State Auditor's Office

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An Audit Report on

The Texas Education Agency's Oversight of Alternative Teacher Certification Programs

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Overall Conclusion

The Texas Education Agency (Agency) should improve its oversight of alternative teacher certification programs (alternative programs) to ensure that candidates complete required course work and appropriately receive teaching certificates. Alternative programs have become a common route to becoming a certified teacher in Texas—55 percent of the 26,576 standard teacher certificates issued for academic year 2006-2007 were issued through alternative programs (see text box and Appendix 3 for additional information).

The Agency should improve its monitoring function, its process for collecting and validating performance data, and the controls over its information technology. The Agency also should review how it assesses alternative programs through its accreditation ratings.

> **Background Information**
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> There are 87 alternative teacher certification programs (alternative programs) in Texas. For the academic year 2006-2007, the Agency issued 26,576 standard teaching certificates: 14,536 certificates were issued to teachers who had completed an alternative program and 12,040 were issued to teachers who had completed a traditional program. A standard certificate is issued to an individual who has completed all certification requirements (including passing state certification exams), and it is valid for five years. There were 311,466 full-time teachers employed in Texas public school districts for academic year 2006-2007.
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> Source: Texas Education Agency.

The Agency has made efforts to increase the monitoring of alternative programs since September 2005, when legislation was authorized to transfer the State Board for Educator Certification's administrative functions and services to the Agency. As of May 2008, the Agency had conducted 24 five-year reviews; there had been no on-site monitoring visits conducted before 2005. The Agency also provided monitoring reports to the program directors.

The Agency did not adequately monitor all aspects of the alternative programs.

The Agency did not ensure that data self-reported by alternative programs is accurate and that teacher candidates had completed all program requirements before being designated as a "completer." The Agency's current monitoring process does not include enough detailed reviews to ensure that this data is accurate. Five of eight alternative programs auditors visited classified some teacher candidates as completers even though the teacher candidates had not completed all education and training requirements. As a result, there is an increased risk that unqualified teachers may be issued a certificate and allowed to teach in Texas schools.

The Agency does not adequately ensure the accuracy of alternative programs' accreditation ratings, which are reported to the State Board for Educator Certification and are the only measure being used by the State to evaluate the effectiveness of teacher certification programs. Alternative programs self-report completer data, and completers' certification exams are the major component in determining accreditation ratings. If this completer data is not accurate, as discussed above, then the accreditation ratings also will be inaccurate. Additionally, the Agency should review the formulas it uses to calculate accreditation ratings.

The Agency did not ensure that annual performance reports submitted by alternative programs were complete or submitted by the deadline in the Texas Administrative Code. The purpose of the annual performance reports is to determine whether the alternative programs are accessible and equitable. The Agency reported alternative programs' performance data for the 2006-2007 academic year to the State Board for Educator Certification in May 2008, seven months after the due date set in the Texas Administrative Code. The Agency did not verify the accuracy of the self-reported performance data; however, six of the eight alternative programs auditors visited provided support demonstrating that the reported data was substantially accurate.

The Agency lacked a formal, documented methodology for prioritizing site visits to alternative programs. Without a formal risk assessment process, the Agency cannot ensure it is allocating its limited resources effectively and providing sufficient monitoring of those alternative programs at highest risk of noncompliance with state and Agency requirements. The Agency's informal process for selecting alternative programs to visit considers whether the alternative program (1) is new, (2) has an unacceptable pass rate, (3) has been the subject of complaints, or (4) is due for a required five-year review.

The Agency has a backlog of required monitoring visits and is not complying with the Texas Administrative Code, which requires the Agency to review alternative programs at least once every five years. As of March 2008, 54 percent of the alternative programs due for a required five-year review had not received the review.

The Agency lacks proper security management, which exposes the confidential data of approximately 1.47 million teachers and teacher candidates to unauthorized access and modification.

Security management weaknesses identified include terminated employees continuing to have access, users having inappropriate rights assigned to them, a lack of documentation showing approved levels of access, a lack of password and account lockout controls, and inadequate controls over the application used by the third-party vendor that administers the state teacher certification exams.

Alternative certification programs vary greatly in the design and method of curriculum delivery.

Although the Agency's administrative rules are structured to allow for flexibility, the current rules and regulations do not ensure some level of consistency in the design and method of curriculum delivery among alternative programs. Auditors conducted surveys of alternative program directors and school principals. The directors' responses indicate that alternative programs' requirements for admission criteria, field experience, internships, and mentoring vary widely. The school principals stated that the alternative programs are fulfilling a need on their campuses and that the long-term success of the teacher candidates was as dependent on the teacher candidates' innate abilities as on the quality of an alternative program's curriculum and training.

Five of the eight alternative programs that auditors visited did not adequately ensure that teacher candidates designated as completers had completed all program requirements.

The eight alternative programs visited accounted for 38 percent of the standard teacher certificates issued for academic year 2006-2007. At five of these programs, auditors identified some teacher candidates reported as completers who had not actually completed all program requirements. Because the Agency does not have the authority to impose sanctions, the Agency is limited in enforcing alternative programs' compliance with state laws and Agency regulations.

Other weaknesses identified during the site visits included:

➢ Four of the eight (50 percent) alternative programs did not have sufficient documentation to verify completer records. The Agency has not provided guidance to alternative programs about record retention requirements, which could limit the Agency's ability to monitor alternative programs. One alternative program discarded nearly all of the documentation supporting its reported completer data.

➢ Three of the eight (38 percent) alternative programs did not have a functioning advisory committee that met Texas Administrative Code requirements.

➢ Two of the eight (25 percent) alternative programs allowed interns to teach in a school district without obtaining a required probationary certificate.

The Agency has a documented process for approving new alternative programs that complies with Texas Administrative Code.

The Agency approved five programs during the 2006-2007 academic year. However, Agency staff did not consistently document the required reviews of applications for new programs.

Summary of Management's Response

The Texas Education Agency generally agrees with the recommendations in the report. Detailed management responses from the Agency are included in the Detailed Results section of this report; detailed management responses from the eight alternative programs that auditors visited are presented in Appendices 5 through 12.

Summary of Information Technology Review

The Agency lacks proper security management over the State Board for Educator Certification On-line Enterprise System (SBEC Online), which includes the Accountability System for Educator Preparation (ASEP). This potentially exposes confidential data to unauthorized access and modification. Identified weaknesses included terminated employees with access, users with inappropriate rights assigned, lack of documentation, and lack of password and account lockout controls. Auditors did not test the validity of state teacher certification exams or the reliability of the scoring by the third-party vendor that administers these exams.

Summary of Objectives, Scope, and Methodology

The objectives of this audit were to:

➢ Determine whether the Agency's oversight of alternative programs ensures that these programs comply with applicable laws and administrative rules.

➢ Determine whether controls over ASEP provide reasonable assurance that data related to alternative programs is accurate and complete.

➢ Review the performance of alternative programs as indicated by required annual performance reports and ASEP.

The scope of this audit covered a review and analysis of the Agency's oversight monitoring activities and performance data for alternative programs during the 2006-2007 academic year.

The audit methodology included reviewing the Agency's monitoring processes, conducting site visits of alternative programs; issuing surveys to teachers, principals, and alternative program personnel; reviewing controls over the accountability system, including reports for certification exam results and accreditation ratings; reviewing policies and procedures for conducting background checks; and performing data analysis. Auditors did not review the results of certification exam data received from the Agency's test contractor for accuracy.

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Detailed Results

The Texas Education Agency Should Improve Its Oversight Processes for Alternative Teacher Certification Programs

The Texas Education Agency (Agency) should improve its oversight of alternative teacher certification programs (alternative programs) to ensure that candidates complete required course work and appropriately receive teaching certificates. The Agency's lack of detailed reviews during on-site monitoring of alternative programs does not ensure that teacher candidates have completed all program requirements before being classified as "completers." Auditors identified teacher candidates who were designated as completers who had not completed all program requirements in five of eight alternative programs visited. As a result, there is an increased risk that program participants who have not completed all education and training requirements may be certified to teach in Texas schools. In addition, the Agency is not adequately ensuring that the alternative programs' accreditation ratings reported to the State Board for Educator Certification are accurate.

Auditors identified other weaknesses in the Agency's oversight processes for alternative programs. Specifically, the Agency:

- Used formulas to calculate accreditation ratings that may not reflect the actual performance of alternative programs.

- Did not ensure that annual performance reports submitted by alternative programs were complete or submitted by the due date set in the Texas Administrative Code.

- Did not ensure that all alternative programs due for a required five-year review received a review.

- Lacked a formal, documented risk-based approach for prioritizing alternative program visits.

- Lacked formal, written policies and procedures for most of its monitoring functions.

Chapter 1-A
The Agency Did Not Ensure That Program Completer Data and Accreditation Ratings Were Accurate

The Agency did not ensure that data reported by the alternative programs was accurate.

The Agency did not verify the accuracy of the data that alternative programs submitted to it. Each alternative program self-reports which of its teacher candidates have completed all education and training requirements; each teacher candidate is then classified as a program "completer" (see text box for additional information on the definition of a completer). The alternative programs self-report this data into the automated Accountability System for Educator Preparation (ASEP), which the Agency uses to determine accreditation ratings.

However, the Agency did not validate this data. Five of the eight alternative programs auditors visited classified some teacher candidates as completers even though the teacher candidates had not completed all program requirements. Error rates among the samples tested at the alternative programs varied from 7 percent to 93 percent. Some of the alternative programs did not retain sufficient documentation to show that the teacher candidates designated as completers had actually completed all program requirements. Other alternative programs incorrectly designated teacher candidates as completers because they did not independently verify the teacher candidates' completer status when it is automatically updated by ASEP. Because of these issues, there is an increased risk that unqualified teachers may be issued a certificate and allowed to teach in Texas schools.

> ### What Is A Program Completer?
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> An individual becomes classified as a completer when he or she has satisfied an alternative program's requirements for his or her selected certification field. A teacher candidate is designated a "program completer" regardless of whether the individual has taken or passed the required certification tests or whether the program has recommended that the individual be certified. The Agency currently requires each alternative program to report which teacher candidates are program completers to the Accountability System for Educator Preparation (ASEP) by October 15 following the academic year of completion.

The Agency did not require alternative programs to specify whether they had verified the accuracy of each teacher candidate's completion year. In addition, the Agency did not ensure that alternative programs are correctly utilizing a verification status field in ASEP that was implemented to indicate whether an alternative program has verified a candidate's completion year. Without this assurance, there is a risk that completer information in ASEP is incorrect.

The Agency did not ensure that alternative programs' accreditation ratings are accurate.

Because the Agency does not validate completer data, it is not adequately ensuring that accreditation ratings submitted to the State Board for Educator Certification are accurate. Completer certification exam scores are the major component in calculating the alternative programs' accreditation ratings and are the only objective measure included in the calculation. Accreditation ratings may be incorrect because they include test scores of

> ### Accreditation Ratings
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> Annual accreditation ratings are issued for each alternative program based on teacher certification exam scores of program completers. Currently, there are four ratings:
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> - **Accredited**: Annual rating issued based on an entity's performance (certification exam results) for a specified period.
> - **Accredited Under Review**: Rating issued to an entity that does not attain an acceptable initial or final pass rates for a specified period.
> - **Accredited – Preliminary Status**: New entities receive this rating until the first accreditation ratings are issued following the academic year in which one or more of the entity's candidates completes the program.
> - **Not Accredited**: Rating issued for failure to meet accountability standards.
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> For academic year 2006-2007, no alternative program was rated as accredited-under review.

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teacher candidates who were labeled as completers, but who the alternative programs cannot demonstrate are completers. As discussed above, auditors identified errors in the completer data submitted by five of the eight alternative programs visited. The Agency uses the accreditation ratings to measure the effectiveness of teacher certification programs.

State statute identifies two factors that should be used to determine an alternative program's accreditation rating; the Agency currently uses only one of these factors. The Texas Administrative Code and Texas Education Code state that teacher certification programs' accreditation ratings should be based on (1) the performance on teacher certification examinations by teaching candidates who have successfully completed all requirements of their teacher preparation programs and (2) school districts' performance appraisals of beginning teachers. However, the Office of the Attorney General issued an opinion on April 7, 2003, stating that school districts' teacher appraisals are confidential and may be released by the school district only to the teacher or another school district at which the teacher has applied for employment. As a result, the Agency does not have access to these appraisals and cannot include the appraisals in the evaluation of an alternative program's effectiveness. Therefore, it is crucial that the Agency ensure that the completer data reported by alternative programs is accurate.

Accreditation Rating Formulas

The Agency calculates an alternative program's initial pass rates and final pass rates using the following formulas in Texas Administrative Code, Title 19, Section 229.2 (7)(8):

- **Initial Pass Rate**: The number of successful (passing) last attempts made by the cohort of program completers divided by the total number of last attempts made by the cohort. To be accredited, a program's initial pass rate must be 70 percent or higher.

- **Final Pass Rate**: The number of successful (passing) last attempts made by the cohort of program completers divided by the number of last attempts made by the cohort. To be accredited, a program's final pass rate must be 80 percent or higher.

The Agency should review the formulas it uses to calculate accreditation ratings.

The formulas used by the Agency to calculate accreditation ratings may not reflect the actual performance of alternative programs. Alternative programs' accreditation ratings are based on the performance of program completers on the teacher certification exams. The Agency calculates a program's initial and final pass rates; however, the Agency's formula used to calculate these pass rates do not account for the number of attempts that a teacher candidate makes before passing a certification exam. The formulas include only the teacher candidate's last attempt. For example, if a program completer has made five unsuccessful attempts to pass the certification exam, the formula counts only the most recent failed attempt. As a result, an alternative program's pass rates may not accurately reflect how well that program is preparing its teacher candidates for the state certification exams, or by extension, the classroom.

The Agency should implement detailed reviews during its monitoring process to ensure that data reported by alternative programs is correct.

The Agency does not verify actual teacher candidate data during its monitoring of alternative programs. The Agency's current monitoring process includes interviews with an alternative program's advisory council, directors and faculty, teachers, mentors, interns, administrators, and supervisors to

gather testimonial evidence about the alternative program's compliance with Agency requirements and state statutes. In addition, the Agency has a document review process that includes reviews of at least the following:

- The number of teacher candidates currently enrolled in an alternative program.

- A blank application for admission to the program.

- Teacher candidate handbook.

- Copy of assessments used to determine language proficiency.

- Copy of teacher candidate evaluation documents.

- Copy of blank observation forms used by mentors and field supervisors.

However, because the Agency gathers only anecdotal evidence and reviews mostly blank forms used by the alternative programs, its monitoring process does not provide assurance that teacher candidates actually complete the alternative program's requirements before becoming eligible for certification. For example, the Agency reviews a blank teaching observation form that a teacher candidate would complete after observing an experienced teacher in the classroom. Without reviewing the completed forms, however, the Agency cannot determine whether the teacher candidate actually completed all required observations. This is one reason the Agency's monitoring process did not identify the same weaknesses in alternative programs' completer data that auditors identified.

Recommendations

The Agency should:

- Verify that data self-reported by alternative programs is accurate and that teacher candidates complete all program requirements before being designated as a completer.

- Provide guidance to alternative programs about record retention requirements.

- Verify the accuracy of an alternative program's accreditation ratings by validating that teacher candidates designated as completers have met all program requirements.

- Revise the formulas used to calculate accreditation ratings so that the alternative program and teacher candidate's actual performance is more accurately reflected.

Management's Response

Recommendation: *Verify that data self-reported by alternative programs is accurate and that teacher candidates had completed all program requirements before being designated as a completer.*

Agency staff agrees that the program monitoring visit process needs to be strengthened and expanded to include data validation. The Director of Educator Standards and the Deputy Associate Commissioner for Educator Certification and Standards will review the process and include validation of program self-reported data beginning with program visits conducted after September 1, 2008. However, the current statute and Texas Administrative Code do not allow for any sanctions for programs that do not report data accurately.

