



Compliance Audit Report 2010-2011 Quality ACT, LP

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

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Program Specialists Dr. Phillip Eaglin and Mr. Mixon Henry conducted a Texas Education Agency Compliance Audit on October 12 - 14, 2010. The following are the findings and recommendations for program improvement.

Self-Report Submitted: September 14, 2010

COMPONENT I: COMMITMENT AND COLLABORATION - Texas Administrative Code (TAC) §228.20 – GOVERNANCE OF EDUCATOR PREPARATION PROGRAMS

Findings:

Quality ACT, LP is in compliance with all the indicators reviewed in accordance with Texas Administration Code (TAC) §228.20.

The advisory committee consists of 11 members: eight (8) from a school district, one (1) from higher education, one (1) from an Education Service Center (ESC), and one (1) from business and community. The composition of the advisory committee meets the requirements of TAC Section 228.20(b).

Advisory committee meetings were held on August 17, 2010, and on May 26, 2010. The next advisory committee meeting has been scheduled for February 15, 2011. According to the self-report, the date of the next meeting for the spring 2011 is to be determined. Meetings are held twice a year as required by TAC Section 228.20(b). Agendas and attendance records were available during the document review as evidence of compliance. No minutes of the meetings were kept by the program to confirm the level of committee member involvement. It is recommended that minutes of advisory committee meetings are kept to help record and reflect the participation of members in the analysis of program curriculum, design, evaluation, performance, improvement, and field-based experiences. Eight out of eleven advisory committee members responded to the questionnaire sent by the Texas Education Agency

(TEA). Sixty-two percent (62%) of the responding committee members indicated they had served on the advisory committee from one to three years. One hundred percent (100%) of the members also indicated that they were familiar with TAC Chapters §227, §228, and §229. One of the advisory committee members indicated that the type of teaching practicum offered by the program was “clinical teaching”. Thus, it was evident that this particular advisory committee member misunderstood the type of practicum offered by the program. Committee members should be provided more information on the practicum provided by the program.

From the questionnaire responses, there was evidence of advisory committee involvement in the evaluation of program performance and improvements, such as reviewing the number of students passing the TExES on the first attempt and reviewing evaluations submitted by principals. Half of the responding advisory committee members (50%) indicated that they do not participate in designing or revising the educator preparation program’s curriculum, and 3 out of 8 indicated that they do not participate in evaluating data for the purpose of preparing an improvement plan for the program. However, the May 26, 2010, meeting agenda indicated that program issues from the summer session training with teachers were among the topics of discussion. Curriculum design and structures should be discussed with members for the purpose of determining a better fit with the needs and requirements in the field. Advisory committee members should evaluate and provide feedback on ASEP data, qualitative evaluations from candidates, campus administrators, faculty personnel, mentors, field supervisors, program staff, and candidate retention.

Because of the importance of the advisory committee’s contributions and since there are ongoing revisions being made to TAC, it is recommended that yearly training such as that provided by the TEA webinar this fall, be provided to the members. Since the membership of the advisory committee, especially those new to the committee, may not be familiar with all of their roles in the analysis of program planning, evaluation and design, it is recommended that a handbook be developed. Committee members should be provided with state and federal reports related to educator preparation and teacher quality so that an overall program evaluation and recommendation can be made for program improvement. It is also strongly recommended that committee members continue to receive professional development regarding the Texas Administrative Code (TAC) §227, §228, §229 so that all recommendations can be clear and measurable.

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

Findings:

Quality ACT, LP is in compliance with Texas Administrative Code §227.10-Admission Requirements.

During the compliance audit, there was evidence that one candidate was admitted that had no basic skills test scores and did not appear to meet any Texas Success Initiative (TSI) exemption/exception—that candidate holds an out-of-country degree and was entered under a TSI exemption. Per TAC Rule §227.10(4), “for a program candidate who will be seeking an initial certificate, the candidate shall demonstrate basic skills in reading, written communication, and mathematics or by passing the Texas Academic Skills Program® (TASP®) test or the Texas Higher Education Assessment® (THEA®) with a minimum score of 230 in reading, 230 in mathematics, and 220 in writing. In the alternative, a candidate may demonstrate basic skills by meeting the requirements of the Texas Success Initiative (Texas Education Code, §51.3062) under the rules established by the Texas Higher Education Coordinating Board in Part 1, Chapter 4, Subchapter C of this title (relating to Texas Success Initiative).” Per TAC Rule §4.54 (a)(4) of the Texas Success Initiative, “a student who has graduated with an associate or baccalaureate degree from an institution of higher education and a student from an out-of-state institution of higher education who has satisfactorily completed college-level coursework is exempt from TSI requirements.” The TSI exemptions allow for students with degrees from out-of-state institutions of higher education. Therefore, the Quality ACT, LP program is in compliance with TAC Rule §227.10(4).

