Compliance Audit Report
2010-2011
University of Phoenix at San Antonio
Principal Preparation Post Approval Audit

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

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County-District Number: 015-705

Accreditation Status: Accredited-Not Rated

Texas Education Agency (TEA) Program Specialists Vanessa Alba and Dr. Mary Black conducted a Texas Education Agency one year post-approval compliance audit on July 19-21, 2011, in compliance with Texas Administrative Code (TAC) §228.10(c). The University of Phoenix at San Antonio's Principal Preparation Program was the focus of the visit.

Data Analysis:

Information concerning compliance with Texas Administrative Code governing educator preparation programs was collected by various quantitative and qualitative means for this audit. A review of the self-report submitted on June 21, 2011, documents, syllabi, and curriculum correlations charts provided evidence regarding compliance. In addition, electronic questionnaires were sent to the University of Phoenix at San Antonio's Principal Preparation Program participants by TEA staff prior to the visit in July 2011. A total of twenty-seven (27) out of eighty-one (81) responses to the questionnaires were received. The responses included eight (8) out of twelve (12) advisory committee members, two (2) out of one (1) field supervisors, nine (9) out of thirty-four (34) principal candidates, and eight (8) out of thirty-four (34) campus principal mentors. The reason that there were two (2) responses to the field supervisor questionnaire was because the field supervisor associated with the principal preparation program submitted the questionnaire two times. Qualitative methods of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence reviewed for this audit.

Background Information

The University of Phoenix submitted a proposal to offer principal certification in Texas to TEA in September, 2008. Marla La Rue, former Dean of the University of Phoenix College of Education signed assurances on page 5 of the proposal that the university would 1) comply with and implement all rules of the Texas Administrative Code; 2) send appropriate personnel to training for the Texas Accountability System for Educator Preparation (ASEP); 3) use the knowledge and skills identified by the standards and competencies of the State Board for Educator Certification in the curriculum; and 4) conduct on-going program evaluation for improvement. Based on the assurance provide to TEA staff, that proposal was approved by the State Board of Educator Certification (SBEC) on February 6, 2009.

TEA facilitated an interim meeting on January 25, 2011, prior to conducting a post-approval visit. The following people were in attendance: Dr. Michael Phillips, Regional Director for the San Antonio office; Dr. Sharon Michael-Chadwell, Campus College Chair, College of Education, San Antonio; Dr. Deborah Cross, Associate Director of Academic Affairs; Dr. Sandra McCarty, Regional Assistant Dean, College of Education; Dr. Jackie Mangieri, Regional Assistant Dean, College of Education; Vanessa Alba, TEA Program Specialist; and Sandra Nix, TEA Program Specialist. Janice Lopez, Director of Educator Standards, and Tabita Gutierrez, Director of Certification, welcomed the University of Phoenix staff and responded to questions from the program staff. The purpose of the meeting was to review all five components, based on the first self-report which was submitted on January 11, 2011. TEA program specialists stated that they would conduct a post-approval visit with the University of Phoenix at San Antonio in the spring of 2011. Each member present received a copy of the "Rubric for Programs with Online/Hybrid Programs" and a copy of the "Principal Audit Rubric" to follow as each component was discussed.

Currently, the University of Phoenix at San Antonio offers a Master of Arts in Education with a principal certification. At the time of the interim visit to TEA, the principal certification program had four (4) candidates, who were either just beginning or were in the middle of their coursework. During the one year post-approval visit it was determined that there are three (3) "on-ground" principal candidates and fifty-six (56) "on-line" principal candidates. It was also determined that there are a total of fifty-nine (59) candidates currently in the principal preparation program.

In the first self report, it was stated and the program confirmed that during the 2009-2010 academic year a total of fifty-two (52) candidates were admitted, one hundred thirty-three (133) candidates enrolled, and there were no finishers. These data conflicted with the data that the TEA program specialists shared for the 2009-2010 academic years: thirty-six (36) candidates were admitted, thirty-six (36) candidates retained, and there were no finishers. The staff of the University of Phoenix at San Antonio stated that they had a different understanding of the definitions of admitted, retained, and completed. For that reason, they have hired a person to work specifically with their Accountability System for Educator Preparation (ASEP) data within the Educator Certification Online System (ECOS).

July 19-21, 2011 Post-Approval Compliance Audit

Opening and Closing Sessions:

The opening session on July 19, 2011, was attended by twenty-two (22) people. The following University of Phoenix staff were at the opening session: Dr. Meredith Curley, Dean, College of Education; Dr. Sandra McCarty, Regional Associate Dean, College of Education; Dr. Deborah Cross, Director of Academic Affairs; Jeanie Murphy, Director of Academic Affairs; Dr. Sharon Michael-Chadwell, Campus College Chair; Dr. Charity Jennings, Online Campus College Chair; Kathy Cook, Curriculum Director; Jayme Cross, Credentialing Analyst; Becky Loedwick, Regional Director of Academic Affairs; among others. The following advisory committee members were present at the opening session: Fernando Mesa, Dean of San Antonio School of Excellence; Mark Gottsberger, Director of Hallmark College; Thomas Seaberry, Garland ISD secondary special education teacher; Beth Nesbeth, Region VI Education Service Center (ESC); Buddy Echols, Executive Director, Region X ESC; and Cynthia Kennedy, East Central ISD Middle School Teacher.

During the opening session on July 19, TEA program specialists offered to train members of the advisory committee in their TAC mandated duties and responsibilities. This offer was declined by Dr. Curley. TEA program specialists left the advisory committee training presentation for Dr. Michael-Chadwell's future use. Dr. Curley presented a PowerPoint overview of the University of Phoenix program including information specific to Texas and San Antonio.

