Compliance Audit Report
Sul Ross State University-Rio Grande College
Generalist EC-6 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 required by the Texas legislature for the regulation of all educator preparation programs in the state. Please see the complete Texas Administrative Code at www.tea.state.tx.us for details.

Contact Information:  Dr. Dorman Moore, Chair

County/District Number:  232502

TEA Approval Date:

A compliance audit visit for the Generalist EC-6 initial teacher certification program at Sul Ross State University-Rio Grande College, Uvalde, Texas, was conducted on February 7-9, 2012, by Texas Education Agency (TEA) Program Specialist, Dr. Mary S. Black, and Program Manager, Ms. Sandra Jo Nix, in compliance with Texas Administrative Code (TAC) §229.6 (a).

Data Collection and Analysis:

The audit used information from a self-report completed by Sul Ross State University-Rio Grande College (Sul Ross-RGC), a review of documents, syllabi, curriculum correlation charts, and responses from electronic questionnaires as evidence of compliance with Texas Administrative Code. A total of 16 responses were received by TEA to the electronic questionnaires: five (of 9) from advisory committee members; one (of 18) from educator candidates; none (of 3) from field supervisors; five (of 19) from campus principals; five (of 30) from cooperating teachers. Qualitative methods of content analysis, cross-referencing, and triangulation were used to evaluate the evidence. Evidence of compliance was measured using a rubric correlated to Texas Administrative Code.

Prior Compliance Audit:

TEA conducted a compliance audit of this program in 2007. At that time, Sul Ross-RGC was found out of compliance in Component I, concerning the advisory committee. The audit report recommended including all four categories of stakeholders stated in Texas Administrative Code. The audit report also states that no collaboration with the advisory committee was evident at
that time. The report also cited a lack of training for cooperating teachers, and lack of candidate instruction in instructional technology.

Opening and Closing Sessions:

An Opening Session was held on February 7, 2012. The meeting was attended by six people, including Dr. Paul Sorrels, Dean of Sul Ross-RGC; and Dr. Dorman Moore, Chair of the Education Department. The others attendees also represented the university. Dr. Mary S. Black presented advisory committee training, reviewed audit procedures, and responses from electronic questionnaires. Dr. Black also presented a summary of audit findings at a Closing Session to Dr. Moore and two members of the Advisory Committee on February 9, 2012.

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 Sul Ross–RGC per TAC §228.20(c) as evidenced by the participation of Dr. Paul Sorrels, and Dr. Dorman Moore in various aspects of the compliance audit.

The Sul Ross – RGC advisory committee is comprised of 9 members: four members from public education; five members from institutions of higher education. The composition of the advisory committee meets the requirements of TAC 228.20(b).

According to TAC 228.20(b), the advisory committee members should be apprised of their roles and responsibilities. Sul Ross – RGC presented packets that were prepared for the advisory committee members explaining their roles and responsibilities. However, on the electronic questionnaires sent by TEA to the advisory committee members, there appeared to be some confusion in their responses as to what their roles and responsibilities were. There was no evidence that advisory committee training has been provided by Sul Ross -RGC to elaborate on the members' roles and responsibilities.

Texas Administrative Code (TAC) §228.20(b) requires that advisory committees meet at least twice each academic year. Minutes and an agenda for a teleconference meeting held on October 28, 2011, were presented. According to the minutes, five Sul Ross-RGC professors and four representatives from local school districts attended. TAC 228.20(b) requires that the advisory committee members assist in the design, delivery, policy decisions, and program evaluations. Examination of advisory committee minutes of the October meeting indicated discussion of admission requirements, field experience [TAC §228.35(d)], TExES certification pass rates, mentor training policies, and other topics. The next meeting will be scheduled for March, 2012. Sul Ross - RGC was asked to present evidence of advisory committee meeting for the fall of 2010 and spring of 2011 in order to show continuous advisory committee involvement. They were unable to do so.

Because of a lack of evidence for two advisory committee meetings per academic year since 2007, and limited understanding by the advisory committee members on their roles and responsibilities, Sul Ross -RGC did not meet standards for TAC §228.20.