Per the program staff and the self-report, in order to be admitted into the program, candidates must submit the required application materials, undergo a transcript review, submit a writing sample rubric, and participate in an interview process. The interview was conducted by Ventures for Excellence, an outside consultant. Per TAC §230.413 (5), “an applicant for a Texas educator certificate must be able to speak and understand the English language sufficiently and be able to use it easily and readily in conversation and teaching”. The Test of Spoken English (TSE) test is accepted, but no longer can be administered. However, in May 2006, the State Board for Educator Certification (SBEC) approved use of the Test of English as a Foreign Language, an Internet-Based Test (TOEFL iBT) as an acceptable test of English language proficiency. The TOEFL iBT replaces the Test of Spoken English (TSE) for this purpose. It is recommended that the preparation program begin use of the TOEFL iBT for language testing.

Candidates were admitted under the 10% cohort rule per TAC §227.10. Sufficient evidence exists in candidate files that admission criteria were applied in an equitable manner for all candidates.

Prior to the visit, the Quality ACT, LP website indicated that a pre-admission application fee of \$50 was collected prior to the potential candidate taking the Pre-Admission Content Test (PACT). In discussions with Ms. Robbins, Director of Quality ACT, LP, it was stated that the website was outdated and that no fee is being collected prior to the PACT. TAC §227.10 (a) (3)

(C) allows degreed individuals who have not been enrolled in an educator preparation program (EPP) to take PACT to demonstrate content competency for possible admission in an EPP. EPP approval is not necessary for potential candidates to register and take a PACT content exam. Program staff updated the website prior to TEA's departure from the compliance audit to reflect the removal of the pre-admission fee prior to the application process. TEA staff was provided with a copy of that update.

The Quality ACT, LP program disseminates information to potential candidates through the advisory committee members, the Quality ACT, LP website, word of mouth/phone calls, flyers/brochures, the TEA website, job fairs hosted by two local universities and a Quality ACT, LP program-hosted job fair attended by local ISDs. An information session about the program will be held on November 18, 2010, and information about the program will be provided at the Texas Association of School Personnel Administrators (TASPA) conference. During the document review, TEA reviewed samples of candidate recruiting materials.

COMPONENT III. CURRICULUM - Texas Administrative Code (TAC) §228.30 – EDUCATOR PREPARATION CURRICULUM

Findings:

Quality ACT, LP is not in compliance with TAC §228.30 Educator Preparation Curriculum.

Per TAC §228.10 (e), an educator preparation program that is rated "accredited," as provided in §229.3 of this title (relating to The Accreditation Process), may request additional certification fields be approved by TEA, by submitting a curriculum matrix with a description of how the standards for Texas educators are incorporated into the educator preparation program's curriculum. TEA records indicate that the Quality ACT, LP program received approval for the Generalist EC-6 certification field on January 14, 2009. This was the curriculum area identified as a primary focus of the compliance audit.

TAC §223.30 (a) states that "the educator standards adopted by the State Board for Educator Certification (SBEC) shall be the curricular basis for all educator preparation and, for each certificate, address the relevant Texas Essential Knowledge and Skills (TEKS)." Prior to the visit, the program completed two of the charts showing the 17 curriculum areas and the Generalist EC-6 TEKS alignment. The two completed charts showed evidence of alignment. Following the visit, the TEA staff confirmed that an email was sent to the Executive Director notifying her of the compliance audit notification and the required Generalist EC-6 curriculum alignment charts to be completed.