A debriefing session, conducted by TEA program specialists, was held at the end of the second day of the one year post-approval compliance audit. It was attended by twelve (12) people. The following University of Phoenix at San Antonio staff were present: Dr. Meredith Curley; Dr. Sandra McCarty; Dr. Deborah Cross; Jeanie Murphy; Dr. Sharon Michael-Chadwell; Dr. Charity Jennings; Kathy Cook; Jayme Cross; Becky Loedwick; Rachel Williams, Curriculum Director; Melinda Chiodi, Online Field Placement Manager; and Wally Hedgecock, Vice-President and Director of the University of Phoenix San Antonio Campus. The purpose of the debriefing session was for the TEA program specialists to provide information regarding Texas Administrative Code and noncompliance findings. The University of Phoenix at San Antonio staff was given an opportunity to provide additional evidence.

The closing session was held on July 21, 2011. The following six (6) people were in attendance: Dr. Meredith Curley; Dr. Sandra McCarty; Dr. Sharon Michael-Chadwell; Jeanie Murphy; Becky Loedwick; and Michael Phillips.

The following report contains the findings and recommendations for improvement of the principal preparation program.

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

Findings:

Component I concerns governance of an educator preparation program as prescribed by TAC §228.20.

Support was indicated per TAC §228.20(c) by the governing body of the University of Phoenix at San Antonio as evidenced by Dean Curley, Dr. McCarty, and Dr. Chadwell's participation in all aspects of the compliance audit as it pertained to the principal preparation program. Additionally, the university demonstrated support for the principal preparation program in Texas by including seven people from the Arizona headquarters in the compliance audit. The facilities for face-to-face classes in San Antonio are adequate, and only used for three (3) principal preparation candidates due to low enrollment. The remainder of the principal preparation candidates is enrolled in the online certification program. The online infrastructure observed by TEA program specialists during this visit was inadequate. There were insufficient online record-keeping and curriculum delivery systems which demonstrated a lack of support for the program by the governing body and the chief operating officer of the Texas educator preparation program per TAC §228.20(c).

At the time of the program's interim visit to TEA, membership in the program's advisory committee consisted of nine members. TEA program specialists recommended that the advisory committee be expanded to include more members and specifically more members that are not directly affiliated with the University of Phoenix at San Antonio to ensure a balanced group of representatives per TAC §228.20(b). It is important to note that the original proposal submitted in September 2008 states on page 8 that the local advisory board will include individuals from the community: "P-12 classroom teachers and administrators from public or private schools, personnel director of a school district, school district superintendent or designee, etc." The University of Phoenix was responsive to the advisory committee recommendations made during the interim visit. It was reported in the self report, submitted on June 21, 2011, that there are currently twelve (12) members on the advisory committee. The membership now includes four (4) representatives from public/private school; three (3) members from regional education service centers; three (3) members from institutions of higher education; and two (2) members from business and community.

The advisory committee has met three times during the 2010-2011 academic year. This was verified in the electronic document review and in the advisory committee questionnaire, where one hundred percent (100%) of the respondents reported that they had met two or more times per year. Electronic advisory committee agendas, minutes, and sign-in sheets were provided for the meetings. Topics discussed at the January 13, 2011 meeting included: TEA Annual Reporting per Texas Education Code 21.045 and TAC §229; the small number of candidates in University of Phoenix overall program; pilot year principal survey data; tuition costs for the program; marketing challenges; advisory committee expectations in Texas; and changes to the by-laws. Topics discussed at the February 16, 2011 meeting included: TEA rubrics that are used to determine whether or not the University of Phoenix at San Antonio is in compliance with

TAC; changes that would be necessary to ensure complete compliance with TAC; and recommendations made by TEA to bring the University of Phoenix at San Antonio into full compliance; the format for future advisory committee meetings, which will include one formal face-to-face meeting, one teleconference, newsletter updates, and a requirement of two meetings from September 1–August 31 of each academic year. Topics discussed at the June 24, 2011 teleconference meeting included: the upcoming TEA visit; the five components of the compliance audit; expansion of advisory committee; issues facing the University of Phoenix at San Antonio College of Education; and the questionnaires that were sent out to stakeholders, specifically the University of Phoenix at San Antonio staff's inability to answer the questions on their questionnaire. As a result of the last advisory committee, it was decided until further notice, enrollment in the Texas certification programs has been suspended. After reviewing the minutes, during a debrief on the second day of the visit, TEA program specialists recommended to Dean Curley that she submit a letter to Dr. Janice Lopez, Director of Educator Certification, Standards, and Fingerprinting, stating that the University of Phoenix at San Antonio has suspended enrollment for Texas candidates.

As previously stated in this report, TEA program specialists offered to train members of the advisory committee. Dean Curley declined that offer and Dr. Michael-Chadwell provided that training once the TEA program specialists left to conduct the remainder of the compliance audit. TEA program specialists left the advisory committee PowerPoint presentation for Dr. Michael-Chadwell's future use. TEA program specialists later stated that the purpose for offering to provide that training was because new members had been added and a concern was addressed and noted in advisory committee meeting minutes that members did not know how to respond to the questionnaires. It is also important to note that a total of fifty percent (50%) of respondents to the advisory committee questionnaire reported that they had served on the advisory committee for three years or less. Of that fifty percent (50%), thirty-seven point five percent (37.5%) have served on the advisory committee for less than six months. Based on the evidence presented, it was unclear to TEA program specialists whether or not the advisory committee understands their roles and responsibilities as required per TAC §228.20(b).

At the time of the interim visit to TEA, the staff of the University of Phoenix at San Antonio stated that there was no documentation or evidence of on-going and relevant field-based experiences as determined by the advisory committee per TAC §228.35(d). At that time, TEA program specialists provided information on how to document and suggested that a template for items that must be covered at each meeting be the format for writing agendas for meetings. During the one-year post approval audit, even though the advisory committee had met twice since the interim visit to TEA, there was no evidence that the advisory committee determines on-going & relevant field-based experiences as required per TAC §228.35(d) and specified in TAC §228.20. TEA program specialists provided Dr. Michael-Chadwell with a recommended template for beginning and end of year advisory committee meetings items as talking points for discussion during meetings.

