



## 2017 – 2018 Continuing Approval Review Report

### A Career in Teaching – Corpus Christi (108-703)

#### PURPOSE

Texas Education Agency (TEA) Program Specialist, Kerri Elzie, conducted a five-year Continuing Approval Review of the educator preparation program (EPP) A Career in Teaching – Corpus Christi (108-703) on April 30, 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...". Mr. Adrian Fernandez was identified as the program Legal Authority and primary EPP contact for the review process. ACiT-CC was approved as an EPP on December 10, 2004. At the beginning of the review, the EPP accreditation status was Accredited for the 2015-2016 academic year. During the progress of the review, the EPP accreditation status for the 2016-2017 academic year was released as Accredited – Warned. At the time of the review, ACiT-CC was approved to certify candidates in the following classes: Classroom Teacher and Principal; however, the Principal certification was not active.

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 and Action Plan were developed 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: Adrian Fernandez, JoAnna Fernandez, and Dr. Jaime Lopez.

#### 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 April 16, 2018. Additional EPP documents, including records for 10 candidates, were submitted on April 30, 2018. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence.



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### 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 §228.20

##### Findings

Component I: Governance was not fully reviewed, but TEA noted the following:

- The EPP is approved and accredited with the State Board for Educator Certification and TEA. The EPP is not accredited by any other accrediting bodies. 19 TAC §228.10(a)
- The EPP confirmed in the Status Report that they meet the minimum requirements for support and resources, advisory committee membership, member training, activities, and frequency of meetings. 19 TAC §228.20(b-c)
- TEA has record that the EPP restructured in 2016, and notification was provided to TEA. The EPP indicates that a curriculum review was initiated in spring 2018, and will be launched in summer 2018. 19 TAC §228.20(e)
- The EPP has a calendar of activities posted on their website. 19 TAC §228.20(g)

Based on the evidence presented, ACiT-CC complies with 19 TAC §228 – Governance of Educator Preparation Programs.

**Recommendations: None**

#### COMPONENT II: ADMISSION - 19 TAC §227.10

##### Findings:

TEA reviewed the admission practices of the EPP in accordance with 19 TAC Chapter 227, and found that:

- Applicants were informed of requirements for admission via the website, application, orientation, and admission materials. Candidates signed an agreement that they understood the information. 19 TAC §227.1(c)
- Most candidates met the degree requirement with original university transcripts. One candidate was admitted with a degree from an unaccredited university, resulting in cancelation of the probationary certificate. 19 TAC §227.10(a)(1)



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- Candidates with degrees from countries outside the United States provided a foreign credential evaluation from an approved entity. 19 TAC §227.10(e)
- Three candidates did not meet the GPA requirements, but were admitted under the 10% exception rule. Two candidates provided a statement of extraordinary circumstances, but information regarding work, business, or career experiences equivalent to the GPA requirement was not provided. Program policy for accepting equivalent experience and achievement was not present. 19 TAC §227.10(a)(3)(B)
- Most candidates demonstrated content knowledge prior to admission by either a passing score on a Pre-Admission Content Test (PACT) or college coursework. 19 TAC §227.10(a)(4)
- Applicants met basic skills requirements by holding college degrees, except for the candidate whose degree was from an unaccredited university. 19 TAC §227.10(a)(5)
- Six candidates met the English proficiency requirement by degrees earned in United States accredited universities. One candidate's degree from an unaccredited university was not accepted for English proficiency. One candidate passed the Test of English as a Foreign Language (TOEFL), but the score report was not acceptable since it was from the examinee. One candidate produced a TOEFL score report from 1981 that is not acceptable since it is outdated and is not the same test. The 1981 TOEFL did not include speaking. One candidate had neither a U.S. degree nor a TOEFL score report. 19 TAC §227.10(a)(6)
- Candidate were required to complete an application for admission and submit to an interview. The Accountability System for Educator Preparation (ASEP) data shows a 100% admission rate. The EPP once used the Cornell Critical Thinking Test, but this practice has been discontinued. 19 TAC §227.10(a)(7)
- The candidate with outdated 1981 TOEFL scores transferred from another EPP, and a high number of hours was indicated on the transfer form. It is not clear how the hours were applied, although the candidate bypassed Phase I and the field-based experience portions of the training. EPP policy for transfer candidates was not provided. 19 TAC §227.10(c)
- One candidate for Health Science certification met requirements with a Registered Nurse license that was current at the time of admission and two years of RN experience. 19 TAC §227.10(d)
- Candidates were given formal admission letters with dates that, for the most part, match the dates in the Educator Certification Online System (ECOS). There were two discrepancies between the dates on the admission letters and the dates entered on ECOS. 19 TAC §227.17(a)
- It could not be determined whether candidates were admitted to the EPP prior to beginning coursework. The coursework was checked off on a benchmark form, but no dates were provided for completion of each course. Candidates were admitted before test approval was given. 19 TAC §227.17(e)



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Based on the evidence presented, ACiT-CC does not comply with 19 TAC §227 - Admission Criteria.