When the additional charts were requested by TEA staff at the visit, the Quality ACT, LP program staff indicated that since all candidates were admitted using Pre-Admission Content Testing (PACT), they did not think that the program's curriculum needed to be aligned to the Generalist EC-6 educator standards, namely the content and methodology of teaching art,

music, language arts, math, physical education, health, science, and social studies. Since the program's curriculum materials provided for review did not include any alignment to the Generalist EC-6 educator standards, the Quality ACT, LP staff was asked if all of the candidates had been admitted using the PACT requirement. The staff indicated that was the case. Contrary to what was reported by Quality ACT, LP staff during the visit, the intern survey results indicated that 29% of the interns (9 out of 31) did not take the PACT prior to admission. ASEP records from 2009-2010 confirmed that all candidates were not admitted under PACT, and many were approved for content testing after admission by the Quality ACT, LP program. Prior to approval of content tests, the program is required to provide a Generalist EC-6 standards-based curriculum in knowledge and content methodology to prepare and support content preparation. TAC does not provide an exemption from the requirement that the program delivers a curriculum aligned to the content and methodology of the SBEC-approved educator standards. No coursework and/or module curricular materials, syllabi, major instructional activities, or benchmarks and structured assessments aligned to the Generalist EC-6 educator standards were provided during the compliance audit. Program staff indicated that the additional Generalist EC-6 educator standards alignment charts could be provided, but not by the last day of the compliance audit. Since the program's Generalist EC-6 curriculum materials and alignment charts were not available, it was not possible for TEA staff to review curriculum alignment with the Generalist EC-6 educator standards as required by TAC §223.30.

To prepare candidates who are not admitted into the program under PACT, as well as for those that use PACT for admission, TAC §223.30 requires that content instruction be included in the curriculum and be aligned to the Generalist EC-6 educator standards as the curricular basis for all of the educator preparation program's curriculum. To be in compliance with TAC §223.30, it is recommended that the program conduct an extensive curriculum review/audit, and develop and align the teacher preparation curriculum with the SBEC approved educator standards related to each of the program's approved certification fields. For each certification field offered, the educator preparation program shall provide candidates with coursework and/or training that is directly related to that certification area and is aligned to the state standards for the applicable certification field. It is also recommended that the program's Generalist EC-6 curriculum be developed so that a high degree of alignment with the English Language Proficiency Standards (ELPS) found in TAC Chapter §74.4 are evident. The program does provide a balanced literacy course, which is delivered in two sessions. The course was added for elementary education candidates based on district need and principal input from Irving ISD.

It is recommended that the Reading in the Content Area Module be enhanced by including strategies for teaching scientific reading and scientific vocabulary development. When information was requested on how the science content area is being addressed in the curriculum, it was not evident that it was being adequately addressed in the curriculum modules. The Quality ACT, LP program staff indicated that heterogeneous grouping of candidates in the summer session allows for the different content area backgrounds to direct learning. From the review of the curriculum, it also appears that the program is not preparing its prospective science teachers using instructional models based on recent research for how students learn science. Per the subject-specific knowledge and skills of the SBEC-approved educator standards (particularly for the secondary science subjects), it is recommended that the program adequately prepares science teachers by including in the curriculum recent learning theories

such as those described in the National Research Council's *How Students Learn: Science in the Classroom*.

Quality ACT, LP provided an organizational chart and field supervisor resumes. There were eight (8) field supervisors on staff. All of them are Texas certified, six with master's degrees, and two with bachelor's degrees. Resumes for the nineteen (19) summer institute instructors were available. Many nationally-recognized speakers were secured for the summer institute presentations.

Ninety-six percent (96%) of the interns (28 out of 29 responding) indicated in the questionnaire administered by TEA that they had been provided with a clear and concise course syllabus. In reviewing the available course syllabi, it was found that consistent and common components were not included. Those included in the syllabi were test domains, competencies, and TxBESS Framework, as well as the presenter's name and session topics. It is recommended that the syllabi also include instructor contact information, content descriptions, session goals and objectives, TEKS (if applicable), SBEC-approved educator standards, field-based experiences guidelines, classroom policies, types of assessments, and criteria for scoring formative and summative assessments. It is also recommended that the aligned English Language Proficiency Standards (ELPS) are included in the syllabi so that candidates can specifically understand how and why the ELPS are being addressed.

A free-standing test preparation training session of six hours has been developed and delivered to ensure candidate success on the TExES test.

COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT - Texas Administrative Code (TAC) §228.35 – PREPARATION PROGRAM COURSEWORK AND/OR TRAINING

Findings:

Quality ACT, LP is in compliance with TAC §228.35 Preparation Program Coursework and/or Training.

