

# Desk Audit Compliance Audit Report 2015-2016 Argosy University

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.texas.gov](http://www.tea.texas.gov) for details.

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**County/District Number:** 057-714

**SBEC Approval Date:** March 4, 2005

Texas Education Agency Education Preparation Program Specialist, Vanessa Alba, conducted a compliance desk audit of Argosy University Educator Preparation Program (EPP), located at 5001 LBJ Freeway, Farmers Branch, TX 75244, in December, 2015, as required by Texas Administrative Code (TAC) §228.10(c) and TAC §229.6(a) which states that educator preparation programs "shall be reviewed at least once every five years". The focus of the audit was the Post Baccalaureate Principal Program and the principal curriculum. The program's accreditation status is "Accredited". The following are the findings of the desk audit.

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

The scope of this audit is restricted solely to verifying compliance with Texas Administrative Code (TAC) §227, §228, §229, §241 and §230.

### **Data Analysis:**

Information concerning compliance with TAC governing educator preparation programs was collected by various qualitative means. A self-report was submitted to TEA on December 1, 2015. A TEA review of documents, student records, course material, and curriculum correlations charts provided evidence regarding compliance. In addition, TEA sent electronic questionnaires to Argosy University EPP stakeholders. A total of 9 out of 17 (53%) responded to the questionnaires as follows: 4 out of 5 (80%) advisory committee members; 2 out of 5 principal candidates (40%); 2 out of 5 (40%) site supervisors; and 1 out of 2 (50%) field supervisors. 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 aligned to Texas Administrative Code.

## **Findings, Compliance Issues, and Recommendations:**

“Findings” indicate evidence that was collected during the compliance audit process. If the program is “NOT in compliance” with any identified component, the program should consult the Texas Administrative Code and correct the issue IMMEDIATELY. An “action plan” may be drafted during the desk audit that identified compliance issues to be addressed. A timeline for completion will be agreed upon between TEA and the program. Program “recommendations” are suggestions for general program improvement and no follow up is required.

### **Ongoing Communication and Action Plan:**

A communication between TEA program specialist and the Argosy University EPP VPAA/Interim Education Chair and Dr. Anita Varrati, Associate Professor and Chair of the Doctoral Program at Argosy University occurred via phone conference on January 29, 2016 to discuss findings and request additional information. Additional documents were submitted by the VPAA/Interim Education Chair on February 5, 2016, and reviewed by TEA. The audit was closed on March 16, 2016.

The action plan was developed in a phone conference with the VPAA/Interim Education Chair and agreed upon on March 16, 2016.

## **COMPONENT I: COMMITMENT AND COLLABORATION - Texas Administrative Code (TAC) §228.20**

### **FINDINGS:**

1. Nannette Glenn, Ph.D., VPAA/Interim Education Chair, College of Education provided support, participated in all aspects of the desk audit, and is accountable for the quality of the educator preparation program and the candidates whom the program recommends for certification [TAC §228.20(c) and TAC §228.2(8)];
2. The advisory committee currently consists of five members representing four groups (2 members represent public/private schools, 1 member represents higher education, 1 member represents an ESC, and 1 member represents business/community). A list of advisory committee members with representation identified was provided as evidence. Argosy University EPP meets TAC §228.20(b) minimum requirements for advisory committee composition;
3. Minutes, agendas and original sign-in sheets verified advisory committee meetings were held. Meeting dates were verified as follows:
  - December 13, 2011 (5 members + EPP Dean were present) (2011-2012 academic year);
  - April 10, 2013 (1 member + EPP Dean were present) (2012-2013 academic year);
  - November 13, 2013 (4 members + EPP Dean were present); (2013-2014 academic year);
  - April 10, 2014 (members present could not be determined) (2013-2014 academic year); and
  - November 12, 2015 (5 members + EPP Dean were present) (2015-2016 academic year).

- While the advisory committee has met five times since 2011 as follows: once in 2011-2012, once in 2012-2013, twice in 2013-2014, and once in 2015-2016 because it did not meet 2 times per academic year (September 1-August 31) Argosy University EPP does not meet TAC §228.20(b) minimum requirements for advisory committee meetings twice during each academic year (September 1-August 31);
- 4. Minutes indicated that the members assisted in the design, delivery, evaluation, and major policy decisions of the EPP. The program meets the minimum requirements of TAC §228.20(b) and TAC §228.1(a); and
- 5. Limited evidence was available that advisory committee members understood their roles and responsibilities as noted in the advisory committee meeting minutes and agendas. The program provided CAEP requirements for advisory committee training and a generic letter on EPP letterhead addressed to “Colleague” regarding advisory committee member roles and responsibilities noting a March 4, 2015 date signed by the EPP Dean. However, there was no specific information on who received the communication and it could not be determined if it was a training regarding TAC requirements for advisory committee member roles and requirements. The date also does not correspond to an EPP advisory committee meeting date. Argosy University EPP did not meet minimum requirements of yearly advisory committee training per TAC §228.20(b).

