



International Leadership Texas (ILTexas)

Pre-Approval Site Visit 2021-2022 Report

PURPOSE

Texas Education Agency (TEA) Education Specialists, Vanessa Alba and Emily Carrizalez, conducted a Pre-Approval Site Visit of the proposed educator preparation program (EPP) International Leadership Texas (ILTexas) on November 5, 2021. Per 19 Texas Administrative Code (TAC) §228.10(a), “An entity seeking initial approval to deliver an educator preparation program (EPP) shall submit an application and proposal with evidence indicating the ability to comply with the provisions of this chapter, Chapter 227 of this title (relating to Provisions for Educator Preparation Candidates), Chapter 229 of this title (relating to Accountability System for Educator Preparation Programs), and Chapter 230 of this title (relating to Professional Educator Preparation and Certification). The proposal will be reviewed by the Texas Education Agency (TEA) staff and a pre-approval site visit will be conducted”. The site visit was conducted in a Virtual format due to the ongoing COVID disruption. Dr. Dionel Waters was identified as the application author and primary contact for the Virtual Pre-Approval site visit.

ILTexas proposes to offer alternative Teacher certification in the following certificate areas: Core Subjects EC-6 with STR & ESL Supplemental, Core Subjects EC-6 with STR & Bilingual Supplemental, Core Subjects 4-8 with STR & ESL Supplemental, and Core Subjects 4-8 with STR and Bilingual Supplemental with an anticipated program start date of January 3, 2022.

Per 19 TAC §228.10(a)(1), an EPP applicant must submit a proposal with evidence indicating the ability to comply with the provisions in 19 TAC Chapters 227, 228, 229, and 230 including the following program approval components: ownership & governance, criteria for admission, curriculum, coursework and/or training, including ongoing support during clinical teaching, internship, and practicum, certification procedures, assessment & evaluation of candidates for certification and EPP improvement, professional conduct of EPP staff and candidates, EPP complaint procedures, and required submissions of information, surveys, and other accountability data. Verification of compliance with the required components was the scope of the Pre-Approval Site Visit. Evidence of compliance was measured using the application and a standard rubric aligned to TAC.

ILTexas staff participating in the Pre-Approval Site Visit at various stages were Dr. Dionel Waters, proposal author & Executive Director at ILTexas; Dr. Thomas Seaberry, Deputy Superintendent, ILTexas; Aaron Thorson, Chief of Staff ILTexas; Timothy Brightman, Chief Legal Officer ILTexas; Dr. Laura Carasco, Deputy Superintendent, ILTexas; Charles Klein, Senior Executive Director of Construction, ILTexas; Merida Robertson, Certification Specialist, ILTexas; and Eric Reeves, Consultant working with ILTexas.



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 [applicable TAC](#) and correct identified areas prior to SBEC approval. “Recommendations” are suggestions for general program improvement and no follow-up is required.

COMPONENT I: GOVERNANCE – 19 TAC Chapter 228

Findings:

- TEA verified that the ILTexas Proposal met all requirements pertaining to governance as written.
- Dr. Thomas Seaberry, the Deputy Superintendent, ILTexas, advised TEA about the support the district would provide to the ILTexas programs. This includes creating a budget and adhering to TEA requirements and recommendations. Dr. Seaberry advised TEA staff that ILTexas currently has an Instructional Technology (IT) department and Academic department with resources that can be applied to the program to ensure technology needs are met. The district is also committed to determining the needs of the program, meeting legal requirements, continuous improvement, addressing program needs on an ongoing basis, addressing the needs of the candidates so they are prepared for their certificate(s) sought, and providing financial & policy support to ensure ILTexas is in compliance with all TAC pertaining to educator preparation. [19 TAC §228.20(c)]
- Dr. Waters advised TEA that the advisory committee had not yet met but plans to meet in December once approved. The ILTexas advisory committee plans to meet four times per year in September, December, April, and June, if approved. [19 TAC §228.20(b)]
- ILTexas shared the website that will be published if approved. Information about the program calendar of activities from admission to completion, including a deadline for accepting applicants into the program to assure adequate time for admission, coursework, training, and field-based experiences (FBEs) prior to internship is not currently posted, but was identified in the application. The program applicant was advised to post the calendar as prescribed once the website is live. [19 TAC §228.20(g)]

Requirements:

- If approved, ensure that all governance requirements of [19 TAC §228.20](#) are followed by ILTexas staff and the governing body as written in the proposal.