The program is delivered in a face-to-face format during a summer institute. Two online courses are offered by Quality ACT, LP: 1) an ethics course offered through Education Service Center Region XIII; 2) the Connections Course offered through ECAP. The program's self-report and discussion during the compliance audit did not indicate that these courses are aligned to the iNACOL standards. Since the iNACOL standards are approved by Commissioner Rule for online learning, it is recommended that Quality ACT, LP review and ensure that online courses are aligned to those standards.

The total hours for an elementary and secondary certificate are 300 clock hours. The program has two ways to track clock hours. One tracking chart is for "late hires" and another tracking chart is for "non-late hires." Ninety hours are completed during the summer institute. A

maximum of 50 hours of district staff development is accepted with verification by principals and facilitators.

Quality ACT, LP requires a minimum of 30 hours of field experience, all of them as observation hours. According to the self-report and candidate teacher responses, time logs, reflective journals, and class discussions are used to reinforce a quality field-based experience.

The candidates completed 180 days of internship.

Quality ACT, LP has eight field supervisors located in Irving at the main offices. All field supervisors are certified teachers with many years of public school service. One-hundred percent (100%) of the field supervisors indicated that they had been involved in field supervision for more than ten years.

Ninety-six percent (96%) of the student teachers reported that the field supervisors were effective or very effective. One-hundred percent (100%) of the principals indicated in their questionnaire, which was administered by TEA, that they had received written feedback about the teaching candidates from the field supervisors.

The field supervisors also indicated in their questionnaire that they receive four to five training sessions yearly, and the lead facilitators meet once per six weeks with the other field supervisors for informal discussions. Copies of agendas and attendance records verified that field supervisor training was held on May 11, 2010, and other meetings were held four to five times per year depending on the needs of the field supervisors. In addition, the field supervisors were provided with a list of training materials such as a handbook containing references to research-based resources. Training materials, agendas, and attendance records for field supervisors were available in the document review.

Two out of four cooperating teachers reported that training is provided through an orientation from Quality ACT, LP, and one hundred percent (100%) of the cooperating teachers reported having received a handbook or manual. The Intern Handbook outlines the responsibilities of the field supervisor, district personnel, cooperating teacher, as well as those for the intern.

In the questionnaire responses from the interns, two candidates expressed concerns about their treatment by program staff. The procedures for due process for a grievance could not be found in the student or intern handbook. It is recommended that the program develop a grievance/due process procedure for addressing candidate concerns. Program staff indicated that there was a due process procedure in the past and provided a copy of the revised due process procedure that will be included in future handbooks.

Per responses from interns and cooperating teachers in their respective questionnaires, the first contact with the intern was made within the first three weeks. Quality ACT, LP documents contact using an electronic log with anecdotal notes from the conference.

In reviewing the student folders, evidence of three formal observations was verified by observation forms. Interns and their cooperating teachers/mentors confirmed that formal observations were 45 minutes or more in duration followed by an interactive conference. This was also confirmed in the review of the observation forms located in the student folders. The observation forms were PDAS oriented. The forms contained a scale for determining growth during the internship. The powerfulness of the document would be increased if it were more

focused on content-specific aspects of the teaching process. It was very clear who conducted the observation and completed the observation form.

Quality ACT, LP staff reported that students who are struggling in the program receive assistance through the development of a growth plan and/or intervention plan. Specific skill areas that the student needs to target during observations are noted, and candidate information is provided by the field supervisors to the Program Director for identifying extra support. Different campus mentors from those assigned may be identified, as needed, to address specific candidate skill deficiencies.

COMPONENT V: PROGRAM EVALUATION – Texas Administrative Code (TAC) §228.40 – ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT.

Findings:

Quality ACT, LP is in compliance with TAC §228.40 Assessment and Evaluation of Candidates for Certification and Program Improvement.

Per TAC §228.40 (a), “to ensure that a candidate for educator certification is prepared to receive the standard certificate, the entity delivering educator preparation shall establish benchmarks and structured assessments of the candidate's progress throughout the educator preparation program”. TEA staff determined that there was limited formative assessment of candidates’ progress. It is recommended that more frequent formative assessments of candidates’ progress throughout the program be provided that are aligned to the knowledge and skills of the educator standards. In addition, the formative assessments should clearly define scoring criteria (e.g. rubrics) and be included in the course/module syllabi. Specifically, formative assessments on integrating the ELPS in teaching and learning and on conducting parent conferences were two examples discussed during the site visit. One question discussed during the visit was “How do you know if a candidate understands differentiated instruction prior to internship without the use of formative assessments of candidate progress?” Program staff acknowledged that formative assessment data of candidates’ progress needs to be collected and will be collected during the next summer institute. More defined criteria for evaluating formative assessments (e.g. rubrics specifically aligned to the skills of the educator standards) will also be developed. TEA staff reviewed documents that indicate that TxBESS was being used to provide some variation for evaluating candidates during their internship using the performance tasks.

