (2) different admission dates but there were no new admission documents for the second admission so it was assumed that the second of the two (2) admission dates was a reporting error.
- Candidate enrollment status is reported each year on the Finisher Records List. Candidates are retained each year with a status of Other Enrolled in the certificate area sought. Status is updated to “Finisher” when candidates have completed all EPP requirements. Enrollment records are consistently not reported accurately relative to the certificate sought by the candidate. This is a consistent issue that is frequently seen when TEA assists candidates and districts who contact the agency with questions about candidate preparation. In this review, four (4) of the 24 candidates completed an internship in a certificate area that did not match the certificate area reported for the candidate on the Finisher Records List. TEA strongly encourages EPP staff to implement a process to accurately track candidate enrollment, updating as needed to reflect the certificate sought by each candidate if that should change after admission. TEA assumes that data submitted by the EPP is an accurate representation of the activities of the EPP.



- The EPP is required to report the subject-specific coursework hours completed prior to admission for each candidate in the year in which the candidate is admitted. The accuracy of the hours reported could not be verified for 14 of the 30 candidates due to either a) discrepancies in the number of related hours on candidates' transcripts when compared with those reported; or b) confusion about the subject area in which the candidate was actually admitted.
- The admission dates reported for 26 of the 30 candidates whose records were reviewed were reported accurately when compared with dates on admission documents in the candidates' records.
- The overall and admission GPA must be reported for each candidate in the year in which the candidate is admitted. The GPA data reported for 23 of the 30 candidates was accurate when compared with transcripts in the candidates' records. Seven of the candidates either had old admission dates so the GPA that was reported could not be linked to the candidate or the candidate was admitted with an SOQ so the GPA did not have to be reported.

Compliance Issues to be Addressed (see Compliance Plan)

1. [19 TAC §229.3(a), §229.3(f)(1), & related graphic Figure 19 TAC §229.3(f)(1)] Review admission requirements around qualifying candidates for admission into specific certificate areas. Train admissions staff to collect the number of subject-specific credit-hours related to the one (1) or two (2) certificate areas of admission as per the qualifications of the candidate. Report subject-specific credit-hours for each area of admission in the admission record in ECOS.

Recommendations

- The records for ATT candidates do not appear to be an accurate depiction of the activities and status of candidates in the program. This is widespread and was evident in the 30 candidates whose records were selected for this review. Test approval admission dates sometimes reflect two (2) dates with no new admission records present for the second admission date. Enrollment records are not an accurate representation of the certificate area(s) pursued by candidates. Additionally, at least three (3) of the 30 candidates selected for review appeared to have been inactive for multiple years suggesting the actual enrolled number reported each year may be inflated. The program is strongly advised to review data collection and reporting processes and update processes where needed to ensure accurate records are kept and reported for all candidates.

Based on the evidence presented, A+ Texas Teachers is not compliant with 19 TAC Chapter 229 – Integrity of Data Reported.



PROGRAM RECOMMENDATIONS AII EPPS

- To ensure continuity in record keeping and other related processes, consider creating a procedure manual documenting EPP processes.
- 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 TAC;
- Continue to participate in training and webinars provided by the Division of Educator Preparation to ensure that the program staff is knowledgeable about current requirements and changes in the TAC;
- 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 A+ Texas Teachers staff. Per 19 TAC §229.6(b), the EPP must submit evidence to TEA that all “Compliance Issues to be Addressed” have been corrected on or before August 1, 2021.

“I have reviewed the EPP Report and agree that all required corrections will be made on or before August 1, 2021.”

Signature of Legal Authority

Date

Printed Name of Legal Authority

Date