



Desk Audit Compliance Audit Report 2014-2015 McLennan Community College

According to Texas Administrative Code (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 Texas Education Agency (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 required by the Texas legislature for the regulation of all educator preparation programs in the state. Please see the complete Texas Administrative Code at www.tea.texas.gov for details.

Contact Information: Fay Gutierrez, Program Director

County/District Number: 161-502

SBEC Approval Date: August 3, 2001

Texas Education Agency Education Preparation Program Specialists, Vanessa Alba and Lorrie Ayers, and Education Preparation Program Manager, Sandra Nix, conducted a desk compliance audit of McLennan Community College Alternative Certification Program (ACP), located at 1400 College Drive, Waco, TX 76708, in the spring of 2015, as required by Texas Administrative Code (TAC) §228.10(c) which states that educator preparation programs "shall be reviewed at least once every five years" per TAC §229.6(a). The program's accreditation status is "Accredited". The following are the findings of the desk audit.

Scope of the Compliance Audit:

The scope of this audit is restricted solely to verifying compliance with Texas Administrative Code (TAC) §227, §228, §229, and §230.

Data Analysis:

Information concerning compliance with TAC governing educator preparation programs was collected by various qualitative means. A self-report was submitted to TEA on February 24, 2015. A TEA review of documents, student records, course material, and curriculum correlations charts provided evidence regarding compliance. In addition, TEA sent electronic questionnaires to McLennan Community College ACP stakeholders. A total of 143 out of 338 (42%) responded to the questionnaires as follows: 15 out of 23 (65%) advisory committee members; 46 out of 104 educator candidates (44%); 25 out of 78 (32%) principals; 56 out of 128 (44%) cooperating teachers/mentors; and 1 out of 5 (20%) field supervisors responded. Qualitative methods of content analysis, cross-referencing, and triangulation of the data were

used to evaluate the evidence. Evidence of compliance was measured using a rubric aligned to Texas Administrative Code.

Findings, Compliance Issues, and Recommendations:

Findings indicate evidence that was collected during the compliance audit process. If the program is NOT in compliance with any identified component, the program should consult TAC and is required to correct the issue IMMEDIATELY. An action plan was drafted during the desk audit that identified compliance issues to be addressed and a timeline for completion was agreed upon between the program and TEA. Program recommendations are suggestions for general program improvement and no follow up is required.

Ongoing Communication and Action Plan:

Communication between TEA program specialists and the McLennan Community College ACP Director, Faye Gutierrez, and Assistant Director, Ronny Massey, occurred via email and conference call throughout the desk audit process in May 2015.

The action plan phone conference was held on Monday, June 1, 2015, and was attended by the same individuals. The action plan was developed to guide implementation of compliance issues. General recommendations were incorporated into the report.

COMPONENT I: COMMITMENT AND COLLABORATION - Texas Administrative Code (TAC) §228.20

FINDINGS:

1. The advisory committee currently consists of 26 members. Seventeen members of the advisory committee are from local school districts, 8 members represent an institution of higher education, and one member represents the business and community. McLennan Community College ACP meets TAC §228.20(b) minimum requirements for advisory committee composition.
2. Minutes and agendas verified that advisory committee meetings were held twice during the past three academic years. For the 2013-2014 academic year, meetings were held on November 5, 2013 (11 members present) and May 14, 2014 (14 members present). Advisory committee meetings were held for the 2012-2013 academic year on November 12, 2012 (11 members present) and April 30, 2013 (11 members present). Advisory committee meetings for the 2011-2012 academic year were held on November 1, 2011 (14 members present) and May 1, 2012 (12 members present).
3. Agendas, minutes, and attendee records verified that the members assist in the design, delivery, evaluation, and major policy decisions of the ACP. Additionally, the agendas, minutes, and attendee records documented that the ACP approved the roles and responsibilities of each member. [TAC §228.20(b)].

Common trends reported by the advisory committee members in their comments were as follows:

- The program staff and leadership, working closely with candidates and local schools, assistance provided to candidates, and preparing candidates for exams were identified as a strengths.

- The need for more candidate observations of experienced teachers in the classroom setting and a need for the program to provide more assistance to candidates emerged as areas in need of improvement.

