



## Post-Approval Compliance Audit Report 2012-2013 North American College Initial Teacher Certification Program

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

**Contact Information:** Halil I. Tas, Ed.D., Program Director

**County/District Number:** 101-725

**SBEC Approval Date:** June 17, 2011

Program Specialists, Vanessa Alba and Mixon Henry, conducted a Texas Education Agency Compliance Audit of North American College traditional undergraduate initial educator preparation program located at 3203 N. Sam Houston Parkway W., Houston, TX 77038 on November 8, 2012. The focus of the post-approval compliance audit was the initial teacher certification program and implementation of the new educator preparation program proposal approved by the State Board for Educator Certification (SBEC) including the following certificates: English Language Arts and Reading (Grades 8-12); Mathematics (Grades 8-12); Physical Science (Grades 8-12); Social Studies (Grades 8-12); and Technology Applications (Grades 8-12). The following are findings and recommendations for program improvement.

### **Scope of the Compliance Audit:**

The scope of this audit was restricted solely to compliance with Texas Administrative Code §227, §228, §229, and §230.

### **Data Analysis:**

Information concerning compliance with Texas Administrative Code (TAC) governing educator preparation programs was collected by various quantitative and qualitative methodologies. A self-report was submitted to the Texas Education Agency on October 10, 2012. The program staff re-submitted the original curriculum correlation charts from the original proposal on August 17, 2012, since there have been no changes to the program since the pre-approval audit. An

on-site review of documents, candidate records, course material, online courses, and curriculum correlations charts provided evidence regarding compliance. In addition, a total of twenty-two (22) electronic questionnaires were sent to North American College initial teacher educator preparation program stakeholders. A total of six (6) out of the twenty-two (22) electronic responses were received (27%) as follows: One (1) out of eight (8) advisory committee members (12.5%); three (3) out of twelve (12) student teachers (25%); and two (2) out of two (2) field supervisors (100%). Electronic questionnaires were not sent to cooperating teachers or campus principals/administrators due to the fact that educator candidates had not been assigned to campuses at the time that the electronic questionnaires were sent. Quantitative and qualitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. Evidence of compliance was measured using a rubric correlated to Texas Administrative Code.

### **Opening and Closing Session:**

Since this was a one day post-approval compliance audit, the opening session also served as the closing session and was held on November, 8, 2012. There were eight (8) people in attendance at the opening/closing session, including the following leadership team:

- President Recayi “Reg” Pecen, Ph.D.;
- Education Department Chair & Program Director Halil I. Tas, Ed.D.; and
- Director of Admissions Sean S. Namli, Ph.D.

It is noteworthy that there had been a change in leadership at the college. President Y. Alp Aslandagon, Ph.D. is no longer serving as the President of North American College and has been replaced by President Recai “Reg” Pecen, Ph.D. TEA was advised of the change prior to the compliance audit and a meeting was scheduled with President Pecen to discuss future changes that will be occurring with the entity. Topics of discussion on the morning of November 8, 2012, included the following:

- A name change from North American College to North American University;
- Potential accreditation from SACS; and
- Merging of the Texas Gulf Foundation, County-District #101-719, post bac alternative teacher certification program with North American College.

## **COMPONENT I: COMMITMENT AND COLLABORATION - Texas Administrative Code (TAC) §228.20 – Governance of Educator Preparation Programs**

### **FINDINGS:**

Program support was indicated by the governing body of North American College initial undergraduate teaching certification program per TAC §228.20(c) as evidenced by the participation and cooperation of President Pecen and Dr. Tas in various stages and steps of the compliance audit.

At the time of the pre-approval audit conducted on June 1, 2011, the advisory committee consisted of nine (9) members as follows: One (1) member represented local public/private school districts; one (1) member represented an education service center; two (2) members represented higher education; and five (5) members represented community/business interests. Since then, there has been a change in the advisory committee membership. This was discussed during the review of the self-report with the program director and an updated roster of advisory committee members was added to the self-report by the program. The current advisory

committee consists of eight (8) members. One (1) member represents local public/private schools; two (2) members represent higher education; and five (5) members represent business/community interests. North American College EPP meets TAC §228.20(b) requirements for advisory committee composition.