**Compliance Issues to be addressed:**

- Provide training on the roles and responsibilities of each member of the advisory committee. If presented in person, have advisory committee members sign attendance records. If a handbook is provided by email, use the delivery/read receipt. Retain all documentation for audit purposes [TAC §228.20(b)]; and
- Schedule advisory committee meetings twice during each academic year (September 1-August 31). An agenda should be published, dated attendance records collected, and detailed dated minutes of proceedings should be taken. Minutes should be emailed to all members. Retain attendance records, and minutes for audit purposes [TAC §228.20(b)].

**Recommendations:**

- Utilize the TEA Advisory Committee Training PPT to train members in their roles and responsibilities. This can be emailed to members with a delivery/read receipt to serve as documentation that members have been trained annually. Maintain email verification as evidence that training has occurred;
- Consider adding a back-up person, familiar with the program, to serve as the Advisory Committee Chair, when the program director is not available to conduct the advisory committee meetings;
- Consider conducting the meetings via SKYPE or other electronic communication;
- Rotate the terms of the advisory committee members to bring fresh ideas and insights to the group; and
- Provide an incentive to the members of the advisory committee for their involvement and assistance with the Argosy University Educator Preparation Program (EPP) by providing Continuing Professional Education (CPE) credit to members who need CPE hours for the renewal of their Texas certificates.

**Based on the evidence presented, Argosy University Educator Preparation Program (EPP) is not in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.**

**COMPONENT II: Texas Education Code (TEC) §21.044(e) and ADMISSION CRITERIA - Texas Administrative Code (TAC) §227.10 and §241.5**

**FINDINGS:**

1. Consistent and accurate information is provided to all applicants and enrolled candidates on the effect of supply and demand forces on the educator workforce in this state. Argosy University provides this information on the website. The program was advised about providing consistent and accurate information to all applicants and enrolled candidates on the performance over time of the educator preparation program [Texas Education Code (TEC) §21.044(e)];
2. Argosy University EPP admission requirements as identified on the website and self-report require the applicant to:
  - A. Be enrolled in an educator preparation program from an institution of higher education that is accredited by a regional accrediting agency, as recognized by the Texas Higher Education Coordinating Board (THECB) [TAC §227.10(a)(2) and TAC §230.11];
  - B. Hold a Baccalaureate Degree from an accredited institution of higher education [TAC §241.5(a); TAC §227.10(a)(2)];
  - C. Have a minimum 2.5 GPA or at least a 2.5 in the last 60 semester credit hours [TAC §227.10(a)(3)(A)] or meet the exception to the minimum GPA [TAC §227.10(a)(3)(B)];
  - D. Submit an application [TAC §227.10(a)(6)];
  - E. Complete an interview [TAC §227.10(a)(6) and TAC 241.5(c)];
  - F. Submit a writing sample [TAC §227.10(a)(6) and TAC §241.5(c)];
  - G. Submit 3 letters of recommendation [TAC §241.5(c)];
  - H. Hold a valid teaching certificate [TAC §241.20(3)]; and
  - I. Be formally admitted and accept that formal admission invitation [TAC §227.17(a)].
3. The program was advised on future implementation admission requirements as follows:
  - A. For an applicant to be formally admitted to an educator preparation program (EPP), the applicant must meet all of the admission requirements specified in 227.10 of this title (relating to Admission Criteria) [TAC §227.17(a)];

- B. For an applicant to be formally admitted to an EPP, the EPP must notify the applicant of the offer of admission in writing by mail, personal delivery, facsimile, email, or an electronic notification. The offer of admission must include the effective date of admission [TAC 227.17(b)];
- C. For an applicant to be considered admitted to the EPP, the applicant must accept the offer of admission in writing by mail, personal delivery, facsimile, email, or an electronic notification. The acceptance admission must include the effective date of admission. [TAC 227.17(c)];
- D. An EPP shall not provide examination approval, training, or coursework that leads to certification to applicants prior to formal admission into an EPP [TAC 227.17(d)];

E. Incoming Class Grade Point Average as follows [TAC 227.19(a)]:

(a) The overall grade point average (GPA) of each incoming class admitted between September 1 and August 31 of each year by an educator preparation program (EPP), including an alternative certification program, may not be less than 3.00 on a four-point scale or the equivalent. In computing the overall GPA of an incoming class, an EPP may:

(1) Include the GPA of each person in the incoming class based on all coursework previously attempted by the person at an accredited institution of higher education from which:

(A) The applicant is currently enrolled (undergraduate university program formal admission, alternative certification program contingency admission, or post-baccalaureate program contingency admission); or

(B) The most recent bachelor's degree or higher degree was conferred (alternative certification program formal admission or post-baccalaureate program formal admission); or

(2) Include the GPA of each person in the incoming class based only on the last 60 semester credit hours of all coursework attempted by the person at an accredited institution of higher education from which:

(A) The applicant is currently enrolled (undergraduate university program formal admission, alternative certification program contingency admission, or post-baccalaureate program contingency admission); or

(B) The most recent bachelor's degree or higher degree was conferred (alternative certification program formal admission or post-baccalaureate program formal admission).

(b) A person seeking career and technical education certification is not included in determining the overall GPA of an incoming class.

- 4. Ten (10) candidate records were provided to verify that admission requirements are followed:
- 5. Transcripts for 9 of the 10 files reviewed were provided to verify that all were enrolled as post-baccalaureate student at Argosy University in the College of Education [TAC §227.10(a)(1); TAC §230.11; and TAC§ 241.5];

6. Transcripts for 9/10 candidates were provided to verify a GPA range of 2.19-3.78 at the time of admission. Of the 9 files reviewed, there were 3 candidates admitted who met the exception to the minimum GPA requirement. Documentation was signed by the program director noting the reason for acceptance for each of the files reviewed [TAC §227.10(a)(3)(A) and TAC §227.10(a)(3)(B)];
7. Files were provided for review (9/10 files) to document that candidates hold a baccalaureate degree from an accredited institution of higher education [TAC §241.5(a); TAC §227.10(a)(2)];
8. It was verified that files (70%) reviewed contained a completed signed and dated electronic application (7/10 files reviewed). Because this was not a preponderance of evidence, the program did not meet the application requirement [TAC §227.10(a)(6)];
9. It was verified that 1/10 applicants participated in an interview with the program admissions committee and a recommendation for admission was made. While the program advised that there were more than one applicant interview notes (with the scoring rubric) provided in the documents that were provided on both the initial submission and resubmission of documents. The evidence was not found. It was noted by TEA that the interviews and writing samples were conducted at the same time. The program did not meet the interview requirement [TAC §227.10(a)(6)];
10. A writing sample was found in 7 out of 10 (70%) files reviewed [TAC §227.10(a)(6)]; TAC 241.15(b)];
11. Three letters of recommendation (2 from a source familiar with the student and 1 from the current school/district administrator) were found in 3 out of 10 files reviewed. The program did not meet the requirement as prescribed [TAC §227.10(a)(6)]; TAC 241.15(b)];
12. A current resume was found in 6 out of 10 (60%) files reviewed. The program did not meet the requirement as prescribed [TAC §227.10(a)(6)]; TAC 241.15(b)];
13. The admissions requirements are published on the Argosy University website [TAC §227.10(a)(7)]; and
14. It was not verified (10 files reviewed) that evidence a candidate's eligibility for admission to the program and evidence completion of all program requirements are kept for a period of 5 years. The program keeps electronic files, but did not produce all records for files reviewed. The program did not meet the requirement as prescribed [TAC §228.40(d)].

**Compliance Issues to be addressed:**

- Collect all admission information prior to formal admission into the principal preparation program: A signed and dated application, a structured interview based on a rubric with a cut score, a writing sample, and a current resume, and a service record reflecting two years of teaching experience [TAC §227.10(a)(6); TAC 241.5(b); TAC 227.10(a)(8)]; and
- Retain all documentation for each candidate's eligibility for admission to the program and evidence of completion of all program requirements for a period of 5 years. These records should be available for audit purposes [TAC §228.40(d)].

### **General Recommendations:**

- Consider requiring more than one interviewer in each interview to ensure that bias is eliminated in the interview process. It is recommended that 3 people sit in for the interview in case there is a question as to whether applicant meets admission requirements, third person can serve as tie-breaker.