Responsibility: TEA Deputy Associate Commissioner for Educator Certification and Standards and TEA Director of Educator Standards Staff

Recommendation: *Provide guidance to alternative programs about record retention requirements.*

Agency staff has proposed a revision to Texas Administrative Chapter 228, Requirements for Educator Preparation Program, to include a provision that all educator preparation programs maintain documents for five year to allow for data verifications.

Responsibility: TEA Deputy Associate Commissioner for Educator Certification and Standards

Recommendation: *Verify the accuracy of an alternative program's accreditation ratings by validating that teacher candidates designated as completers have met all program requirements.*

Texas Education Agency staff agrees with the auditors that programs need to be verified by the completer year to ensure accurate data and accreditation ratings. That issue will be addressed as the Texas Education Agency technology staff is developing a new system for the State Board for Educator Certification scheduled to be in production in 2010.

Prior to that time, programs will be sent a copy of their completer list and each educator will need to be verified as a completer by the program with the forms signed and notarized. That process was implemented in May 2008 to verify the 2006-2007 accreditation ratings. A comparison of the online data and data verification forms did not result in any changes to any of the accreditation ratings for the 142 educator preparation programs.

Responsibility: TEA Educator Standards Staff and TEA Technology Staff

Recommendation: Revise the formulas used to calculate accreditation ratings so that the alternative program and teacher candidate's actual performance is more accurately reflected.

As Texas Education Agency staff continues its rule review process, Texas Administrative Code Chapter 229, Accountability System for Educator Preparation, will be revised that may change the accountability system to include more than certification test scores of completers. The rule review process is scheduled to begin in August 2008 by the Director of Educator Standards and the Deputy Associate Commissioner for Educator Certification and Standards. The revisions will also need legislation action since the accountability system is also in statute. It is a priority for the next legislative session.

Responsibility: TEA Deputy Associate Commissioner for Educator Certification and Standards, TEA Director of Educator Standards, and TEA Technology Staff

Chapter 1-B

The Agency Did Not Ensure That Annual Performance Reports Submitted by Alternative Programs Were Complete or Submitted by the Due Date Set in the Texas Administrative Code

The Agency did not collect all required performance data from alternative program by the due date in its administrative rules. The Texas Administrative Code requires that each alternative program file an annual performance report with the State Board for Educator Certification no later than October 15 following each academic year. The purpose of these performance reports is to determine whether alternative programs are accessible and equitable. Under the Texas Education Code, Section 21.045 (b), and Texas Administrative Code, Title 19, Section 229.7, alternative programs are required to provide the following performance data:

- Number of teacher candidates who applied to the alternative program.

- Number of teacher candidates admitted to the alternative program.

- Number of teacher candidates retained in the alternative program.

- Number of teacher candidates who completed all requirements of the alternative program.

- Number of completers who were employed in the teaching profession after completing the alternative program.

- Number of completers retained in the teaching profession.

The Agency did not request, and alternative programs did not provide, (1) the number of candidates employed in the profession after completing the program, and (2) the number of candidates retained in the teaching profession. In addition, the Agency reported the programs' performance data for the 2006-2007 academic year to the State Board for Educator Certification in May 2008, seven months after the Texas Administrative Code due date. In addition, the Agency did not break down programs' completer data by gender and ethnicity, as required by Texas Education Code, Section 21.045 (b).

The State Board for Educator Certification, which was a stand-alone state agency before September 2005, had not been collecting this information. When the Agency became responsible for oversight of teacher certification programs in September 2005, it required that all teacher certification programs submit annual performance information. As a result, the Agency had alternative programs' performance reports for the past two academic years.

The Agency did not verify the accuracy of the alternative programs' self-reported performance data; however, six of the eight programs auditors visited provided support demonstrating that the reported data was substantially accurate. If the Agency does not verify the accuracy of the data, it cannot, with assurance of reliability, determine trends in enrollment and retention among alternative programs and may not identify potential problems developing at individual programs. A 2002 internal audit report by Rupert & Associates, P.C. Certified Public Accountants recommended that the State Board for Educator Certification develop a process to verify the accuracy of data reported by alternative programs.[1]

Recommendation

The Agency should improve its process for collecting and ensuring the reliability of self-reported performance data for alternative programs.

Management's Response

Agency staff agrees that the Annual Reports need to be completed annually and accurately and meet the timelines as outlined in rule. Revisions in the reporting process will be made in August, 2008 by the Director of Educator Standards to ensure the data will be reported as outlined in TAC. The Director of Educator Standards will coordinate with the Agency technology staff to gather the "completer" data and retention data.

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[1] *Internal Audit of the State Board for Educator Certification Accountability and Professional Discipline*, Rupert & Associates, P.C. Certified Public Accountants, June 14, 2002.

The Agency agrees that revisions need to be included in the program monitoring processes to validate self-reported data by programs. The Director of Educator Standards will make revisions in its program monitoring process beginning with visits after September 1, 2008. The revisions in the process of conducting program visits will result in more time and staff to conduct the visits. The program specialists currently conduct 2-day monitoring visits and this may need to be extended to three days to allow for the data validation.

Although the current Texas Administrative Code Chapter 229, Accountability System for Educator Preparation, adopted in 1999, required Annual Performance Reports, the reports were never completed prior to State Board for Educator Certification rejoining Texas Education Agency in 2005. Since that time self-reported Annual Performance data was collected from the educator preparation programs for 2005-2006 and 2006-2007 academic years. Programs were asked to submit data that could not be obtained through any of the state database systems. As a result, Agency staff was able to report program data on applicants, admitted candidates, and retained candidates to the State Board for Educator Certification Board. An Agency research staff member was able to gather "completer" data from the state system.

Responsibility: TEA Educator Standards Staff

Chapter 1-C

The Agency Did Not Comply With Follow-up and Ongoing Review Requirements for Existing Alternative Programs

The Agency has a backlog of required monitoring visits and is not complying with the Texas Administrative Code, which requires the Agency to review alternative programs at least once every five years. The State Board for Educator Certification had not conducted any on-site monitoring visits of alternative programs before its administrative functions and services were authorized by legislation to be transferred to the Agency in September 2005.

For the academic year 2006-2007, the Agency performed 11 five-year monitoring reviews of alternative programs, and it was scheduled to conduct 13 five-year reviews during the 2007-2008 academic year. However, as of March 2008, 54 percent (29 of 54) of the alternative programs due for a required five-year review had not received the review.

Additionally, the Agency should improve its risk assessment process. The Agency uses some criteria for prioritizing program visits, such as whether the alternative program (1) is new, (2) has an unacceptable pass rate, (2) has been the subject of complaints, or (4) needs a required five-year cycle review. However, the Agency's documentation of these criteria is minimal and does

not describe how each criterion should be weighted in relation to the others. The Agency has five program specialists who are qualified to perform monitoring visits, and Agency staff is currently focused on reducing the backlog of overdue five-year reviews and other required visits. Without a documented, risk-based approach to prioritizing program visits, the Agency cannot ensure that, as it moves forward, it is allocating its limited resources effectively and providing sufficient monitoring of those programs at highest risk of noncompliance with state and Agency requirements.

In addition to the five-year monitoring visits, the Agency also conducts monitoring visits related to approving new programs (pre- and post-approval visits), conducts additional monitoring visits, and performs monitoring functions of traditional teacher certification programs. This is accomplished with 10 employees who are responsible for monitoring 70 alternative programs, 55 traditional programs, and 17 programs that offer both an alternative and a traditional teacher certification program.

Types of Monitoring Visits

The Agency performs four types of monitoring visits:

- **Program Pre-Approval Visits**–The Agency visits a proposed alternative program to determine whether it has the capacity to implement the program components successfully.

- **Program Post-Approval Visits**–The Agency will conduct a follow-up visit 6 to 12 months after the State Board for Educator Certification has approved an alternative program to ensure that the program's implementation complies with the approved plan.

- **Additional Program Visits**–The Agency will conduct on-site visits as needed based on complaints and other data received about a program or to ensure that a program is reviewed at least once every five years.

- **Oversight Visits**–The Agency provides technical assistance to an alternative program that has been rated "Accredited-Under Review."

The Agency should ensure that all visits occur within specified timelines based on Agency policies and are appropriately documented. During the 2006-2007 academic year, the Agency conducted 5 pre-approval visits, 3 post-approval visits, 3 additional visits, and 8 oversight visits for alternative programs. However, 1 of the 3 (33 percent) post-approval visits did not occur within 6 to 12 months after the alternative program's initial approval, as required by Agency policy. In addition, Agency files for 1 of these 3 post-approval visits lacked documentation that the alternative program had submitted a required report informing the Agency of any recent program changes.

The Agency may require alternative programs with identified deficiencies or with initial and final pass rates that are below acceptable levels to submit action plans for addressing and correcting these issues. Agency informal policy requires its staff to conduct a follow-up site visit within 12 months after an action plan is filed. During the 2006-2007 academic year, five alternative programs submitted action plans, and the Agency is scheduled to conduct on-site visits of all five alternative programs during the 2007-2008 academic year. However, the Agency lacked supporting documentation showing that these plans were reviewed and approved by the Agency's director. Auditors reviewed each plan, and all the plans contained sufficient information about the areas of needed improvements and how the program planned to make these improvements. Without a documented supervisory review, however, there is increased risk that the Agency will not identify weaknesses in the action plans before the alternative programs initiate changes.

Recommendations

The Agency should:

- Continue its monitoring efforts to ensure that alternative programs are reviewed as required by the Texas Administrative Code.

- Develop a thorough, documented method to identify and assess risks within the alternative programs that will help determine which alternative programs should receive monitoring visits.

- Ensure that it performs post-approval visits within 6 to 12 months after an alternative program's initial approval.

- Document the receipt, review, and approval of action plans submitted by alternative programs and ensure timely follow-up on action plans.

Management's Response

Recommendation: Continue its monitoring efforts to ensure that alternative programs are reviewed as required by the Texas Administrative Code.

Although the current TAC rules, adopted in 1999, requires monitoring visits of programs every five years, the visits were not completed prior to State Board for Educator Certification staff rejoining the Texas Education Agency in September 2005. Since that time, an effort has been made by the Division of Educator Standards staff to schedule and conduct approximately 30 program visits per year based on staffing and budget.

Responsibility: TEA Educator Standards Staff

Recommendation: Develop a thorough, documented method to identify and assess risks within the alternative programs that will help determine which alternative programs should receive monitoring visits.

The program visits conducted in the last three years were prioritized as listed in the report. However, the staff agrees that a formal risk assessment needs to be completed to prioritize future visits. The Director of Educator Standards and the Deputy Associate Commission of Educator Certification and Standards will meet with Texas Education Agency internal auditors in July 2008 to develop a process to be implemented with program visits conducted after September 2008.

Responsibility: TEA Deputy Associate Commissioner for Educator Certification and Standards, TEA Director of Educator Standards, and TEA Internal Auditors

Recommendation: Ensure that it performs post-approval visits within 6 to 12 months after an alternative program's initial approval.

Although Texas Education Agency staff has a backlog of five-year program visits to complete, all pre-approval and post-approval visits for new programs have been completed in a timely manner since 2005 with the exception of one visit that was rescheduled due to scheduling conflicts with the program.

Responsibility: TEA Director of Educator Standards

Recommendation: Document the receipt, review, and approval of action plans submitted by alternative programs and ensure timely follow-up on action plans.

The Division of Educator Standards staff will continue to review all action plans required of educator preparation programs due to their performance under the Accountability System for Educator Preparation data specified in the rules. The Division of Educator Standards staff will continue to receive the action plans and will document any follow-up action and communication with the programs.

Responsibility: TEA Director of Educator Standards

Chapter 1-D
The Agency Lacked Formal, Written Policies and Procedures for Most Monitoring Functions and a Tracking System for Complaints Filed Against Alternative Programs

The Agency lacked formal, written policies and procedures for prioritizing program site visits, approving new alternative programs, monitoring alternative programs, determining accreditation ratings, reporting performance data, issuing certificates, handling complaints, and adding certificate fields. The Agency has processes in place for approving and monitoring new entities, but it has not developed detailed, comprehensive policies and procedures. Without formally documented policies and procedures, there is an increased risk that Agency processes and procedures will not be followed consistently and effectively among Agency staff or in the absence of key individuals. It is important that the Agency ensure consistency because the majority of its employees have been with the Agency's Educator Certification and Standards Division for fewer than two years.

In addition, the Agency lacked formal policies and procedures for logging, tracking, and resolving complaints filed against alternative programs. Therefore, it is not possible for the Agency to (1) determine the extent to which complaints have been made, (2) identify significant trends in alternative programs' needed areas for improvement, or (3) determine whether all complaints have been satisfactorily resolved. The Agency currently files all

documentation related to a complaint in the files for each alternative program. However, the resolution of a complaint is not always communicated in writing and the Agency cannot ensure that all parties to a complaint were contacted regarding the complaint's resolution.

The Agency also does not require alternative programs to have a formal system for tracking complaints, and none of the alternative programs visited had such a system. It would be beneficial for the alternative programs to have a centralized location for tracking the filing and resolution of complaints, especially if an alternative program experiences a large number of complaints.

Recommendation

The Agency should develop and implement written policies and procedures for all monitoring functions. These policies and procedures should include a documented, risk-based approach for prioritizing monitoring visits and a method to formally log and track complaints at the Agency and alternative programs.

Management's Response

An Educator Preparation Program Directors Handbook was developed and disseminated to all educator preparation program directors in the state in April 2007. Although it does not contain policies and procedures for all functions of the Division of Educator Standards staff, it does outline many procedures used by staff to guide and communicate with the programs.

The Division of Educator Standards staff will develop a Procedures Manual to be utilized by staff relating to complaints; program visits, approving new programs, monitoring programs, adding certification fields and other functions related to programs. The Manual will be completed by June 2009.

Responsibility: TEA Director of Educator Standards and Staff

Chapter 1-E
The Agency Followed Its Processes for Approving New Programs, Strengthened the Process for Adding Certification Fields, and Developed Policies for Fingerprinting All Teachers

During the academic year 2006-2007, the Agency performed 11 required monitoring visits, approved new alternative programs, reviewed accreditation data, responded to program needs, fulfilled requests to add certificate fields, approved continuing professional education providers, and conducted training sessions. However, the Agency could improve its documentation of the approval process for applications for new alternative programs.

Applications for New Programs

The Agency approved five new alternative programs during the 2006-2007 academic year. The Agency's process for approving new programs complied with the Texas Administrative Code. The process included conducting a pre-approval visit to the alternative program site, preparing a summary report of the visit, and preparing an executive summary as an agenda item for the next State Board for Educator Certification meeting.

The Agency substantially complied with its process for approving new alternative programs. However, the proposals for two of the five (40 percent) new alternative programs approved during the 2006-2007 academic year had been reviewed but the formal signature sheet had not been signed by two program specialists. In another case, one of the five (20 percent) new alternative programs approved during the 2006-2007 academic year lacked the signature sheet documenting that the Deputy Associate Commissioner for Educator Certification and Standards and two program specialists had reviewed the application. The Agency's internal procedures require two program specialists and the Deputy Associate Commissioner for Educator Certification and Standards to review the application and proposal for all new alternative programs.

The Agency strengthened requirements for the addition of certificate fields and complied with requirements for continuing approval of certification fields.

In August 2007, the Agency strengthened the process that alternative programs must complete to add certificate fields. Alternative programs are required to submit a proposal to the Agency documenting that the program has the capacity to offer support, training, and quality coursework to teacher candidates in the new certification fields. Previously, alternative programs were required to submit only a letter of intent. As a result, during the 2006-2007 academic year, 58 alternative programs submitted letters and received approval to add 347 certificate fields. If an alternative program lacks the capacity or resources to manage additional certification fields, there is a risk that the alternative program may not provide a curriculum that is in compliance with Agency and statutory requirements.

