Compliance Audit Report  
2011-2012 
Concordia University 
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 §228.11(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 for details.

Contact Information: Dr. Jim McConnell, Dean  
County/District Number: 227505  
SBEC Approval Date: July 15, 1988 

Program Manager, Sandra Jo Nix, program specialist, Vanessa Alba, and Certification Manager, Ruth Smith, conducted a Texas Education Agency (TEA) Compliance Audit of Concordia University’s traditional initial teacher certification program on December 6-8, 2011. The focus of the compliance audit was the Generalist EC-6 certification program. The following are findings and recommendations for program improvement.

Data Analysis: 

Information concerning compliance with Texas Administrative Code (TAC) governing educator preparation programs was collected by various qualitative means. A self-report was submitted to the Texas Education Agency on November 4, 2011. An on-site review of documents, candidate records, course material, and curriculum correlations charts provided evidence regarding compliance. In addition, electronic questionnaires were sent to Concordia University’s initial teacher preparation program stakeholders by TEA staff. Thirteen out of 21 advisory committee members, six out of 16 student teachers, six out seven field supervisors, ten out of 14 principals, and eight out of 16 cooperating teachers responded. Qualitative methods of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. Evidence of compliance was measured using a rubric correlated to Texas Administrative Code.
Opening and Closing Session:

The opening session on December 6, 2011, was attended by 11 people, including Dr. Jim McConnell, Dean of the College of Education, Dr. Bret Champion, Superintendent of Leander I.S.D., and Dr. Chris Winkler, Director of the Masters of Education program. Others in attendance were Glenda Prewett, Allan Brown, Jeanne Cours, Jake Hollatz, Cari Chittick, Sarah Baker, Alison Chai, and Gert Keiper. During the opening session, Dr. McConnell presented a PowerPoint presentation on the traditional initial certification program.

The closing session on December 8, 2011, was attended by 12 people including Dr. Jim McConnell.

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 Concordia University per TAC §228.20(c) as evidenced by the participation of Dr. Jim McConnell and other staff members in various aspects of the compliance audit.

The advisory committee consists of 27 members. Eleven members represent local school districts, one member represents an education service center, 13 members represent higher education, and two members represent community/business interests. Concordia University meets TAC §228.20(b) requirements for advisory committee composition.

Agendas and minutes were presented as evidence of advisory committee meetings for November 9, 2010, and March 31, 2011. The first meeting of the 2011-12 academic year was held on October 10, 2011. Sixteen advisory committee members attended. The agenda reflects that the advisory committee was provided training on their roles and responsibilities, a review of the program operation, and a discussion of field-based experiences. In addition, program and curriculum evaluation information was presented. Agendas, minutes, and attendee records were available to substantiate that the advisory committee meetings were held. The second meeting for the academic year is scheduled for March 2012. Ninety-two point two percent (92.2%) of the advisory committee members confirmed that they do meet two times per academic year. The program meets the requirements for conducting a minimum of two advisory committee meetings per academic year as required by TAC §288.20(b).

Eighty-three point three percent (83.3%) of the advisory committee members reported that they do assist in the design, delivery, evaluation and major policy decisions of the educator preparation program. One hundred percent (100%) indicated that the members review the types of field-based experiences provided to the candidates.

Based on the evidence presented, Concordia University is in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.
FINDINGS:

According to the Concordia University’s website, to enter the teacher certification program, the candidate must have completed 45 credit hours, have at least a 2.5 GPA [TAC §227.10(A)], show mastery of basic skills proficiency on the THEA [TAC §227.10(4)] and submit an application [TAC §227.10(6)]. In addition, the candidate must have a grade of C or better in all core subjects, grade of B or better in Writing Across the Curriculum, and clearance from the Director of Student Services, Provost, and Faculty Advisor [TAC §227.10(7)]. Since candidates are admitted into the College of Education at mid-semester of their Sophomore year, the candidates do not have twelve (12) semester credit hours in a content field [TAC §227.10(C)]. However, by the time the candidate is eligible for student teaching, candidate has exceeded this number. In the past, an interview has not been conducted. However, beginning January 1, 2012, all candidates will be interviewed by their academic advisors as part of the advising process. Additional screening instruments will be implemented in the fall of 2012. The college will begin utilizing the Gallup “Strengths Quest” survey and a faculty/student self-evaluation of performance evaluation which will be scored with a rubric.