Compliance Issues to be addressed:

None

Recommendations:

- Consider adding representation from the local Education Service Center (ESC), former candidates, and mentor teachers to provide additional insight for the Advisory Committee;
- Provide an incentive to the members of the Advisory Committee for their involvement and assistance with the McLennan Community College Alternative Certification Program (ACP) by providing Continuing Professional Education (CPE) credit to members who need CPE hours for the renewal of their Texas certificates; and
- Rotate the terms of the Advisory Committee members to bring fresh ideas and insights to the group.
- Consider using technology such as webinars and WebEx in conducting Advisory Committee meetings in order encourage participation of members.

Based on the evidence presented, McLennan Community College Alternative Certification Program (ACP) is in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.

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

FINDINGS:

The McLennan Community College ACP admission requirements as published on the website require the applicant to:

1. Hold a bachelor's degree from an accredited institution of higher learning [TAC §227.10(a)(2)];
2. Meet with the Assistant Program Directors to assess college transcripts, GPA, and certification goals;
3. Provide a TOEFL oral speaking score of 26 and foreign transcript evaluation by a TEA approved evaluation service if the applicant's bachelor's degree is from another country [TAC §227.10(a)(5)];
4. Have a GPA of 2.75 in the last 60 hours or cumulative GPA [TAC §227.10(a)(3)(A)];

5. Have passing scores on the Texas Success Initiative (TSI), TSI exemption, or passing the required State Content Exam [TAC §227.10(a)(3)(C)]; [TAC §227.10(a)(4)]; [TAC §230(a)]; [TAC §230.11(b)(5)];
6. Provide three (3) confidential professional references [TAC §227.10(a)(7)];
7. Participate in an official interview with the Program and Assistant Program Directors (scored on a rubric). Applicants seeking bilingual certification are required to interview in both English and Spanish. [TAC §227.10(a)(6)];
8. Have a minimum of 12 semester credit hours in the subject-specific content area for the certification sought for initial certification, a passing score on a comparable content certification examination, or a passing score on a content vendor list [TAC §227.10(a)(3)(C)];
9. Submit an application [TAC §227.10(a)(6)];
10. Submit a resume for evaluation [TAC §227.10(a)(7)]; and
11. Submit an application fee of \$40.
12. A review of fifteen (15) candidate records verified that admission requirements are followed. Twelve (12) applicants had a bachelor's degree, one candidate had an out-of-state bachelor's degree; two (2) applicants had Master's degrees. A GPA range of 2.4-3.71 was documented in the records review.
13. Transcripts for each of the fifteen (15) candidates were reviewed for a minimum of 12 semester credit hours in the subject-specific content area for which certification is sought (Math/Science 15 semester hours for Grades 7-12), a passing score on a content certification examination, or a passing score on a content examination administered by a vendor on the Texas Education Agency (TEA)-approved vendor list. The files reviewed met the requirements of TAC §227.10(a)(3)(C).
14. Each of the candidate's met the basic skills requirement in reading, written communication and mathematics [TAC §227.10(a)(4) and TAC §230(a)].
15. There were no out-of-country candidates' files reviewed [TAC §227.10(a)(5); TAC §227.10(e); TAC §230.11(b)(5)].
16. There were no contingency admission candidate files reviewed [TAC 227.15(a); TAC §227.5(4)].
17. There were no files reviewed for Career and Technology Education [TAC §227.10(d)].
18. There was one file reviewed for exception to the minimum GPA requirement. The record showed that the program director granted approval for admission [TAC §227.10(a)(3)(B)].
19. All records for current students and those certified within the past five years are kept in the McLennan Community College ACP office files. Files for students that drop from the program are retained there. Before student files older than five years are shredded, the files are scanned and kept in the network college file. TEA program specialists verified via email that record are kept in a secure location for a period of five years after program completion [TAC 228.40(d)].

Compliance Issues to be addressed:

None

Recommendations:

Ensure that information about the requirement to have 15 semester credit hours in math and science if seeking to teach math or science at grades 7-12 without testing is available on the website.

Incorporate a reading passage into the interview process which is evaluated with a rubric.