The Agency also amended the Texas Administrative Code to allow only fully accredited teacher certification programs to add certificate fields, preventing alternative and traditional certification programs with accreditation-preliminary approval and accreditation-under review ratings from adding new fields.

In addition, the Agency had processes in place to ensure that an alternative program loses authorization to offer an individual certification field if the program's initial and final passing rates (representing more than 10 completers) for that certification field fall below acceptable levels for three consecutive years, in compliance with Texas Administrative Code. No

alternative programs are scheduled to lose their ability to offer a certification field based on this requirement for academic year 2008-2009.

The Agency has established policies and procedures to comply with state fingerprinting requirements.

The Agency has established policies and procedures to comply with the State's National Criminal History Record Information Review of Certified Educators requirements. The Agency has set a timeline to obtain all criminal history record information for all certified educators by September 1, 2011. The Agency's policies and procedures also include:

- Reviewing criminal history information of any applicant for or holder of a teaching certificate who has not previously submitted fingerprints or been subject to a criminal history review.

- Placing an educator's certificate on inactive status for failure to comply with a deadline for submitting fingerprints.

- Setting a schedule for obtaining and reviewing the information a certified educator must provide to the State Board for Educator Certification.

The Agency began conducting criminal history background checks in January, 2008. As of May 2008, the Agency had conducted background checks in 3 of the 1,249 school districts and charter operators that are required to obtain these checks. An additional 20 school districts had background checks that were ongoing.

Recommendation

The Agency should ensure that applications for new programs receive all required reviews and that these reviews are consistently documented.

Management's Response

Agency staff agrees that processes were followed for approving new programs and strengthened the process for adding certification fields and developed policies for fingerprinting. The Division of Educator Standards staff will continue to implement the processes that have proven to be beneficial for educators in the state. The Director of Educator Standards will be responsible for verifying that all documentation is complete and maintained beginning in July 2008.

Responsibility: TEA Director of Educator Standards

The Agency Has Administrative Rules That Are No Longer in Effect

Texas Administrative Code, Title 19, Chapter 229 (19 TAC 229), includes five rules that expired in August 2002. These five rules overlap and duplicate other sections in 19 TAC 229, which may confuse the public and providers of alternative programs about which rules should be followed. Texas Government Code, Section 2001.039, requires state agencies to review and consider for readoption each of its rules every four years.

Recommendation

The Agency should readopt, readopt with amendments, or repeal its expired administrative rules.

Management's Response

Agency staff has been working with committees of stakeholders to update each chapter of the rules. The SBEC Board approved a Rule Revision Chart that shows the progress towards updating all rules. The staff of Educator Quality and Standards will continue the process according to the chart until all are complete scheduled for spring 2010.

Responsibility: TEA Educator Certification and Standards Staff

The Agency Lacks Proper Security Management, Exposing Confidential Data to Potential Unauthorized Access and Modification

The Agency does not properly manage its State Board for Educator Certification On-line Enterprise System (SBEC Online), which tracks a teaching candidate's progress toward meeting alternative program requirements and records the issuance of teaching certificates. The lack of proper security management exposes the confidential data of approximately 1.47 million teachers and teaching candidates to risk of unauthorized access and modification. Specific weaknesses include:

- Terminated employees continuing to have access.

- Users having inappropriate rights assigned to them.

- A lack of documentation showing approved levels of access.

- A lack of password and account lockout controls.

- Inadequate controls over the test vendor application.

The Agency has stated that it is replacing SBEC Online with a more reliable platform and that some modules of the new system will be operational for the 2008-2009 academic year. The new system was not implemented at the time of this audit. As the Agency implements the new system, it should ensure that it does not duplicate the weaknesses currently in SBEC Online.

Chapter 2-A
Security Weaknesses Place Data in SBEC Online At Risk of Unauthorized Access

Security weaknesses place data in SBEC Online at risk of unauthorized access and modification. This could expose the personal information of all certified teachers in Texas to identity theft or could result in teaching candidates being issued certificates without completing all teacher preparation requirements. SBEC Online is the primary system that supports the certification of teachers in Texas and is accessed by Agency staff, as well as by more than 5,500 staff members at alternative and traditional programs as of January 2008. SBEC Online contains teachers' Social Security numbers, birth dates, addresses, and phone numbers, as well as certification test scores and the official record of who has been issued a teaching certificate.

The Agency does not have documentation to show which employees should have access or what type of access they should have to SBEC Online.

The Agency should develop better access controls over SBEC Online. Four of seven Agency information technology employees reviewed had access to modify data in SBEC Online; this access was not approved by the group

responsible for approving access rights to SBEC Online. Because information technology developers have access to change the program code, these developers should have read-only access to the actual data within a system. In addition, the Agency did not have the forms showing the approved levels of access for all 77 internal employees who have access to SBEC Online. Therefore, the Agency did not know whether these employees' access was appropriate. Texas Administrative Code, Title 1, Section 202.21, requires that the person responsible for a computer system approve access to that computer system. Furthermore, without documenting approved access, the Agency cannot monitor whether employees have correct access levels to SBEC Online.

The Agency and alternative programs did not remove former employees' access in a timely fashion.

Some former employees of the Agency and alternative programs continued to have access to SBEC Online after their termination dates. Specifically:

- Seventy-one of 263 (27 percent) accounts tested at eight alternative programs that auditors visited belonged to people who had terminated their employment. Auditors tested 17 of these 71 accounts and determined that 2 (12 percent) were used to access the system after the employees' termination dates.

- Three of 79 (4 percent) accounts tested belonged to former Agency employees who continued to have access to SBEC Online for up to 5 years after their employment termination dates.

In addition, 35 of 263 (13 percent) accounts tested at alternative programs had assigned access rights that were either excessive for the employee's current job duties or the employee had changed jobs and no longer required access.

Texas Administrative Code, Title 1, Section 202.25 (1 TAC 202.25) requires that access to applications be appropriately modified when the employee no longer needs that access. This prevents the modification or undue exposure of data within a system.

Because SBEC Online is a system that is operated by the Agency, it is crucial that the Agency monitor access to this confidential information. The Agency did not develop any type of security report or online tool that would allow it or alternative programs to regularly review employee access.

The Agency lacks adequate password and account lockout controls.

The Agency lacked adequate set-up of password and account lockout procedures for SBEC Online. 1 TAC 202.25 requires state agencies to use industry-established best practices in developing their password and account lockout procedures. Specific details regarding system security were provided in writing to Agency management.

In addition, the Agency does not require users to change their passwords on a regular basis. As a result, some account holders are using passwords that are older than recommended by best practices. Sixteen of 20 (80 percent) accounts reviewed that were used to access the Accountability System for Educator Preparation (ASEP) database had passwords that were older than 90 days. Three accounts with administrative privileges had passwords that were more than two years old. By changing passwords periodically, the Agency can ensure that a compromised password is not reused indefinitely. Best practices recommend that passwords expire as often as necessary for a particular business environment. Passwords should be changed every 90 days at a minimum.

Also, the SBEC Online application overwrites the date of a user's last password change with an erroneous date. Because dates are being incorrectly overwritten, 13 of 93 (14 percent) accounts reviewed showed that the most recent password change had occurred more than 19 years ago. Without accurate information, the Agency cannot determine when passwords were last changed and cannot monitor and request that users change their passwords on a timely basis.

Recommendations

The Agency should:

- Document all employees' approved level of access to SBEC Online and ensure the access is properly restricted and provides for proper segregation of duties.

- Review all access granted to SBEC Online and ensure this access matches the employees' approved level of access.

- Provide a security report or online tool that alternative programs can use to monitor their employees' access, and regularly review these reports and modify access to SBEC Online as needed.

- Ensure that information technology developers have read-only access and cannot modify application data.

- Ensure all system access is properly approved by the application owner and that all access granted is properly documented and that this documentation is retained.

- Ensure that access to SBEC Online is modified and/or removed in a timely manner when employees leave or change jobs within the Agency or alternative programs.

- Ensure that data was not improperly altered by former employees who accessed the SBEC Online system after the termination of their employment.

- Implement system password and account lockout parameters that meet industry best practices and are in compliance with 1 TAC 202.25.

- Modify SBEC Online to prevent it from overwriting system-populated dates.

Management's Response

Recommendation: Document all employees' approved level of access to SBEC Online and ensure the access is properly restricted and provides for proper segregation of duties.

Recommendation: Review all access granted to SBEC Online and ensure this access matches the employees' approved level of access.

Management agrees with the findings.

The Educator Standards division will perform an audit to document and review all SBEC Online accounts for program users and TEA employees. The audit will involve re-validating all users with signoff from the responsible organization heads to ensure proper segregation of duties. This audit is expected to be completed by January 2009.

Responsibility: TEA Educator Standards Staff

Recommendation: Provide a security report or online tool that alternative programs can use to monitor their employees' access, and the Agency should regularly review these reports and modify access to the system as needed.

The Educator Standards division will provide a report to each organization head, requesting re-validation and signoff of their employees' access, on a quarterly basis. The creation and distribution of these reports will begin by September 2008.

Responsibility: TEA Educator Standards Staff

Recommendation: Ensure that information technology developers have read-only access and cannot modify application data.

Due to technical limitations within the current SBEC Online infrastructure, it is not feasible to restrict the support team to read-only access in production. However, the agency plans to implement the rewritten version of the system to enable this segregation of development and production support duties. The rewritten system is expected to reach production status in 2010.

Responsibility: TEA Technology Staff

Recommendation: Ensure all system access is properly approved by the application owner and that all access granted is properly documented and that this documentation is retained.

The Educator Standards division will ensure that all system access is requested and approved using the official request form. These forms will be approved by the program area designees and will be stored according to TEA retention schedules. This process will be implemented by July 2008.

Responsibility: TEA Educator Standards Staff

Recommendation: Ensure that access to SBEC Online is modified and/or removed in a timely manner when employees leave or change jobs within the Agency or alternative programs.

The Educator Standards division will receive notification when TEA employees leave or change jobs within the Agency. The alternative programs will be reminded of their responsibility to notify TEA to disable accounts when their own employees are terminated. Additionally, the planned process for reporting on and re-validating SBEC Online users on a quarterly basis will allow TEA to disable any accounts that are not positively re-certified by the alternative programs. These measures will be put into place starting between July and September of 2008.

Responsibility: TEA Educator Standards Staff

Recommendation: Ensure that data was not improperly altered by former employees who access the SBEC Online system after their termination.

As part of the user audit planned in response to recommendations 1 and 2 (under Chapter 2A), the Educator Standards division will review data under the control of former users that have been identified as having left the organization and who then subsequently accessed the system. This review is expected to be completed by January 2009.

Responsibility: TEA Educator Standards Staff

Recommendation: Implement system password and account lockout parameters that meet industry best practices and are in compliance with1 TAC 202.

Recommendation: Modify SBEC Online to prevent it from overwriting system-populated dates.

Changes to the existing SBEC Online application will be made to comply with these recommendations. TEA Information Systems is now working to develop the time and cost estimates needed for this remediation.

Chapter 2-B
The Agency Did Not Properly Document SBEC Online

The Agency did not have complete, accurate, up-to-date documentation for SBEC Online. The Agency lacked descriptions for the definitions of what each field in the database means and documentation of how SBEC Online should operate. As discussed above, the Agency also lacked documentation about how security should be defined in SBEC Online. Proper documentation is essential to ensure that employees correctly use the system. This documentation also is important to ensure continuity of SBEC Online. If key personnel were to leave the Agency, continued operation and development of SBEC Online could be difficult.

Recommendation

The Agency should formally develop and maintain complete, accurate, up-to-date system documentation for Agency-designed systems.

Management's Response

TEA will begin the process of collecting and consolidating existing documentation, and adding more where gaps are identified. The development of additional documentation will be performed on an ongoing basis starting in July of 2008.

Responsibility: TEA Educator Standards Staff

Alternative programs vary greatly from each other in the curriculum's design and method of delivery. No two programs have the same requirements. Texas Administrative Code, Title 19, Chapter 228, states that:

> …the [State Board for Educator Certification's] rules governing educator preparation are designed to promote flexibility and creativity in the design of programs, including Centers for the Professional Development of Teachers and alternative routes to certification, to accommodate the unique characteristics and needs of different regions of the state, as well as the diverse population of potential educators.

Although the Agency's administrative rules are structured to allow for flexibility, the current rules and regulations do not ensure some level of consistency in the design and method of curriculum delivery among alternative programs. It should be noted that the Agency presented proposed new minimum requirements for traditional and alternative programs to the State Board of Education (Board) in March 2008, and the Board is reviewing those requirements.

Survey of Alternative Programs

Auditors surveyed the program directors of 85 alternative programs, and 69 (81 percent) of them responded. The requirements that teacher candidates must complete varied greatly among the alternative programs. Specifically:

- The majority of survey respondents reported that the number of field experience hours (the hours of observation of a certified teacher in the classroom) that a teacher candidate must complete prior to being given a teaching assignment was 50 or fewer hours.

- The length of required internships (in which a teacher candidate leads a class in a school district while still enrolled in the alternative program), ranged from fewer than three months to one year. The length of required internships is not specified in the Texas Administrative Code. The majority of the survey respondents required a one-year internship.

- The minimum number of required observations for candidate mentoring (in which a mentor observes the candidate in a classroom setting) varies. A mentor program is intended to provide the teacher candidate with supervision that includes structured guidance and ongoing support from an

experienced educator who has received mentor training. Most survey respondents reported that teacher candidates receive monthly feedback.

- Most survey respondents said they used a minimum grade point average ranging from 2.5 to 2.99 on a 4.0 scale as an admission requirement.

In addition, the majority of survey respondents stated they meet with their advisory committee a few times a year or less often. The purpose of the advisory committee is to assist in the design, delivery, evaluation, and major policy decisions of the alternative program.

Surveys of Teachers and School Principals

Auditors surveyed 846 teachers who received their teaching certificates through an alternative program and 202 school principals who hired these teachers. The response rate from the teachers and principals was low, 18.4 percent and 41.6 percent, respectively. However, auditors identified some common themes that emerged from the responses.

The majority of the teacher respondents stated that the alternative program had adequately prepared them for the teaching field, and that they planned to remain in the teaching field for more than seven years. Many also stated that they had good experiences during their required internships. However, some teacher respondents said the alternative programs should have provided more preparation and support to help prepare them for the realities of teaching in an actual classroom. Teacher respondents suggested that alternative programs could improve their programs by providing more training in classroom management, more experiences in observation, more support through mentoring, and more courses in specific content areas. One teacher had completed the observation of a teacher in a classroom during summer school, which did not adequately prepare this individual for teaching during a regular school year.

Nearly all of the principal respondents stated that the alternative programs were fulfilling a need on their campuses. They also stated that the teachers from alternative programs generally stayed employed with the school district for three to five years or longer. However, half of the principal respondents stated that, in general, the teachers coming from alternative programs were less prepared than teachers coming through traditional college educator preparation programs. Long-term success of the teachers coming from alternative programs depended on each teacher's innate abilities, as well as the quality of the alternative programs the teachers had completed.

Management's Response

No agency response requested; however it was noted that current rules and regulations do not ensure some level of consistency in the design and method

of curriculum delivery among alternative programs. Agency staff has proposed revisions to TAC Chapter 228 to allow for flexibility but include minimum standards for all programs to provide for greater consistency among programs.