**Based on the evidence presented, Argosy University EPP is not in compliance with TAC §227.10 and TAC §241.5 - Admission Criteria.**

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

### **FINDINGS:**

1. The curricular scope of the desk audit focused on standards required for principal certification;
2. The program was advised about new requirements in Texas Education Code (TEC) §21.044(e) regarding the following:
  - Consistent and accurate information provided to all educator candidates on the high expectations in the state;
  - Consistent and accurate information provided to all enrolled educator candidates on the responsibilities that educators are required to accept;
  - Consistent and accurate information provided to all applicants and enrolled candidates on the skills that educators are required to possess;
  - Consistent and accurate information provided to all enrolled candidates concerning the framework in this state for teacher and principal evaluation, including the procedures followed in accordance with Subchapter H; and
  - Consistent and accurate information provided to all enrolled candidates on the importance of building strong classroom management skills.
3. The Principal Standards alignment chart, syllabi and course outlines were provided as evidence that the educator standards adopted by the State Board for Educator Certification (SBEC) are the curricular basis for all educator preparation. There are 10 courses required for principal certification in the Argosy University principal program. The program meets the requirements that the educator standards adopted by the State Board for Educator Certification (SBEC) shall be the curricular basis for all educator preparation [TAC §228.30(a); TAC §241.10; and TAC §241.15];
4. The degree plan noting coursework required and syllabi presented for review for the 10 courses required for principal certification served as evidence that the curriculum for each educator preparation program relies on scientifically based research. Coursework and training should be sustained, rigorous, interactive, student-focused, and



performance-based. Specifically, the syllabi and course notes reflected that there was ongoing interaction with instructors, direct instruction and multiple opportunities to practice the skills required to be a principal in the courses required of all candidates, which include: E6034 Intro to Ed Leadership, E6035 Supervision and Evaluation of Instruction, E6306 School Law, E 6037 Improving School Decisions through Data-Driven Change, E6038 Education in a Diverse Society, E 6039 Administration of Human Resources, E 6100 Research in Education, E 6233 Educational Finance, E 6579 The Texas Principalship, and E 6580/6581/6582 School Administrative Practicum [TAC §228.30 (a)];

5. Syllabi detailing the assessments used in each course were provided for each course offered. Specific evidence, in the form of E6233 School Finance, one of the 10 courses that each candidate is required to take, documented that each candidate met the requirement of structured assessments of each candidate’s progress throughout the EPP as prescribed. That course included the syllabus, PPTs, a document related to school finance that was used as a part of the course requirements, a TEA document entitled “School Finance 101”, and formative/summative assessments were noted within the syllabus. An example of remediation was addressed in ED 6579, which is a total overview and review of all courses required of each candidate. The program met the requirement as prescribed [TAC §228.40(a)];
6. It was noted in the self report that the courses are offered in a face-to-face format and less than 51% of coursework is offered online, while candidates noted in their questionnaire responses that the program was a hybrid of on-line and face-to-face modules. Candidates also reported wanting more “on-land classes”.
7. It was also noted in the faculty/field supervisor questionnaire results that only one standard in each over-arching area required for certification was addressed in the curriculum, observations and written-feedback provided to candidates. This is in direct contradiction to syllabi and standards alignment charts submitted for TEA review.

Principal candidates and field supervisors reported the following regarding instruction, observing and providing written feedback in their respective questionnaires:

Instruction Provided in the Following Areas:	Candidates Yes/No	Faculty/Field Supervisors Yes/No
<b>Learner-Centered Values and Ethics of Leadership</b>		
modeling and promoting the highest standard of conduct, ethical principles, and integrity in decision making, actions and behaviors	100% / 0%	100% / 0%



implementing policies and procedures that encourage all campus personnel to comply with Chapter 247 of this title (relating to Educators' Code of Ethics)	100% / 0%	0% / 0%
modeling and promoting the continuous and appropriate development of all learners in the campus community	100% / 0%	0% / 0%
promoting awareness of learning differences, multicultural awareness, gender sensitivity, and ethnic appreciation in the campus community	100% / 0%	0% / 0%
articulating the importance of education in a free democratic society	50% / 50%	0% / 0%
<b>Learner-Centered Leadership and Campus Culture</b>		
creating a campus culture that sets high expectations, promotes learning, and provides intellectual stimulation for self, students, and staff	100% / 0%	100% / 0%
ensuring that parents and other members of the community are an integral part of the campus culture	50% / 50%	0% / 0%
using strategies to ensure the development of	100% / 0%	0% / 0%

collegial relationships and effective collaboration of campus staff		
responding appropriately to the diverse needs of individuals within the community in shaping the campus culture	100% / 0%	0% / 0%
using emerging issues, trends, demographic data, knowledge of systems, campus climate inventories, student learning data, and other information to develop a campus vision and plan to implement the vision	100% / 0%	0% / 0%
facilitating the collaborative development of a shared campus vision that focuses on teaching and learning	100% / 0%	0% / 0%
facilitating the collaborative development of a plan in which objectives and strategies to implement the campus vision are clearly articulated	100% / 0%	0% / 0%
aligning financial, human, and material resources to support the implementation of the campus vision	100% / 0%	0% / 0%
establishing processes to assess and modify the plan of implementation to ensure achievement of the campus vision	100% / 0%	0% / 0%