Based on the evidence presented, Sul Ross State University-Rio Grande College is not in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.
COMPONENT II: ADMISSION CRITERIA - Texas Administrative Code (TAC) §227.10 – Admission and Certification Criteria

FINDINGS:

There are currently 108 candidates enrolled in the Sul Ross – RGC certification program. Sul Ross – RGC requires that applicants file an application, apply for and hold an official degree plan, have sound mental and physical health, not be on disciplinary probation, pass all parts of the THEA with a Reading score of 250, a Math score of 230, a writing score of 230, attain a junior standing with a grade point average (GPA) of 2.5 or 2.5 in the last 60 hours on a 4.0 scale, complete at least 9 of the 12 semester hours in English with no incomplete grades or grades lower than "C", be within 30 to 45 hours of graduation.

Ten randomly selected student records (of 108 currently enrolled) were reviewed by TEA to verify that admission requirements were followed. All candidates had completed applications [TAC §227.10(6)] and degree plans. All had entering grade point averages (GPAs) above 2.5 [TAC §227.10(A)], which is the state mandated minimum. One candidate from out-of-country had her transcript evaluated by an appropriate agency but met the exemption criteria for the TOEFL defined in TAC §230.413. All candidate files contained transcripts [TAC §227.10(C)] and basic skills scores where needed [TAC §227.10(4)]. No interview or other screening device is currently being used to determine the oral communication skills or appropriateness for certification sought [TAC §227.10(6)].

Transcripts showed that all candidates for admission had completed 12 or more semester credit hours in subject-specific content [TAC §227.10(C)]. No evidence was found for a pre-admission interview or other screening instrument, as required by Texas Administrative Code §227.10(a) (6).

Admission criteria are published in the university catalog and on the website [TAC 227.10(7)(e)].

Because of the lack of an interview or use of other screening device, Sul Ross – RGC did not meet standards for this component.

Based on the evidence presented, Sul Ross State University-Rio Grande College is not in compliance with TAC §227- Admission Criteria.

COMPONENT III: CURRICULUM - Texas Administrative Code (TAC) §228.30--Curriculum

FINDINGS:

Sul Ross - RGC provided standards correlation charts for the Generalist EC-6 certificate [TAC §228.30(a)], as well as for standards for Pedagogy and Professional Responsibilities, Texas Essential Knowledge and Skills (TEKS) [TAC 228.30(a)], and the 17 topics required by Texas Administrative Code §228.30 (b). Syllabi for all courses listed on the degree plan to earn this certificate were examined. In addition, online components of one course, EDUC 3310 Early Childhood Curriculum, were reviewed. A TEA program specialist visited one of the distance learning classes being conducted on the Sul Ross - RGC campus to view the process.

Some syllabi contained the TExES or certification standards and/or competencies covered in the course, but many did not. It appeared that the curriculum is focused on the domains and
competencies of the TExES examination as opposed to the educator standards prescribed for the certification field. It must be noted that the domains and competencies do not necessarily cover all of the knowledge and skills outlined in the educator standards. Few syllabi contained detailed assignments or daily topics. Some professors indicated that the information was placed on Blackboard.

In reviewing syllabi and correlation charts, frequent repetition of topics mandated by Texas Administrative Code §228.30 was noted. This could be because students are offered a variety of courses from which to choose in order to fulfill requirements, but in some cases all courses showing duplication are required.

For example EDUC 3302 Educational Psychology states as one instructional objective that students will identify and understand the stages of human growth and development. Daily assignments for EDUC 3302 consist of various chapters in the text. EDUC 3304 Human Growth and Development states objectives of 1) identifying major proponents and theories of child development (which usually includes stages of growth and development); and 2) applying the major theories of development to developmentally appropriate practice in the teaching of children. Daily assignments for EDUC 3304 include completing the Virtual Child software program which progresses through various stages of human growth and development from birth to adolescence. Both of these courses are required, so there may be some room for realignment of objectives to enable more depth or to include other topics. There was no evidence that the English Language Proficiencies or Dyslexia was covered in the content.

On the other hand, no evidence was found that some topics mandated by TAC §228.30, such as academic motivation, differentiated instruction, diagnosing learning needs, and using instructional technology, were incorporated into the courses. This might be remedied by more complete documentation of course activities, or the situation may call for redesigning certain courses in order to align them to TAC requirements.