Some Alternative Programs Do Not Adequately Ensure That Teacher Candidates Complete All Program Requirements, While Most Report Accurate Performance Data

Auditors visited eight alternative programs, five of which designated teacher candidates as completers who had not completed all program requirements (see text box for list of alternative programs visited). Error rates for the samples tested at the alternative programs visited ranged from 7 percent to 93 percent. The alternative programs visited accounted for 38 percent of the standard teaching certificates issued for academic year 2006-2007. Because the Agency does not have the authority to impose sanctions, it is limited in its ability to enforce alternative programs' compliance with state laws and Agency regulations. If alternative programs do not comply with state laws and Agency regulations, there is an increased risk that unqualified teachers may be issued teaching certificates and allowed to teach in Texas schools.

As discussed in Chapter 3, the current rules and regulations do not ensure some level of consistency among the alternative programs. For example, auditors noted that the screening for oral communication skills varied across the eight alternative programs auditor visited. Specifically, four of the eight alternative programs auditors visited used an interview process to perform this screening. However, other alternative programs did no screening for this requirement other than ensuring that teacher candidates obtained undergraduate or graduate degrees at higher education institutions in the United States (in other words, these alternative programs relied on evidence of a degree from a United States higher education institution to determine whether a teacher candidate could effectively communicate orally).

Four of the eight alternative programs visited also did not retain sufficient documentation, which limits the Agency's and program management's ability to monitor the alternative programs. One alternative program discarded nearly all of the documentation supporting its reported completer data. In addition, two of the eight programs visited allowed interns to teach in a school district without obtaining a required probationary teaching certificate.

Most of the alternative programs visited complied with the Agency's five areas of program requirements. However, three of the eight alternative programs visited did not have an advisory committee that met the requirements in the Texas Administrative Code. In addition, two of the eight alternative programs visited did not accurately report the breakdown of performance data by demographic groups; however, six of the eight programs visited provided support that the reported data was substantially accurate.

Tables 1 through 3 summarize the results for the eight alternative programs' compliance with ensuring completers met all program requirements, compliance with the Agency's five-component model, and the accuracy of reported performance data. See Chapters 5 through 12 for the detailed results of each alternative program visited, which are listed in alphabetical order.

Table 1 shows the alternative programs' compliance with ensuring that teacher candidates met all program requirements before being classified as a completer. A "√" in the column indicates that all files reviewed contained evidence that the teacher candidate had completed the requirements. An "X" indicates that, within at least a 10 percent error rate, some teacher candidates classified as completers did not complete the requirements.

Table 1

Compliance with Ensuring Completers Met All Program Requirements								
Reporting Requirement	ACT-Houston	Dallas Independent School District	ESC-Region 10 (Richardson)	ESC-Region 20 (San Antonio)	Houston Independent School District	iteachTEXAS	Lone Star College - Kingwood	University of Texas - Pan American
Teacher candidate completed ongoing and relevant field-based experience requirements.	√	X	Not Available [b]	√ [a]	√	√	X	X
Teacher candidate completed a field-based practicum.	√	√	√	√	X	√	X	√ [a]
Teacher candidate was issued a probationary credential prior to internship.	√	√	√	√	X	√	√	√ [a]
Teacher candidate completed mentoring observations and meetings as frequently as the curriculum specified.	√	√ [a]	X	√ [a]	√ [a]	√ [a]	X	X
Teacher candidate completed structured assessments and established benchmarks as the curriculum specified.	√	√ [a]	X	√	X	√	X	X
Teacher candidate completed all classroom courses outlined in the curriculum.	√	X	Not Available [b]	√ [a]	X	√	X	X

Compliance with Ensuring Completers Met All Program Requirements								
Reporting Requirement	ACT-Houston	Dallas Independent School District	ESC-Region 10 (Richardson)	ESC-Region 20 (San Antonio)	Houston Independent School District	*i*teachTEXAS	Lone Star College - Kingwood	University of Texas - Pan American

a Auditors identified exceptions for these attributes, but the error rate was less than 10 percent or had minor exceptions.

b Auditors did not test this because of the ESC Region 10's lack of documentation.

Table 2 shows the eight alternative programs' compliance with the Agency's five-component model for alternative program requirements. A "√" in the column indicates that the alternative program complied with all requirements of the component. An "X" in the column indicates that the alternative program did not comply with all requirements of the component. (See Appendix 2 for additional information about the Agency's five-component model.)

Table 2

Compliance with the Agency's Five-Component Model								
Agency Component	ACT-Houston	Dallas Independent School District	ESC-Region 10 (Richardson)	ESC-Region 20 (San Antonio)	Houston Independent School District	*i*teachTEXAS	Lone Star College - Kingwood	University of Texas - Pan American
(1) Advisory committee requirements.	X	√	√	X	√	√	√	X
(2) Admission screening requirements.	√	√	√	√	√	√	√	√
(3) Curriculum requirements.	√	√	√	√	√	√	√	√
(4) Program delivery (field-based experiences and assessments) and evaluation requirements.	√	√	√	√	√	√	√	X
(5) On-going support for interns and mentors requirements.	√	√	√	√	√	√	X	√

Table 3 shows the accuracy of reported performance data by each of the eight alternative programs. A "√" in the column indicates that the data retained at the program level matched the performance data reported to the Agency. An "X" means that the data retained at the program level did not match the reported performance data, either in total or in the breakdown by gender and ethnicity. As discussed in Chapter 1-B, the Agency does not request performance data from alternative programs about (1) the number of candidates employed in the profession two years after completing the program and (2) the number of candidates retained in the teaching profession two and five years after completing the program.

Table 3

Accuracy of Reported Performance Data								
Reporting Requirement	**ACT-Houston**	**Dallas Independent School District**	**ESC-Region 10 (Richardson)**	**ESC-Region 20 (San Antonio)**	**Houston Independent School District**	***i*teachTEXAS**	**Lone Star College – Kingwood**	**University of Texas - Pan American**
Number of teacher candidates who applied.	√	√	√	√	√	√	X [a]	X [a]
Number of teacher candidates admitted.	√	√	√	√	√	√	X [a]	X [a]
Number of teacher candidates retained.	√	√	√	√	√	√	X [a]	X [a]
Number of teacher candidates who completed the program.	√	√	√	√	√	√	X	√
[a] Total numbers reported were accurate; however, data retained at program level did not match reported performance for gender and ethnicity totals.								

Chapter 5
Alternative Certification for Teachers—Houston Alternative Certification Program

Three Primary Areas Reviewed

Auditors reviewed three primary areas during their on-site visits of alternative programs. Specifically, auditors:

- Tested a sample of program completers to ensure that the teacher candidates had completed all program requirements.

- Reviewed the alternative program's operations for compliance with the Agency's five-component model for alternative program requirements, including having an advisory committee that collaborates on major program decisions; following Agency-set admission requirements; offering an appropriate curriculum; providing sufficient field based experiences, assessments, and evaluations; and providing ongoing support of mentors and interns.

- Analyzed performance data the alternative program reported to the Agency for the number of teacher candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the alternative program.

The Alternative Certification for Teachers—Houston Alternative Certification Program (ACT-Houston) had 1,198 students who received standard teaching certificates for the 2006-2007 academic year.[2] ACT-Houston ensured that teacher candidates completed all program requirements before it designated them as completers, and it complied with all but one of the Agency's five areas of alternative program requirements. Also, ACT-Houston reported accurate performance data to the Agency. However, it should improve its advisory committee membership representation.

ACT-Houston ensured that teacher candidates completed all program requirements prior to classifying them as completers.

All 30 program completer files reviewed contained sufficient evidence that the teacher candidates had completed all program requirements, including completing (1) all preparation training requirements, (2) all required assessments, and (3) a two-semester internship. Also, all 30 files contained a recommendation for certification from the principal.

ACT-Houston teacher candidates must complete two phases of the program. Specifically:

- **Training and Content Preparation:** Teacher candidates must complete a seven-component preparation program that includes assignments and a three-part review to prepare for content exams.

- **Internship:** Teacher candidates must complete a two-semester internship, an internship introductory meeting, and nine intern development sessions hosted by the alternative program. During the two-semester internship, the teacher candidate's field advisor conducts five assessments. In addition, the teacher candidate must complete weekly mentor meetings and three mentor observations of the teacher candidate (beginning in Spring 2007). Teacher candidates also must obtain a recommendation for certification from the principal of the campus where the teacher candidate performed the internship.

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[2] This is based on unaudited data in ASEP.

ACT-Houston also has a model for evaluating program delivery and improvement, requires teacher candidates to complete an evaluation of the training preparation program, and requires its mentors to attend training.

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Advisory Committee Requirements

Texas Administrative Code, Title 19, Section 228.20, requires that teacher preparation and certification programs:

Shall be a collaborative effort among accredited public schools and/or private schools; regional education service centers; institutions of higher education; and business and community interests; and shall be delivered in cooperation with accredited public schools and/or private schools.

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ACT-Houston complied with all but one of the Agency's five areas of program requirements; its advisory committee did not have the required membership representation.

ACT-Houston screened applicants for admission, provided a comprehensive teacher-training curriculum, obtained feedback from program participants, and provided ongoing mentoring to teacher candidates. However, ACT-Houston's advisory committee did not have membership representation from a university and an affiliated business and community interest, as required by the Texas Administrative Code (see text box). It should be noted that ACT-Houston consulted with a university about ACT-Houston's curriculum.

ACT-Houston reported accurate performance data to the Agency.

Data retained at the program level matched the performance information that ACT-Houston reported to the Agency. This information included the number of teacher candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the program. As discussed in Chapter 1-B, the Agency did not require alternative teacher certification programs to submit performance data for the number of candidates employed in the profession after completing the program or for the number of candidates retained in the profession two and five years after completing the program.

Recommendation

ACT-Houston should ensure that its advisory committee includes membership representation from a university and an affiliated business and community interest.

Dallas Independent School District Alternative Certification Program

The Dallas Independent School District Alternative Certification Program (Dallas ACP) had 769 students who received standard teaching certificates for the 2006-2007 academic year.[3] Dallas ACP did not ensure that teacher candidates completed all program requirements before it reported them as completers. Dallas ACP complied with the Agency's five areas of alternative program requirements and reported accurate performance data to the Agency. However, it did not consistently screen applicants for math proficiency.

Dallas ACP does not adequately ensure that teacher candidates have completed all program requirements prior to designating them as completers.

Of 30 program completer files reviewed, 17 (57 percent) did not complete all requirements. While all 30 program completer files reviewed contained evidence that the teacher candidate had completed a one-year internship and received a recommendation for certification from the principal, Dallas ACP did not consistently ensure that teacher candidates completed required field-based experiences and other training, as required by the Texas Administrative Code (see text box). Specifically:

- Eleven of 30 (37.0 percent) files reviewed lacked documentation that the teacher candidate had completed the required 25 hours of field-based experience or waivers of this requirement.

- Eleven of 30 (37.0 percent) files reviewed lacked documentation showing that the teacher candidates had completed all required summer training. Dallas ACP requires two months of extensive summer training.

- One of 30 (3.3 percent) files reviewed lacked a principal's mid-year and final assessments of the teacher candidate.

- One of 30 (3.3 percent) files reviewed lacked evidence that the teacher candidate had completed all required mentoring observations. Dallas ACP

Three Primary Areas Reviewed

Auditors reviewed three primary areas during their on-site visits of alternative programs. Specifically, auditors:

- Tested a sample of program completers to ensure that the students had completed all program requirements.

- Reviewed the alternative program's operations for compliance with the Agency's five-component model for alternative program requirements, including having an advisory committee that collaborates on major program decisions; following Agency-set admission requirements; offering an appropriate curriculum; providing sufficient field based experiences, assessments, and evaluations; and providing ongoing support of mentors and interns.

- Analyzed performance data the alternative program reported to the Agency for the number of candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the alternative program.

Assessment Requirements

Texas Administrative Code, Title 19, Section 228.40, requires alternative programs to "establish benchmarks and structured assessments of the candidate's progress throughout the program."

Training Requirements

The Texas Administrative Code, Title 19, Section 228.30 requires:

(a) The educator standards adopted by the Board shall be the curricular basis for all educator preparation and, for each certificate, address the relevant knowledge and skills adopted by the State Board of Education.

(b) Educator preparation entities shall provide evidence of on-going and relevant field-based experiences throughout the program as determined by the collaborative.

(c) Supervision shall be conducted with the structured guidance and regular ongoing support of an experienced educator who has been trained as a mentor.

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[3] This is based on unaudited data in ASEP.

requires four observations. In this case, the teacher candidate was absent one day and the mentor did not conduct a subsequent make-up observation.

Dallas ACP teacher candidates must complete two phases of the program. Specifically:

- **Training**: Teacher candidates attend two months of intensive training, including university coursework, online courses, and a minimum of 25 hours of field experiences.

- **Internship**: Teacher candidates must complete a one-year internship. Coordinators provide training and technical assistance throughout the internship. Each intern meets at least monthly with his or her assigned coordinator for support sessions and/or professional development. Dallas ACP also requires interns to attend a minimum of 14 hours of test preparation.

In addition, Dallas ACP requires mentors to attend annual training. Dallas ACP also has a model for evaluating program delivery and improvement that includes administering a survey to teacher candidates prior to their internships and conducting a survey of principals at the end of each school year to assess their satisfaction with program participants.

Dallas ACP complied with the Agency's five areas of program requirements; however, it did not consistently screen applicants for math skills.

Dallas ACP had an advisory committee, provided a comprehensive teacher-training curriculum, obtained feedback about the program from program participants, and provided ongoing mentoring to teacher candidates. However, Dallas ACP did not consistently screen applicants for math skills and other admission criteria, as required by the Texas Administrative Code (see text box). Specifically:

> **Admission Screening Requirements**
>
> Texas Administrative Code, Title 19, Section 227.10 requires teacher preparation and certification programs to:
>
> Establish policies for screening for admission to include but not limited to college level skills in reading, oral and written communication, critical thinking, and mathematics.

- In 3 of 30 (10.0 percent) teacher candidate files reviewed, the teacher candidates were admitted to Dallas ACP even though the math grades on the teacher candidates' transcripts did not meet Dallas ACP requirements. In addition, these three files lacked documentation that Dallas ACP had applied any other screening tests for math skills for these applicants.

- One of 30 (3.3 percent) teacher candidate files reviewed lacked results of a screening test that Dallas ACP used to assess oral communication skills.

- Three of 30 (10.0 percent) teacher candidates files reviewed either lacked a written essay by the teacher candidate that Dallas ACP used to screen for written communication skills, or contained an unscored essay that did not

indicate whether the teacher candidate had met the Dallas ACP admission standards.

- One of 30 (3.3 percent) teacher candidate files reviewed lacked results of a screening test that Dallas ACP used to assess critical thinking skills.

Dallas ACP reported accurate performance data to the Agency.

Data retained at the program level matched the performance information that Dallas ACP reported to the Agency. This information included the number of candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the program. As discussed in Chapter 1-B, the Agency did not require alternative teacher certification programs to submit performance data for the number of candidates employed in the profession after completing the program or for the number of candidates retained in the profession two and five years after completing the program.

Recommendations

Dallas ACP should:

- Ensure that a teacher candidate completes all program requirements before designating the teacher candidate as a completer. Specifically, Dallas ACP should ensure that teacher candidates complete all observations, training, and assessments.

- Retain all documentation supporting teacher candidates' completion of program requirements in teacher candidate files.

- Ensure it screens all applicants for math skills.

- Retain all documentation of screenings for oral and written communication skills and critical thinking skills in teacher candidate files.

The Education Service Center Region 10 Teacher Certification Program (Region 10 Program) based in Richardson, had 829 students who received standard teaching certificates for the 2006-2007 academic year.[4] The Region 10 Program lacked documentation and documentation retention policies, which prevented auditors from being able to verify that teacher candidates reported as completers had completed all program requirements. The Region 10 Program complied with all of the Agency's five areas of alternative program requirements and reported accurate performance data to the Agency.

The Region 10 Program lacked documentation and documentation retention policies.