- The EPP admitted and certified a candidate whose bachelor's degree was granted by an unaccredited university. 19 TAC §227.10(a)(1)
- The EPP did not have a clear policy for admitting candidates whose GPA is less than 2.5. 19 TAC §227.10(a)(3)(B)
- The EPP admitted candidates who did not meet English language proficiency requirements. 19 TAC §227.10(a)(6)
- ASEP data indicates that the EPP admitted all candidates who applied. 19 TAC §227.10(a)(7)
- The EPP admitted a transfer candidate with unacceptable TOEFL scores, and it could not be determined what courses and training were accepted. 19 TAC §227.10(c)
- It could not be determined whether coursework was completed prior to admission. 19 TAC §227.17(e)

### Recommendations:

- The EPP must use the TEA-approved resources to verify university accreditation status before accepting a degree for admission.
- The EPP should establish a policy for accepting work, business, or career experience of a person whose GPA does not meet the minimum requirement for admission.
- The EPP must provide applicants with the EPP's assigned TOEFL entity code and verify TOEFL scores using secure access to the TOEFL website. TOEFL scores are valid for no more than 2 years.
- The EPP should review the screening process to determine whether the interview and rubric are sufficiently rigorous to identify potentially successful candidates and suitability for the certificate sought.
- The EPP should develop a written policy for accepting transfer candidates' previous coursework and training.
- The EPP should carefully document admission date and the beginning of coursework to ensure that training does not precede the date of admission.

### COMPONENT III: CURRICULUM – 19 TAC §228.30

The curriculum component was not reviewed; however, it should be noted that the EPP needs to select from the approved providers for mental health, substance abuse, and youth suicide training.



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

#### Findings:

TEA reviewed the program delivery and ongoing support practices of the EPP in accordance with 19 TAC Chapter 228.35, and found that:

- The EPP maintains records of testing history, course plans, program overviews, and benchmarks that address standards for multiple years. All 2016-2017 finishers reviewed passed tests and were recommended for a standard certificate. Two enrolled candidates reviewed from 2016-2017 have not yet passed content tests to become eligible for an internship. Two enrolled candidates who were in teaching internships for 2017-2018 passed content tests but have not attempted the PPR. 19 TAC §228.35(a)(1)
- The EPP's coursework and training appears to meet requirements. Coursework for mental health, substance abuse, and youth suicide is not through an approved provider. 19 TAC §228.35(a)(2)
- Program benchmarks, checklists, schedules of coursework, and tracking logs indicate that teacher candidates receive at least 300 hours of training prior to completion of the program and issuance of a standard certificate. 19 TAC §228.35(a)(3)
- EPP does not have written procedures for acceptance of military training and experience. 19 TAC §228.35(a)(5)(A)
- EPP does not have written procedures for acceptance of prior experience, education, or training from other EPPs. 19 TAC §228.35(a)(5)(B)
- Benchmark documents reflect completion of 300 hours for standard certification; however, it is unclear when candidates completed coursework. 19 TAC §228.35(b)
- Documentation was not sufficient to verify that candidates who were issued intern or probationary certificates completed the required field-based experience prior to internship. Candidates completed 30 experiences, but not 30 hours. 19 TAC §228.35(b)(1)
- Documentation was not sufficient to verify that candidates completed the required coursework prior to internship. Coursework did not reflect the date on which each course was completed. 19 TAC §228.35(b)(2)
- Documentation was not sufficient to verify that candidates completed the required number of hours of field-based experiences. 19 TAC §228.35(e)(1)(A)
- Documentation was not sufficient to verify that candidates completed acceptable FBEs via electronic transmission. Several candidates did complete video FBE's but it was difficult to determine the number of hours. 19 TAC §228.35(e)(1)(B)
- Candidates completed a successful internship, as evidenced by signed district forms and recommendations. 19 §228.35(e)(2)(C)(i)