supporting innovative thinking and risk-taking efforts of everyone within the school community and view unsuccessful experiences as learning opportunities	100% / 0%	0% / 0%
acknowledging, recognizing, and celebrating the contributions of students, staff, parents, and community members toward the realization of the campus vision	100% / 0%	0% / 0%
<b>Learner-Centered Human Resources Leadership and Management</b>		
collaboratively developing, implementing, and revising a comprehensive and on-going plan for professional development of campus staff that addresses staff needs and aligns professional development with identified goals	100% / 0%	100% / 0%
facilitating the application of adult learning and motivation theory to all campus professional development, including the use of appropriate content, processes, and contexts	100% / 0%	0% / 0%
ensuring the effective implementation of the professional	100% / 0%	0% / 0%

development plan by allocation of appropriate time, funding, and other needed resources		
implementing effective, legal, and appropriate strategies for the recruitment, selection, assignment, and induction of campus staff	100% / 0%	0% / 0%
using formative and summative evaluation processes appropriate to the position held to further develop the knowledge and skills of campus staff	100% / 0%	0% / 0%
diagnosing and improving campus organizational health and morale through the implementation of strategies designed to provide on-going support to campus staff members	100% / 0%	0% / 0%
engaging in on-going, meaningful, and professional growth activities to further develop necessary knowledge and skills and to model lifelong learning	100% / 0%	0% / 0%
<b>Learner-Centered Communications and Community Relations</b>		
demonstrating effective communication through oral, written, auditory, and nonverbal expression	100% / 0%	100% / 0%

using effective conflict management and group consensus building skills	100% / 0%	0% / 0%
implementing effective strategies to systematically gather input from all campus stakeholders	100% / 0%	0% / 0%
developing and implementing strategies for effective internal and external communications	100% / 0%	0% / 0%
developing and implementing a comprehensive program of community relations which uses strategies that will involve and inform multiple constituencies, including the media	100% / 0%	0% / 0%
providing varied and meaningful opportunities for parents to be engaged in the education of their children	100% / 0%	0% / 0%
establishing partnerships with parents, business, and other groups in the community to strengthen programs and support campus goals	100% / 0%	0% / 0%
responding to pertinent political, social, and economic issues that exist in the internal and external environment	100% / 0%	0% / 0%
<b>Learner-Centered Organizational</b>		

<b>Leadership and Management</b>		
implementing appropriate management techniques and group processes to define roles, assign functions, delegate authority, and determine accountability for campus goal attainment	100% / 0%	100% / 0%
gathering and organizing information from a variety of sources for use in creative and effective campus decision making	100% / 0%	0% / 0%
framing, analyzing, and creatively resolving campus problems using effective problem-solving techniques to make timely, high-quality decisions	100% / 0%	0% / 0%
developing, implementing, and evaluating change processes for organizational effectiveness	100% / 0%	0% / 0%
implementing strategies that enable the physical plant, equipment, and support systems to operate safely, efficiently, and effectively to maintain a conducive learning environment	100% / 0%	0% / 0%
applying local, state, and federal laws and policies to support sound decisions while	100% / 0%	0% / 0%

considering implications related to all school operations and programs		
acquiring, allocating, and managing human, material, and financial resources according to school district policies and campus priorities	100% / 0%	0% / 0%
collaboratively planning and effectively managing the campus budget	100% / 0%	0% / 0%
using technology to enhance school management	50% / 50%	0% / 0%
using effective planning, time management, and organization of work to maximize attainment of school district and campus goals	100% / 0%	0% / 0%
<b>Learner-Centered Curriculum Planning and Development</b>		
using emerging issues, occupational and economic trends, demographic data, student learning data, motivation theory, learning theory, legal requirements, and other information as a basis for campus curriculum planning	100% / 0%	100% / 0%
facilitating the use of sound research-based practice in the development and implementation of campus curricular, co-curricular, and extra-curricular	100% / 0%	0% / 0%