- Record and retain detailed agendas, minutes, and sign-in sheets of each advisory committee meeting and ensure that specific input provided by advisory committee membership is included. [19 TAC §228.20(b)]
- Publish the program calendar of activities from admission to completion once the website is live, including a deadline for accepting applicants into the program to assure adequate time for admission, coursework, training, and field-based experiences (FBEs) prior to internship. [19 TAC §228.20(g)]

Recommendations:

- Consider using the TEA Advisory Committee PowerPoint presentation to train membership.
- Consider awarding continuing professional education (CPE) credit to reward members of the advisory committee for their involvement and assistance with the ILTexas educator preparation program by providing CPE hours. Teachers are required to earn 150 clock-hours every five years and professional class certificates (Principals, Superintendents, Counselors, Educational Diagnosticians, Reading Specialists, School Librarians, and Master Teachers) are required to earn 200 clock-hours of CPE every five years to renew their Texas certificates. All can earn 45 clock-hours of CPE in a five-year period for mentoring another educator.
- After the initial two years of the program, rotate the membership of the advisory committee periodically to gain fresh perspectives and insight.
- Organize each agenda to specifically address the areas of authority of the advisory committee: design; delivery; evaluation; and major policy decisions.

Based on the evidence presented, International Leadership Texas was in compliance with 19 TAC Chapter 228 – Governance of Educator Preparation Programs.

COMPONENT II: ADMISSION - 19 TAC §227.10

Findings:

- TEA verified that the ILTexas proposal met all requirements pertaining to admission as written.
- The admissions process will be managed by the program Executive Director and Certification Officer. ILTexas requires formal admissions and has developed a letter for admission purposes. [19 TAC §227.17]



- ILTexas staff stated that for applicants who do not meet the GPA requirement for admission, the Texas pre-admission content test (TXPACT) would be used. The topic of applicants admitted under the 10% exception was discussed in depth with ILTexas staff. Dr. Waters identified various circumstances that ILTexas would consider as an extraordinary circumstance, such as starting a college career with a low GPA and making improvements as well as taking into consideration the rigor of the level of college coursework when a GPA is less than 2.5. TEA was assured that all applicants under the 10% exception would be required to take and pass a Texas pre-admission content test (TXPACT) exam, the program will identify and document the extenuating circumstance, and the program will provide documentation that the applicant's work, business, or career experience demonstrates achievement equivalent to the academic achievement represented by the GPA requirement. TEA also discussed with the program how they would ensure that a GPA of 3.0 would be maintained for the incoming class each year from September 1-August 31 taking into consideration the 10% exception. The program stated the Certification Officer would track GPAs on a continuous basis and the program would retain a running record of GPAs to ensure that it does not fall below a 3.0 GPA. [19 TAC §227.10(a)(3)(A-C)]
- TEA and IL Texas staff discussed the English language proficiency requirement and how it would be determined for applicants. The program identified a minimum of a bachelor's degree from a US university or the Test of English as a Foreign Language (TOEFL-iBT) if the degree was from a university whose language is not English. [19 TAC §227.10(a)(7); 19 TAC §230.11(b)(5)(A-C)]

Requirements:

- If approved, ensure that all admission requirements of [19 TAC §227.10](#) are followed by ILTexas staff and met by ILTexas applicants as written in the proposal.
- For applicants with transcripts from a country whose official language is not English, require a course-by-course transcript evaluation from an approved [Foreign Credential Evaluation Service](#).

Recommendations:

- If approved, contact Educational Testing Service (ETS) to obtain a TOEFL code so that applicants that require a TOEFL for admission may use your TOEFL code to have scores sent directly to ILTexas.