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- Candidates who were placed in internships held probationary certificates while completing internship assignments. 19 §TAC 228.35(e)(2)(C)(iv)
- Candidates were recommended for additional internships, even though they had a successful internship the first year. They were extended solely for test completion. 19 TAC §228.35(e)(2)(C)(v)
- Candidates were supported during an additional internship, as evidenced by observation data, and were recommended for a standard certificate. 19 TAC §228.35(e)(2)(C)(vi)(I)
- Documentation of FBEs did not adequately reflect a full range of professional responsibilities, including the start of the school year. 19 TAC § (e)(2)(F)
- Candidates in internships were appropriately placed and fully documented, as evidenced by campus mentor forms. 19 TAC§228.35(e)(4)
- Internship candidates were assigned mentors as evidenced by the Campus Mentor Designee form and Campus Mentor Agreement form. 19 TAC §228.35(f)
- Mentors were certified, experienced and trained. Mentor guides and requirements were provided. One mentor’s teaching experience was not documented. 19 TAC §228.2(12) and (23)
- All mentors received training from the EPP as evidenced by a training certificate. 19 TAC §228.35(f)
- Field supervisors for teacher interns held the required credentials, were trained, and made the required initial contact. Interns received the required pre- and post-observation conferences and written feedback. Observation documents were signed by appropriate individuals. There was some evidence of informal observations, coaching collaboration via email and observation logs. 19 TAC §228.35(g)
- Formal observations for teacher candidates met the duration, frequency, and format requirements. 19 TAC §228.35(g)(1-8)

Based on evidence presented, ACiT-Corpus Christi is not in compliance with 19 TAC §228.35 – Program Delivery and On-Going Support.

- Candidates did not receive sufficient training as evidenced by test passing rates. 19 TAC §228.35(a)(1)
- Coursework for mental health, substance abuse, and youth suicide was not through an approved provider. 19 TAC §228.35(a)(2)
- EPP does not have a written policy for accepting relevant military experience. 19 TAC §228.35(a)(5)(A)
- EPP does not have a written policy for accepting prior experience, education, or training. 19 TAC §228.35(a)(5)(B)
- Field-based experiences were not sufficiently documented or evaluated, and did not include 30 hours. 19 TAC §228.35 (b)(1), (e)(1)(A)



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- Documentation did not verify completion of 150 clock hours of coursework and 30 hours of FBEs prior to the internship. 19 TAC §228.35(b)(2)
- Candidates were recommended for additional internships, even though the first internship was successful. The additional internships were recommended solely for testing purposes. 19 TAC §228.35(e)(2)(C)(v)
- Candidate training did not include experiences with a full range of professional responsibilities, including the start of the school year, prior to the internship. 19 TAC §228.35(e)(2)(F)

### Recommendations

- The EPP will redesign curriculum to ensure that coursework and training are aligned with all standards, and that the delivery is designed to ensure success in the classroom and on examinations. Coursework for mental health, substance abuse, and youth suicide must be selected from one of the approved providers.
- The EPP will redesign its field-based experiences process to ensure that all candidates complete 30 hours of FBE that meet specification in TAC, including a variety of experiences and the start of the school year. This may include up to 15 hours of electronic/video transmission. Care should be taken to ensure that candidate accurately document the FBEs and understand that they must complete 30 hours.
- The EPP will develop policies for accepting relevant military experience and for accepting the prior education, experience, and training of non-military candidates.
- The EPP will redesign its tracking of coursework and benchmarks to ensure that educators meet requirements for internships, as well as issuance of intern, probationary, and standard certificates. Course completion should be dated to reflect when candidates meet requirements of 150 clock hours of training and 30 hours of acceptable FBE's prior to internship and issuance of intern or probationary certification.

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

#### Findings

TEA reviewed the program assessment and candidate evaluation practices of the EPP in accordance with 19 TAC Chapter 228.40, and found that:



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- Benchmark information was provided through candidate transcripts, tracking documents, website, and handbook information. 19 TAC §228.40(a)
- EPP primarily requires the PACT for admission to the teacher program. Benchmark documents were provided. 19 TAC §228.40(b)
- TEA was unable to determine whether the EPP has a process for allowing a candidate to prepare and test in a different certification area for which the candidate is admitted. 19 TAC §228.40(c)
- TEA was unable to determine whether the EPP has a process for determining candidates' readiness to take certification examinations, such as the PPR test. 19 TAC §228.40(d)
- The EPP provided no information about the sources of information used to evaluate program design and delivery. 19 TAC §228.40(e)

Based on evidence presented, ACiT-Corpus Christi is not in compliance with 19 TAC §228.40 – Assessment and Evaluation of Candidates and EPP.

### Recommendations

- Develop and publish policy for allowing candidates to test, and revise documents to more clearly track their progress.
- Develop policy for allowing candidates to add or change certification fields that includes a written request and justification. Ensure that candidates are prepared in each certification field identified.
- Develop a data-driven plan to evaluate program design and delivery that includes internal and external sources, reports, and advisory committee input.