programs		
facilitating campus participation in collaborative school district planning, implementation, monitoring, and curriculum revision to ensure appropriate scope, sequence, content, and alignment	100% / 0%	0% / 0%
facilitating the use and integration of technology, telecommunications, and information systems to enrich the campus curriculum	100% / 0%	0% / 0%
facilitating the effective coordination of campus curricular, co-curricular, and extracurricular programs in relation to other school district programs	100% / 0%	0% / 0%
<b>Learner-Centered Instructional Leadership and Management</b>		
facilitating the development of a campus learning organization that supports instructional improvement and change through an on-going study of relevant research and best practice	100% / 0%	100% / 0%
facilitating the implementation of sound, research-based	100% / %	0% / 0%

instructional strategies, decisions, and programs in which multiple opportunities to learn and be successful are available to all students		
implementing special campus programs to ensure that all students are provided quality, flexible instructional programs and services to meet individual student needs (i.e., guidance and counseling programs and services);	100% / 0%	0% / 0%
using interpretation of formative and summative data from a comprehensive student assessment program to develop, support, and improve campus instructional strategies and goals	100% / 0%	0% / 0%
facilitating the use and integration of technology, telecommunications, and information systems to enhance learning	100% / 0%	0% / 0%
facilitating the implementation of sound, research-based theories and techniques of classroom management, student discipline, and school safety to ensure an environment conducive to teaching and learning	100% / 0%	0% / 0%

facilitating the development, implementation, evaluation, and refinement of student activity programs to fulfill academic, developmental, social, and cultural needs	50% / 50%	0% / 0%
acquiring and allocating sufficient instructional resources on the campus in the most equitable manner to support and enhance student learning	100% / 0%	0% / 0%

**Compliance Issues to be addressed:**

- None

**Recommendations:**

- Ensure that Texas faculty/field supervisors are aware of all of the Texas principal standards in TAC §241.15 required for initial certification and how they can ensure that candidates are meeting the requirements of those standards. This should be accomplished with training sessions with the field supervisors.

**Based on evidence presented, Argosy University Educator Preparation Program (EPP) is in compliance with Texas Administrative Code Section §228.30.**

**COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT - Texas Administrative Code (TAC) §228.35**

**FINDINGS:**

1. Argosy University coursework and training ensure the educator is effective in the professional assignment. The program curriculum review, degree plan for each candidate file reviewed and the course/module schedule revealed that the program has a total of 645 clock-hours in the Post-Bac program [TAC §228.35(b) and TAC §228.2(5)]. The program requires that candidates complete 405 clock-hours of coursework and training prior to principal practicum [TAC §228.35(a)(3) and TAC §228.2(5)] and a 240 clock hour practicum [TAC §228.35(d)(3)]. The total program hours, program hours prior to principal practicum and principal practicum hours provided in the document review were verified in the degree plan and program hours chart;

2. All coursework and training shall be completed prior to educator preparation program completion and issuance of standard certification. Candidate files were provided for review noting program benchmarks, degree plans, transcripts and review of the program schedule of coursework as evidence of compliance [TAC §241.20(5); TAC §228.2(18)];
3. While the Argosy University Self Report reflected that a 240 clock-hour practicum is required, the program did not provide sufficient evidence to document that practicum was actually 240 clock-hours. The candidate files reviewed (8 out of 10) documented hours ranging from 33-264.53 clock hours. A waiver was presented for one candidate due to extensive work experience. Two candidates did not have practicum logs due to the death of a professor and lack of program maintaining records. The program reported that prior to 2010 candidates were not required to complete a 160 clock hour practicum. As a result of the program's misunderstanding about practicum requirements, TEA further verified with the program that the 160 clock-hour practicum requirement has been in effect since December 14, 2008. The program did not meet the requirement as prescribed [TAC §228.35(d)(3); TAC §228.2(d)(17)];
4. The program provided sufficient documentation that each candidate had an appropriate site supervisor. Candidate placement information showing name of site supervisor was provided. The campus name or contact information was also provided. The program met the requirements of site supervision as prescribed [TAC §228.2(19)];
5. There was not sufficient evidence provided that Argosy University EPP provided site supervisor training. A sample document regarding site supervisor training was provided, but it was not specific for each site supervisor assigned to each principal candidate. The program did not meet the requirement as prescribed [TAC §228.35(e)];
6. It was documented by the program and verified that there are 4 field-supervisors at Argosy University. All hold an appropriate in-state principal certification, but 1 out of 4 has an inactive certificate. That individual is not currently serving as a field supervisor. Each of the field supervisors has 5+ years of teaching experience. A certified field supervisor was assigned to each candidate. The program provided candidate placement lists with field supervisors assigned as evidence of compliance. It was verified that the certified field supervisors met the requirements as prescribed [TAC §228.35(g); TAC §228.2(10)];
7. The Argosy University EPP field supervisors received training on December 6 and December 17, 2013. Field supervisor training with original signature was provided for those dates noting 4 field supervisors were trained. Because the only documented training occurred in 2013, the program did not meet the field-supervisor training requirement as prescribed [TAC §228.35(g)];
8. Argosy University EPP did not provide evidence that field supervisors made initial contact within the first 3 weeks of assignment with each candidate as required. The program did not meet the requirements of initial contact by the field-supervisor as prescribed [TAC §228.35(f)];
9. Argosy University EPP did not provide evidence that field supervisors conducted observations for a total of 135 minutes. A sample observation document based on ISSLIC Standards was provided for review. It was noted that the practicum occurs within the following courses: E6580, E6581, and E6582. The program did not meet the requirements of field-supervision as prescribed [TAC §228.35(g)(1)];