Based on the evidence presented, International Leadership Texas is in compliance with 19 TAC §227.10 - Admission Criteria.



COMPONENT III: CURRICULUM – 19 TAC §228.30

Findings:

- TEA verified that the ILTexas proposal met all requirements pertaining to curriculum as written.
- ILTexas staff reassured TEA that the curriculum offered would be implemented as written in the proposal and as approved. [19 §TAC 228.30(a-b); 19 §TAC 228.30(c)(1-8); 19 TAC 228.30(d)(1-4)]
- ILTexas assured TEA staff that for any trainings offered by the Education Service Center (ESC), the program would retain a dated copy of the certificate of completion and the hours earned for the trainings. [19 TAC §228.30(a-b); 19 TAC §228.30(c)(1-8); 19 TAC 228.30(d)(1-4)]
- ILTexas identified that the Director of Instructional Technology would provide digital literacy training that is aligned with the [International Society for Technology in Education \(ISTE\) standards](#) as prescribed. [19 TAC §228.30(8)(A-C)]

Requirements:

- If approved, ensure that all candidates meet the curriculum requirements of [19 TAC §228.30](#) as written in the proposal.

Recommendations:

- None.

Based on the evidence presented, International Leadership Texas is in compliance with 19 TAC §228.30-Curriculum.

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

Findings:

- TEA verified that the ILTexas Proposal met all requirements pertaining to program delivery and ongoing support as written.
- The total number of coursework hours required for each certificate area are:
 - 315 clock-hours for Core Subjects w/STR EC-6 and ESL Supplemental;



- 324 clock-hours for Core Subjects w/STR EC-6 and Bilingual Supplemental;
 - 300 clock-hours for Core Subjects w/STR 4-8 and ESL Supplemental; and
 - 309 clock-hours for Core Subjects w/STR 4-8 and Bilingual Supplemental.
- The program will be delivered in a face-to-face format only and will be sustained, rigorous, intensive, interactive, candidate-focused, and performance-based. [19 TAC §228.35(a)(2); 19 TAC §228.35(a)(6)(B)]
 - Teacher candidates will receive, at a minimum, 150 clock-hours of required coursework prior to internship. [19 TAC §228.35(b)(2)(A-J)]
 - All candidates will be required to complete 30 clock-hours of field-based experiences (FBEs) prior to internship and of those FBEs, 15 clock-hours must be interactive. [19 TAC 228.35(e)(1)(A-B)]
 - TEA discussed late-hires with ILTexas staff. The program anticipates late-hires. The program assured TEA that 50 clock-hours of district training would be allowed, but it had to be completed within 90 days of assignment. Candidates will be informed via benchmark documentation about the 90-day requirement and what needs to be completed. TEA also discussed the deactivation process if the requirement was not met within required timelines. [19 TAC §228.2(25); 19 TAC §228.35(d); 19 TAC §228.35(b); 19 TAC §228.35(a)(4)]
 - ILTexas candidates will not offer clinical teaching and candidates only have the option to complete a supervised internship year. TEA and the program discussed the requirements for field-supervision, including duration and the number of observations required for candidates on an intern or probationary certificate. [19 TAC §228.35(e)(2)(B); 19 TAC §228.35(g)(1-4); 19 TAC §228.35(e)(2)(B)(vii)(I-II)-(viii)]
 - ILTexas discussed that field supervisors (FS) and mentor teachers will be qualified and trained according to requirements in TAC. [19 TAC §228.2 (18) & (26); 19 TAC §228.35(f); 19 TAC §228.35(g)]
 - ILTexas discussed the process that they will follow if either the FS or campus administrator does not recommend to ILTexas that a candidate should be recommended for standard certification. That process follows TAC as written. [19 TAC §228.35(e)(2)(B)(ix)]

Requirements:

- If approved, ensure that all candidates meet the program delivery and ongoing support requirements of [19 TAC §228.35](#) as written in the proposal.