The first meeting of the 2011-2012 academic year was held on September 10, 2011. Eight (8) members attended. The agenda and minutes reflect discussion of future plans for North American College and advisory committee training. Original sign-in sheets verified that eight (8) members were present. The second meeting of the 2011-2012 academic year was held on May 12, 2012. Eight (8) members attended this meeting as verified through original sign-in sheets. The agenda and minutes reflected that a presentation on the progress of the program was provided. Agendas, minutes, and attendee records were available to substantiate that the advisory committee meetings were held during the 2011-2012 academic year.

The first meeting for the 2012-2013 academic year was scheduled for October 27, 2012. The meeting was cancelled due to lack of attendees (TEA program specialists verified with the program director that no members attended the meeting). An agenda was available and TEA staff noted that an advisory committee template was utilized by the program to ensure that all TAC required items were addressed during this first meeting. The program director was provided with guidance on alternative ways to conduct meetings to increase advisory committee participation (via webinar, Skype, or telephone conference), how to increase membership, and how to document attendee participation in those meetings. The program meets the requirements for conducting a minimum of two advisory committee meetings for the 2011-2012 academic year as required by TAC §228.20(b). Since the 2012-2013 academic year is currently in progress, a determination could not be made as to whether or not the program will meet the requirement for conducting a minimum of two advisory committee meetings for the current academic year as required by TAC §228.20(b).

Advisory committee membership was trained at the time of the pre-approval visit on June 1, 2011. The program director was advised to ensure that as new members are added that training is provided regarding their roles and responsibilities.

While there are concerns regarding the cancellation of the first advisory committee meeting for the current academic year, it is recommended that the program be allotted more time to stabilize the advisory committee and seek more stakeholder members.

**Based on the evidence presented, North American College educator preparation program is in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.**

## **COMPONENT II: ADMISSION CRITERIA - Texas Administrative Code (TAC) §227.10 – Admission Criteria**

### **FINDINGS:**

According to the self-report, to enter the North American College teacher certification program, the candidate must meet the following admission requirements:

- Demonstrate mastery of basic skills with a passing score on the SAT with state mandated minimum scores or higher; or a passing score on the ACT; or meet the Texas Success Initiative (TSI) requirements [TAC §227.10(a)(4)];
- Meet the minimum GPA requirement of 2.5 or 2.5 in the last 60 hours [TAC §227.10(a)(3)(A)];
- Submit a completed application [TAC §227.10(a)(6)];
- Complete a minimum of twelve (12) semester credit hours in the subject-specific content field for which the certification is sought [TAC §227.10(3)(C)];
- Complete an interview or other screening instrument to determine appropriateness for the certification sought [TAC §227.10(6)]; and
- Complete a successful background check [TAC §227.10(b)].

Out-of-country applicants whose first language is not English must demonstrate competence in the English language by submission of an official minimum score on the computer-based Test of English as a Foreign Language (TOEFL). In addition, the applicant must have his/her transcripts from an out-of-country non-English speaking university evaluated by an approved evaluation service [TAC §227.10(5)].

In a review of the twelve (12) candidates' records, which included three (3) candidates who were admitted during the 2011-2012 academic year and nine (9) candidates who were admitted during the 2012-2013 academic year, it was noted that the official transcripts were not found in the records reviewed. The Director of Admissions stated that the official transcripts were housed in the admissions office. After a review of the candidates' records, TEA staff met with the President of the College, the Admissions Officer, and the Program Director to provide guidance, review admissions requirements, and to discuss candidates' records organization for future audits.

North American College educator preparation program is not approved to offer the career and technology certificate. As a result, there were no candidates' records to review for this certification area. [TAC §227.10(7)(d); TAC §230; TAC§233].

It was noted that all twelve (12) candidates were admitted with a grade point average that ranged from 2.72-3.83. The GPA range in the records reviewed met the requirements of TAC §227.10(a)(3)(A).

