



2019 – 2020 Continuing Approval Review Report American College of Education

PURPOSE

Texas Education Agency (TEA) Program Specialist, Vanessa Alba, conducted a five-year Continuing Approval Desk Review of the educator preparation program (EPP) for American College of Education on March 2, 2020. Per 19 Texas Administrative Code (TAC) §228.10(b), "...An entity approved by the SBEC under this chapter shall be reviewed at least once every five years...". Thomas Brouwer was identified as the program Legal Authority and Stephie Gupstill, Backup Legal Authority, was identified as the primary EPP contact for the review process. American College of Education (ACE) was approved as an EPP on February 6, 2009. At the time of the review, the EPP was Accredited. At the time of the review, ACE was approved to certify candidates in the following classes: Principal / Principal as Instructional Leader only.

Per 19 TAC §228.1(c), "all educator preparation programs are subject to the same standards of accountability, as required under Chapter 229 of this title." The TEA administers TAC required by the Texas legislature for the regulation of all EPPs in the state. (See the complete [TAC](#) for details.) The five-year Continuing Approval Review was conducted in a "Desk Review" format where EPP staff submitted requested documents to TEA for review.

The scope of this review included: 1) verifying compliance with Texas Administrative Code and Texas Education Code as applicable to all certification classes in all certification routes offered by the EPP; and 2) developing a plan for improvement based on review data, performance indicators identified in 19 TAC §229.4, and self-reported EPP information provided in the Status Report. Next Steps were developed to address plans for quality improvement. Evidence of compliance was measured using a rubric aligned to TAC.

EPP staff participating in the review at various stages were: Thomas Brouwer, Legal Authority & Director of Regulatory Affairs and Compliance, Stephie Gupstill, Backup Legal Authority & Regulatory Compliance Specialist, Danielle Kauser, Regulatory Compliance Specialist, Conna Bral, Assistant Provost, Education Professions, Kathleen Stroud, Chair, Leadership and Administration, Scott Bailey, Program Director, Educational Leadership, and Jeannie Taylor, Director of Admission.

DATA ANALYSIS

Information concerning compliance with TAC governing EPPs was collected by a variety of means. A Status Report and related program documents were submitted to TEA on February 3, 2020. Additional EPP documents, including records for ten candidates as follows: five post-baccalaureate and five alternative certification program (ACP) candidates, were submitted on



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February 19, 2020. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence.

FINDINGS, COMPLIANCE ISSUES and RECOMMENDATIONS

“Findings” indicate evidence collected during the review process. If the program is “not in compliance” with any identified component, the program should consult the TAC and correct the issue immediately. A “Compliance Plan” may be drafted during the review that identifies compliance issues to be addressed and a timeline for completion. “Recommendations” are suggestions for general program improvement and no follow up is required.

COMPONENT I: GOVERNANCE – 19 TAC §228

Findings

- Governance was not reviewed as a part of the Desk Review. TEA relied on self-reported data contained within the status report to determine compliance.
- The ACE legal authority attested that ACE meets requirements for advisory committee membership, training, and meeting frequency. [19 TAC §228.20(b)]
- The ACE legal authority provides support and resources for the EPP as evidenced by participation in the Desk Review. The EPP also self-reported that it meets requirements as prescribed. [19 TAC §228.20(c)]
- ACE has published a calendar of activities for its principal/PIL program. The calendar was found on the program website. [19 TAC §228.20(g)]
- ACE submitted the Status Report on 1/31/2020 as required for the EPP Review. [19 TAC §228.10(b)(1)]

Compliance Issues to be Addressed (Next Steps)

- None.

Recommendations

- None.

Based on the evidence presented, American College of Education was in compliance with 19 TAC §228 – Governance of Educator Preparation Programs.