Currently the University of Phoenix at San Antonio does not have any expansion sites per TAC §228.20(d), but there was a concern about where candidates are calling their "home campus". This was discussed during the interim visit by TEA program specialists and both Dr. Lopez and Tabita Gutierrez. At that time, TEA was assured that the University of Phoenix at San Antonio would have a systematic process is in place so that all candidates enrolled in the University of

Phoenix at San Antonio #015705 know that it is their "home campus". During the one-year post approval audit ASEP and ECOS training was provided to Jayme Cross. Specifically, Ms. Cross was shown how to locate candidates in the database and how to remove them from the database if they were not University of Phoenix at San Antonio candidates. Three candidates in the principal preparation program had applied for certification in Texas, but were not candidates in the University of Phoenix at San Antonio principal preparation program. It was determined that one of those candidates was a University of Phoenix candidate, but not in Texas. That candidate was removed from the database by Ms. Cross. Ms. Cross stated that she would verify whether or not the other two candidates were part of the University of Phoenix at San Antonio principal preparation program before deleting them from the database. It became evident to TEA program specialists that the "home campus" issue that was discussed during the interim visit had not been rectified at the time of the one year post-approval compliance audit.

Because of 1) lack of evidence that the advisory committee understands their roles and responsibilities; 2) lack of evidence that the advisory committee discusses or approves of field-based experiences; and 3) insufficient support for the principal preparation program by the university as demonstrated by inadequate computer infrastructure, the University of Phoenix at San Antonio is not in compliance with TAC §228.20.

Based on the evidence presented, University of Phoenix at San Antonio is not in compliance with Texas Administrative Code (TAC) §228.20 – GOVERNANCE OF EDUCATOR PREPARATION PROGRAMS.

COMPONENT II: ADMISSION CRITERIA - Texas Administrative Code (TAC) §227.10 AND TAC §241.5 – PRINCIPAL PREPARATION PROGRAM ADMISSION CRITERIA

Findings:

Component II concerns admission criteria into the principal preparation program as prescribed by TAC §227.10 and TAC §241.5. As reported in the self-report, in order to be admitted into the University of Phoenix at San Antonio's principal preparation program, an applicant must have a four year degree from an accredited institution of higher education, a minimum grade point average (GPA) of two point five (2.5), a completed application, and a successful background check.

There were a total of fifty-nine (59) candidates in the principal preparation program during the 2010-2011 academic year. They included three (3) "on ground" or face-to-face candidates and fifty-six (56) "online" candidates. This information contradicted information that was provided by the university in a spreadsheet showing candidates admitted into the principal preparation program during the 2010-2011 academic year. That spreadsheet listed a total of thirty-nine (39) candidates and did not distinguish between "on ground" and "online" candidates.

A total of seven electronic applicant files were reviewed to check for compliance with TAC §227.10 and TAC §241.5 admissions requirements. The files reviewed included three (3) files for applicants who it was determined are not a part of the University of Phoenix at San Antonio principal preparation program, three (3) files for applicants who were admitted to the "on ground" program in San Antonio, and one file for an applicant who was admitted to the "online program. It is important to note that to review the electronic applicant files required a total of three (3) University of Phoenix at San Antonio staff members two point five (2.5) hours to retrieve the data from the online system because there was not a single person who had full access to the online files or knew who the candidates are in the principal preparation program. All of the electronic files reviewed contained a transcript showing a baccalaureate degree conferred from an institution of higher education and met the requirements of TAC §227.10(2) and TAC §241.5(a). All of the applicant files reviewed contained evidence that applicants had a cumulative GPA of two point five (2.5) or above and met the minimum GPA requirements per TAC §227.10(3)(A). All of the files reviewed contained an electronic application that was signed electronically by the applicant and met the application requirements of TAC §227.10(6).

At the time of the University of Phoenix at San Antonio's interim visit to TEA, it was noted that the program did not conduct candidate interviews or use other screening instrument to determine a candidate's appropriateness for the certification sought per TAC §227.10(6). The program directors clarified that they do utilize a "Dispositions Course" and rubric that is applied to that course to determine whether or not a potential candidate has the appropriate disposition for the position they are seeking. The TEA program specialists clarified that the course would not be an acceptable method for an interview or screening process because it occurs after a candidate is already admitted into the program. The program directors assured the program specialists that an interview or other screening instrument would be created or identified and systematically used per TAC §227.10(6) and TAC §241.5(c). During the one year post-approval compliance audit, none of the applicant files contained evidence of an interview or other screening instrument to determine the educator preparation candidates appropriateness for the certification sought per TAC §227.10(6) and §241.5(c). Dean Curley stated that this was an aspect of the admissions criteria that was in process of being developed as a result of the interim visit to TEA, but that the process was not yet complete. The University of Phoenix at San Antonio shall require principal applicants to demonstrate oral communications via an interview per TAC §227.10(5-6). In addition, the University of Phoenix at San Antonio should consider utilizing the "Principal Dispositions Course" criteria and associated rubric as a part of the University of Phoenix oral admissions requirement as well as a benchmark in the Internship II course. Dean Curley and Dr. Sandra McCarty both stated that the "Principal Dispositions Course" was originally meant to be a part of the admissions criteria, but was moved from an admission requirement for the principal preparation program to a point later in the sequence of courses in order to fulfill National Council for Accreditation of Teacher Education (NCATE) requirements. The University of Phoenix at San Antonio shall adhere to the TEA expected requirements per TAC in order to comply with the proposal that was approved by the State Board of Educator Certification (SBEC) on February 6, 2009.

Since the University of Phoenix at San Antonio uses the Test of English as a Foreign Language (TOEFL) to determine oral communications skills for applicants who have indicated that they speak a foreign language or that they are from out-of-country, the TEA program specialists stated that during the compliance audit they would request to see those candidates' files. During

the compliance audit, the TEA program specialists requested to review files for out-of-country applicants. It was noted that University of Phoenix at San Antonio does not admit any candidates who speak a foreign language and therefore, does not utilize the TOEFL. This is inconsistent with the initial proposal that was submitted and approved by the SBEC. The initial proposal states on page 11 that "…applicants who completed high school/secondary school outside of the United States, in a country where English is not the official language, must meet the English Language Proficiency Requirement." It is also inconsistent with the current admissions handbook policy which states as one of its admissions requirements that "…Only students who reside within the United States and its territories are eligible to enroll into a UOPX bachelor or master of education program." The University of Phoenix at San Antonio program staff needs to review its principal preparation program proposal and adhere to the TEA expected requirements per TAC in order to comply with the proposal that was approved by the State Board of Educator Certification (SBEC) on February 6, 2009.