- If approved, ensure that a record of completion of the 30 clock-hours of field-based experiences required by the program, with adequate evidence including date, subject, grade level, candidate observation notes, campus, district with original verifying signatures of observed teachers, is able to be maintained in detail in paper or electronic format for review (auditing) purposes. [19 TAC §228.35(b)(1)]
- If approved, ensure that all dated formal 45-minute observations have evidence of original signatures of the field supervisor, candidate, and mentor teacher. Retain in candidate's records for review (auditing) purposes. [19 TAC §228.35(g)]
- If a candidate is not recommended for standard certification, notify the candidate, FS, and campus administrator about the reason for lack of recommendation and retain the documentation in the candidate's file for review (auditing) purposes. [19 TAC §228.35(e)(2)(B)(ix)]

Recommendations:

- Consider providing CPE credit to field-supervisors and mentor teachers for their support and work with candidates. A standard certified educator may earn up to 45 clock-hours of CPE for serving as a mentor in a five-year period.

Based on the evidence presented, International Leadership Texas is in compliance with 19 TAC §228.35 – Program Delivery and On-Going Support.

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

Findings:

- TEA verified that the ILTexas Proposal met all requirements pertaining to assessment and evaluation of candidates and program as written.
- ILTexas verified that candidates will be kept informed of their progress regularly. Candidates will receive coaching conversations by the FS based on formal and informal observations. Candidates will receive progress reports regularly with regards to attendance, observations, and course completion. [19 §TAC 228.40(a)]
- ILTexas staff explained that readiness to test is determined when a candidate earns 80% on a practice exam. [19 TAC §228.40(b) & (d)]
- Records will be stored for a period of five years from admission to completion, withdrawal, or removal in a physical paper format. TEA saw the intended location in the



ILTexas offices that will contain candidate records. It was noted that records will be maintained in paper format on the 2nd floor of the program office adjacent to the office of the Executive Director. [19 TAC 228.40(f)]

Requirements:

- If approved, ensure that all assessment and evaluation of candidates for certification and program improvement requirements of [19 TAC §228.40](#) are followed by ILTexas staff and met by ILTexas candidates as written in the proposal.

Recommendations:

- Monitor the number of TExES exams taken by each candidate and the pass rate regularly. This information can be accessed from the [Pearson EPP Page](#).

Based on the evidence presented, International Leadership Texas is in compliance 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 educator preparation program 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).

- TEA verified that the ILTexas Proposal met all requirements pertaining to the professional conduct of the individuals preparing candidates and the candidates themselves.
- ILTexas staff assured TEA that the Educator Code of Ethics will be required to be signed by all ILTexas candidates at admission and ILTexas staff each year. The documentation will be retained in candidate and ILTexas files.

Requirements:

- If approved, ensure that all professional conduct requirements of [19 TAC §228.50](#) are followed and met by ILTexas staff and met by ILTexas applicants as written in the proposal.

Recommendations:



- If approved, consider having candidates and staff watch a State Board for Educator Certification (SBEC) meeting to see the various cases about violations of the Educator Code of Ethics so that they will understand the importance of understanding and adhering to the Educator Code of Ethics.

Based on the evidence presented, International Leadership Texas is in compliance with 19 TAC §228.50 - Professional Conduct.

COMPONENT VII: COMPLAINTS PROCESS – 19 TAC §228.70

Findings:

- Per 19 TAC §228.70(b), the ILTexas complaints process is on file at TEA.

Requirements:

- If approved, ensure that all complaints procedures requirements of [19 TAC §228.70](#) are followed by ILTexas staff as written in the proposal.
- Immediately upon SBEC approval, information concerning the complaint process must be posted on the ILTexas website, at the official administrative offices, and the candidate teaching sites. [19 TAC §228.70(b)(2-3)]

Recommendations:

- None.

Based on the evidence presented, International Leadership Texas is in compliance with 19 TAC §228.70 – Complaints Process.