COMPONENT II: ADMISSION - 19 TAC §227.10

Findings

- ACE has informed applicants of the required information about the EPP on the website. Admission & completion requirements, the effects of supply & demand, the EPP



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performance over time, the right to request a criminal background check, the potential ineligibility of an individual who has been convicted of an offense for issuance of a certificate upon completion of the program, and the right to request a criminal history evaluation letter. [19 TAC §227.1(c-d)]

- All ten files reviewed contained evidence of a degree held at the time of admission. Post-baccalaureate candidates are required to hold a bachelor's degree at the time of admission. All five files did contain evidence of a bachelor's degree at admission. ACP candidates are required to hold a master's degree at the time of admission. Only one out of five held a master's degree at the time of admission. The rest of the ACP files were post-baccalaureate candidates incorrectly classified as ACP candidates. The program was advised to correctly classify candidates as post-baccalaureate or ACP based on degree held at the time of admission. [19 TAC §227.10(a)(1-2)]
- One file reviewed was an out-of-country applicant. That file contained evidence of a transcript evaluation noting degree conferred. The service used by the program was World Education Services. That same applicant was required to have taken the Test of English as a Foreign Language Internet-Based Test (TOEFL i-BT). Documentation with minimum scores of 24 Speaking, 22 Listening & Reading, and 21 Writing were not provided. [19 TAC §227.10(e); 19 TAC 227.10(a)(7); 19 TAC §230.11(b)(5)(B)]
- All files reviewed met the minimum GPA requirement. The GPA range was 2.59-3.54. [19 TAC §227.10(a)(3)(A)]
- All files reviewed contained evidence that minimum certification, degree, and experience were met. Teaching certificates, official transcripts, and service records were provided as evidence of compliance. [19 TAC §227.10(a)(5)]
- All files reviewed contained evidence that basic skills were met prior to admission. Transcripts noting degree were evidence of compliance. [19 TAC §227.10(a)(6)]
- Applicants to a principal program are required to submit an application and be screened on more than one device to determine if the knowledge, experience, skills, and aptitude are appropriate for the certification sought. All files contained evidence of an electronic application. All files also contained evidence of two screens. The screens used were an interview and an essay scored on a rubric with a cut score. [19 TAC §227.10(a)(8); 19 TAC §241.5; 19 TAC §241.45]
- All files reviewed were formally admitted. The evidence provided was a dated formal offer of admission letter accepted by signature for each file reviewed. It was noted that five files reviewed were "conditionally admitted" pending receipt of documents. There is no "conditional admission", only formal admission or contingency admission in the final semester prior to a degree conferred. All files reviewed began coursework, training, and test approval after they were formally admitted as required. [19 TAC §227.17; 19 TAC §227.17(d); 19 TAC §227.17(f)]



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Compliance Issues to be Addressed (Next Steps)

19 TAC §227.10(a)(7) and 19 TAC §230.11(b)(5(B) ACE did not require applicants to demonstrate English language proficiency prior to admission.

Action: Verify minimum scaled scores of 24 for speaking, 22 for listening & reading, and 21 for writing on the TOEFL-iBT prior to admission. Retain evidence in each candidate file for auditing purposes.

Recommendations

- Do not allow candidates to be “conditionally admitted” pending receipt of documents.

Based on the evidence presented, American College of Education is not in compliance with 19 TAC §227.10 - Admission Criteria.

COMPONENT III: CURRICULUM – 19 TAC §228.30

Findings

- Curriculum was not reviewed as a part of the Desk Review. TEA relied on the self-reported data contained within the Status Report to determine compliance.
- The curriculum is based on educator standards and the EPP uses assessments to measure candidate progress. [19 TAC §228.30(a-b)]
- The required subject matter curriculum is taught in coursework as follows:
 - Code of Ethics is taught in ELX5033 Creating Safe and Supporting Learning Environments and ELX 5753 Law & Policy. [19 TAC §228.30(c)(1)]
 - Dyslexia is taught in ELX5033 Creating Safe and Supporting Learning Environments; ELX 5703 Campus Improvement; LIT 5253 Literacy for Educational Leaders. [19 TAC §228.30(c)(2)]
 - Mental health & youth suicide is taught in ELX5033 Creating Safe and Supporting Learning Environments; ELX 5703 Campus Improvement and EPP uses US Mental Health First Aid, SAMHSA, TX Health & Human Services, and Suicide Prevention Resource Center. [19 TAC §228.30(c)(3)]
 - The skills that educators are required to possess, the responsibilities that educators are required to accept, and the high expectations for students in this state are taught in ELX 5983 Practicum. [19 TAC §228.30(c)(4)]
 - The importance of building strong classroom management skills is taught in ELX 5033 Creating Safe and Supporting Learning Environments and ELX 5983 Practicum. [19 TAC §228.30(c)(5)]
 - The framework for teacher and principal evaluation is taught in ELX 5623 Developing Teachers. [19 TAC §228.30(c)(6)]
 - Appropriate relationships and boundaries taught in ELX 5753 Law and Policy. [19 TAC §228.30(c)(7)]