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 written or 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(7)]. At this time, no out-of-country students have been admitted to the teacher education program. However, policies exist which address the requirements should the need arise.

In a review of 25 candidates’ records, it was found that for students who had graduated from the program an application was missing from their records. The application had been destroyed as a means to conserve storage space. Evidence of the student teaching start date, four observations, enrollment information, transcript with grade point average, and basic skills scores were present. For candidates who were to begin student teaching in the spring of 2012, their records contained an application, enrollment information, transcript with GPA, basic skills scores and records of the 30 clock-hours of field-based experience. Documents were present in some student folders of student teacher placement.

The self-report submitted indicated that information on admission criteria can be found on Concordia’s website and in the University catalog. Information about the teacher education program was distributed in brochures, school and community college visits, and through career fairs. [TAC §227.10(7)].

Based on the evidence presented, Concordia University is not in compliance with TAC §227 - Admission Criteria.
COMPONENT III: CURRICULUM - Texas Administrative Code (TAC) §228.30 – Educator Preparation Curriculum

FINDINGS:

Concordia University is approved to offer teacher certification in 20 certification fields and two classes of certification. For the purpose of this compliance audit, the Generalist EC-6 certificate was selected for in-depth review.

Qualifications necessary to be selected as a course instructor require an advanced degree, a Texas or out-of-state teaching certificate, and at least five years teaching experience. Instructors’ credentials were presented for review and criteria for selection were verified. Review of 14 faculty vitae indicated that nine had Texas teaching certification and five had out-of-state licensure. It was verified that the instructors have the appropriate background and experience to provide instruction in this certification area.

In reviewing the Generalist EC-6 curriculum syllabi and alignment charts, 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 the curriculum alignment charts provided evidence that the program addressed the relevant Texas Essential Knowledge and Skills (TEKS) as required by TAC §228.30(a). The seventeen (17) subject matter topics were included in the coursework as prescribed TAC §228.30(b). Six hours of test preparation was provided for candidates prior to TExES testing as per TAC §228.30(b)(17) and TAC §228.35(a)(3)(C).

Student teachers/clinical teachers/interns were asked to respond to a series of questions prepared by TEA and sent to them electronically in order to verify aspects of the curriculum, its delivery, and effectiveness. They responded (100%) that they were provided instruction in Reading Strategies Across the Curriculum for all grade levels; Texas Educators’ Code of Ethics; Child and/or Adolescent Development; Theories of How People Learn; Texas Essential Knowledge and Skills (TEKS); Utilizing TEKS in the Content Area(s); How to Develop a Lesson; How to Utilize a Variety of Classroom Assessments with Students; How to Use Formative Assessments to Diagnose Learning Needs; Models and Methodologies in Classroom Management Prior to Placement as a Student Teaching Candidate; among others. They responded that they would like more preparation in Laws and Standards Regarding Students with Special Needs (67.7%) and Models and Methodologies in Classroom Management Prior to Placement as a Teaching Candidate (80%).

Cooperating teachers expressed in their questionnaire that they felt that the student teachers were well prepared in understanding the Texas Code of Ethics, child/adolescent development, Texas Essential Knowledge and Skills (TEKS) in the content areas, and developing lessons. They also indicated that the student teachers would benefit from more emphasis on using formative assessments to diagnose student learning needs and strategies for gifted/talented and limited English proficient students.

Principals responding to their questionnaires reported that the students were well prepared in classroom management, communicating clear expectations to students and in the use of technology. However, they also expressed that the students would benefit from more emphasis on working with students with limited English proficiency and in interpreting formal and informal assessments.
Based on evidence presented, Concordia University 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 Concordia University’s initial teacher preparation program is delivered in a face-to-face format. The total program consists of 2069 clock hours for elementary certification and 1930 clock hours for secondary certification and 2113 clock hours for all-level certification. This meets the requirements set forth in TAC §228.25(a)(3). Evidence was found in the self-report and in the degree plans included in the Teacher Education Handbook.