10. It could not be verified that the first observation occurred within the first 6 weeks of practicum assignment for each candidate reviewed. The program provided evidence for 3 out of 10 (30%) files reviewed, but it appeared that the site supervisor, and not the field supervisor, conducted those observations [TAC §228.35(g)(2)];
11. It could not be verified that a minimum of three observations by the field supervisor were completed during the term of the practicum. The program did not meet the requirements as prescribed [TAC §228.35(g)(3)];
12. It could not be verified that the field supervisor documented professional practices observed, provided written feedback through an interactive conference with the candidate. The field supervisor conducted conferences with groups of candidates and not with individual candidates. The program did not meet the requirement as prescribed [TAC §228.35(g)];
13. It could not be verified that the field supervisor provided a copy of the written feedback to the candidate's site supervisor as required. The program did not meet the requirement as prescribed [TAC §228.35(g)]; and
14. There was documentation provided in the form of a sample remediation process to verify that additional observations and coaching are provided. It was noted in the Self Report that the program has Dispositions, questions to the professor, and remediation activities to address deficiency areas. The program met the requirements of informal observations and coaching as prescribed [TAC §228.35(g)].

**Compliance Issues to be addressed:**

- Require each principal candidate to maintain a practicum log that reflects completion of activities in each principal standard during the minimum of 160 clock-hour practicum [TAC §228.35(d)(3) and TAC §228.2(17)]. Retain in candidate records for audit purposes;
- Document by dated attendance records with original signatures that the program provided yearly site supervisor training. Retain attendance records for audit purposes [TAC §228.35(e)];
- Document by dated attendance records with original signatures that the program provided yearly field supervisor training. Retain attendance records for audit purposes [TAC §228.35(g)];
- Require each field supervisor to maintain a field supervisor log that reflects by date, and method of first contact with each candidate reflecting contact within the first 3 weeks of assignment in the principal practicum. This can be done by telephone, email, or other electronic communication. Retain documenttion of first contact for audit purposes [TAC §228.35(g)];
- Revise the observation form to reflect the start date of the practicum, whether the contact is the first contact, first, second, or third observatoin, time the observation starts, time it ends, principal standard being observed, comments about practices observed, start and stop time of interactive conference and signatures of principal candidate, field supervisor, and site supervisor;

- Require each field supervisor to conduct a minimum of three observations totaling at least 135 minutes in duration by using an observation form reflecting the start and stop time of the observations. The first observation must be conducted within the first 6 weeks of practicum assignment. Retain observation forms in the candidate's records for audit purposes [TAC §228.35(g)(1); TAC §228.35(g)(2); TAC §228.35(g)(3); and
- Require each field supervisor to document on the observation form professional practices observed during the observation. The field supervisor should document by a conference start and stop time on the observation form an interactive conference. The field supervisor and the candidate must sign to acknowledge the observation and the interactive conference. The field supervisor must provide a copy of the written feedback to the candidate's site supervisor. The delivery can be the signed observation form by the site supervisor or the designee of the site supervisor. The signed observation form should be retained in the candidate's folder for audit purposes [TAC §228.35(g)].

### Recommendations:

- Consider providing Site Supervisor Training materials via email with read receipt to ensure that each site supervisor has received, read and understands the requirements; and
- Consider providing Field Supervisor Training materials via email with read receipt to ensure that each field supervisor has received, read and understands the requirements.