Region 10 Program employees stated that they had discarded most of the documentation supporting the program's completer data for the 2006-2007 academic year. As a result, auditors were unable to verify that teacher candidates reported to the Agency as completers had completed all program requirements. If sufficient supporting documentation is not retained, the Agency and program's supervisors are limited in their ability to monitor the accuracy of the program's reported data.

Auditors were able to conduct some limited testing of program completer files. All 30 files tested contained evidence that teacher candidates completed a one-year internship and received a recommendation for certification from a principal and a Region 10 specialist. However, some weaknesses were identified. Specifically:

- 23 of 26 (88.5 percent) files tested lacked documentation that the teacher candidate had received the required mentoring. The Region 10 Program requires mentors to complete five mentoring reports on each teacher candidate. Teacher candidates for 4 of the 30 files tested did not have a mentoring requirement.

- 5 of 30 (16.7 percent) files lacked the required program consultant assessments. The Region 10 Program requires four program consultant assessments.

Auditors conducted a high-level review of a sample of completer files for academic year 2007-2008. All of those files contained documentation that the

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Assessment Requirements

Texas Administrative Code, Title 19, Section 228.40, requires alternative programs to "establish benchmarks and structured assessments of the candidate's progress throughout the program."

Training Requirements

The Texas Administrative Code, Title 19, Section 228.30 requires:

(a) The educator standards adopted by the Board shall be the curricular basis for all educator preparation and, for each certificate, address the relevant knowledge and skills adopted by the State Board of Education.

(b) Educator preparation entities shall provide evidence of on-going and relevant field-based experiences throughout the program, as determined by the collaborative.

(c) Supervision shall be conducted with the structured guidance and regular ongoing support of an experienced educator who has been trained as a mentor.

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[4] This is based on unaudited data in ASEP.

teacher candidates had completed the required field observations, mentoring, and coursework and had obtained the required program consultant assessments.

Region 10 Program teacher candidates must complete two main phases of the program. Specifically:

- Coursework: Teacher candidates must complete 20 hours of classroom observation and the required curriculum courses based on the teacher candidates' certification areas. Teacher candidates also must complete a set number of hours of pre-assignment training, depending on the teacher candidates' certification areas.

- Internship: Teacher candidates must complete a one-year internship, including an online intern orientation, and required coursework and five mentoring observations (the mentor observing the teacher candidate). They also must also complete five classroom observations (observing an experienced teacher). A campus administrator must submit a summative teacher appraisal indicating the teacher candidate's level of teaching proficiency. The program also provides quarterly status reports to all interns. Teacher candidates also must complete review courses for their state certification exams.

In addition, Region 10 requires mentors to attend training. Region 10 also has a model for evaluating program delivery and improvement under which an external evaluator annually surveys interns, mentors, administrators, and human resources personnel and provides the Region 10 Program with a detailed report of the results.

The Region 10 Program complied with all of the Agency's five areas of program requirements.

The Region 10 Program had an advisory committee, provided a comprehensive teacher training curriculum, obtained feedback from program participants, and provided ongoing mentoring for teacher candidates. The Region 10 Program also screened applicants for math, reading, writing, oral communication, and critical thinking skills.

The Region 10 Program reported accurate performance data to the Agency.

Data retained at the program level matched the performance information that the Region 10 Program reported to the Agency. This information included the number of candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the program. As discussed in Chapter 1-B, the Agency did not require alternative teacher certification programs to submit performance data for the number of candidates employed in the profession after completing the program or for the number of candidates retained in the profession two and five years after completing the program.

Recommendation

The Region 10 Program should develop and follow a record retention policy that ensures appropriate documentation supporting teacher candidates' progress in and completion of the program is retained in the teacher candidates' files.

The Education Service Center Region 20 Teacher Certification Program (Region 20 Program) based in San Antonio had 366 students who received standard teaching certificates for the 2006-2007 academic year.[5] The Region 20 Program ensured, with minor exceptions, that teacher candidates completed all program requirements before it designated them as completers; complied with all but one of the Agency's five areas of alternative program requirements; and reported accurate performance data to the Agency. However, the Region 20 Program lacked a functioning advisory committee.

The Region 20 Program ensured that teacher candidates have completed all program requirements prior to classifying them as completers, but some improvements are needed.

Of the 30 program completer files reviewed, 3 (10 percent) did not complete all program requirements. While all 30 files tested contained a recommendation for certification by a campus principal and evidence that the teacher candidate had completed (1) all assessments, (2) a 10-month internship, and (3) all training and test preparation courses, the Region 20 Program did not consistently ensure that teacher candidates completed all observations, as required by the Texas Administrative Code (see text box). Specifically:

> **Three Primary Areas Reviewed**
>
> Auditors reviewed three primary areas during their on-site visits of alternative programs. Specifically, auditors:
>
> - Tested a sample of program completers to ensure that the students had completed all program requirements.
> - Reviewed the alternative program's operations for compliance with the Agency's five-component model for alternative program requirements, including having an advisory committee that collaborates on major program decisions; following Agency-set admission requirements; offering an appropriate curriculum; providing sufficient field based experiences, assessments, and evaluations; and providing ongoing support of mentors and interns.
> - Analyzed performance data the alternative program reported to the Agency for the number of candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the alternative program.

- Twenty-seven of 30 (90 percent) files contained supporting documentation that the teacher candidates had completed all required classroom instruction. However, 3 of these files lacked evidence that the teacher candidates had completed the required 15 hours of observing an experience teacher. The Region 20 Program requires teacher candidates to complete 15 hours of observation, 3 of which must relate to special education.

- All 30 program completer files reviewed contained evidence that the teacher candidates had completed seven monthly mentoring observations, as required by the Region 20 Program. However, in one of these cases, the teacher candidate and mentor conducted these observation sessions during a 10-day period in the last month of the teacher candidate's internship. If this mentoring does not occur in a timely manner—ideally, once a month—the teacher candidate teacher may not receive the full benefits of the mentoring component.

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[5] This is based on unaudited data in ASEP.

Region 20 Program teacher candidates must complete two phases of the program. Specifically:

- **Pre-employment:** Teacher candidates must complete 10 days of summer training courses and 15 total hours of observation in two different districts, 3 hours of which must relate to special education.

- **Internship:** Teacher candidates must complete a 10-month internship that includes one observation each semester by a program specialist, and the mentor and teacher candidate must complete seven monthly observations of each other. During the internship, the teacher candidate must complete 10 monthly training sessions hosted by the Region 20 Education Service Center. Teacher candidates also must receive preliminary and final assessments by the campus principal and mentor, as well as a recommendation for certification by the principal. In addition, teacher candidates must complete three book studies and a review for their state certification exams.

In addition, the Region 20 Program has a model for evaluating program delivery and improvement and contracts with an independent entity to develop and administer a confidential survey about the program.

The Region 20 Program complied with all but one of the Agency's five areas of program requirements; it lacked a functioning advisory committee.

The Region 20 Program provided a comprehensive teacher-training curriculum, obtained feedback from program participants, and provided ongoing mentoring to teacher candidates. The Region 20 Program also screened applicants for math, reading, writing, oral communication, and critical thinking skills. However, it lacked a functioning advisory committee, as required by the Texas Administrative Code (see text box for details on code requirements). It should be noted that Region 20 Program was in the process of establishing an advisory committee during this audit. During the 2006-2007 academic year, it conducted a meeting to review by-laws and program requirements and elect officers.

The Region 20 Program reported accurate performance data to the Agency.

Data retained at the program level matched the performance information that the Region 20 Program reported to the Agency. This information included the number of candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the program. As discussed in Chapter 1-B, the Agency did

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Advisory Committee Requirements

Texas Administrative Code, Title 19, Section 228.20, requires that teacher preparation and certification programs:

Shall be a collaborative effort among accredited public schools and/or private schools; regional education service centers; institutions of higher education; and business and community interests; and shall be delivered in cooperation with accredited public schools and/or private schools.

Training Requirements

The Texas Administrative Code, Title 19, Section 228.30 requires:

(a) The educator standards adopted by the Board shall be the curricular basis for all educator preparation and, for each certificate, address the relevant knowledge and skills adopted by the State Board of Education.

(b) Educator preparation entities shall provide evidence of on-going and relevant field-based experiences throughout the program as determined by the collaborative.

(c) Supervision shall be conducted with the structured guidance and regular ongoing support of an experienced educator who has been trained as a mentor.

not require alternative teacher certification programs to submit performance data for the number of candidates employed in the profession after completing the program or for the number of candidates retained in the profession two and five years after completing the program.

Recommendations

The Region 20 Program should:

- Consistently retain necessary supporting documentation in teacher candidate files.

- Ensure it has a functioning advisory committee.

Houston Independent School District Alternative Certification Program

The Houston Independent School District Alternative Certification Program (Houston ACP) had 409 students who received standard teaching certificates for the 2006-2007 academic year.[6] Houston ACP did not consistently ensure that teacher candidates had completed all program requirements before designating them as completers. Houston ACP complied with all of the Agency's five areas of alternative program requirements and reported accurate performance data to the Agency.

Houston ACP did not adequately ensure that teacher candidates completed all program requirements prior to classifying them as completers.

Of 30 program completer files reviewed, five belonged to teacher candidates who had either resigned or were dropped from the program and, therefore, could not have completed all program requirements. However, Houston ACP did not properly update the completer data in ASEP for these five files. In addition, two of these five teacher candidates had started their internship, but they had not obtained a probationary certificate, as required by the Texas Administrative Code (see text box).

Twenty-four of the remaining 25 files reviewed contained evidence that the teacher candidates had completed all program requirements. One teacher candidate did not complete all required training and coursework. In addition, another teacher candidate obtained a probationary certificate for an internship as required, but not until 63 days after the first day of school.

Houston ACP teacher candidates must complete three phases of the program. Specifically:

- **Pre-Assignment Training**: Teacher candidates must complete an orientation session, three to nine three-hour test preparation sessions (depending on the teacher candidate's area of certification), five days of curriculum training, and four to five days of integrated field experience.

- **Coursework**: Teacher candidates must complete three to five university-level graduate courses, depending on the teacher candidate's certification area.

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[6] This is based on unaudited data in ASEP.

- **Internship**: Teacher candidates must complete a two-semester internship, weekly in-service trainings each semester, six monthly observations by both a Houston ACP supervisor and the teacher candidate's mentor, and four observations by the campus principal. Teacher candidates also must obtain a recommendation for either certification or a one-year extension from the principal.

In addition, Houston ACP requires mentors to attend orientation, annual professional development training, and other applicable training. Houston ACP has a model for evaluating program delivery and improvement that includes feedback from training, course evaluations, and online teacher surveys.

Houston ACP complied with all of the Agency's five areas of program requirements.

Houston ACP had an advisory committee, provided a comprehensive teacher-training curriculum, evaluated its program by obtaining feedback from program participants, and provided ongoing mentoring to teacher candidates. Houston ACP also screened applicants for math, reading, writing, oral communication, and critical thinking skills.

Houston ACP reported accurate performance data to the Agency.

Data retained at the program level matched the performance information that Houston ACP reported to the Agency. This information included the number of candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the program. As discussed in Chapter 1-B, the Agency did not require alternative teacher certification programs to submit performance data for the number of candidates employed in the profession after completing the program or for the number of candidates retained in the profession two and five years after completing the program.

Recommendations

Houston ACP should:

- Ensure that a teacher candidate completes all program requirements before designating that teacher candidate as a completer.

- Ensure that teacher candidates obtain probationary certificates for their internship.

The *i*teachTEXAS Alternative Teacher Certification Program (*i*teachTEXAS), an online-based program based in Denton, had 1,530 students who received standard teaching certificates for the 2006-2007 academic year.[7] *i*teachTEXAS ensured that teacher candidates completed all program requirements before it designated them as completers, complied with all of the Agency's five areas of alternative program requirements, and reported accurate performance data to the Agency.

Three Primary Areas Reviewed

Auditors reviewed three primary areas during their on-site visits of alternative programs. Specifically, auditors:

- Tested a sample of program completers to ensure that the students had completed all program requirements.

- Reviewed the alternative program's operations for compliance with the Agency's five-component model for alternative program requirements, including having an advisory committee that collaborates on major program decisions; following Agency-set admission requirements; offering an appropriate curriculum; providing sufficient field based experiences, assessments, and evaluations; and providing ongoing support of mentors and interns.

- Analyzed performance data the alternative program reported to the Agency for the number of candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the alternative program.

iteachTEXAS adequately ensured that teacher candidates completed all program requirements prior to classifying them as completers.

Twenty-eight of 30 (93 percent) program completer files reviewed contained sufficient evidence that the teacher candidates had completed all program requirements. All 30 program completer files reviewed contained documentation that the teacher candidates (1) completed all required coursework modules, (2) completed the required test preparation module, (3) completed two semesters of internship, and (4) obtained a recommendation for certification from the principal.

However, 2 of the 30 (7 percent) files lacked sufficient documentation that all required observations by the mentor had been completed. The program requires six observations by the intern's mentoring supervisor. The Texas Administrative Code requires mentoring guidance and support (see text box). *i*teachTEXAS scanned observation summary forms indicating the dates and performance ratings of the individual observations, but it discarded the original individual observation forms. Without the full observation forms, the program cannot ensure that the observations conducted were thorough and complete.

Mentoring Requirement

Texas Administrative Code, Title 19, Section 228.30 requires:

Supervision shall be conducted with the structured guidance and regular ongoing support of an experienced educator who has been trained as a mentor.

*i*teachTEXAS teacher candidates must complete two phases of the program. Specifically:

- **Coursework:** Teacher candidates must complete an introductory module, 10 instructional modules containing assignments and assessments, and a comprehensive test preparation module.

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[7] This is based on unaudited data in ASEP.

- **Internship**: Teacher candidates must complete a two-semester internship that includes six observations by the mentoring supervisor. Teacher candidates also must receive a joint recommendation for certification by the mentoring supervisor and the campus principal. In addition, *i*teachTEXAS requires all teacher candidates to complete an online survey about the program.

_i_teachTEXAS complied with all of the Agency's five areas of program requirements.

*i*teachTEXAS had an advisory committee, provided a comprehensive teacher-training curriculum, consistently obtained feedback from program participants, and provided ongoing mentoring to teacher candidates. *i*teachTEXAS also screened applicants for math, reading, writing, oral communication, and critical thinking skills. Auditors noted that 1 of the 30 (3 percent) teacher candidate files lacked evidence that the teacher candidate had been screened for writing proficiency.

_i_teachTEXAS reported accurate performance data to the Agency.

Data retained at the program level matched the performance information that *i*teachTEXAS reported to the Agency. This information included the number of candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the program. As discussed in Chapter 1-B, the Agency did not require alternative teacher certification programs to submit performance data for the number of candidates employed in the profession after completing the program or for the number of candidates retained in the profession two and five years after completing the program.

Recommendation

*i*teachTEXAS should consistently retain necessary supporting documentation in teacher candidate files.

Lone Star College—Kingwood Alternative Teacher Certification Program

The Lone Star College—Kingwood Alternative Teacher Certification Program (Lone Star-Kingwood ACP) had 282 students who received standard teaching certificates for the 2006-2007 academic year.[8] Lone Star-Kingwood ACP did not ensure that teacher candidates completed all program requirements before designating them as completers. Lone Star—Kingwood ACP complied with all but one of the Agency's five areas of alternative program requirements; however, it reported inaccurate performance data to the Agency.

Three Primary Areas Reviewed

Auditors reviewed three primary areas during their on-site visits of alternative programs. Specifically, auditors:

- Tested a sample of program completers to ensure that the students had completed all program requirements.

- Reviewed the alternative program's operations for compliance with the Agency's five-component model for alternative program requirements, including having an advisory committee that collaborates on major program decisions; following Agency-set admission requirements; offering an appropriate curriculum; providing sufficient field based experiences, assessments, and evaluations; and providing ongoing support of mentors and interns.