Completion of from 120 to 183 clock hours of field-based experience depending on whether you were enrolled in the elementary/middle, secondary or all level program was verified prior to student teaching as required by TAC §228.35(d)(3)(A). Evidence was found in the candidate’s record in the form of a field-experience log and a Field Work Handbook. The field-based observations are conducted in association with specific courses. Each course specifies the number of hours required to successfully complete the course. Eighteen hundred to one thousand nine hundred twenty clock hours of coursework is required prior to student teaching. This was verified by review of the degree plans presented [TAC §228.35(a)].

Because Concordia University is small, student teaching [TAC §228.35(d)(2)(A)] consists of fourteen weeks and is currently offered during the spring semester. Evidence was presented in the form of student teacher placement information verified that student teaching took place in an actual school setting rather than a distance learning lab or virtual school setting as prescribed by TAC §228.35(d)(2)(C)(ii).

According to TAC §228.35(e), Concordia University is responsible for providing cooperating teachers training that is scientifically–based or verify that training has been provided by a school district or education service center. Concordia University produced evidence of training material, sign-in sheets and agendas. Training for cooperating teachers for the spring 2012 student teaching session was held on December 10, 2011.

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. Seven individuals were identified as field supervisors for the spring 2012 student teaching session. Five field supervisors are also faculty members. All field supervisors have teaching certification. Training was provided on December 9, 2011 for the field supervisors. Concordia produced evidence of a field work handbook in addition to agendas and training material and sign in sheets. In addition, a new observation document has been development that will be executed electronically. Training was also provided on the use of the new observation rubric.

Initial contact made within the first three weeks of the assignment by the field supervisor as required by TAC §228.35(f) was verified in a review of the student files. Contact was made by emails to the candidates.
A total of three observations [TAC §228.35(f)(4)] must be conducted during the student teaching/clinical teaching assignment and must be at least 45 minutes in duration [TAC §228.35(f)]. TAC §228.35(f) also states that the first observation must be conducted within the first six weeks of student teaching/clinical teaching. In review of the candidate folders, evidence was located that the observations were conducted on the schedule prescribed. Concordia University has adopted the use of a new observation rubric that will be used beginning spring 2012. The observation rubric is divided into the following sections: designing instruction and assessment to promote student learning; creating a positive, productive classroom environment; implementing effective, responsive instruction and assessment; fulfilling professional roles and responsibilities; and content pedagogy. There is a separate content pedagogy for each of the content areas required in the Generalist EC-6 certificate. The observation rubric requires the beginning or placement date of the candidate, the date of the observation, beginning time/ending time and comments and recommendations. The electronic rubric is signed by student teacher.

Furthermore, TAC §228.35(f) requires that the field supervisor documents instructional practices observed and provides written feedback through an interactive conference with the candidates. Evidence was presented to support an interactive conference. With the new electronic observation rubric, the field supervisor acknowledges by typing/signing their name in a specific box that an interactive feedback conference followed the classroom observation.

It is also the responsibility of Concordia to provide a copy of the written feedback to the candidate’s campus administrator as required by TAC §228.35(f). Evidence was presented to support that the field supervisor had provided the feedback to the campus administrator. The campus administrator or his/her representative is asked to sign the electronic observation rubric. A copy of the observation form will be sent via email with a read receipt requested.

Additional informal observations and coaching were provided by the program as specified in TAC §228.35(f). Evidence was presented in the form of additional observation forms and emails.

Based on evidence presented, Concordia University is not in compliance with Texas Administrative Code Section §228.35 – PROGRAM DELIVERY AND ON-GOING SUPPORT.

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

**FINDINGS:**

Concordia University has a candidate assessment and benchmarking process as prescribed by TAC §228.40(a). As soon as a candidate is admitted to the Teacher Education Program, the faculty begins tracking each student’s performance as reflected in his/her grades earned in the courses. The student’s courses and grades are updated at the end of each semester and given to the Directors for review. Outcomes in classes are monitored by faculty to assure student progress each semester. The candidate must maintain the required GPA, as well as continue to meet, or exceed, outcomes in classes.

Readiness for testing [TAC §228.40(b)] is determined by the candidate’s completion of EDU 4101 Teacher Education Seminar. This course is taken the semester prior to student teaching.
In this course, test content and strategies are discussed. In addition, candidates take a representative pedagogy and responsibilities and content area tests. The goals is for each student to pass the representative forms of the tests with an 80% or better. If a student does not reach this goal, each test is reviewed for areas of weaknesses. The candidate is then provided extra assistance from the staff of the College of Education and by the content area professors. It is recommended that the candidates then complete the T-Cert preparation. 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.