In addition TAC §228.30 requires a minimum of six clock hours of preparation for the TExES, and Texas Education Agency policy, which is contained on page 12 of the Educator Preparation Program Director’s Handbook for 2011-2012, states that this preparation must not be embedded into coursework. The reason for this policy is to clearly separate coursework and required test preparation. The syllabi for Sul Ross University-RGC clearly indicate that test preparation is the main focus of their curriculum and is embedded in several courses. For example, taking the practice TExES exam is required in EDUC 3309 Early Childhood Education Methods and Classroom Management. If a student fails to take this practice test, the course grade is lowered by 10 points. Identifying TExES competencies is required in EDUC 3303 Methods and Classroom Management in Elementary Schools, and one of the course objectives is to prepare for the TExES. Both EDUC 3303 and 3309 are required courses.

Because the curriculum does not appear to be based on the educator standards for the certification being sought, the university does not meet the standards for this component.

Based on evidence presented, Sul Ross State University-Rio Grande College is not in compliance with Texas Administrative Code §228.30—Curriculum.

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

According to the self-report, Sul Ross State University-RGC offers 486 clock hours of coursework, which exceeds the minimum of 300 clock hours required by Texas Administrative Code §228.35 (a)(3). The clock hours were verified by the degree plans. The program is delivered face-to-face and by teleconference in Uvalde, Del Rio and Eagle Pass, Texas. A few courses are delivered in a hybrid face-to-face/online format.

All candidates complete a minimum of 30 clock hours of field-based experience prior to student teaching. The field-based experience was verified by time logs found in candidates' records. Logs are signed by both the candidate and the classroom teacher being observed [TAC §228.35(d)(A)]. Two hours of field-based experience is completed using video which is permissible per TAC §228.35(a)(3)(A).

Three formal observations are made by field supervisors to each candidate during student teaching [TAC §228.35(f)(4)]. Observation instruments are signed and dated by both the candidate and the field supervisor. It appeared that first contact is made via letters sent to the candidates within the first three weeks of placement and that the formal observations occurred on the schedule specified in TAC. Minimum required 45-minute observation periods could not be ascertained because the observation instruments lacked any notation of start or stop time [TAC §228.35(f)]. In addition, there was no documentation available to substantiate that the principal received a copy of the candidate’s observation feedback as required by TAC §228.35(f).

Student teaching is 14-weeks to allow candidates the full semester experience in a K-12 school [TAC §228.35(d)(2)(A)]. Start dates for student teaching were recorded in candidates' files. For the Generalist EC-6 certification, all candidates have two student teaching placements of 7 to 8 weeks each. One placement is in a lower grade and one at a higher grade level. Student teaching placement information was found in the candidate's records [TAC §228.35(d)(2)(C)(ii)] along with the candidate's field supervisor assignment [TAC §228.35(f)]. Cooperating teachers also evaluate student teachers and collaborate with field supervisors.

The student handbook states that tutors are available at each of the three sites during the fall and spring semester. These tutors offer assistance in Mathematics, English, and History, and various PowerPoint presentations are available for review. Tutor schedules are posted on bulletin boards around campus as well as on the academic support services website www.sulross.edu/pages/1113.asp. Tutors can be accessed by appointment or walk in. Academic support services also offer many other services, including study skills information, research skills information, writing skills information, TASP workshops, and TExES study guides [TAC §228.35(d)].

Cooperating teachers are trained by means of a handbook presented by the field supervisors, although no documentation of delivery to the cooperation teacher was presented [TAC §228.35(e)].

Field supervisors are trained by the Department Chair and a handbook is available for their reference [TAC §228.35(f)].

Because of lack of documentation for the length of the observation and training of cooperating teachers, the program does not meet standards for this component.
Based on evidence presented, Sul Ross State University-Rio Grande College 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:

Sul Ross — RGC ensures that candidates are prepared to receive the standard certificate by requiring success on designated benchmarks and assessments for candidates. Benchmarks include periodic required meetings with professors who advise candidates on course selection, test preparation, and other topics [TAC §228.40(a)]. Candidates must successfully complete all required courses and student teaching prior to graduation.