- Analyzed performance data the alternative program reported to the Agency for the number of candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the alternative program.

Lone Star-Kingwood ACP did not adequately ensure that teacher candidates completed all program requirements prior to classifying them as completers.

Twenty-eight of 30 (93 percent) program completer files reviewed lacked evidence that the teacher candidates had completed all program requirements, thereby not meeting all of the requirements in the Texas Administrative Code (see text box). Specifically:

- 18 of 30 (60 percent) files reviewed contained insufficient or no evidence that the teacher candidates had completed the required 20 hours of field-based observations.

- 4 of 30 (13 percent) files reviewed indicated that teacher candidates did not complete the required internship. One of these four teacher candidates completed an internship, but in a field different from the field in which the teacher candidate ultimately became certified.

- 18 of 28 (64 percent) files reviewed contained insufficient or no evidence that mentoring interactions had occurred. Teacher candidates for two of the 30 files tested did not have a mentoring requirement.

- 4 of 30 (13 percent) files reviewed lacked documentation of either the teacher candidates' interim assessments during their internships or signed final recommendations by district administration.

- 13 of 29 (45 percent) files reviewed lacked documentation indicating that the teacher candidate had completed the required certification test preparation course. Two of these files also lacked documentation

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[8] This is based on unaudited data in ASEP.

indicating that the teacher candidates had completed the required seminars.

After discussing these issues with auditors, Lone Star-Kingwood ACP reviewed all the completer data it reported to the Agency and determined that 36 teacher candidates had been inaccurately reported as completers for the 2006-2007 academic year.

Auditors conducted a high-level review of a sample of completer files for academic year 2007-2008, all of which contained more complete documentation of the teacher candidates' mentor observations, program coordinator visit commentary, coursework completion, and district recommendations.

Lone Star-Kingwood ACP teacher candidates must complete two phases of the program. Specifically:

- **Pre-service:** Teacher candidates must complete training courses during pre-service and internship phases of the program. In addition, teacher candidates must complete 20 hours of observation.

- **Internship:** Teacher candidates must complete a 2-semester internship or a 12-week teacher candidate teaching practicum, as well as orientation training for new teachers, an online course, and a review course for their certification exam. Also, teacher candidates must receive two observations each semester by a supervisor, and mid-year and final assessments and recommendations for certification from their mentor, supervisor, and campus principal.

Lone Star-Kingwood ACP complied with all but one of the Agency's five areas of program requirements; it offered but did not require mentor training for the educator assigned to the teacher candidate to provide guidance and support.

Lone Star-Kingwood ACP provided a comprehensive teacher-training curriculum, obtained feedback from program participants, and provided ongoing mentoring to teacher candidates. However, it offered but did not require mentor training, as required by the Texas Administrative Code.

Lone Star-Kingwood ACP did not adequately ensure teacher candidates were screened for admission criteria.

Lone Star-Kingwood ACP did not consistently retain necessary documentation in teacher candidate files to

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Probationary Certificate Requirement

Texas Administrative Code, Title 19, Section 228.30, requires alternative programs to provide internships "that allows the candidate either to serve as teacher of record on a probationary certificate …for at least one school year, or to complete a teaching practicum."

Assessment Requirements

Texas Administrative Code, Title 19, Section 228.40, requires alternative programs to "establish benchmarks and structured assessments of the candidate's progress throughout the program … and to determine the readiness of its candidates to take the appropriate certification assessments, including assessments of knowledge of content, professional development, and professional ethics and standards of conduct."

Training Requirements

The Texas Administrative Code, Title 19, Section 228.30, requires:

(a) The educator standards adopted by the Board shall be the curricular basis for all educator preparation and, for each certificate, address the relevant knowledge and skills adopted by the State Board of Education.

(b) Educator preparation entities shall provide evidence of on-going and relevant field-based experiences throughout the program as determined by the collaborative.

(c) Supervision shall be conducted with the structured guidance and regular ongoing support of an experienced educator who has been trained as a mentor.

indicate that the program had screened the teacher candidates for admission. The program had a policy in place to screen candidates for admission but did not always follow it. Specifically:

- One of 30 (3 percent) teacher candidate files reviewed lacked evidence that the teacher candidate had received a baccalaureate degree.

- 10 of 30 (33 percent) teacher candidate files reviewed lacked evidence that the program had screened the teacher candidates for reading proficiency.

- 2 of 30 (7 percent) teacher candidate files reviewed lacked evidence that the program had screened the teacher candidates for oral communication and critical thinking skills.

- 11 of 30 (37 percent) teacher candidate files reviewed lacked evidence that the program had screened the teacher candidates for writing proficiency.

- 12 of 30 (40 percent) teacher candidate files reviewed lacked evidence that the program had screened the teacher candidates for math proficiency.

In addition, two of the files reviewed were for teacher candidates who had completed coursework outside the United States. Neither of these files contained evidence that the program had completed the required screening of these teacher candidates for English proficiency.

Lone Star-Kingwood ACP reported inaccurate performance data to the Agency.

Data retained at the program level did not match the performance information that Lone Star-Kingwood ACP reported to the Agency. This information included the number of teacher candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the program. While Lone Star-Kingwood ACP reported accurate total numbers for these categories, the reported breakdown of this data for gender and ethnicity was inaccurate, according to the supporting detail retained by the program.

As discussed in Chapter 1-B, the Agency did not require alternative teacher certification programs to submit performance data for the number of candidates employed in the profession after completing the program or for the number of candidates retained in the profession two and five years after completing the program.

Recommendations

Lone Star College-Kingwood ACP should:

- Ensure that a teacher candidate completes all program requirements before designating that teacher candidate as a completer.

- Retain necessary documentation in teacher candidate files to indicate that the program had screened the applicant for admission.

- Ensure that data retained at the program level supports the accuracy of the performance information it reports to the Agency.

University of Texas—Pan American Alternative Teacher Certification Program

The University of Texas–Pan American Alternative Teacher Certification Program (Pan American ACP) had 116 students who received standard teaching certificates for the 2006-2007 academic year.[9] Pan American ACP did not adequately ensure that teacher candidates had completed all program requirements before designating them as completers. Pan American ACP complied with all but two of the Agency's five areas of alternative program requirements; however, it did not report accurate performance data to the Agency.

Pan American ACP did not adequately ensure that teacher candidates completed all program requirements prior to classifying them as completers.

Pan American ACP did not consistently ensure teacher candidates had completed all program requirements prior to being designated as a completer. Six of 30 (20 percent) program completer files reviewed lacked evidence that the teacher candidates had completed all program requirements; therefore, they did not meet all requirements of the Texas Administrative Code (see text box.) Specifically:

- Four of 30 (13 percent) files reviewed lacked evidence that the teacher candidates had completed all required university courses.

- Two of 30 (7 percent) files reviewed lacked evidence that the teacher candidates had completed the required two semester internship.

- One of 30 (3 percent) files reviewed lacked evidence that the teacher candidate completed the required six mentoring assessments throughout the internship. This teacher candidate received a total of two observations. If assessments do not occur in a timely manner—ideally, once a month—the intern may not receive the full benefits of mentoring.

- One of 30 (3 percent) files reviewed indicated that the teacher candidate did not obtain a probationary certificate while teaching during the internship. Teachers must obtain necessary certification when teaching full-time in a school district.

Three Primary Areas Reviewed

Auditors reviewed three primary areas during their on-site visits of alternative programs. Specifically, auditors:

- Tested a sample of program completers to ensure that the students had completed all program requirements.

- Reviewed the alternative program's operations for compliance with the Agency's five-component model for alternative program requirements, including having an advisory committee that collaborates on major program decisions; following Agency-set admission requirements; offering an appropriate curriculum; providing sufficient field based experiences, assessments, and evaluations; and providing ongoing support of mentors and interns.

Analyzed performance data the alternative program reported to the Agency for the number of candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the alternative program.

Probationary Certificate Requirement

Texas Administrative Code, Title 19, Section 228.30 requires alternative programs to provide internships "that allows the candidate either to serve as teacher of record on a probationary certificate …for at least one school year, or to complete a teaching practicum."

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[9] This is based on unaudited data in ASEP.

Pan American ACP teacher candidates must complete two phases of the program. Specifically:

Coursework: Teacher candidates must attend an orientation session and complete five to seven university courses, depending on the certification area. Teacher candidates also must attend a review session for their state certification exams.

Internship: Teacher candidates must complete a two-semester internship, complete two observations of the mentor each semester, attend four to six bi-monthly training seminars each semester, and receive two observations by a supervisor each semester. Teacher candidates also must receive a recommendation for certification from the campus principal.

In addition, Pan American ACP requires mentors to attend a mentor training program.

Pan American ACP complied with all but two of the Agency's five areas of program requirements; it lacked an advisory committee and a model for evaluating program delivery and improvement.

Pan American ACP screened applicants for admission, provided a comprehensive teacher-training curriculum, and provided ongoing mentoring. However, it did not have an advisory committee during the 2006-2007 academic year (although it did establish one in October 2007). Also, Pan American ACP lacked a model for evaluating program delivery and improvement. During the auditors' on-site visit in March 2008, Pan American ACP management stated they were in the process of phasing in a post-baccalaureate program for the 2008-2009 academic year. The current undergraduate alternative certification program is scheduled to be phased out by the 2009-2010 academic year. As part of this process, Pan American ACP also is revising its curriculum requirements and plans to implement a model for evaluating program delivery and improvement.

Pan American ACP did not report accurate performance data to the Agency.

Data retained at the program level did not match the performance information reported to the Agency for the total numbers reported as teacher candidates who (1) applied, (2) were admitted, (3) were retained, and (4) completed the program. While Pan American ACP reported accurate total numbers for these categories, the reported breakdown of this data for gender and ethnicity was inaccurate, according to the supporting detail retained by the program.

As discussed in Chapter 1-B, the Agency did not require alternative teacher certification programs to submit performance data for the number of candidates employed in the profession after completing the program or for the number of candidates retained in the profession two and five years after completing the program.

Recommendations

Pan American ACP should:

- Ensure that a teacher candidate completes all program requirements, including completing an internship, before designating that teacher candidate as a completer. Pan American ACP also should ensure that teacher candidates obtain a probationary certificate for the internship.

- Implement a model for evaluating program delivery and improvement.

- Ensure it reports accurate performance information to the Agency and retains sufficient documentation supporting this reported data.

Appendices

Objectives, Scope, and Methodology

Objectives

The objectives of this audit were to:

- Determine whether the Texas Education Agency's (Agency) oversight of alternative teacher certification programs (alternative programs) ensures that these programs comply with applicable law and administrative rules.

- Determine whether controls over the Accountability System for Educator Preparation (ASEP) provide reasonable assurance that data related to alternative programs is accurate and complete.

- Review the performance of alternative programs as indicated by required annual performance reports and ASEP.

Scope

The scope of this audit covered a review and analysis of the Agency's oversight monitoring activities and performance data for alternative programs during the 2006-2007 academic year.

Methodology

The audit methodology included reviewing the Agency's monitoring processes, conducting site visits of alternative programs; issuing surveys to teachers, principals, and alternative program personnel; reviewing controls over the accountability system, including reports for certification exam results and accreditation ratings; reviewing policies and procedures for conducting background checks; and performing data analysis. Auditors did not review the results of certification exam data received from the Agency's test contractor for accuracy.

Information collected and reviewed included the following:

- Texas Education Code and Texas Administrative Code.

- Interviews with Agency staff and alternative program personnel.

- *Educator Preparation Program Director's Handbook*, the Agency's Division of Educator Standards, April 2007.

- "A Look at the Educator Preparation Programs in Texas," presentation given to the State Board for Educator Certification on August 8, 2007.

- ASEP data for academic year 2006-2007.

- Accreditation ratings for academic year 2006-2007.

- Annual performance reports filed by alternative programs for academic year 2006-2007.

- *Internal Audit Report of the Alternative Educator Certification Programs*, Texas Education Agency, January 2007.

- *Internal Audit of the State Board for Educator Certification Accountability and Professional Discipline*, Rupert & Associates, P.C. Certified Public Accountants, June 14, 2002.

- Agency's five-component model for alternative program requirements (see Appendix 2 for details of the model).

- Agency's process flowcharts for new alternative program approval and for fingerprinting.

- Agency organization charts.

- Agency processes and alternative programs' policies and procedures.

- Performance data for the alternative programs visited by auditors.

- State Board for Educator Certification meeting minutes.

- Accountability System for Educator Preparation Data Model.

Procedures and tests conducted included the following:

- Distributed and analyzed results of surveys sent to (1) alternative programs, (2) principals who supervise teachers who received their education training through alternative programs, and (3) teachers who received their training through alternative programs.

- Analyzed a random sample of completer data and teacher candidate files.

- Analyzed the Agency's master list of monitoring visits.

- Analyzed new alternative programs' applications and proposals.

- Analyzed Division of Educator Certification and Standards work-log for academic year 2006-2007 for adding certificate fields prior to August 2007.

- Reviewed the automated information system that tracks alternative program requirements and records the issuance of teaching certificates.

- Tested the Agency's new alternative program approval process.

- Tested the Agency's monitoring processes.

- Analyzed data regarding standard and probationary certificates issued through alternative and traditional teacher certification programs for the 2006-2007 academic year.

Criteria used included the following:

- Statutory and Agency requirements.

- State Board for Educator Certification On-Line System.

- ASEP criteria.

- *Educator Preparation Program Director's Handbook.*

- Agency's five-component model for alternative program requirements (see Appendix 2 for details of the model).

- Alternative program requirements.

Project Information

Audit fieldwork was conducted from January 2008 through April 2008. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The following members of the State Auditor's staff performed the audit:

- Dana Musgrave, MBA (Project Manager)

- Harriet Fortson, MAcy, CGAP (Assistant Project Manager)

- Robert Bollinger, CFE, CPA

- Erin Cromleigh

- Ashlee Jones, MAcy, CGAP

- Agnes Rasmussen, CPA, CISA

- Sajil Scaria

- Stacey Williams, CGAP

- Stephen Randall, MBA (Information Systems Audit Team)

- Michael Yokie, CISA (Information Systems Audit Team)

- Leslie Ashton, CPA (Quality Control Reviewer)

- Verma Elliott, MBA, CIA, CGAP (Audit Manager)

Texas Education Agency's Five-component Model for Alternative Program Requirements

The Texas Education Agency (Agency) uses a five-component model that groups the requirements and standards for teacher certification programs. The Agency uses this model to assess proposals for new alternative teacher certification programs (alternative programs) and to monitor alternative programs for compliance with state laws and regulations. This model was in place when oversight of teacher certification programs was transferred from the State Board for Educator Certification (formerly a stand-alone state agency) to the Agency.

Component I: Alternative Program's Commitment and Collaboration to Promote Educator Certification (Texas Administrative Code, Title 19, Section 228.20)

The alternative program and other stakeholders show commitment to support and promote educator certification. Stakeholders are accredited public schools and/or private schools, regional education service centers, institutions of higher education, and business and community interests. The alternative program shall adequately prepare candidates to meet certification standards and shall be accountable for the program's quality so that the candidates will be certified.

An advisory committee with members representing stakeholders shall assist in the following:

- Design and delivery of the alternative program.

- Major policy decisions of the alternative program.

- Evaluation of the alternative program.

Component II: Admission to an Alternative Program (Texas Administrative Code, Title 19, Section 227.10)

The alternative program shall develop procedures to determine the teacher candidates' appropriateness for the certification sought. The alternative program shall establish policies and procedures for admission criteria and how it is equitably applied to all teacher candidates. Screening for admission should include, but is not limited to, appropriate knowledge and skills in (1) reading, (2) oral and written communication, (3) critical thinking, and (4) mathematics. In addition, evidence of a baccalaureate degree should be included in the admission requirements.