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. Per the self-report, the program has a systematic plan to evaluate the curriculum and program effectiveness every 12 months. Information for evaluative purposes are gathered from the Texas Education Agency’s ASEP (Accountability System for Educator Preparation) system, qualitative evaluations through focus groups comprised of faculty members, cooperating teachers, student teachers, principals, field supervisors, and advisory committee members.

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. In a review of the student records it was found that the application to the College of Education containing the entry grade point average was not retained. Because the application was not retained according to TAC rule, Concordia University is not in compliance with this requirement.

Based on evidence presented, Concordia University is not 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). Since Concordia is a private Lutheran university, emphasis is placed on both the University’s code of ethics and those of the Texas Educator’s Code of Ethics. The Code of Ethics is covered as part of the Teacher Education Seminar. Each student is required to sign an acknowledgment of reading and understanding the code of ethics. Copies of the acknowledgement were found in the candidate’s files. A copy of the acknowledgment was found in the candidate’s record. In addition, the code of ethics is reviewed in a faculty/staff meeting each year.

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

**Current Accreditation Status**

Concordia University is currently “Accredited with Action Plan.”
Standard I: Results of Certification Exams

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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.

COMPLIANCE RECOMMENDATIONS: In order to meet requirements of all Texas Administrative Code rule governing educator preparation programs, the following recommendations are made:

TAC §228.10 Admission Criteria
- Develop a set of standard interview questions and a scoring rubric to be implemented in a candidate interview to be conducted prior to admission to the college of education program teaching program. This should be utilized with students entering the teacher education program beginning January 1, 2012.

TAC §228.35(f) Preparation Program Coursework and/or Training
- Document first contact by the field supervisor to the student teaching candidate within the first three weeks of student teaching assignment. This must be done immediately.

TAC §228.40 Assessment and Evaluation of Candidates for Certification and Program Improvement
- Maintain the application to the College of Education in the candidate’s record for five years. This must be initiated with candidates completing the program in December, 2011.
GENERAL PROGRAM RECOMMENDATIONS:

Component I Recommendations:

- Consider expanding the depth of the advisory committee to include human resource directors, cooperating teachers/mentors among others;
- Consider having rolling terms of advisory committee members to ensure that new perspectives are brought to the advisory committee;
- Explore creative ways to conduct advisory committee meetings such as webinar, skype, to increase participation in the advisory committee meetings; and
- Continue advisory committee training on an annual basis to prepare any new members for their roles and responsibilities.

Component II Recommendations:

- Consider having students sign a FERPA letter stating that information on field observations can be provided to the campus administrator;
- Continue plans to select and utilize other screening instruments to be used in admission of candidates;
- Add the ethnic and race identification areas to match the federal guidelines and TEA’s database on the application to the College of Education; and
- Maintain the application in the graduates’ records for a minimum of five years.

Component III Recommendations:

- Review the curriculum for the special populations coverage portion of the 17 mandated curriculum topics, especially the laws and regulations and classroom management;
- Ensure incorporation of theater arts into the Generalist EC-6 certification program;
- Review and update all syllabi to delete old information and to expand on content areas to reflect course content, and to reflect the proper EC-12 PPR Standards;
- Provide a copy of the alignment charts to the students to let the candidate know where specific required content is being covered to prepare them for the TEXES test; and
- Revise the fine arts courses to reflect adequate coverage of art, music, and theatre in the Generalist EC-6 program.

Component IV Recommendations:

- Ensure and document that campus administrators receive a copy of the formal observation results.
Component V Recommendations:
- Maintain documentation electronically for five years after the candidate’s completion of the program per Texas Administrative Code.

General Recommendations:
- Follow the State Board for Educator Certification (SBEC) and the meetings and minutes to ensure that the staff is knowledgeable about the current Texas Administrative Code;
- Read the Educator Standards and ETS newsletters to ensure that the program staff is knowledgeable about current Texas Administrative Code;
- Participate in webinars conducted by Division of Educator Certification, Standards, and Fingerprinting to ensure that the program staff is knowledgeable about changes in TAC rule; and
- Participate in the Dean and Director’s meetings to ensure that the program staff is knowledgeable about requirements and changes in TAC rules.