All University of Phoenix at San Antonio applicants are required to electronically sign an "Enrollment/Disclosure Agreement". All principal preparation program applicant files contained an enrollment/disclosure signature. The "Enrollment/Disclosure Agreement" meets the requirements of TAC §227.10(7), any other academic criteria for admission that are published and applied consistently.

Admissions requirements are published online, in the Admissions Handbook, and in television commercials that recruit for principal applicants in Texas. However, the TEA program specialists review of the University of Phoenix website prior to the visit found that it was difficult to access the Texas requirements for admission. Specifically, in order to access admission requirements, potential applicants must go to the website, locate "Academics" from the tabs at that top of the toolbar, and then click on "Admission Requirements". From that point, an individual must then enter a zip code, an area of interest (such as education), and then determine either Ground Campus or Learning Format as an option prior to clicking "continue" to proceed to the next step. At that point, a potential applicant is required to complete general contact information in order to request application information. As an alternative, potential applicants can dial a toll free telephone number. Program specialists were not able to actually review the website admissions requirements for Texas. It is recommended that the University of Phoenix at San Antonio make Texas admissions requirements easily accessible on the University of Phoenix website to ensure that Texas applicants for the Texas principal preparation program receive correct admissions criteria. During the interim visit to TEA, it was noted that candidates were uncertain about which of the University of Phoenix locations is their "home campus". This was discussed by TEA program specialists and both Dr. Lopez and Tabita Gutierrez. At that time, it was determined that the University of Phoenix at San Antonio would ensure that a systematic process is in place so that all candidates enrolled in the University of Phoenix at San Antonio #015705 know that it is their "home campus". At the time of the compliance audit, the admissions process had not rectified that issue.

The University of Phoenix at San Antonio staff stated at the time of the interim visit to TEA, that all applicant and candidate records are maintained electronically. For that reason, the TEA program specialists stated that they would require that someone from the university work with them as electronic files are reviewed to ensure data verification. During the compliance audit, there were three (3) University of Phoenix at San Antonio staff members who participated in the

electronic folder review: Charity Jennings; Jayme Cross; and Sharon Michael-Chadwell. Because the folder review process required so many staff members to locate applicant information and to determine exactly who is a part of the University of Phoenix at San Antonio principal preparation program, TEA program specialists recommended that Dean Curley and Dr. McCarty ensure that at least one University of Phoenix at San Antonio staff member in Texas be able to track all Texas principal candidates from admissions to completion of program and issuance of standard certification.

The University of Phoenix at San Antonio is not in compliance with TAC §227.10 and TAC §241.5 because of 1) lack of an admission's interview; 2) lack of any other admission's screening instrument for educator certification; and 3) limited access to the published admission criteria for Texas applicants on the website.

Based on the evidence presented, University of Phoenix at San Antonio is not in compliance with Texas Administrative Code (TAC) §227.10 and TAC §241.5 – Principal Preparation Program Admission Criteria.

COMPONENT III: CURRICULUM - Texas Administrative Code (TAC) §241.15 - EDUCATOR PREPARATION CURRICULUM / STANDARDS FOR THE PRINCIPAL CERTIFICATE

Findings:

Component III concerns the state mandated curriculum for principal preparation, as found in TAC §241.15. Mrs. Kathy Cook, University of Phoenix Curriculum Director, was assigned to the TEA program specialists to review the online curriculum for the principal preparation program and Dr. Sharon Michael-Chadwell, University of Phoenix at San Antonio College Campus Chair, was assigned to TEA program specialists to review the face-to-face curriculum. It is important to note that since there has not been a candidate in the principal preparation program who has completed the program's curriculum requirements, not all of the online coursework has been completely developed. This was first discovered during a review of curriculum prior to the one year post-approval audit and then confirmed by Mrs. Cook at the time of the compliance audit.

The coursework for Texas is also the sequence of coursework for ten (10) other states. As a result, the syllabi that were provided were generic and not focused on the Texas standards and competencies specified in TAC §228.30(a) or TAC §241.15. The University of Phoenix at San Antonio staff needs to implement a curriculum plan that includes a specific focus on Texas Standards which includes depth and complexity for Texas candidates. Specific areas of depth and complexity of standards that were discussed with Ms. Cook and Dr. Michael-Chadwell included using Academic Excellence Indicator System (AEIS) data analysis instead of the "Kelsey Unified Virtual USA data" that was provided in one of the syllabi, as well as ensuring that principal candidates received Instructional Leadership Development (ILD) and Professional Development and Appraisal System (PDAS) training which is required for principals in Texas.

At the time of the interim visit to TEA, the University of Phoenix at San Antonio curriculum was not reviewed. However, since it was stated in the first self-report that more than fifty percent (50%) of the curriculum is provided online, TEA program specialists stated that they would require access to the online portion of the curriculum prior to the one year post-approval compliance audit. TEA program specialists also reviewed the rubric for programs with online/hybrid curriculum with the University of Phoenix at San Antonio staff. It is important to note that prior to the one year post-approval visit, TEA program specialists requested and were not granted access to the curriculum as required in policy for programs that indicate that more than fifty percent (50%) of their curriculum is online. Dr. Lopez called the University of Phoenix at San Antonio and spoke with Dr. Michael Phillips to request access to the online portion of the curriculum. TEA program specialists were only granted access to the course syllabi prior to the visit. It is important to note that TEA program specialists were granted access and were able to log in to the University of Phoenix secure website to view only generic items that were available to all candidates taking online coursework. This became evident after the TEA program specialists' search for specific courses specified for Texas principal certification only to find coursework aligned with "Oregon's Plan for the 21st Century" in EDA 525.