Students must have a minimum of 12 semester credit hours in the subject-specific content area for which certification is sought. The degree plan in candidates' records verified that the twelve hours needed for admission and the hours needed for graduation will be completed prior to issuance of the Bachelor of Science in Interdisciplinary Studies in Education degree and certification. This documentation met the requirements of TAC §227.10(a)(3)(C).

The number of candidates admitted under the 10% rule did not exceed the percentage of cohort candidates allowed by TAC §227.10(A)(3)(B). Evidence was not required that admission of the candidate(s) was approved by the program director and was granted because of extraordinary circumstances.

Basic Skills per TAC §227.10(a)(4) & TAC §230(a) were met in ten (10) of the twelve (12) candidates' records reviewed. The program utilized TSI-TAKS scores, Accuplacer, out-of-state

community college records, and COMPASS passing scores. One (1) candidate did not meet the requirements because the associate's degree was not conferred from a community college and one (1) candidate did not meet the COMPASS passing standards. Because a preponderance of evidence demonstrated that basic skills were met for ten (10) of the twelve (12) candidates' reviewed, the program met the requirements of TAC §227.10(a)(4) & TAC §230(a).

Two (2) of the records reviewed were candidates admitted from out-of-country. In those two records, evidence was not present that the candidates' oral communication skills per TAC §227.10(5) and TAC §230.11 were met. Specifically, no TOEFL scores were present in their records. The program was utilizing the completion of the Gulf Language School to meet the TOEFL requirement. While the training from the Gulf Language School may be helpful to a candidate, in the future, the program must utilize the TOEFL as evidence of a candidate's ability to speak and write fluently in English in order to communicate with students, school staff, and parents. There was evidence in both records that the out-of-country applicants' credentials were evaluated by a transcript evaluation service. The transcript evaluation services utilized were Span Tran Evaluation Services and Evaluation World, LLC. Transcript evaluations met the requirements of TAC §227.10(e) and TAC §245.

Each candidate's record (12 reviewed) contained evidence of a completed application which met the requirements of TAC §227.10(a)(6).

The program conducted candidate interviews using a set of standardized questions. The interview process met the requirements of TAC §227.10(a)(6). An additional screening device was a written response to the following prompt: "Why I want to be a teacher". In addition, "Fitness to Teach Formal Review" could be initiated by any faculty member who had concerns about a candidate's fitness to teach. The use of the other screening instruments met the requirements of TAC §227.10(a)(6).

The self-report submitted by North American College educator preparation program stated that program information and admission requirements could be located on their website, the calendar, and brochures. This was verified at the time of the post-approval compliance audit. Published admission criteria is applied consistently and met the requirements of TAC §227.10(7).

**Based on the evidence presented, North American College educator preparation program is not in compliance with TAC §227 – Admission Criteria.**

### **COMPONENT III: CURRICULUM - Texas Administrative Code (TAC) §228.30 – Educator Preparation Curriculum**

#### **FINDINGS:**

North American College educator preparation program is approved to offer teacher certification in five fields as follows: English Language Arts and Reading (Grades 8-12); Mathematics (Grades 8-12); Physical Science (Grades 8-12); Social Studies (Grades 8-12); and Technology Applications (Grades 8-12). For the purpose of the one year post approval compliance audit, all five certification fields and implementation of the total program as approved by the State Board for Educator Certification (SBEC) were selected for in-depth review.

As reported in the self-report, the primary qualification necessary to be selected as a course instructor is an advanced degree. Instructors' credentials were presented for review and criteria for selection verified. It was verified that the instructors has the appropriate background or experience to provide instruction in these certification areas.

In reviewing all five of the certification fields offered, the curriculum correlations charts, and the syllabi for course offerings, it was found that the educator standards were the curricular basis for instruction as required by TAC §228.30(a). It was also noted that within the curriculum for the five certificates offered, evidence was provided that they addressed the relevant Texas Essential Knowledge and Skills (TEKS) as required by TAC §228.30(a). The TEKS were specifically noted in the syllabi reviewed. The seventeen (17) subject matter topics were included in the coursework as prescribed by TAC §228.30(b). The correlations to the 17 subject-matter topics from the original proposal were provided by the program director prior to arrival on site. There had not been any significant changes to the program's coursework since the pre-approval audit.