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- Instruction in digital literacy is taught in ELX 5703 Campus Improvement; ELX 5723 Resource & Fiscal Management; and ELX 5983 Practicum. While digital literacy is taught in coursework, ACE did not meet the requirement as prescribed because the instruction in digital learning did not include a digital literacy evaluation followed by a prescribed digital learning curriculum that is aligned with the latest version of the [International Society for Technology in Education \(ISTE\)](#), provide effective evidence-based strategies to determine a person's degree of digital literacy, or include resources to address any deficiencies identified in the digital literacy evaluation. [19 TAC §228.30(c)(8)(A-C)]
- The principal standards are taught in all coursework required for certification. [19 TAC §228.30(e)]

Compliance Issues to be Addressed (Next Steps)

- 19 TAC §228.30(c)(8)(A-C) ACE instruction in digital learning did not include a digital literacy evaluation followed by a prescribed digital learning curriculum that is aligned with the latest version of the [International Society for Technology in Education \(ISTE\)](#), provide effective evidence-based strategies to determine a person's degree of digital literacy, or include resources to address any deficiencies identified in the digital literacy evaluation.
- Action: Provide instruction to all candidates in digital learning that includes a digital literacy evaluation followed by a prescribed digital learning curriculum that is aligned with the latest version of the [International Society for Technology in Education \(ISTE\)](#), provides effective evidence-based strategies to determine a person's degree of digital literacy, and includes resources to address any deficiencies identified in the digital literacy evaluation. Retain evidence in each candidate file that the instruction was provided for auditing purposes.

Recommendations

- None.

Based on the evidence presented, American College of Education is not in compliance with 19 TAC §228.30-Curriculum.

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

Findings

- ACE is an online principal program that provides candidates with adequate preparation and training. A total of 510 clock-hours is required for standard certification. The EPP requires 34 credit hours which is equivalent to 510 clock-hours. The scope and sequence document and degree plans for all files reviewed served as evidence of compliance. [19 TAC §228.35(a)(1)]



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- Training is sustained, rigorous, and interactive. The degree plans for all files reviewed served as evidence of compliance. [19 TAC §228.35(a)(2)]
- Program benchmarks and degree plans served as evidence that candidates completed required coursework prior to EPP completion and standard certification. One file reached point of standard certification. [19 TAC §228.35(a)(3)]
- ACE has procedures for allowing relevant military experiences. Evidence was found on page 29 of the candidate handbook. ACE also has procedures for allowing prior coursework. Evidence was found on page 22 of the candidate handbook. [19 TAC §228.35(a)(5)(A-B)]
- Coursework and training offered online does not meet standards. The program did not provide evidence that it is making progress toward meeting, criteria set for accreditation, quality assurance, and/or compliance with DEAC, QM, or requirements for public institutions. [19 TAC §228.35(a)(6)]
- Transcripts for the ten files reviewed, degree plans, and the program Scope & Sequence served as evidence that candidates seeking principal/PIL certification complete the required coursework and training. A total of 200 clock-hours and a 160 clock-hour practicum are required. Candidates complete nine courses prior to the practicum experience. They complete the practicum, a capstone experience, and the Law & Policy course concurrently. [19 TAC §228.35(c)]
- Six files reviewed reached the point of practicum. Evidence was provided that candidates complete a practicum. The EPP provided the ELX 5983 practicum course on the transcript as evidence and the tracking document for each file reviewed noting 166 clock-hours of a standards-based practicum. [19 TAC §228.35(e)(8)]
- Candidate proficiency in the educator standards is determined during the practicum. The program provided observation documentation for the files reviewed. A total of six candidates are in the process of completing the 135 minutes of field-supervision during the practicum. The other two files reviewed have completed the requirement. [19 TAC §228.35(e)(8)]
- ACE provided evidence that the field supervisor and site supervisor provided recommendations to the EPP regarding candidate success in the practicum. For each file reviewed, the site supervisor received an email regarding the observation and the field supervisor submits final documentation to the EPP noting all observations are complete and the candidate was successful. [19 TAC §228.35(e)(8)(D)]
- All candidates that reached the point of practicum were assigned a site supervisor. Each site supervisor was certified as a principal and held the required years of experience. Service records and certificates were provided as evidence of compliance. The site supervisors were trained as required. The training PowerPoint and the dated signed document stating training was completed within three weeks of the assignment were provided for each file reviewed. [19 TAC §228.35(f); 19 TAC §228.2(31)]