The commonality among coursework leading to the principal certification includes individual and learning team assignments, candidate written assignments, portfolio creation, and project completion. All courses are assigned recommended weekly point values based on assignments, portfolios, discussion questions, assessments, and participation. This was verified in course syllabi, the self-report for the principal preparation program, and the questionnaires. Principal candidates responded to their questionnaire that their knowledge and skills were assessed in the following ways: essays, projects, and presentations (100%); chapter module tests, mid-terms, and final exams (12.5%); and candidates responded that "…all work that is done is hands-on" (25%).

EDA 500: Orientation to Administration is the first course in the sequence of coursework that candidates in the principal preparation program must complete. It is a one week course for which candidates receive no credit. There was no syllabus for this course and Mrs. Cook explained that this was just an introductory course.

The second course in the sequence is COM 516 (Version 3): Professional Communications. According to the syllabus, the course is aligned with TAC §241.15(e), Learner-Centered Communications and Community Relations. Course topics and objectives are stated for each of the three weeks of the course. All course materials are available electronically and include one supplemental resource. Candidates are assigned point values for individual and learning team assignments. Learning team assignments include group projects, papers, and presentations. The total point value assigned to the course is one hundred (100) points.

The third course in the sequence and the first course that was reviewed with Mrs. Cook was EDA 518 (Version 3): Leadership and Collaborative Processes. According to Mrs. Cook, this is the "first administrative content course and requires a higher level of prior knowledge." This course is a six week course that covers four of the standards in TAC §241.15(b-f): Learner-Centered Values and Ethics of Leadership; Learner-Centered Leadership and Campus Culture; Learner-Centered Communications and Community Relations; and Learner-Centered Organizational Leadership and Management. What is important to note about this course is that one of the individual assignments that is required of candidates in this course is a "Data Driven

Communication Plan". Candidates are required to read a one paragraph scenario and an abbreviated data chart prior to responding to a series of questions in a 700-1050-word paper. It is also important to note about this particular course is that when the TEA program specialists asked Mrs. Cook about how the University of Phoenix at San Antonio's curriculum addresses data specific to Texas, such as Academic Excellence Indicator System (AEIS) and Texas Assessment of Knowledge and Skills (TAKS) data, Mrs. Cook responded that she could not address content that was specific to Texas because she was not familiar with Texas standards or assessments related to principal preparation. Mrs. Cook did share a virtual school that is used with candidates in the online course. The "Kelsey Unified School District Virtual School" is a mock school environment for elementary, middle, and high school teachers and students. Principal candidates utilize the individual student, teacher's classroom, and campus grade level standardized test scores. The teacher data that was provided included teacher profiles, communications between teachers and parents, lesson plans, teacher growth plans, and formative/summative evaluations. TEA program specialists stated that the data contained for this school district was generic in nature and not geared toward the type of data that a principal in Texas would be required to analyze, such as AEIS data, PDAS appraisals, Teacher in Need of Assistance (TINA) growth plans, among others. Mrs. Cook stated that a focus on Texas would strengthen the online coursework.

EDD 567: Introduction to Action Research: Data driven decision-making is a course that was in the original proposal that was approved by the State Board for Educator Certification (SBEC); however a syllabus for this course was not provided. It is important to note that in addition to EDD 567, EDA 565: (Version 2): School Improvement Processes has also not yet been developed in Texas. When TEA program specialists asked Mrs. Cook how K-12 assessments specific to Texas would be addressed, she responded that she did not know.

Two courses, EDL 531 (Version 2): Coaching and Mentoring and EDL 505 (Version 2): Cultural Competency were courses that were not addressed in the curriculum alignment chart that was submitted prior to the visit. When the TEA program specialists inquired as to why these courses were not addressed in the alignment charts, Mrs. Cook explained that it was because they are elective courses and not required of all candidates.

One course syllabus, EDL 505 (Version 2): Cultural Competency contained the following in the section for State Standards: "In your course syllabus, insert your state's teacher preparation standards or administrator preparation standards that align to this course. You will find the link to the Teaching Standards Alignment Documents on the course Materials page." TEA program specialists inquired about this to Mrs. Cook. Her response was that the course is an elective course that is used in other states and not required in Texas. TEA expressed the fact that this course and all others required that the instructor insert state specific standards as a concern because there was a lack of monitoring by the University of Phoenix at San Antonio to ensure that the Texas standards and competencies required per TAC § 228.30(b) and TAC §241.15 are being appropriately addressed. Mrs. Cook stated that she agreed with how this could be a concern.

Additional questions that were posed to Mrs. Cook included the following: How does the University of Phoenix at San Antonio address teacher appraisals for beginning administrators specific to Texas, such as PDAS and ILD?; and How does the University of Phoenix at San Antonio address K-12 assessments for administrators specific to Texas? She stated that she did

not know since she was not familiar with Texas standards and requirements. The TEA program specialists requested that someone familiar with the Texas curriculum for principal preparation address the curriculum. On that day and during the entire time of the three day one year post-approval compliance audit, the principal program curriculum specific to Texas was not clarified or addressed by the University of Phoenix at San Antonio.

In September of 2008, Marla LaRue, former Dean of the College of Education, electronically signed (on page 5) and submitted the program assurances for the University of Phoenix at San Antonio's Master of Arts in Education Principal Preparation Program. One of those assurances was the entity understands the rules and expectations and agrees to comply with and implement all future revisions of the TAC related to educator preparation programs approved in Texas. Another program assurance that Dean Larue agreed to, that is correlated and directly related, is that the curriculum offered by the entity shall contribute to the advancement of professional knowledge and skills identified by the standards and competencies of the State Board of Educator Certification. The University of Phoenix at San Antonio is beginning to utilize the knowledge and skills in the development of the curriculum and coursework for the principal preparation program, but not to the depth and complexity required per TAC §241.15.

The University of Phoenix at San Antonio principal preparation program is not in compliance with TAC §241.15 concerning curriculum that must be based on Texas standards.

Based on the evidence presented, University of Phoenix at San Antonio is not in compliance with Texas Administrative Code (TAC) §241.15 – EDUCATOR PREPARATION CURRICULUM / STANDARDS FOR THE PRINCIPAL CERTIFICATE.