Six hours of test preparation will be provided for candidates prior to TExES testing in a designated class entitled "Test Preparation Seminar" per TAC §228.30(b)(17) and TAC §228.35(a)(3). Since no candidate has completed all requirements of the program, there was no evidence to review.

**Based on evidence presented, North American College educator preparation program is in compliance with Texas Administrative Code Section §228.30 – Educator Preparation Curriculum.**

#### **COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT - Texas Administrative Code (TAC) §228.35 – Preparation Program Coursework and/or Training**

##### **FINDINGS:**

Currently, the North American College initial undergraduate educator preparation program is delivered in a face-to-face format. The total program consists of one thousand six hundred twenty-five (1625) clock-hours for secondary certification. This exceeds the requirements set forth in TAC §228.35(a)(3). The total clock-hours were verified in the degree plans for candidates currently in the program.

Thirty (30) clock-hours of field-based experiences were verified prior to student teaching per TAC §228.35(d). Evidence was found in three (3) of the twelve (12) candidates' records of completing field-experiences in a local school district. Specifically, two (2) records reviewed contained evidence of a time log noting the name of the campus, the grade level, the subject observed, and the schools' demographic information. Additionally, the candidates' reflections containing pertinent observation information were found in their records. One (1) record reviewed did not have a completed log to verify completion of the field-based hours. However, the candidate's reflections were found. In the other nine (9) records, candidates had not reached the point in the program to start their field-based experiences. The program is in process of ensuring that all candidates meet requirements of TAC §228.35(d).

Fifteen (15) clock-hours of field-based experience may be provided by use of electronic transmission, or other video or technology-based methods per TAC 228.35(a)(3)(A). This option was not utilized by North American College initial undergraduate educator preparation program.

Per TAC §228.35(a)(6), the program may allow candidates to substitute prior ongoing experience and/or professional training for part of the educator preparation required hours. These hours can be applied to such areas as the 30 clock hours of field-based experiences. However, previous experience cannot replace student teaching. This option was not utilized by North American College initial undergraduate educator preparation program.

Since the program offers an undergraduate degree, the program provides more than eighty (80) clock-hours of coursework prior to student teaching. The hours prior to student teaching were verified through a review of the degree plans and in candidates' records. Coursework prior to student teaching meets the requirements of TAC §228.35(a)(3)(B).

Fifty (50) clock-hours of training, provided by a school district and/or campus, are not accepted toward the total number of program hours. [TAC §228.35(a)(6)]

Student teaching [TAC §228.35(d)(2)(A)] will be conducted for fourteen (14) weeks in a full day, unpaid assignment which exceeds the minimum requirement of twelve (12) weeks. To date, no candidate has begun their student teaching assignment. The program anticipates that one candidate will be ready for student teaching in the spring of 2013.

Evidence was presented in the form of the name of a local school district where student teaching will take place. Student teaching will occur in an actual school setting rather than a distance learning lab or virtual school setting prohibited by TAC §228.35(d)(2)(C)(ii).

According to TAC §228.35(e), North American College educator preparation program is responsible for providing cooperating teacher training that is scientifically-based or verify that training has been provided by a school district or education service center. According to the self-report, dated attendance records with original signatures, dated sign-in information for online training, and dated CPE certificates would be accepted as evidence that cooperating teachers received training. During the on-site compliance audit, the following was verified: The program will utilize TxBESS training materials and a Cooperating Teacher Handbook for the 2012-2013 academic year. However, no training has been provided yet since no candidates are participating in student teaching. Training for cooperating teachers met the requirements of TAC §228.35(e).

TAC §228.35(f) states that supervision of each candidate shall be conducted with the structured guidance and regular ongoing support of an experienced educator who has been trained as a field supervisor. Since there are no candidates currently in student teaching assignments, the Field Supervisor Handbook for the 2012-2013 academic year was reviewed. The North American College educator preparation program currently has two (2) field supervisors who were trained by the Gulf Educator Foundation. Evidence of completion was certificates reflecting six (6) clock hours of CPE credit. Field supervisor training met the requirements of TAC §228.35(f).