Based on the evidence presented, McLennan Community College Alternative Certification Program (ACP) is in compliance with TAC §227.10 - Admission Criteria.

COMPONENT III: CURRICULUM - Texas Administrative Code (TAC) §228.30**FINDINGS:**

1. A review of the Pedagogy and Professional Responsibilities (PPR) EC-12 content indicated that the educator standards are not the curricular basis for all educator preparation [TAC §228.30 (a)]. A review of the PPR course outline, activities, and assessments did not meet the requirements that the curriculum relies on scientifically based research to ensure teacher effectiveness.
2. It was noted that throughout the PPR EC-12 material, the entire curriculum appeared to be focused on TExES test preparation rather than effective teacher preparation.
3. It was noted that each of the required content competencies were taught in a manner that lacked rigor and depth [TAC §228.30(b)].
4. The coursework and training was not sustained, interactive, student-focused, or performance-based. There was no evidence of projects or activities that required the candidate to apply the skills presented in the knowledge portion of the instruction.
5. Instruction including the Teacher Standards including instructional planning and delivery [TAC §228.30(b)(3)(A)]; knowledge of students and student learning [TAC §228.30(b)(3)(B)]; content knowledge and expertise [TAC §228.30(b)(3)(C)]; learning environment [TAC §228.30(b)(3)(D)]; and data-driven practice [TAC §228.30(b)(3)(E)] was not present.
6. Structured assessments used by the program includes three exams that address specific competencies and a final exam that addresses all competencies required for the PPR EC-12 exam. Structured assessments did not address the acquisition of skills needed to meet the competencies. [TAC §228.40 (a)].
7. A TEKS Correlation Alignment Chart completed by the program served as evidence that the relevant Texas Essential Knowledge and Skills (TEKS) are included in appropriate activities. It was also noted that candidates were required to complete a lesson plan and unit of study that was based on TEKS [TAC §228.30 (a)].

8. Reading instruction was taught within the various content courses which were not reviewed during this audit. Since all candidates participate in TCPP 1004 PPR EC-12 course, a strong reading component emphasizing vocabulary, phonics, phonemic awareness, comprehension, and fluency should be added to this course. [TAC §228.30(b)(1)]
9. The Code of Ethics and Standard Practices for Texas Educators is taught using a PowerPoint during the PPR EC-12 course. An ethics agreement in the Candidate Handbook is required to be signed by each candidate and retained in his/her file [TAC §228.30(b)(2)].
10. Instruction in detection and education of students with dyslexia as indicated in the Texas Education Code (TEC) §21.044(b) was provided to candidates in a book *Dyslexia*, Sally E. Shaywitz in *Scientific American*, Scientific American, Inc. 1996 and discussed in class [TAC §228.35(a)(4)].
11. Instruction in detection and education of students with mental and emotional disorders, as indicated in the Texas Education Code (TEC), §21.044(c-1) and (c-2) was provided to candidates through a PowerPoint presentation [TAC §228.35(a)(5)].

Educator candidates and mentor/cooperating teachers reflected on the preparedness of the candidate for the classroom:

Instruction Provided in the Following Areas:	Candidates Yes/No/Don't Know	Mentor/Cooperating Teachers Yes/No
Reading Instruction for all certification areas at all grade levels	66% / 17% / 17%	81% / 19%
Dyslexia Training	54% / 32% / 15%	
Child/Adolescent Development	83% / 13% / 5%	81% / 19%
Instructional Methods for Motivating Students	85% / 12% / 2%	89% / 11%
Theories of How People Learn	93% / 2% / 5%	87% / 14%
TEKS Organization, Structure, Skills	98% / 2% /	94% / 6%
Utilizing TEKS in Content Areas	90% / 10%	94% / 6%
Teacher Responsibilities for Administering the STAAR or End of Course Exams	73% / 17% / 10%	89% / 11%