Component III: Curriculum (Texas Administrative Code, Title 19, Sections 228.30 and 228.40 (a)(b))

The educator standards adopted by State Board for Educator Certification (Board) shall be the curricular basis for the alternative program and must address the relevant knowledge and skills for each certificate. Specifically, the alternative program should:

- Implement the curriculum adopted by the Board.

- Provide ongoing and relevant field-based experiences throughout the alternative program.

- Provide a field-based practicum or internship.

- Establish benchmarks and structured assessments of the student's progress throughout the alternative program.

- Determine the readiness of its students to take the appropriate state certification exams.

- Continuously evaluate the design and delivery of its curriculum.

Component IV: Program Delivery and Evaluation (Texas Administrative Code, Title 19, Sections 228.30 (b) and 228.40)

The alternative program shall establish a system for program delivery and improvement. On-going support of the certification of students must be a part of the alternative program's design. The alternative program will describe how the program will be delivered.

The alternative program should provide indicators of:

- Ongoing, relevant teaching experiences in a variety of educational settings with diverse student populations.

- Program evaluation procedures using internal and external criteria.

Component V: Ongoing Support (Texas Administrative Code, Title 19, Sections 228.30, 228.40 (e), and 230.610)

Alternative programs must provide on-going support of the students as part of its program design. Observations and results should be used in evaluations. Beginning teachers shall participate in teacher orientation. Training should be provided to mentors, beginning teachers, and principals. The alternative program must have a plan for delivering the correct information about the alternative program, its certification process, and its testing requirements to teaching candidates.

Certificates Issued by Traditional Teacher Certification Programs and Alternative Teacher Certification Programs

Alternative teacher certification programs have become a common method of receiving teacher education and training over the past three academic years (see Figure 1). The Texas Education Agency (Agency) issued 23,475 standard teaching certificates in academic year 2004-2005, 50 percent of which were issued to teacher candidates who had completed an alternative program. In academic year 2005-2006, the Agency issued 25,231 standard teaching certificates, 52 percent of which were issued to teacher candidates coming from alterative programs. In academic year 2006-2007, the Agency issued 26,576 standard teaching certificates, of which 55 percent were issued to teacher candidates coming from alterative programs.

Figure 1

Number of Standard Teaching Certificates Issued To Teacher Candidates Through Traditional and Alternative Teacher Certification Programs
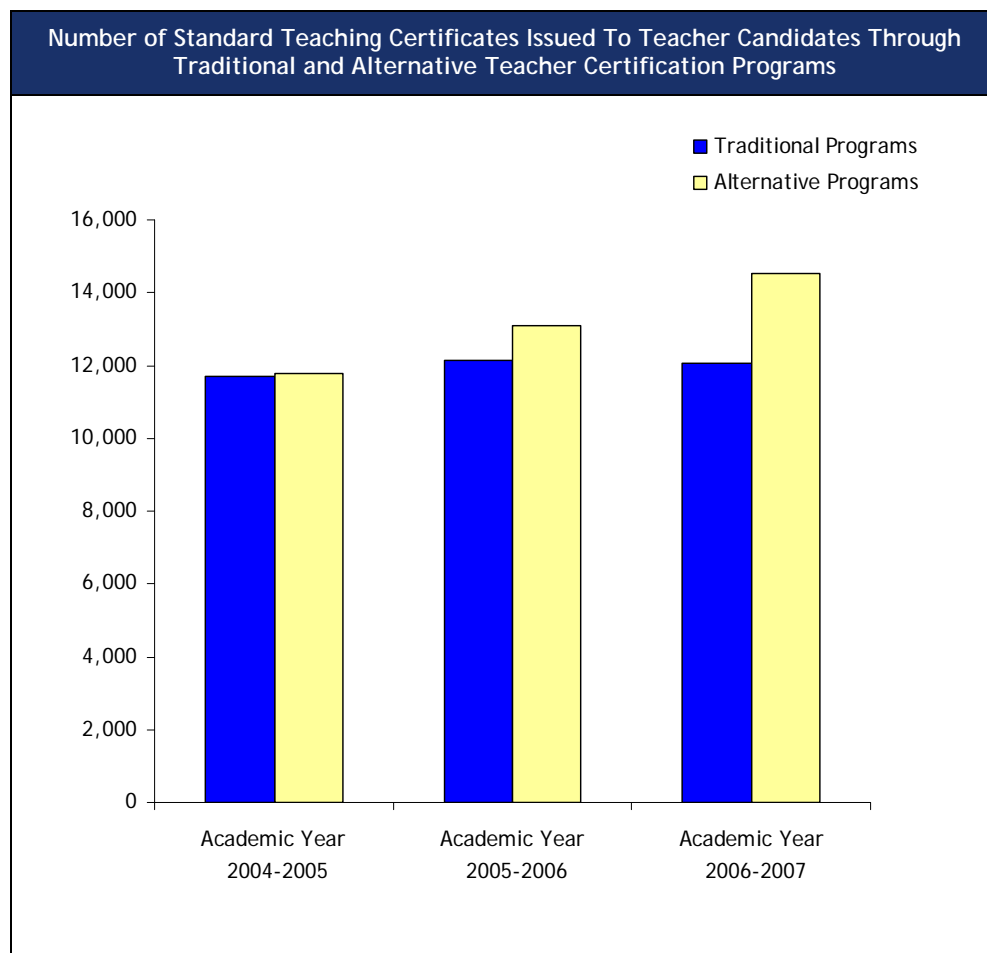
Source: Texas Education Agency's Accountability System for Educator Preparation.

Standard Teaching Certificates Issued to Teacher Candidates at Eight Alternative Teacher Certification Programs

Of the 14,536 standard teaching certificates that the Texas Education Agency (Agency) issued during academic year 2006-2007, 5,499 (37.83 percent) certificates were issued to teacher candidates who completed one of the eight alternative teacher certification programs that auditors visited. Table 4 lists the number of certificates issued to teacher candidates of each program and the percentage of the total number of certificates issued during academic year 2006-2007.

Table 4

Standard Teaching Certificates Issued to Teacher Candidates at Eight Alternative Programs during Academic Year 2006-2007		
Alternative Certification Program	Number of Teacher Candidates Receiving Certificates	Percentage of Total Standard Certificates Issued in Texas
Alternative Certification for Teachers -Houston Alternative Certification Program	1,198	8.24%
Dallas Independent School District Alternative Certification Program	769	5.29%
Education Service Center, Region 10 Teacher Certification Program in Richardson	829	5.70%
Education Service Center, Region 20 Teacher Certification Program in San Antonio	366	2.52%
Houston Independent School District Alternative Certification Program	409	2.81%
iteachTEXAS Alternative Teacher Certification Program in Denton	1,530	10.53%
Lone Star College – Kingwood Alternative Teacher Certification Program	282	1.94%
University of Texas – Pan American Alternative Teacher Certification Program	116	0.80%
Totals	5,499	37.83%

Source: Unaudited data in the Accountability System for Educator Preparation (ASEP).

Responses from Alternative Certification for Teachers—Houston Alternative Certification Program

act ◆ houston
alternative certification for teachers

Management's Formal Response

Advisory Committee Requirements
Texas Administrative Code, Title 19, Section 228.20, requires that teacher preparation and certification programs:
"Shall be a collaborative effort among accredited public schools and/or private schools; regional education service centers; institutions of higher education; and business and community interests; and shall be delivered in cooperation with accredited public schools and/or private schools."

ACT-Houston agrees that it did not have membership representation from a university and an affiliated business and community interest at its formal Advisory Committee Meeting during the 2006-07 academic year. However, the ACT-Houston Program Directors did conduct separate Advisory Committee Meetings during this time period with both university representatives and business and community representatives. These meetings were conducted separately in order to utilize allotted meeting time to share and gain information, and focus on specific suggestions from university, business, and community representatives. In the future, beginning with the Spring 2009 Advisory Committee Meeting, the three Program Directors will conduct general Advisory Committee Meetings, including all representatives required by TAC, and then also continue to meet regularly in separate meetings with university, business, and community advisors.

Labeled as Ad Hoc Advisory Committee Meetings, ACT-Houston conducted three formal meetings during 2006 with university professors, department chairs, and the College of Education Associate Dean. The third meeting held on September 18, 2006, was during the 2006-07 academic year. Meeting agendas and minutes were presented to the auditors showing that the purpose of these meetings was to introduce the process of teacher certification through the ACT-Houston program, submit the major components of ACT-Houston curriculum for review by the university representatives to determine parallels in curriculum content, discuss TExES test preparation, and also develop plans for value-added approaches to higher education and teacher preparation.

Separate Ad Hoc Advisory Committee Meetings were conducted quarterly in 2006-07 with business and community representatives to review ACT-Houston policies and practices with school districts, gain suggestions on technology support, and develop defined management practices and communications with school district representatives. On a monthly basis, the ACT-Houston Program Directors also met with a business/leadership coach to focus on specific areas of responsibility and further develop teamwork and leadership skills in these areas. The list of these members was submitted to the auditors.

June 11, 2008
Submitted by act◆houston Program Directors:
Dr. Debbie Dunlap
Dr. Bobette Dunn
Dr. Vicki Johnston

9301 Southwest Fwy, Suite 250 ◆ Houston, TX 77074 ◆ 832-200-0552 ◆ Fax 832◆200-0549
www.acthouston.com

Dallas Independent School District

MANAGEMENT RESPONSE

RECOMMENDATION #1:

Ensure that a teacher candidate completes all program requirements before designating the teacher candidate as a completer. Specifically, Dallas ACP should ensure that teacher candidates complete all observations, training, and assessments.

The Dallas Independent School District Alternative Certification Program agrees that all candidates should complete program requirements. Dallas ISD ACP interns do complete program requirements; however, the documentation required by auditors for summer 2006 interns was not available for selected interns. Interns cited in the audit were Academy interns who were hired late by the district which made documenting traditional field experience assignments more difficult.

The Dallas ACP implemented the following procedures to address the above concern:

1. Late hires will be required to complete field experiences during their planning periods and must complete 30 hours by the end of their first semester as teacher of record.
2. Interns' student contact experience will be documented in the intern's file (i.e., former teachers, substitutes, teacher assistants). At least thirty contact hours be documented via service records (if available) and letters on institution letterhead.
3. Interns who are absent, regardless of reason, will be required to complete prescribed make-up work by the end of pre-service training or by the end of the internship year. Make-up hours will be documented in the intern's file.
4. The program will have all mid-year and final assessments completed. If building principals fail to submit paperwork, the program's Certification Committee will document this and notify the appropriate Executive Director of his/her learning community. The Certification Committee will then assume the responsibility of final certification and document the assessments.

Person Responsible: Dr. Nell Ingram, Director
                      Content Coordinators

Timeline: New procedures effective June 16, 2008

RECOMMENDATION #2

Retain all documentation supporting teacher candidates' completion of program requirements in teacher candidate files.

The Dallas ACP concurs that it retains all required documentation.

To ensure all documentation is present, the Dallas ACP has implemented the following procedures:

1. Interns will sign in and out each day of training (pre-service) and will sign in and out at their field experience site. Paper sign in sheets will be archived in the district's Records Management Center. A back-up CD will be made by the respective content coordinator and placed in the interns' files.
2. Each content coordinator will document, on Filemaker Pro, the training plan for each intern as well as their completion data. Interns who must be absent will be required to make up the number of training hours missed. Documentation will be maintained in the intern's file.
3. The location of all documents not in the file will be noted in the file.

Person Responsible: Program Content Managers

Timeline: New procedures are in effect as of June 16, 2008

RECOMMENDATION #3
Ensure it screens all applicants for math skills.

The Dallas Independent School District agrees that basic math skills are required. The program will ensure all future interns all have the THEA or one of the approved substitutions as being proposed in rule.
The Dallas ACP will implement the following:
1. Require the THEA, SAT, ACT or Accuplacer as a basic skills requirement. The program will comply with SBEC-recommended minimum scores. Documentation of the results will be placed in the intern's file.

Person Responsible: Valinda Samples, Certification Manager

Timeline: 2009-2010 school year

2. Provide instruction in mathematics for interns who have not scored an A or B in a college level math class.

Person Responsible: Content Coordinators

Timeline: June 16, 2008

RECOMMENDATION #4
Retain all documentation of screenings for oral and written communication skills and critical thinking skills in teacher candidate files.

The Dallas Independent School District agrees that all teachers should possess oral and written communication skills as well as critical thinking skills. All interns were interviewed using a structured interview instrument that assesses critical thinking skills.

All interns wrote essays in English. The three files identified showed the essay had been read since there were scoring/proofreader's marks on the essay. The interviewer indicated a "pass" on the summary sheet used in the hiring process; however, the scoring rubric was missing. Candidates who failed the essay were not hired.

The Dallas ACP has implemented the following:
- Include a process requiring hiring coordinators to sign off on the hiring summary sheet ensuring the scoring rubric is present.
- Developed a process for the Certification Manager to deny hiring without the scoring rubric present.

Person Responsible: Valinda Samples, Certification Manager

Timeline: May 1, 2008

REGION 10
EDUCATION SERVICE CENTER

June 6, 2008

Region 10 ESC Management's Response to Recommendations

In response to the first recommendation, please note that three years ago the Region 10 Program designed and implemented a multi-faceted Lotus Notes database system to document all phases (admission, training, and internship requirements) and processes of each teacher candidate's progress toward meeting program requirements. For example, required intern, consultant, and mentor reports are date-stamped upon arrival, reviewed by program staff, and then recorded in each individual's record within that database system as internship benchmarks. For that reason, the paper copies of those reports have been maintained only until all program requirements have been met, certifications have been recommended, and standard certificates have been issued. Paper documents reflecting major program requirements (i.e. official transcripts, applicant assessment matrices, basic skills test scores, criminal history releases, formal assessments of classroom performance, district and Region 10 recommendations for certification) are maintained in all teacher candidates' files for three years. Those items are directly related to the decision-making processes regarding program completion and certification recommendations, while the observation reports reflect professional growth during the year and serve as benchmarks for teacher candidates' progress throughout the internship. However, all documentation in each teacher candidate's record is maintained permanently in the Lotus Notes database system and is archived annually. Region 10 will seek guidance from TEA by September 1, 2008 concerning the exact documents and the length of time for their retention. Dr. Chris Kanouse and program staff will implement TEA recommendations as soon as they have been determined.

P.O. Box 831300 • Richardson, TX 75083-1300 • 972.348.1700 • FAX 972.231.3642 • www.region10.org
Spring Valley Site - 400 E. Spring Valley Rd. • Abrams Site - 904 Abrams Rd.

ESC★20
Serving the Educational Community

Region 20 Teacher Orientation & Preparation Program

Management responses:

Consistently retain necessary supporting documentation in teacher candidate files:
The program will continue to archive complete teacher files for seven years for all teachers who qualify as completers and earn their Standard certification. Documentation in electronic format is also kept and available for all archived records.

Ensure it has a functioning advisory committee:
The program will proceed in scheduling advisory meetings with an advisory committee that follows guidelines outlined on page #17 of the State Board of Educator Certification Texas Education Agency Program Directors' Handbook (April 2007).

1314 Hines Avenue • San Antonio, Texas 78208-1899 • www.esc20.net
AN EQUAL OPPORTUNITY EMPLOYER

HOUSTON INDEPENDENT SCHOOL DISTRICT
HATTIE MAE WHITE EDUCATIONAL SUPPORT CENTER
4400 WEST 18th STREET • HOUSTON, TEXAS 77092-8501

State Auditor's Office Audit Report on TEA's Oversight of Alternative Teacher Certification Programs:

Management Response from Houston Independent School District Alternative Certification Program

- Ensure that a teacher candidate completes all program requirements before designating that teacher candidate as a completer.