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

Findings:

- TEA verified that the ILTexas Proposal met all requirements pertaining to certification procedures of candidates as written.
- ILTexas plans for candidates to only need to be issued intern certificates. TEA discussed with ILTexas staff the potential of candidates to need a probationary certificate during a second internship year. ILTexas identified options for a probationary certificate and the conditions for which probationary certificates would be issued to candidates. The program identified those options in the proposal. [19 TAC §228.35(e)(2)(B)(iv); 19 TAC §230.36(d)(1); 19 TAC §230.37(d)(2)]



Requirements:

- If approved, ensure that all certification procedures requirements of [19 TAC §228.35](#), [19 TAC §230.36](#), and [19 TAC §230.37](#) are followed by ILTexas staff and met by ILTexas candidates as written in the proposal.

Recommendations:

- None.

Based on the evidence presented, International Leadership Texas is in compliance with 19 TAC Chapters 228 and 230 – Certification Procedures.

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

Findings:

- TEA verified that the ILTexas Proposal met all requirements pertaining to the integrity of data reporting as written. TEA discussed with the program staff their understanding of reporting requirements and reiterated the commitment to meet the requirements as identified. [19 TAC §229.3(f)(1) and [Attached Graphic](#)]

Requirements:

- If approved, ensure that all data reporting procedures requirements of [19 TAC §229.3\(f\)\(1\)](#), are followed and met by ILTexas staff as written in the proposal.

Recommendations:

- Strongly consider assigning one person at ILTexas to handle data submissions.
- Begin reviewing the 2021-2022 Data Reporting Manual posted on the Program Provider Resources page to familiarize yourselves with the requirements for data reporting in the 2021-2022 reporting year.
- If approved, participate in the 2021-2022 ASEP webinar to know, understand about the requirements for ASEP reporting, and implement ASEP reporting with ease.

Based on the evidence presented, International Leadership Texas is in compliance with 19 TAC Chapter 229 – Integrity of Data Reported.



SUMMARY:

Overall Recommendation: Based on the application and the Pre-Approval Site Visit, International Leadership Texas (ILTexas) ACP will be presented to the SBEC for a recommendation for approval to recommend teacher candidates for certification in Texas on Friday, December 10, 2021. TEA further recommends to SBEC that ILTexas ACP be approved to operate upon SBEC approval with a candidate start date effective January 3, 2022.

Upon SBEC Approval: TEA will send IL Texas an official notification of SBEC approval, the program's official TEA county-district number, instructions for determining the legal authority and legal authority back-up, and the name and contact information of the TEA Education Specialist assigned to the program. TEA will also schedule December 14-15, 2021 for IL Texas staff to receive TEA New EPP onboarding training in a virtual format.

If approved by the State Board of Educator Certification (SBEC), ILTexas will need to send a letter on letterhead and signed by the Legal Authority of International Leadership Texas Charter School establishing a Legal Authority Backup within ILTexas for the ILTexas ACP. Additionally, the Legal Authority will need to approve Educator Certification Online System (ECOS) for Entities access for the identified Legal Authority Backup. This individual will be responsible for approving ECOS for Entities access for other ILTexas EPP staff members as needed.

GENERAL PROGRAM RECOMMENDATIONS:

- Ensure that staff utilizes the [Program Provider Resources](#) and the [Texas Educator Preparation Program Weekly Newsletter](#) pages of the TEA website to access pertinent information EPPs frequently request.
- To ensure continuity in record keeping and other related processes, consider creating a procedure manual documenting EPP processes.
- Implement quality control procedures to ensure ASEP reporting is submitted accurately during state reporting each year.
- Align the verbiage of the program to the verbiage of the Texas Administrative Code (TAC) (ex. field supervisor, mentor, candidate, etc.).
- Monitor 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 the current Texas Administrative Code.



- Begin to participate in webinars provided by the Division of Preparation, Certification, & Enforcement once approved to operate as an EPP to ensure that the program staff is knowledgeable about current requirements and changes in the Texas Administrative Code.
- Establish and maintain communication with the Education Specialist assigned to the program.
- Ensure that TEA staff has the most current contact information by sending updates to the assigned Education Specialist.