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

Findings:

Component IV concerns program hours, delivery, field-based experiences, and the principal practicum. Currently, University of Phoenix at San Antonio principal preparation curriculum is delivered in a face-to-face format to three (3) candidates and in an online modality to fifty-six (56) candidates. Two different versions of the program hours charts for coursework and training for the principal preparation program were provided prior to the one year post-approval compliance audit. On the last day of the visit, Dean Curley and Dr. McCarty were able to verify that the University of Phoenix at San Antonio provides a total of six hundred nineteen (619) clock hours of coursework and training. The total number of hours exceeds the requirement of 200 clock hours of coursework per TAC §228.35(b).

The evidence that the University of Phoenix at San Antonio staff provided to assure TEA program specialists that principal candidates had been assigned a trained mentor was a spreadsheet that contained a list of candidates in both the principal and initial teacher preparation programs. The Administrative Internship Handbook states on page 4 that

"…mentors are trained in the use of evaluation instruments and standard observation, feedback, and coaching strategies to assist interns in developing leadership and management skills." Two of the candidates on the list were identified as principal candidates in the "on ground" principal preparation program and their mentor principals were listed along with dates for conference call training and a completed training site visit. The principal mentor names on the spreadsheet corresponded to the names on the mid-term evaluation conducted by the mentor principal. It was reported in the self-report that principal mentors receive yearly scientifically-based training on how to effectively work with principal candidates that is provided in an online format by the University of Phoenix at San Antonio. It was also reported in the self-report that the University of Phoenix at San Antonio documents mentor training with attendance logs and through orientations and workshops. Only three of the eight respondents to the principal mentor questionnaire responded to the question that addressed mentor training and their responses were equally distributed among school district provided training (33.3%), University of Phoenix at San Antonio provided training (33.3%), and Education Service Center provided training (33.3%). The documentation that was provided shows that one mentor principal received training on February 11, 2011, and the other did not receive training. A systematic method for training all mentor principals shall be developed and implemented to ensure future compliance with TAC §228.35(e).

There is currently only one field supervisor assigned to work with the University of Phoenix principal preparation candidates. There was no evidence provided that the field supervisor had received training. The University of Phoenix at San Antonio staff stated at the time of the post-approval compliance audit that the current field supervisor is developing training for future field supervisors. The initial contact between the field supervisor and the two principal candidates occurred five months after the start date of EDA 591 A: Internship I and does not meet the requirements of TAC §228.35(f).

Candidates in the University of Phoenix at San Antonio principal program are required to complete their internship in three courses: EDA 591 A (Version 3) Principal Internship Part I: Instructional Leadership; EDA 591B (Version 3) Principal Internship Part II: Organizational Management; and EDA 591C (Version 4) Principal Internship Part III: Professional Perspectives and Reflective Practice. The total hours for the internship, as provided by the University of Phoenix at San Antonio, is 240 clock hours and is completed during the principal candidates' time before the school day, during planning periods, and after school. The course syllabi show that the internship courses are completed in three blocks of three weeks each for a total of ninety (90) clock hours. This differs from the clock hours Dr. Michael-Chadwell stated as being three seminars of 8 weeks each at 10 hours per week for a total of 80 hours per seminar and an overall total of 240 clock hours. Since there is a discrepancy in the total clock hours provided during the internship and there has not been a candidate who has completed all aspects of the program in order for program specialists to verify the total number of clock hours for the internship, the University of Phoenix at San Antonio is not in compliance with 160 clock hours of practicum per TAC §228.35(d)(3). The University of Phoenix at San Antonio shall implement a practicum for all candidates that is a minimum of 160 clock hours per TAC §228.35(d)(3).

In the self-report that was submitted by the University of Phoenix at San Antonio's staff for the interim visit to TEA, it stated that the program requires that field supervisors make initial contact with candidates within the first three weeks of assignment and that they conduct two (2) formal forty-five (45) minute observations. It is prescribed in TAC §228.35(f) that the first contact

occurs within the first three weeks of assignment and that the field supervisor conduct three (3) forty-five minute formal observations. The program staff misunderstood the requirement and believed that the first contact was part of the three observations. This was clarified by TEA program specialists. It is stated in the self-report that the formal observations are documented on the observation instrument, in field supervisor contact logs, and are signed by both the candidate and the field supervisor. The program staff did request assistance in how to document program contact during the first three weeks of the candidate's assignment. Since all records are kept electronically, it was suggested that this documentation also be maintained electronically as well as documented on the field supervisor contact log. The University of Phoenix at San Antonio submitted a self-report for the one year post-approval visit that stated a "minimum of two formal observations are required." Each of the two principal candidates reviewed have only received one formal evaluation by the field supervisor. There was no observation start or end time noted on the evaluations, there were no documented instructional practices observed, and there was no evidence of written feedback provided to the principal candidates. Campus principal interns, principal mentors, and the field supervisor did sign the "University Supervisor/Mentor Meeting Log" and there was a date/start/end time associated with that meeting for one candidate. There was only a date of the meeting for the other candidate. The format for the log was consistent in the following areas: date/time/length of meeting; participants in meeting; topics discussed; and action items/areas for development. The University of Phoenix at San Antonio is responsible for ensuring (by documenting) that initial contact between field supervisor and principal candidate occurs within the first 3 weeks of assignment per TAC §228.35(f). The university shall provide a minimum of three formal observations that are forty-five (45) minutes in duration and followed by a post-observation conference during the practicum per TAC §228.35(f). Finally, the university shall ensure that the formal observations are focused on TAC §241.15 standards/competencies.

At the time of the interim visit to TEA, the University of Phoenix at San Antonio did not provide a copy of the written feedback from observations to the campus principal as prescribed in TAC §228.35(f). The program staff was not aware of the new TAC rule. The rule was clarified for program staff and methods for documenting that written feedback was provided to the campus principal were discussed. The program staff stated that they would add a column to their field supervisor log and begin using the column as evidence that this requirement has been met. During the one-year post-approval compliance audit, it was not evident to TEA program specialists that this had been accomplished. The University of Phoenix at San Antonio shall document that the campus principal (mentor) receives a copy of the written observation & feedback per §228.35(f). TEA program specialists could not determine whether or not informal observations and coaching are provided per TAC §228.35(f) because no evidence was provided.