The Houston Independent School District Alternative Certification Program (HISD-ACP) agrees that teacher candidates should not be marked as a completer if that candidate has not completed all program requirements. During the academic year 2006-2007, the ASEP completer list was populated by the ASEP system with teacher candidates who were approved by HISD-ACP for TExES examinations. There were errors made in removing teacher candidates from the ASEP completer list if they left the program or were extended in the program and completed in a subsequent year. However, no teacher candidates were recommended by HISD-ACP for certification until that candidate had completed all program requirements. Corrections to the 2006-2007 ASEP completer list have been submitted to the Texas Education Agency. The completer list is used to determine accreditation ratings for the program. With the corrections, the passing rate for the HISD-ACP improved to 99% for the category of All candidates, as well as improving passing rates in every group used for accountability (Female, 99%; Male, 99%; African American 98%; Hispanic, 99%; Other, 100%, and White, 100%). In addition, new procedures have been implemented so that such errors do not happen in the future. A "Program Completion" field will be used in the HISD-ACP database and completion of program requirements will be designated with a date, so that the completion year can be determined.

Person Responsible:
    Karen Owen, Director, HISD-ACP

Timeline: Academic year 2007-2008

Creating a College-Bound Culture

HOUSTON INDEPENDENT SCHOOL DISTRICT
HATTIE MAE WHITE EDUCATIONAL SUPPORT CENTER
4400 WEST 18th STREET • HOUSTON, TEXAS 77092-8501

State Auditor's Office Audit Report on TEA's Oversight of Alternative Teacher Certification Programs:

Management Response from Houston Independent School District Alternative Certification Program

- Ensure that teacher candidates obtain probationary certificates for their internship

The Houston Independent School District Alternative Certification Program (HISD-ACP) and the Admissions Office agree that teacher candidates must obtain probationary certificates for their internship. Beginning the 2007-2008 school year the following procedures were put in place: staff communicated with interns during the first 30 days of employment concerning the probationary certificate; principals were copied on the email and interns were required to complete the process by a specific date; staff ran reports on a weekly basis to check the status of those interns without valid certificates and sent updated communications. Interns received more communication concerning the probationary certificate application which reduced, if not eliminated, the number of Interns without certificates. Beginning the 2008-2009 school year, the Certification Office will not approve ACP hires, if the online application process is not completed. New hires will have an opportunity to complete the process in the Human Resources Office, if necessary. In addition to procedural changes made in the Human Resources Certification office, HISD-ACP will also monitor teacher candidates to determine that they have obtained their probationary certificates.

Persons Responsible:
    Sharon Warren, Certification Officer, HISD
    Karen Owen, Director, HISD-ACP

Timeline: Academic year 2007-2008

Creating a College-Bound Culture

Exception is taken to the following statements:

Chapter 10, Page 5, Paragraph 4

> *"without full observation forms, the program cannot ensure that the observations conducted were thorough and complete"*

> *Within two days of the observation date, all classroom observations are recorded in the database by the Program Supervisor. At the time of recommendation for Standard certification, all individual observation forms are reviewed and retained in the individual's permanent file.*

> *In the 2006-2007 school year, iteachTEXAS sought guidance from SBEC regarding files of individuals recommended for certification. iteachTEXAS specifically inquired about the minimum time period required to retain candidate information, and what specific documentation should be retained. To date we have not received specific guidance on this matter nor have we been able to locate written guidance.*

> *However, iteachTEXAS has developed in-house policies for file retention. Summary observation forms, containing observation dates and ratings, supervisor and campus administration recommendations and signatures, are electronically scanned and saved to the program database.*

Chapter 10, Page 5, Paragraph 3

> *"1 of the 30(3percent) teacher candidate files lacked evidence that the teacher candidate has been screened for writing proficiency."*

> *iteachTEXAS scanning procedures also require the screening of all official transcripts. When the transition to scanned file retention began in January 2008, candidate SAT and ACT scores were not scanned. Therefore, the SAT scores were not scanned and retained. However, in these instances, the candidate's proof of writing proficiency was indicated on the evaluation sheet, which was scanned and retained in the program database.*

LONE STAR
COLLEGE
KINGWOOD

TO:
State Auditor's Office

FROM: Susan Bedwell, Ph.D., Certification Officer
Teacher Certification Program

DATE: June 11, 2008

SUBJECT: Response to the Report on an Audit of TEA's Oversight of Lone Star College-Kingwood Teacher Certification Program.

Thank you for the report and the opportunity to respond. Thank you also for your second look at the Mentoring Component. As the auditors documented and we discussed via a telephone conversation, TCP provided five mentoring trainings during the 2006-2007 and had 85 percent attendance by our Interns and their Mentors. Our ISDs also thoroughly supported these five TxBESS trainings. We appreciate this modification to include TCP's best practices in mentoring in your final audit chapter report.

Throughout this document, we have noted corrections in several areas; however, the timeline seems redundant because the corrections have already occurred. I believe you have diligently presented factual information from the audit of the Teacher Certification Program (TCP), Lone Star College-Kingwood. However, it is our position that a few areas have either been under-represented or were not mentioned in your report. These areas represent critical factors that impact this program and the audit results. These factors were discussed with the audit team during the week long audit process, during our exit phone conference and again were mentioned in written format in the original response to the exit interview.

In my opinion, these factors represent valid information important to the audit results, and we request they be mentioned in the chapter report. Because the comments to the audit report are not numbered, I will refer to each subject area first and then the bullet. The pertinent factors include the following:

20000 Kingwood Drive
Kingwood, TX 77339-3801
281.312.1600
Kingwood.LoneStar.edu

- TCP staff requested mid-week into the audit a review of six student files from 2007-2008. The purpose of this request, which the two auditors granted, was to demonstrate substantive improvements in documentation and adherence to program requirements by students who completed the program. You have included a paragraph noting the improvements and we appreciate these amended statement.

  Also, TCP staff presented documented evidence showing a seventeen-month period, including the period audited, in which the program was significantly understaffed. The result of this lack of resources directly impacted the quality of both services provided and program documentation during the period audited by your office. (A fulltime staff position was hired October 2006 and the quality of accountability improved.) The diligence of the TCP staff during this time of extenuating circumstances was essential in this program maintaining substantial compliance with the rules of TEA and SBEC. We request this explanation of extenuating circumstances be included in the chapter report.

  In a recent phone conversation you strongly recommended that I add the above paragraph to this response to best understand our program's lack of resources for a seventeen month period of extenuating circumstances.

PROGRAM REQUIREMENTS

- For bulleted point #1, during the audit period of 2006-2007, field-based observations were submitted to faculty teaching the Pedagogy and Professional Responsibilities courses. Faculty was directed to turn in the packets to the TCP office. Unfortunately, some of the packets were not turned in and consequently, when this problem was identified by TCP, an <u>immediate</u> change occurred. The change involved the student turning in the field-based packet to the TCP office where the packet was filed in the students' records. We request this factor be noted in the chapter report.
  <u>Responsible Person</u>: Dr. Susan Bedwell
  <u>Timeline</u>: Spring 2007

- For bulleted points # 2, in <u>4</u> of 30 of student files tested, student were incorrectly reported completers, and either did not perform an internship or student teaching. At the entrance meeting with the auditors and campus leadership, we fully and voluntarily disclosed this TCP reporting error and provided to the auditors a written plan of correction. However, the effect of this reporting error was benign to the <u>**four**</u> (4) students (not seven students) in the sample of thirty and the error was consistent throughout the 309 students in the ASEP report for 2006-2007.
  <u>Responsible Person</u>: Dr. Susan Bedwell
  <u>Timeline</u>: September 2008

- We support the bulleted comment #3, because our Intern files did not contain sufficient documentation identifying mentor interactions. This was corrected and fully implemented in the 2007-2008 year.
  Responsible Person: Dr. Susan Bedwell
  Timeline: Corrected Summer 2007

- In bulleted point #4, we corrected this documentation error through the training of our supervisors over the summer 2007. The training clarified why, when, where and who needed to be included in the mid- recommendation/assessment and the final recommendation for the Intern's standard certification.
  Responsible Person: Dr. Susan Bedwell
  Timeline: Corrected Summer 2007

- For bulleted points #5, the auditors stipulated that grades were entered for each student but roll sheets were not found. The policy of the college for Continuing Education courses states that once grades are entered, roll sheets are not maintained. Notwithstanding the policy, TCP did locate and furnish to the auditors some roll sheets and word-processed attendance records for the courses in question. TCP will formally make this procedural change this summer.
  Responsible Person: Dr. Susan Bedwell
  Timeline: July 2008

ADMISSION CRITERIA

- For bulleted #1, we accept a letter on college or university stationary from a dean or department chair stating the degree requirements for the conferred degree have been met for the student. The final transcript with the official conferred degree is submitted to the program when the transcript is available. Our program goal is to work with the student and the ISD desiring to hire the new graduate and to provide test approval once degree requirements have been verified.

- For bulleted item # 2, 4, and 5, refer to the qualifying test scores for reading, writing and math. This program looked carefully at both the student's GPA, test scores on the qualifying exam and desired certification area to make a comprehensive and fair decision regarding the students' competency and proficiency in these areas. Per a change to TEA program guidelines summer 2008, the approved test scores and GPA requirements will be strictly adhered to by TCP.
  Responsible Person: Dr. Susan Bedwell
  Timeline: August 2008

- For bulleted item # 3, the group admissions interview is the program's opportunity to assess the students' oral, written and critical thinking skills. The program systematically improved our processes during the summer 2007 so all students attend this interview and complete the required oral, written and critical thinking assessments.

Responsible Person: Dr. Susan Bedwell
Timeline: Corrected Summer 2007

- For bulleted item #6, we agree the required screening for English proficiency was not uniformly used with our students. The TOEFL has been previously used by our program. With the expertise and consultation of our campus ESL Director, Dr. Masoud Shafiei, we have since adopted the COMPASS-ESL as our tool for assessing English proficiency.
  Responsible Person: Dr. Susan Bedwell
  Timeline: Corrected Fall 2008

OTHER EXCEPTIONS

- It is also noted that during the audited period errors in ethnicity reporting occurred. During 2006-2007, Lone Star College-Kingwood TCP Continuing Education was not collecting ethnicity data. When we later determined that TEA required ethnicity statistics in the ASEP report, we attempted to collect this information retrospectively and mistakes occurred. Our policy on collecting student ethnicity data has changed, and we now collect this at the time of student admission. We request this factor be reported in the chapter report.
  Responsible Person: Dr. Susan Bedwell
  Timeline: Corrected Summer 2007

Thank you for this opportunity to respond. You have been gracious with your comments. We request the final report be amended to include the explanations, corrections, and pertinent information presented above.

OFFICE OF THE DEAN
COLLEGE OF EDUCATION

THE UNIVERSITY OF TEXAS - PAN AMERICAN

1201 West University Drive • Edinburg, Texas 78539-2999 • Office (956) 381-3627 • Fax (956) 381-2184

June 5, 2011

To: The State Auditor of Texas
P.O. Box 12067
Austin, Texas 78711-2067

From: Salvador Hector Ochoa, Dean
College of Education

Re: The University of Texas – Pan American Management's Formal Response

In interpreting this written response to the State Auditor's report of the Alternative Certification Program (ACP), it should be noted that the time period pertaining to this audit of UTPA was from September 1, 2006 to August 31, 2007. During the majority of the time frame period of this review (September 1, 2006 to May 31, 2007, the school calendar year), there was an Interim Dean for the College of Education. The tenure of the new and current Dean of the College of Education began on June 1, 2007.

1. *"Ensure that a teacher candidate completes all program requirements before designating that teacher candidate is a completer. Specifically, Pan American ACP should ensure that teacher candidates complete an internship and obtain a probationary certificate for the internship."*

Management concurs with the recommendation. In order to prevent future potential errors occurring in this area again (i.e., identifying students as completers when they are still on internship or taking coursework), the new Dean will require that the Certification Officer and The Director of Admissions and Certification or her designee collectively prepare, review and initial the completer list as a means of establishing a verification system. Given that the ASEP Report ("completer list') is due in approximately October of each academic year, the Certification Office and the Director of Admissions and Certification will start double checking completers beginning July 2008.

Management concurs with the recommendation. In order to prevent this from occurring again, the ACP staff will meet with the Certification Officer on a weekly basis to ensure that all students enrolling in their internship class have obtained a probationary certificate. Moreover, the Director of Admissions and Certification will check the internship class roster during the first week of each semester and verify that each student has applied for and obtained a probationary certification. If the student has not been recommended for a probationary certification by the end of the first week of the semester, he or she will be dropped from the course and the school district will be notified. These safeguard procedures will be implemented starting fall 08 when the next internship class starts.

2. *"Implement a model for evaluating program delivery and improvement."*

Management concurs with the recommendation. In response to the recommendation noted in this report, all students who have graduated from the program this academic year have been asked to complete a program evaluation survey as of May 29, 2008. This survey has been mailed to all graduates of the program. We are awaiting the return of the surveys to compile the data. A review of the data, along with the data gleaned from the one-to-one meetings with university supervisors noted above, will then be used to address concerns about the ACP and serve as a program evaluation. The program evaluation is expected to be completed by September 2008.

3. *"Ensure it reports accurate performance information to the Agency and retains sufficient documentation supporting this reported data."*

Management concurs with the recommendation. It should be noted that the audit review in this area went beyond the ACP to all our certification program areas because the UTPA Certification Officer was instructed by TEA to combine data for seven of our programs when submitting this informational data.

Data prepared by the Certification Officer submitted by UTPA will first be verified and initialed by a staff member or the Director of Admissions and Certification in the Office of Teacher Certification and Admission Services Offices beginning August 2008. In particular, both total and gender information will be double checked.

Copies of this report have been distributed to the following:

Legislative Audit Committee
The Honorable David Dewhurst, Lieutenant Governor, Joint Chair
The Honorable Tom Craddick, Speaker of the House, Joint Chair
The Honorable Steve Ogden, Senate Finance Committee
The Honorable Thomas "Tommy" Williams, Member, Texas Senate
The Honorable Warren Chisum, House Appropriations Committee
The Honorable Jim Keffer, House Ways and Means Committee

Office of the Governor
The Honorable Rick Perry, Governor

Texas Education Agency
Members of the State Board of Education
    Dr. Don McLeroy, Chair
    Mr. David Bradley, Vice Chair
    Mr. Rick Agosto, Secretary
    Mr. Lawrence A. Allen, Jr.
    Ms. Mary Helen Berlanga
    Ms. Barbara Cargill
    Mr. Bob Craig
    Ms. Cynthia Noland Dunbar
    Ms. Patricia Hardy
    Ms. Mavis B. Knight
    Ms. Terri Leo
    Ms. Gail Lowe
    Mr. Ken Mercer
    Ms. Geraldine Miller
    Mr. Rene Nuñez
Members of the State Board for Educator Certification
    Dr. Bonny Cain, Chair
    Ms. Christie Pogue, Vice Chair
    Mr. John Shirley, Secretary
    Mr. Michael Acuff
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    Ms. Janie Baszile
    Ms. Sandra Bridges
    Ms. Stefani Carter
    Ms. Jeanne Marcum Gerlach
    Ms. Jill Druesedow
    Dr. Susan Hetzler
    Ms. Patti Johnson
    Mr. Homer Trevino
Mr. Robert Scott, Commissioner of Education

Board Members and Program Directors of the Following Alternative Teacher Certification Programs Audited

ACT-Houston Alternative Certification Program

Dallas ISD Alternative Certification Program

Education Service Center Region 10 Teacher Certification Program

Education Service Center Region 20 Teacher Certification Program

Houston ISD Alternative Certification Program

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Lone Star College-Kingwood Alternative Teacher Certification Program

University of Texas-Pan American Alternative Teacher Certification Program