How to Develop a Lesson Plan	95% / 5%	96% / 4%
Process of Curriculum Development	71% / 17% / 12%	87% / 13%
How to Utilize A Variety of Classroom Assessments with Students	95% / 5%	83% / 17%
How to Use Formative Assessments to Diagnose Student Learning Needs	85% / 10% / 5%	74% / 26%
Models and Methodologies in Classroom Management Prior to Placement as a Teaching Candidate	83% / 12% / 5%	82% / 19%
Laws and Strategies Regarding Students with Special Needs	88% / 10% / 2%	83% / 17%
Teaching Strategies for Students Designated as GT	73% / 20% / 7%	66% / 34%
Standards and Teaching Strategies for Students with Limited English Proficiency	75% / 20% / 5%	76% / 25%
Conducting Parent Conferences	83% / 12% / 5%	81% / 19%
Variety of Instructional Strategies in Your Classroom	93% / 7%	94% / 6%
Differentiating or Changing Instruction to Meet Individual Student Needs	85% / 10% / 5%	
Characteristics and Identification of Students with Mental or Emotional Disorders	73% / 22% / 5%	

Compliance Issues to be addressed:

- Require that the educator certification standards be the basis of the curriculum as prescribed in TAC §228.30(a);
- Review and modify the assessments within the PPR EC-12 course to ensure acquisition of both knowledge and skills by the candidate of the PPR educator certification standards in TAC §228.40(a);
- Revise the curriculum to be based on scientifically-based research to ensure teacher effectiveness. Require the coursework and training to be sustained, rigorous, interactive, student-focused, and performance-based as prescribed in TAC §228.30(b); and
- Require the curriculum for the PPR EC-12 course to adequately address the skills and competencies captured in the Texas Teacher Standards, as indicated in Chapter 149 of this title (relating to Commissioner's Rules Concerning Educator Standards), as prescribed in TAC §228.30(b)(3)(A-E).
- Develop classes on data-management to ensure that candidates are adequately prepared for the data-analysis that they will be required to use within the teaching field;
- Develop reading instruction to include in the PPR to ensure that it adequately covers and vocabulary, comprehension, phonics, phonetic awareness, and fluency.
- Use formal formative assessments based on acquisition of educator certification standards to indicate candidates' mastery of knowledge and skills. Design remediation to address the needs of struggling candidates;
- Design reflective questions that require candidates to articulate knowledge and skills in a manner that allows the program to effectively evaluate candidate mastery of the educator standards.

Recommendations:

Per the results of the candidate survey, provide additional training in gifted and talented, English as a Second Language, Bilingual, and Special Education.

Based on evidence presented, McLennan Community College Alternative Certification Program (ACP) is not in compliance with Texas Administrative Code Section §228.30.

COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT - Texas Administrative Code (TAC) §228.35**FINDINGS:**

1. The curriculum review revealed that the program has a total of three hundred thirty-two (332) clock-hours [TAC §228.35(a)(3)]. The total program hours were verified by TEA program specialists.

2. The program requires that candidates complete 80 clock-hours of coursework and training [TAC §228.35(a)(3)(B)] and 30 clock hours of field-based experiences prior to internship or clinical teaching.
3. While candidates complete 30 clock-hours of field-based experiences prior to issuance of the probationary certificate, it was not as prescribed based on the 15 files reviewed. Only one candidate file reviewed met the requirements. It was determined that historically the program allowed substitute teaching and teacher aide experience to count toward the 30 clock hours. However, the program will no longer allow that type of experience to count [TAC §228.35(a)(3)(A) and TAC §228.35(d)(1)].
4. McLennan Community College ACP does not utilize electronic transmission, or other video or technology-based method to count for 15 clock hours of field-based observations [TAC §228.35(a)(3)(A)].
5. The field-based experiences must include 15 clock-hours in which the candidate, under supervision, is actively engaged in instructional or educational activities. The past field-based experience logs that were provided indicated that 14 out of 15 candidates did not complete the interactive field-based experiences as prescribed. A final determination in conference with the program was made to accept the evidence presented [TAC §228.35(d)(1)].
6. The program requires candidates to complete 80 clock-hours of coursework and training prior to clinical teaching or internship. The evidence presented was a record for each candidate indicating where the candidate was in the coursework. The database with attendance dates and times and candidates' records served as evidence of compliance [TAC §228.35(a) (3)(B)].
7. The program requires all coursework and training to be completed prior to educator preparation program completion and standard certification. Evidence was found in candidates' records denoting where each candidate was in the process of program completion. This included benchmarks, a review of the program's schedule of coursework, candidate records, degree plans, and transcripts [TAC §228.35(a)(4)].
8. The program allows 50 clock hours of school district or campus professional development toward the total 300 required clock hours. Consistent evidence was not found in the candidates' records verifying the 50 hours although the hours had been granted to all candidates. The program does not meet the requirement for school district training [TAC §228.35(a)(5)].
9. McLennan Community College ACP had develop and implemented specific criteria and procedures that allow candidates to substitute prior or ongoing experience and/or professional training for part of the educator preparation requirements, provided that the experience or training is not also counted as a part of the internship, clinical teaching, or practicum requirements, and is directly related to the certificate being sought. Specifically, the program had historically permitted candidates to use substitute teaching and teacher aide experience as a part of the 30 clock-hours of field-based experiences prior to clinical teaching/internship. The program may continue to allow this providing the observation meets the following requirements [TAC §228.35(a)(6)]:
 - a) taking place in authentic school settings in a public school accredited by the TEA or other school approved by the TEA for this purpose;