Candidates’ readiness to test is determined by success on a practice examination which is available everyday on computer at the Uvalde site according to the university website. To be eligible for testing, the candidate must have completed 90+ hours, have a 2.5 GPA overall, pass the appropriate practice exam with a score of 80% or higher, attend one workshop, and be enrolled in the last semester before student teaching or on a deficiency plan. If the candidate does not pass the actual test, the candidate must take another practice test. A practice test is only good for six months [TAC §228.40(b)]. Individual tutoring for the test is available from all professors, but no documentation verification was available.

The teacher preparation program is evaluated on an on-going basis by candidate evaluations of courses and TExES results are two primary pieces of evaluation data used internally [TAC §228.40(c)]. In addition, the university was reviewed by the Southern Association of Colleges and Schools (SACS) in 2011 and will be again in 2013.

Student records that evidence a candidate’s eligibility for admission to the program and evidence of completion of all program requirements are maintained for five years or more in secure, locked files [TAC §228.40(d)].

Based on evidence presented, Sul Ross State University-Rio Grande College 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).
Current Accreditation Status

Sul Ross University-Rio Grande College is currently rated “Accredited”

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

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

Compliance Recommendations

1) Texas Administrative Code §228.20 Governance
   a. Conduct two advisory committee meetings each academic year within the period from September 1 to August 31 and keep formal minutes;
   b. Provide advisory committee training yearly focusing on the members’ roles and responsibilities;
   c. Include a business and community member on the advisory committee
2) Texas Administrative Code §227.10 Admissions Criteria
   a. Utilize an interview or identify and utilize another screening instrument with candidates to determine their appropriateness to teach. If the interview questions are developed locally, use a rubric to score candidate’s responses.
3) Texas Administrative Code §228.30 Curriculum
   a. Realign the curriculum to address the educator standards for each certificate;
   b. Realign the curriculum to address the 17 curriculum topics.
4) Texas Administrative Code §228.35 Program Delivery and Ongoing Support
   a. Document delivery of the handbook to cooperating teachers as proof of cooperating teacher training.
   b. Ensure that the start and stop time of the formal observations are recorded on the observation instrument.
GENERAL PROGRAM RECOMMENDATIONS:

TAC §228.20

1) Expand the advisory committee to include additional stakeholders such as current and former students who are currently teaching and cooperating teachers;
2) Seek to identify creative ways to conduct advisory committee training;

TAC §228.30

1) Increase the depth and breadth of the syllabi to include specific mention of the 17 curriculum topics, standards, domains and competencies;
2) Have candidates download the educator certification standards for the candidate’s respective certificate to be utilized throughout their certification course;
3) Share the educator certification standards with the community colleges delivering the freshman and sophomore content preparation;
4) Examine all existing courses for overlapping content coverage in order to consolidate and add additional coverage of knowledge and practice of skills required of each certification area;
5) Examine ways to provide courses in sequence;
6) Examine ways to strengthen the instruction in the fine arts (art, theater) to meet the standards for the Generalist EC-6 certification;
7) Seek ways to strengthen communication with surrounding school districts in order to reflect their curriculum and procedures such as lesson planning, etc.

TAC §228.35

1. Revise the student teacher/cooperating teacher/field supervisor handbook to reflect current information;
2. Revise the observation form to include a start and stop time of the interactive conference;
3. Revise the observation form to include a place for a campus representative initials verifying delivery to the principal;
4. Document informal coaching and teaching that is provided by the field supervisor and faculty;
5. Explore options for increasing technology knowledge and skills in the practice of teaching;
6. Have students sign a FERPA release upon entry to student teaching to allow the college to share information with the cooperating teacher, campus principal, and other campus/district personnel as necessary;
7. Have candidates sign up as substitute teachers for nearby school districts in order to be fingerprinted prior to student teaching;
8. Begin student teaching during the preparation of the school year and the end of the school year.

TAC 228.40

1. Explore options for providing online test preparation not embedded in course work or counted as course grade or credit;
2. Explore other means of test preparation outside of coursework, such as the T-Cert website which offers six clock hours of preparation for the PPR exam, Math, Science, and Special Education preparation.

TAC 228.50

1. Go over the Texas Educators’ Code of Ethics annually with the candidates and faculty and have them sign an Ethics Affirmation.