Initial contact within the first three weeks of placement by the field supervisor as required by TAC §228.35(f) could not be verified because the program does not have candidates in student teaching assignments. However, the program is prepared to make contact with the candidates as required during the spring semester within the EDUC 4691 student teaching course. There will be one candidate prepared for student teaching during the spring of 2013. Initial contact may be made by telephone, email, or other electronic communication.

A total of three observations [TAC §228.35(f)(4)] must be conducted during the student teaching assignment and must be at least 45 minutes in duration [TAC §228.35(f)]. TAC also states that the first observation must be conducted within the first six weeks of student teaching. The field supervisor training and handbook served as evidence that North American College will meet the requirements of formal observations during the student teaching assignments for the spring 2013 semester.

Furthermore, TAC §228.35(f) requires that the field supervisors document observed instructional practices and provide written feedback through an interactive conference with the candidates. The field supervisor training and handbook served as evidence that North American College will meet the requirements of formal observations and interactive conferencing during the student teaching assignments for the spring 2013 semester.

It is also the responsibility of North American College to provide a copy of the written feedback to the candidates' campus administrator as required by TAC §228.35(f). The program currently does not have any candidates in student teaching assignments on campuses.

Additional informal observations and coaching could not be verified since there are no candidates in student teaching assignments. The program is prepared to provide additional observations and coaching as specified in TAC §228.35(f).

**Based on evidence presented, North American College educator preparation program is in compliance with Texas Administrative Code Section §228.35 – Program Delivery and On-Going Support.**

## **COMPONENT V: PROGRAM EVALUATION – Texas Administrative Code (TAC) §228.40 – Assessment and Evaluation of Candidates for Certification and Program Improvement**

### **FINDINGS:**

North American College educator preparation program has a candidate benchmarking and assessment process as prescribed by TAC §228.40(a). The evidence provided was the degree plan for each certification area offered and progression through the degree plan was available in the candidates' records. The benchmarks that North American College utilizes are as follows:

- Entry into the initial teacher education program requiring a 2.5 GPA and completing 60 semester hours of coursework toward a B.S Interdisciplinary Studies in Education;
- At the end of the 5<sup>th</sup> semester, passing the appropriate content exam and completing 90 semester hours of coursework with a 2.5 GPA;
- Certification test preparation occurring during the first semester of the student's senior year requiring a GPA of 2.5 and completing 105 semester hours; and
- By the end of the last semester, maintaining a 2.5 GPA, completing 120 semester hours, completing the student teaching assignment, passing the PPR, and applying for state certification.

All syllabi presented for review contained evidence that the courses had structured specific assessments. The benchmarks and assessments met the requirements of TAC §228.40(a).

Readiness for testing [TAC §228.40(b)] is determined through a review of the candidate's record. To date, no candidates have reached this benchmark. According to TAC §228.40(b), the

program shall not grant test approval for the pedagogy and professional responsibilities test until the candidate has met all the requirements for admission to the program and has been fully accepted into the educator preparation program. The degree plan and the candidates' records reviewed provided evidence that the process is currently being utilized.

Evaluation of the program's design and delivery of the curriculum should be continuous per TAC §228.40(c). Information such as performance data, scientifically-based research practices, and the results of internal and external assessments should be included in the evaluation process. The North American College educator preparation program presented the Unit/Department Institutional Effectiveness Plan (IEP) Report Card noting that the program has met five (5) out of (8) indicators; one (1) out of eight (8) indicators have been partially met; and that two (2) out of eight (8) indicators are not applicable to the program. North American College educator preparation program also presented the Course Evaluation form that students complete at the end of each course and the Faculty Evaluation form that will be completed by the faculty member teaching the course. This met the requirements of TAC §228.40(c).

According to TAC §228.40(d), the program will retain documents that evidence a candidate's eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after program completion. Currently, two years of records are securely stored in paper format in the registrar's office and will be retained for a period of five years per TAC §228.40(d). The program met the requirements of TAC §228.40(d).