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- All candidates that reached the point of practicum were assigned a field supervisor. That field supervisor held the required credentials. The principal certificate, resume, and years of experience were provided as evidence. The field supervisor completed local and statewide field supervisor training. The Region X Education Service Center (ESC) training certificate served as evidence of compliance for state-wide training and the PowerPoint along with a dated signed document noting that local training was completed as required. [19 TAC §228.35(h); 19 TAC §228.2(16)]
- The field supervisor made the first contact within the first quarter of the assignment for all six files that reached the point of field supervision. A dated document served as evidence of compliance. Pre- and post-observation conferences were conducted as required for each observation for the files reviewed. The required individuals received an email and confirmed receipt of the observation feedback. This also served as evidence that the field supervisor collaborated with the required individuals. Three candidates received additional informal support. Emails between the field supervisor and each candidate served as evidence of compliance. Formal observations were held in face-to-face and virtual format. All included the start/stop times, instructional strategies observed, as well as the subject/grade level observed. [19 TAC §228.35(h)(1-3)]

Compliance Issues to be Addressed (Next Steps):

- 19 TAC §228.35(a)(6) ACE is not making progress or has not reached accreditation for its online coursework.
Action: Since ACE works with QM, begin the process to ensure that the program is making progress to achieve full accreditation. Retain the documentation for auditing purposes.

Recommendations

- None.

Based on the evidence presented, American College of Education is not in compliance with 19 TAC §228.35 – Program Delivery and On-Going Support.

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

Findings

- ACE has established benchmarks to measure candidate progress. Benchmarks are a minimum of 80% on Benchmark 1 during the third term, Benchmark 2 during the fifth term, and Benchmark 3 during the final term. Evidence was provided for six files reviewed. Four candidates had not yet enrolled in Benchmark courses. [19 TAC §228.40(a)]



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- Structured assessments to measure candidate progress are required. In addition to the requirement of meeting an 80% on each benchmark, the program provided a sample Principal as Instructional Leader (PIL) assessment with corresponding levels of proficiency with levels of proficiency as evidence of compliance. [19 TAC §228.40(a)]
- ACE has processes in place to ensure that candidates are successful in their certification exams. Readiness to test is based on scoring 80% on a practice exam and is one of the benchmarks for the program. Transcripts and practice exams were provided for three of the files reviewed. One file did not meet the requirements and the other two did. All took the required coursework. [19 TAC §228.40(b)]
- All candidates are granted test approval after formal admission, after taking the required coursework and scoring 80% on the practice exam. The criteria for testing are published in candidate handbooks and the transcripts for files reviewed served as evidence of compliance. [19 TAC §228.40(d)]
- ACE uses information from a variety of sources to evaluate its program design and delivery. Dated advisory committee meeting minutes noting items discussed were provided as evidence of compliance. [19 TAC §228.40(e)]
- The candidate records reviewed served as evidence that ACE retains records that each candidate met admission requirements and completed program requirements as applicable for a period of five years after completion or withdrawal for any reason. [19 TAC §228.40(f)]

Compliance Issues to be Addressed (Next Steps):

- None.

Recommendations

- None.

Based on the evidence presented, American College of Education is in compliance with 19 TAC §228.40 – Assessment and Evaluation of Candidates for Certification and Program Improvement.

COMPONENT VI: PROFESSIONAL CONDUCT - 19 TAC §228.50

Findings

19 TAC §228.50 requires that during the period of preparation, the educator preparation program shall ensure that the individuals preparing candidates and the candidates themselves understand and adhere to Chapter 247 of this title (relating to Educators' Code of Ethics).



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- Each candidate acknowledges receipt of a copy of the Texas Educator's Code of Ethics. A signed copy of the Texas Educator's Code of Ethics was found in seven of the candidate's records. Two candidates had not yet been enrolled in the course where the Code of Ethics is taught, and one candidate did not complete the program.
- All EPP staff signed a Texas Educator's Code of Ethics. Signature documents were submitted for all staff.