### COMPONENT VI: PROFESSIONAL CONDUCT - 19 TAC §228.50

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).

### Findings

TEA reviewed the professional conduct practices of the EPP in accordance with 19 TAC Chapter 228.50, and found that:





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- Each candidate signed a statement that they read, understood, and agree to the Texas Educator's Code of Ethics.
- EPP staff signed a statement that they read, understood, and agree to the Texas Educator's Code of Ethics. Signature documents were submitted for all staff.

Based on evidence presented, ACiT-CC complies with 19 TAC §228.50 - Professional Conduct.

### Recommendation:

- Stay abreast of changes to the Educators' Code of Ethics and update website and program materials accordingly.

## COMPONENT VII: COMPLAINTS PROCESS – 19 TAC §228.70

### Findings

TEA reviewed the complaints process of the EPP in accordance with 19 TAC Chapter 228.70, and found that:

- ACiT-CC has its complaints process on file at TEA. 19 TAC §228.70(b)(1)
- The EPP complaint policy is posted on its website, along with a link to the TEA complaints website. 19 TAC §228.70(b)(2)
- ACiT-CC has its complaint policy posted on the physical site, as evidenced by a picture and description of the physical site posting. 19 TAC §228.70(b)(3)
- The EPP provided complaints information in the form of a candidate handbook. 19 TAC §228.70(b)(4)
- Only one formal complaint has been registered at TEA and did not result in a rule violation.

Based on evidence presented, ACiT-CC complies with 19 TAC §228.70 – Complaints Process.

### Recommendations: None

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

### Findings

TEA reviewed the certification procedures of the EPP in accordance with 19 TAC Chapter 228 and Chapter 230, and found that:



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- Except for one candidate, degree requirements were met with official transcripts and/or credential evaluations. 19 TAC §230.13(a)(1)
- Career and technical education candidates met the occupational experience and licensure requirements. 19 TAC §230.13(b)(2)
- Candidates issued a standard certificate completed the EPP as evidenced by the standard certificate checklist. 19 TAC §230.13(a)(2) and (b)(3)
- Candidates issued standard certificates passed the required exams. 19 TAC §230.13(a)(3)

Based on evidence presented, ACiT-CC complies with 19 TAC §228, §230, and §241 – Certification Procedures.

**Recommendations: None**

### COMPONENT IX: INTEGRITY OF DATA REPORTED - 19 TAC §229.3(f)(1)

#### Findings:

TEA reviewed the data reporting practices of the EPP in accordance with 19 TAC §229, and found that:

The EPP has not reported the required data in an accurate and timely manner. 19 TAC §229.3(f)(1)

- Discrepancies were noted during the 2016-2017 data reporting period. Multiple resubmissions were needed to justify and reconcile data.
- Discrepancies were noted between admission dates and test approval dates.
- The number of enrolled candidates reported on the Status Report does not match the number of Other Enrolled candidates in ECOS.
- The number of candidates enrolled did not match the number of candidates approved for testing.
- Test approvals are not updated to current tests and statuses.
- ASEP data indicates that the EPP did not meet standards for internship observations. 19 TAC §229.4(a)(4)(A)(i)

Based on evidence presented, ACiT-CC is not in compliance with 19 TAC §229 – Integrity of Data Reported.

**Recommendations:**

EPP should establish new and refine existing policies and procedures to ensure accuracy of reporting:



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- Notify TEA within seven calendar days of a candidate's admission through uploading test eligibility status in ECOS. The EPP should also identify the candidates as enrolled or finisher in ASEP.
- Monitor the list of enrolled candidates and remove those who are not actively participating in the program.
- Update test approvals for currently enrolled candidates.
- Revise data-keeping procedures to facilitate accurate and timely reporting.

### GENERAL PROGRAM RECOMMENDATIONS

- To ensure continuity in record keeping and other related processes, continue to review and update processes through internal auditing.
- Ensure that all candidates meet the English proficiency requirement, including original TOEFL score reports for applicants who do not have a degree from the United States or approved countries.
- Develop and clearly articulate procedures for accepting candidates under the 10% exception to the GPA requirement, military candidates, and transfer candidates from other EPPs.
- Redesign procedures for accepting and recording field-based experience hours to comply with TAC, including a variety of experiences, and the start of the school year.
- Stay abreast of changes in the Educators' Code of Ethics and update program materials as needed.
- Ensure timely and accurate reporting by maintaining accurate candidate information in ECOS and the ASEP GPA Spreadsheet.

### SUMMARY

A Compliance Plan was created collaboratively with the ACiT-CC staff.