The University of Phoenix at San Antonio is not in compliance with TAC §228.35 because 1) it was not able to be determined if the practicum met the TAC requirement of 160 clock hours; 2) there was limited evidence provided that principal mentors received training; 3) there was no evidence provided that the field supervisors received training; 3) there was a lack of evidence supporting that the initial contact between the field supervisor and the intern occurs within the first three weeks of the practicum; 4) there was a lack of three observations that are at least forty-five (45) minutes in duration, with the first occurring within the first six (6) weeks of assignment; 4) there was unverifiable documentation that the field supervisors has documented

instructional practices observed or provided written feedback through an interactive conference with the principal candidate; 5) there was no documentation that the campus principal had received a copy of the written feedback; and 6) there was no evidence provided that informal observations and coaching has been provided by the field supervisor as appropriate.

Based on the evidence presented, University of Phoenix at San Antonio is not in compliance with Texas Administrative Code (TAC) §228.35 – PRINCIPAL PREPARATION PROGRAM COURSEWORK AND/OR TRAINING.

COMPONENT V: PROGRAM EVALUATION - Texas Administrative Code (TAC) §228.40 and TAC §241.20 - ASSESSMENT AND EVALUATION OF PRINCIPAL CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT

Findings:

Component V concerns 1) benchmarks for candidate progress throughout the principal preparation program; 2) determining the readiness of candidates to test; 3) overall evaluation of curriculum and general program improvement; and 4) record retention.

The original self-report that was submitted for the interim visit to TEA states that candidates' progress toward program completion is monitored by the Center for Field Placement and supported through field experiences and assignment activities by faculty and staff to be in compliance with TAC §228.40(a)(b). The type of documentation that would be required during the actual one year post approval compliance audit to support this was reviewed and discussed. That documentation included Educational Testing Service (ETS) data that showed passing scores by overall score and disaggregated by domains for both the paper-based and computer assisted tests for the 2009-2010 administration years. It was also communicated to the program staff that this is one type of data that can be utilized to determine candidates' progress toward program completion. The program staff was provided with a hard copy of their ETS data comparison by program and state for both the paper-based and computer assisted tests for candidates in the initial certification program. It is important to note that at the time of the interim visit to TEA, there was no testing data to evaluate for candidates in the principal preparation program because there were not any candidates who had been approved to take a principal TExES exam.

The benchmarks and structured assessments that the University of Phoenix at San Antonio has established to monitor candidates' progress throughout the principal preparation program are embedded within the sequence of courses that lead to principal certification. EDA 524 (Version 1): Supervision of Curriculum and Assessment contains an embedded benchmark assignment that includes a required written report on a professional development topic that is related to curricular, instruction, and/or assessment issues. That report has a specific set of criteria that must be addressed and has an associated rubric for evaluation of the report. EDA 535 (Version 2): Business and Facilities Management contains a benchmark assignment that includes a school walk-around and the development of a facilities improvement plan. That assignment contains a rubric for evaluation. EDA 565 (Version 2): School Improvement Processes

benchmark assignment and associated rubric for evaluation of the assignment requires candidates to plan, organize, monitor, and evaluate a school improvement plan that addresses areas of weaknesses reflected in the school's annual standardized test scores. EDA 570 (Version 2): Equity, Diversity, and Access in Education course requires a diversity report. That report is evaluated based on a rubric. EDA 575 (Version 2): Family, Community, and Media Relations contains a benchmark assignment where candidates are required to develop an outreach program to increase parent and community involvement in their school and include a brief analysis of the success or strength of these partnerships. The assignment contains a rubric by which it is evaluated. Candidates are required to score a "B" or better on each of the benchmark assignments in order to progress to the next course in the sequence. Additionally, each of the courses in the principal practicum serves as a benchmark for which the candidates must successfully progress in order to complete standard principal certification. Samples of syllabi and rubrics were provided as evidence of compliance with TAC §228.40(a). The University of Phoenix at San Antonio shall strengthen principal benchmarks and structured assessments to focus on Texas standards & competencies.

There was limited evidence that a process is in place to determine candidates' readiness to take the appropriate certification assessment. The University of Phoenix at San Antonio has been approved since February 6, 2009 and to date there has not been one candidate who has taken the principal TExES exam. During the one year post-approval compliance audit, Jayme Cross was trained in how to approve candidates for test approval one time, rather than "approve candidates until manual removal". TEA program specialists also showed her how to analyze the testing data for individual candidates to ensure that program support is provided in the identified needed areas prior to approving candidates to take the certification assessment again. The University of Phoenix at San Antonio shall establish criteria to determine principal candidates' readiness to test per TAC §228.40(b). The University should also provide six clock hours of test preparation for the principal TExES exam as part of this determination of readiness to test. Because of the limited evidence provided, the University of Phoenix at San Antonio does not meet the requirements of TAC §228.40(b).

At the time of the one year post-approval compliance audit and to date, there has not been a principal candidate in the University of Phoenix at San Antonio's program in Texas who has been issued a Standard Principal Certificate. For that reason, it is important to note that during the review of candidate records the University of Phoenix at San Antonio staff did not produce actual documentation that candidates held a valid classroom teaching certificate. There was only a place to verify on the application that the candidate held a classroom teaching certificate. Additionally, it was not verifiable that all candidates had two years of creditable teaching experience as a classroom teacher per TAC §241.20(4). The University of Phoenix at San Antonio staff shall implement a system for verifying that candidates hold a valid classroom teaching certificate and that they have two years of creditable teaching experience prior to issuance of the Standard Principal Certificate per TAC §241.20(3) and TAC §241.20(4).