Two summative assessments of candidates were reviewed. The first was a performance task which involved designing and delivering a lesson with a peer review component. The sample of the first summative performance assessment task was entitled *Designing and Teaching a Lesson*, which included evaluation criteria and a checklist for peer evaluation. The second summative assessment was a book study.

Quality ACT, LP verifies candidates' teaching progress by use of an observation document aligned to PDAS. A few of the summer sessions included a series of quizzes (i.e. selected response) as assessments and the day after quizzes were administered, the instructors re-taught content for candidates as needed. The results of these assessment items were used for course evaluation and modification, as well as for determining candidates' progress.

The candidates' readiness to test for the content area and PPR is determined by completion of a review session which includes a practice test and completion of the program requirements and benchmarks.

Quality ACT, LP program evaluations are provided by Shore Research, Inc. through a US Department of Education Transition to Teaching Grant. One example of a program evaluation conducted by Shore Research includes one entitled "*How can the Quality ACT, LP Transition Teaching Educator Certification Program's Marketing and Recruitment Strategies Be Improved?*" Shore Research also collects summer institute feedback and reflection ratings from course evaluations provided by candidates. Field support and retention of candidates were the foci of this past summer's evaluation. Documents also indicated that advisory committee members were informed about and provided feedback on the evaluation efforts provided by Shore Research. Program and curriculum evaluation is conducted by Shore Research twice per year, and the Executive Director, ESC Region 13, and field supervisors (as needed) are involved in the evaluation process.

Accountability System for Educator Preparation (ASEP) data for the past three years indicated that candidates' success exceeds the minimum passing standard.

Candidate records which provide evidence of a candidate's eligibility for admission and completion of all program requirements are kept in a paper format for five years in a secure environment.

PROGRAM RECOMMENDATION

The following are recommendations based on the findings of the Texas Education Agency compliance audit. If the program is NOT in compliance with any component, please consult the TAC and initiate actions to correct the issue IMMEDIATELY. A Compliance Status Report will be required in sixty days on compliance recommendations.

General program recommendations are suggestions for general program improvement and do not require follow-up.

PROGRAM COMPLIANCE RECOMMENDATIONS: A Compliance Status Report will be required in sixty days.

- TAC §228.30 Educator Preparation Curriculum.
Develop and align the teacher preparation curriculum with the knowledge and content methodology skills of the SBEC-approved educator standards related to each of the program's approved certification fields. This must be corrected immediately.

GENERAL RECOMMENDATIONS: No progress report is necessary.

- Develop a handbook which outlines the full roles and responsibilities of the advisory committee members.
- Conduct yearly professional development for advisory committee members.
- Increase communication with advisory committee members by creating minutes of meetings and including in the minutes how the advisory committee's feedback impacts and benefits the program's design, evaluation, performance, improvement, and field-based experiences.
- Improve the teaching developmental benchmark process within and across courses by developing benchmark statements and teaching benchmark assessments aligned to the PPR components and SBEC-approved educator standards which will be measured at regular, specified transition points throughout the program.
- Develop the curriculum syllabi to make instruction of the 17 curriculum topics, the relevant certification educator standards, the ELPS, and the formative and summative assessment types and criteria transparent to the candidates.
- Implement a grievance/due process procedure for addressing candidate concerns. Candidates should be informed of this procedure in the Intern Handbook and admission material.
- Administer the TOEFL for students, regardless of immigration status, who are citizens of countries where English is not the native language and require them to pass the section testing oral proficiency prior to admission.
- Update the program's website to reflect that the TOEFL is required as part of admission criteria to determine English language proficiency for foreign applicants.
- Increase advisory committee members' understanding of Texas Administrative Code (TAC) §227, §228, and §229 so that parameters of recommendations can be clear and measurable.
- Review and align the online courses to the iNACOL standards.
- Include subject-specific preparation for teaching reading in the content areas, including a focus on scientific reading and scientific vocabulary, and include theories of how students learn science in the curriculum.