- b) observing instruction by content certified teachers;
- c) viewing actual students in classrooms/instructional settings with identity-proof provisions;
- d) viewing content or grade-level specific classrooms/instructional settings; and
- e) reflecting on the observation.

10. The program provides both clinical teaching and internship. All files reviewed were for candidates in an internship placement. Placement information in candidate records provided verification that each candidate (13 out of 15 files reviewed) was in an appropriate probationary internship placement that matched the certification field that the candidate was seeking [TAC 228.35(d)(1); TAC §228.35(d)(2)(B); TAC §228.35(d)(2)(B)].
11. All internships took place in an actual school setting and met the requirement as prescribed [TAC §228.35(d)(2)(C)(ii)].
12. Each candidate file reviewed showed documentation that the candidate was assigned a mentor teacher in an actual public/private school setting [TAC §228.35(e); 228.35(d)(2)(C)(ii)].
13. McLennan Community College ACP provided mentor training to each mentor assigned to a candidate. The evidence submitted by the program was a document with an original signature from each mentor teacher verifying that training occurred, a copy of the training material provided, and dated sign-in sheets recorded by the program. This documentation met the requirements as prescribed [TAC §228.35(e)].
14. It was documented by the program and verified by TEA program specialists that each candidate was assigned an appropriate field-supervisor. The field supervisors received training [TAC §228.35(f)].
15. It could not be verified that each candidate was supervised each year that they were on a probationary certificate throughout the entire term of the internship, including all extensions of the initial term, as required [TAC §228.35(f); TAC §228.35(f)(3); TAC §230.37(c)(2)].
16. Each candidate was assigned a field supervisor who provided structured guidance and regular ongoing support. Each of the field supervisors was an experienced educator and had appropriate certification. Certifications for field supervisors were reviewed in the ECOS system by program specialists. The field supervisor met the requirements as prescribed [TAC §228.35(f)].
17. Evidence of training for each field supervisor was found in documentation provided by the program. Documentation included field supervisor signatures indicating the date that training that was provided. Training agendas indicating dates of training for the past three years provided evidence. The program met the requirements of field supervisor training as prescribed [TAC§228.35(f)]. It was noted that although the five field supervisors had many years of experience, they would benefit from additional

professional development to ensure that their knowledge and skills remain current. While the program meets the requirement as prescribed, it is recommended that the program provide professional development to the field supervisors [TAC§230.37(c)(2)].

18. McLennan Community College ACP provided evidence that field supervisors made initial contact within the first 3 weeks of assignment as required. The documentation was noted on the field supervisor contact logs, signed documentation by the candidate and field supervisor, and information in candidate files [TAC §228.35(f)].
19. Each field supervisor conducted observations, documented instructional practices observed, provided written feedback through an interactive conference with the candidates, and provided written feedback to the campus administrator for each observation; however, this was only consistently documented as prescribed during the first year that the candidate was on a probationary certificate. The program did not meet the requirements as prescribed for each extension of the probationary certificate [TAC §228.35(f); TAC §228.35(f)(1); TAC §228.35(f)(2); TAC 228.35(f)(3)].
20. There was no documentation that informal observations and coaching were provided by the field supervisor [TAC §228.35(f)].