Compliance Issues to be Addressed (Next Steps):

- None.

Recommendations

- None.

Based on the evidence presented, American College of Education is in compliance with 19 TAC §228.50 - Professional Conduct.

COMPONENT VII: COMPLAINTS PROCESS – 19 TAC §228.70

Findings

- Per 19 TAC §228.70(b), the ACE complaints process is on file at TEA. It is also posted on the website with a link to the TEA complaints website. ACE provides candidates written information about filing complaints with the EPP and with TEA in its candidate handbook and on the website. [19 TAC §228.70(b)(1-4)]

Compliance Issues to be Addressed (Next Steps):

- None.

Recommendations

- None.

Based on the evidence presented, American College of Education is in compliance with 19 TAC §228.70 – Complaints Process.

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

Findings

- Two files reached the point of standard certification. Official transcripts noting the master's degree conferred served as evidence of compliance. [19 TAC §241.20; 19 TAC §241.60]



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- ACE requires candidates to provide valid teaching certificates during the admissions process. Valid certificates were provided for all ten files reviewed. [19 TAC §§241.20; 19 TAC §241.60]
- Service records are required at the time of admission. The requirement at the time of standard certification is two years of teaching experience as a classroom teacher. Service records noting years of experience as a classroom teacher ranged from 2-12 years per the service records provided for review. [19 TAC §241.20; 19 TAC §241.60]
- The records of EPP completion were provided for the file that reached the point of standard certification. [19 TAC §241.20; 19 TAC §241.60]

Compliance Issues to be Addressed (Next Steps):

- None.

Recommendations

- None.

Based on the evidence presented, American College of Education is in compliance with 19 TAC §228 and §230 – Certification Procedures.

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

Findings

- ACE has reported all required data within the timeframe required. [19 TAC §229.3(f)(1) and related graphic Figure]
- The date on the formal offer of admission letter in one candidate file did not correspond exactly to the date reported in ASEP or the GPA spreadsheet reported to TEA for accountability purposes. A second file contained a formal offer of admission letter with two different dates and three dates reported in ASEP as the date of admission. The admission GPA in one file reviewed did not correspond to the admission GPA spreadsheet reported to TEA for accountability purposes. 19 TAC §229.3(f)(1) and related graphic Figure]

Compliance Issues to be Addressed (Next Steps):

- None.

Recommendations

- Continue to carefully monitor the accuracy of all ASEP submissions during yearly ASEP reporting.
- ACE was advised that all PIL observations must be uploaded for the 19-20 academic year.



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Based on the evidence presented, American College of Education is in compliance with 19 TAC §229 – Integrity of Data Reported.

GENERAL PROGRAM RECOMMENDATIONS

- Certificate deactivation timelines and requirements changes are proposed. Changes will include new timelines for requesting deactivations and information that must be provided to stakeholders in advance of internship start dates. The field supervisor will need to verify candidate placement information at the beginning of the assignment.
- To ensure continuity in record keeping and other related processes, consider creating a procedure manual documenting EPP processes.
- Implement quality control procedures to ensure ASEP reports, including GPA spreadsheets, are submitted accurately during state reporting each year.
- Align the verbiage of the program to the verbiage of Texas Administrative Code (TAC) (ex. Field supervisor, cooperating teacher, mentor, candidate, site supervisor, etc.).
- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about the current Texas Administrative Code.
- Continue to send staff to relevant training offered by TEA and other entities for continuous improvements to the EPP and to stay in step with changes and updates in educator preparation requirements in TAC and TEC.
- Continue to participate in webinars provided by the Division of Educator Preparation to ensure that the program staff is knowledgeable about current requirements and changes in the Texas Administrative Code.
- Continue to maintain communication with the program specialist assigned to the program.
- Ensure that the TEA staff has the most current contact information by sending updates to the assigned program specialist.



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SUMMARY

Next Steps were created collaboratively with the American College of Education staff.

**“I have reviewed the EPP Report and agree that all required corrections will be made on
or before June 18, 2020.”**

_____ Signature of Legal Authority	_____ Date
_____ Printed Name of Legal Authority	_____ Date