**Based on evidence presented, North American College educator preparation program is in compliance with Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates for Certification and Program Improvement.**

#### **COMPONENT VI : Professional Conduct (TAC) §228.50**

TAC §228.50(a) states that during the period of preparation, the educator preparation entity shall ensure that the individuals preparing candidates and the candidates themselves demonstrate adherence to Chapter 247 of this title (relating to Educators' Code of Ethics).

The candidates are informed of the Texas Educator Code of Ethics within the scope of the coursework provided and verified in the degree plans offered. Additionally, candidates are provided with a handbook.

The faculty and staff are informed of the Texas Educator Code of Ethics through a handbook/office procedures document that outlines the requirements of the Texas Educator Code of Ethics.

After a review of the documents provided by the program for review, the program director was provided with specific guidance regarding updating the Code of Ethics within the Cooperating Teacher/Field Supervisor Handbook to reflect the current TAC §247.2.

**Based on evidence presented, North American College educator preparation program is in compliance with Texas Administrative Code §228.50 – Professional Conduct.**

#### **Senate Bill 174/Texas Administrative Code §229**

#### **Current Accreditation Status**

North American College educator preparation program currently has an accreditation status of “Accredited-Not Rated” based on the fact that this is a new educator preparation program. There are no results of certification exams or pass rate data to report.

## PROGRAM RECOMMENDATIONS

Program Compliance Recommendations are based on the findings of the Texas Education Agency technical assistance visit. If the program is out of compliance with any component, please consult the Texas Administrative Code (TAC) rules and correct the issue IMMEDIATELY. General Recommendations are suggestions for program improvement only. Failure to comply with TAC rules governing educator preparation programs may result in action by the State Board for Educator Certification (SBEC) per TAC 229 beginning in 2010.

**PROGRAM COMPLIANCE ACTIONS:** In order to meet requirements of Texas Administrative Code (TAC) governing educator preparation programs, the following actions are necessary:

### **TAC §227.10 Admission Criteria**

- Require all applicants for educator certification meet oral communications skills per TAC §227.10(5) and TAC §230.11(5)(C) through verification of satisfactory scores on the TOEFL. This must be corrected immediately.

### **OTHER PROGRAM RECOMMENDATIONS:**

- Allow North American College more time for full implementation of the traditional undergraduate teacher education program before allowing the program to add additional certification fields or classes of certification;
- Allow North American College with more time for full implementation of the traditional undergraduate teacher education program before allowing the program to merge with Texas Gulf Foundation post-bac alternative educator preparation program (#101-719) which is located on the North American College campus;
- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about current Texas Administrative Code;
- Participate in Annual Deans/Directors Meetings to ensure that the program director is knowledgeable about current Texas Administrative Code and future changes to Texas Administrative Code (Webinar Series);
- Continue to participate in webinars provided by the Division of Educator Certification & Standards to ensure that the program staff is knowledgeable about current requirements and changes in Texas Administrative Code; and
- Continue to maintain communication with the program specialist assigned to the North American College educator preparation program for the purpose of asking questions about current requirements in TAC for Governance; Admissions; Curriculum; Program Delivery & On-Going Support; and Program Evaluation (TAC § 227-229).

Component I: Governance of Educator Preparation Programs:

- Expand the advisory committee to include more members from stakeholder groups such as school district human resource directors, cooperating teachers, principals, superintendents, and former and current candidates; and
- Ensure that new members are trained in their roles and responsibilities.

Component II: Admission Criteria:

- Consider strengthening the other screening instruments utilized by the program to include specific criteria and/or a cut score for the written response and the “Fitness to Teach Formal Review”.

Component IV: Preparation Program Coursework and/or Training:

- Consider upgrading record-keeping to ensure the documentation of thirty (30) clock-hours of field-based experiences reflects that the candidates are on track to student teach; and
- Consider utilizing the T-Cert test prep and ensure that the students provide the EPP with the certificate of completion indicating six (6) clock hours of test preparation that is not embedded in any other curriculum coursework.

Component VI: Professional Conduct:

- Consider utilizing the TEA Ethics Training.