Compliance Issues to be addressed:

- Require the program to maintain as evidence in each candidate's file the record of completion of 50 clock-hours of school district training as prescribed in TAC §228.35(a)(5);
- Require each field-supervisor to observe candidates as prescribed in TAC §228.35(f)(3) for each year that candidates are on a probationary certificates and maintain a copy of that documentation in each candidate's file; and
- Require each field-supervisor to provide and document informal observations and coaching for each candidate for each year that the candidate is on a probationary certificate as prescribed in TAC §228.35(f).

Recommendations:

- Consider the elimination of allowing candidates to use 50 clock-hours of school district training as a part of the program's coursework and training. This will allow the program to focus on the standards required for certification and ensure that candidates are all receiving the same high-quality instruction provided by the program [TAC §228.35(a)(5)];
- Consider requiring candidates to move in cohorts, such as a summer, fall, and spring cohorts. This will allow the program to ensure that each cohort meets all requirements of TAC §228.35; and
- Consider providing field-supervisors with high-quality professional development throughout the entire term of the candidates' internship, including all extensions of the initial term to ensure that the supervision and guidance being provided by field-supervisors is based on current best practice[TAC §230.37(c)(2)];

Based on evidence presented, McLennan Community College Alternative Certification Program (ACP) is not in compliance with Texas Administrative Code Section §228.35 – Program Delivery and On-Going Support.

COMPONENT V: PROGRAM EVALUATION – Texas Administrative Code (TAC) §228.40

FINDINGS:

1. McLennan Community College ACP has established benchmarks to ensure that candidates are prepared to receive standard certification [TAC §228.40(a)]. Documentation detailing the benchmark activity, timeline, and person responsible and the candidate record showing progression through the program by verifying benchmarks signed by the program director and assistant program director was provided as evidence.
2. The program provided evidence that the readiness of each candidate to take the appropriate certification assessment of pedagogy and professional responsibilities, including professional ethics and standards of conduct was determined as required [TAC §228.40(b);TAC §230.21(c)]. It was noted that candidates are able to take either the PPR or content exam first.
3. The program continuously evaluates the design and delivery of the educator preparation curriculum based on performance data, scientifically-based research practices, and the results of internal and external assessments [TAC §228.40(c)]. The evidence provided included documentation detailing the evaluation activity, timeline, and person responsible, as well as, agendas and minutes of advisory committee meetings. The documentation was signed by the director and an advisory committee member.

Compliance issues to be addressed:

None

Recommendations:

None

Based on evidence presented, McLennan Community College Alternative Certification Program (ACP) is in compliance with Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates of Candidates for Certification and Program Improvement.

COMPONENT VI: Professional Conduct (TAC) §228.50

Findings:

1. TAC §228.50(a) states that during the period of preparation, the educator preparation entity shall ensure that the individuals preparing candidates and the candidates themselves demonstrate adherence to Chapter 247 of this title (relating to Educators' Code of Ethics). The McLennan Community College staff and candidates (15 files reviewed) have signed a statement of reading, understanding, and abiding by the Code of Ethics and an email was sent to all staff by the Program Director specifically outlining the updates to the Code of Ethics.

Based on evidence presented, McLennan Community College Alternative Certification Program (ACP) is in compliance with Texas Administrative Code §228.50(a) regarding Professional Conduct.

Recommendations:

- Consider having McLennan Community College leadership team along with outgoing staff come to TEA for tune-up training to ensure that the program's continuity is maintained and to ensure that the staff knowledge and skills about the program are based on the most recent legislative actions;
- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about current Texas Administrative Code;
- Continue to participate in webinars provided by the Division of Educator Certification and Standards to ensure that the program staff is knowledgeable about current requirements and changes in Texas Administrative Code;
- Continue to maintain communication with the program specialist assigned to the program; and
- Ensure that TEA staff has the most current contact information by sending update emails to the assigned program specialist.