**Based on evidence presented, Argosy University Educator Preparation Program (EPP) 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

### FINDINGS:

1. Argosy University EPP has established benchmarks to ensure that candidates are prepared to receive standard certification [TAC §228.40(a)]. Documentation detailing the benchmark activity, timeline, person responsible, the candidate record showing progression through the program by verifying benchmarks, and additional documentation in the form of a degree plan was present for 9 out of 10 candidate files reviewed.
2. It was noted that the inclusion of E6579 *The Texas Principalship*, serves as the benchmark course for student preparation to sit for the principal certification exam. "These benchmarks are pivotal in helping the student prepare for the exam, shore up any areas that need improvement, and provide a vehicle for students to feel confident about taking the exam because they have had multiple opportunities." [TAC §228.40(b)]; and

3. The program did not provide sufficient evidence that it continuously evaluates the design and delivery of the educator preparation curriculum based on performance data, scientifically-based research practices, and the results of internal and external assessments. The program provided information regarding internal assessments used to gauge candidate performance that are located in each course. These Learning Assessment System Assignments (LASAs) are utilized in evaluation of the program, and as the program reported, during annual program reviewed, where all assessment data are discussed. All of these assessments are research-based. While the program stated that this is done, tangible evidence was not provided for the audit and, thus, did not meet the requirements as prescribed [TAC §228.40(c)].

**Compliance issues to be addressed:**

- Annually create an evaluative report presented to the advisory committee on the design and delivery of the educator preparation curriculum based on internal (surveys from site supervisors, course surveys from candidates) and external data including performance data such as test results, ASEP reports, and scientifically-based research practices [TAC §228.40(c)].

**Based on evidence presented, Argosy University Educator Preparation Program (EPP) is not in compliance with Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates of Candidates for Certification and Program Improvement.**

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

**Findings:**

1. 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); Argosy University EPP did not provide documentation indicating that faculty members submitted a signed document noting that they had read and understood, and will abide by the Code of Ethics; and
2. Argosy University EPP did not provide documentation that candidates reviewed or acknowledged by signing a statement that they read and understood and will abide by the Code of Ethics.

**Compliance issues to be addressed:**

- Require all faculty, staff and candidates sign a copy of the Texas Educators' Code of Ethics stating that they have read, understood, and will abide by Chapter 247 of this title relating to the Educators' Code of Ethics [TAC §228.50 and TAC §247.2].

**Recommendations:**

- Consider utilizing the TEA Ethics videos for staff/candidates.



**Based on evidence presented, Argosy University Educator Preparation Program (EPP) is not in compliance with Texas Administrative Code §228.50(a) regarding Professional Conduct.**

### **COMPONENT VII: Complaints and Investigations Procedures TAC) §228.70**

1. The EPP shall adopt and send to TEA staff, for inclusion in the EPP's records, a complaint procedure that requires the EPP to timely attempt to resolve complaints at the EPP level before a complaint is filed with TEA staff. Argosy University has a complaint policy on file with TEA. The policy is not posted on the program's website because it has not been submitted to the program's legal department. The program meets the requirements as prescribed [TAC 228.70(b)(1)];
2. The EPP shall post a notification at all of its physical site(s) used by employees and candidates, in a conspicuous location, information regarding filing a complaint with TEA staff in accordance with subsection (c)(1) of this section. The program was advised of the requirement [TAC 228.70(b)(2) and TAC 228.70(b)(3)]; and
3. Upon request of an individual, the EPP shall provide information in writing regarding filing a complaint under the EPP's complaint policy and the procedures to submit a complaint to TEA staff in accordance with subsection (c)(1) of this section. The program was advised of the requirement [TAC §228.70(b)(4)].

#### **Compliance issues to be addressed:**

- None

#### **Recommendations:**

- Ensure that Argosy posts conspicuously, in offices and classrooms, information regarding filing a complaint with TEA.

**Based on evidence presented, Argosy University Educator Preparation Program (EPP) is in compliance with Texas Administrative Code § regarding Complaints and Investigations Procedures.**

### **COMPONENT VIII: Rules for Probationary Certificates (TAC) §230.37**

1. Argosy University does not place any principal candidates on probationary certificates for practicum requirements.

**Based on evidence presented, Argosy University Educator Preparation Program (EPP) is in compliance with Texas Administrative Code §230.37 regarding Rules for Probationary Certificates.**

**Compliance issues to be addressed:**

- None

**Recommendations:**

- If any candidates in the future complete their practicum as an internship, require that they be placed on an appropriate probationary certificate.



**Standard Recommendations for Argosy University EPP:**

- Align the verbiage of Argosy University EPP to the verbiage of Texas Administrative Code (TAC) (ex. Field supervisor, site supervisor, candidate, practicum, internship, etc.);
- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about current Texas Administrative Code;
- Continue to participate in webinars provided by the Division of Educator Preparation to ensure that the program staff is knowledgeable about current requirements and changes in Texas Administrative Code;
- Continue to maintain communication with the program specialist assigned to the program; and
- Ensure that TEA staff has the most current contact information by sending update emails to the assigned program specialist.