For the purposes of program improvement, the University of Phoenix at San Antonio staff provided a document entitled "Plan for Program and Course Evaluation". The plan consists of five parts which includes: an analysis of candidate assessment data, the identification of strengths and weaknesses indicated by the data, and possible reasons for the candidates' performance; a Faculty Council that analyzes the assessment data and program outcomes in

order to make recommendations for program improvement; data from each state's approval process which serves as an external evaluation; an annual Academic Quality Review (AQR); and a five year assessment plan that is scheduled by fiscal year with different phases each fiscal year depending on the program under review. There was no documentation of actual evidence pertaining to the plan for program improvement provided during the one year post-approval compliance audit. The University of Phoenix at San Antonio should utilize principal candidate TExES data, ETS testing data, future ASEP data, and the standards & associated competencies to evaluate the design & delivery of University of Phoenix at San Antonio's curriculum as it pertains to program evaluation. The University of Phoenix at San Antonio does not meet the requirements per TAC §228.40(c).

Program records are maintained electronically for each candidate and meet the requirements of TAC 228.40(d). During the candidate folder review for the one year post-approval compliance audit, it became evident that it was difficult for program staff to locate all of the required documentation for review by TEA program specialists. The University of Phoenix at San Antonio program staff should keep all electronic documentation for each candidate in a central electronic location.

Because of 1) limited evidence of a process in place to determine candidates' readiness to test; and 2) limited evidence of evaluation of curriculum and overall program effectiveness, the University of Phoenix at San Antonio is not in compliance with TAC §228.40.

Based on the evidence presented, University of Phoenix at San Antonio is not in compliance with Texas Administrative Code (TAC) §228.40 – ASSESSMENT AND EVALUATION OF PRINCIPAL CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT.

Senate Bill 174/Texas Administrative Code §229

Currently, University of Phoenix at San Antonio holds a status of "Accredited-Not Rated". There are not any TExES test results for the principal certification exam.

PROGRAM RECOMMENDATION

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

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

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

Governance of Educator Preparation Programs

- Provide evidence of on-going & relevant field-based experiences as determined by the advisory committee per TAC §228.35(d) as specified in TAC §228.20.

Admission Criteria

- Require principal applicants to demonstrate oral communication skills through an interview or other screening instrument per TAC §227.10(5-6).

Curriculum

- Ensure that the standards, competencies, knowledge and skills identified in TAC §241.15 are used in the development of curricula and coursework for the principal program.

Program Delivery & On-Going Support

- Implement a practicum that is a minimum of 160 clock hours per TAC §228.35(d)(3);

- Implement a systematic method for training all mentor principals to ensure future compliance with TAC §228.35(e);

- Ensure (by documentation) that initial contact between field supervisor and principal candidate occurs within the first three weeks of assignment per TAC §228.35(f);

- Provide a minimum of 3 formal observations that are forty-five (45) minutes in duration and followed by a post-observation conference during the practicum per TAC §228.35(f);

- Ensure that the formal observations during the practicum are focused on TAC §241.15 standards/competencies; and

- Ensure that the campus principal mentor receives a copy of the written observation & feedback per §228.35(f).

Assessment and Evaluation of Candidates for Certification and Program Improvement

- Ensure that a process is in place for principal candidates' readiness to test per TAC §228.40(b);

- Implement a system for verifying that candidates hold a valid classroom teaching certificate and that they have two years of creditable teaching experience prior to

issuance of the Standard Principal Certificate per TAC §241.20(3) and TAC §241.20(4); and

- Continuously evaluate the design and delivery of the University of Phoenix at San Antonio's curriculum based on performance data, scientifically-based research practices, and the results of internal & external assessments per TAC §228.40(c).

GENERAL RECOMMENDATIONS: No progress report is necessary.

- Utilize the suggested beginning and end of year advisory committee agendas that were provided to Sharon Michael-Chadwell, Campus College Chair;

- Ensure that the disconnect between University of Phoenix at San Antonio face-to-face candidates & online candidates is eliminated;

- Utilize the "Principal Dispositions" criteria & associated rubric as a part of the University of Phoenix at San Antonio oral admissions requirement as well as a benchmark in the Internship II course;

- Make Texas admissions requirements easily accessible on the University of Phoenix website;

- Implement a curriculum plan that includes a specific focus on Texas Standards for Texas candidates;

- Utilize the language of the state (Texas vocabulary) in the curriculum to ensure that University of Phoenix at San Antonio candidates for certification have the same advantages as other Texas candidates;

- Ensure that at least one University of Phoenix staff member in Texas is able to track all Texas principal candidates from admissions to completion of program and issuance of standard certification;

- Provide six hours of test preparation for the principal TExES exam to ensure that principal candidates are prepared to take appropriate certification exam;

- Utilize principal candidate TExES data, ETS testing data, future ASEP data, and the standards and associated competencies to evaluate the design & delivery of University of Phoenix at San Antonio's curriculum;

- Strengthen the University of Phoenix at San Antonio's principal benchmarks and structured assessments to focus on Texas standards & competencies;

- Keep all electronic documentation for each candidate in a central electronic location;

- Adhere to the TEA expected requirements per Texas Administrative Code in order to comply with the proposal that was approved by the State Board of Educator Certification (SBEC) in September, 2008;

- Submit a letter to the Director of Educator Certification, Standards, and Fingerprinting, stating that the University of Phoenix at San Antonio has stopped enrolling candidates;

- Participate in annual Deans & Directors Meeting;

- Follow the State Board of Education (SBOE) meetings, via live stream or by reading the minutes, to stay abreast of changes due to legislative mandates;

- Follow the State Board of Educator Certification (SBEC) meetings, via live stream or by reading the minutes, to stay abreast of changes in TAC;

- Ensure that staff members responsible for the University of Phoenix at San Antonio candidates have access to the Wiki in order to receive the most current information;

- Participate in Educator Certification, Standards, & Fingerprinting webinars;

- Read the Educator Standards Newsletters and share with appropriate University of Phoenix at San Antonio staff;

- Contact the program specialist assigned when you have questions about Texas Administrative Code (TAC) or any question that you may have regarding the University of Phoenix at San Antonio's preparation program; and

- Align program terminology with Texas Administrative Code terminology.