



# Compliance Audit Report 2014-2015 North American University and Texas Gulf Foundation

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](http://www.tea.state.tx.us) for details.

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And

Dr. Kudbettin Aksoy, Director of Texas Gulf Foundation

**County/District Number:** 101-725 and 101-719

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

Texas Education Agency Education Preparation Program Specialists, Lorrie Ayers and Mixon Henry, conducted compliance audits of North American University and Texas Gulf Foundation, both located at 3203 N. Sam Houston Pkwy W., Houston, TX 77038, on January 6-8, 2015, as required by Texas Administrative Code (TAC) §229. North American University (NAU) is a traditional program and Texas Gulf Foundation (TGF) is an alternative certification program; however, both programs share resources such as building and staff. During the opening session, staff from both programs discussed merging both NAU and TGF under the NAU name but retaining the traditional and alternative certification options for educator preparation. The programs plan to present the merger to the advisory committee with the intention of completing the merger. This report is written with the understanding that the merge will take place following the advisory committee meeting. The report will identify the compliance issues within each program with the understanding that all compliance issues will be corrected. The following are the findings of the audit.

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

The scope of this audit is restricted solely to verifying compliance with Texas Administrative Code §227, §228, §229, §230, and §149.

### **Data Analysis:**

Information concerning compliance with TAC governing educator preparation programs is collected by various qualitative means. Self-reports were submitted to TEA on December 4, 2014. An onsite review of documents, student records, course materials, and curriculum correlations charts provided evidence regarding compliance. In addition, TEA sent electronic questionnaires to North American University and Texas Gulf Foundation stakeholders. Respondents for NAU included five (5) out of seven (7) advisory committee members, two (2) out of nine (9) educator candidates, one (1) out of six (6) principals, and four (4) out of nine (9) cooperating teachers/mentors. Respondents for TGF included one (1) out of six (6) advisory committee members, six (6) out of fifteen (15) educator candidates, six (6) out of twelve (12) principals, and two (2) out of eleven (11) cooperating teachers/mentors. Qualitative methods of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. Evidence of compliance is measured using a rubric aligned to Texas Administrative Code.

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

“Findings” indicate evidence collected during the audit process. Findings will identify any areas in which the program is not meeting Texas Administrative Code (TAC). If the program is NOT in compliance with any identified component on the rubric, the program should consult the Texas Administrative Code and correct the issue IMMEDIATELY. An action plan with a timeline for correcting compliance issues may be drafted during the visit. Program recommendations are suggestions for general program improvement and no follow up is required.

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

The opening session on January 6, 2015, was attended by Dr. Reg Pecen, University President, Dr. John Topuz, Vice President of Academic Affairs, Dr. Kudbettin Aksoy, Director of Texas Gulf Foundation and Dr. Halil Tas, Director of Teacher Certification at NAU. During the opening session, Dr. Aksoy and Dr. Tas presented an overview of the North American University and Texas Gulf Foundation Teacher Preparation Programs.

The closing session was held on January 8, 2015, and was attended by Dr. John Topuz, Vice President of Academic Affairs, Dr. Kudbettin Aksoy, Director of Texas Gulf Foundation and Dr. Halil Tas, Director of Teacher Certification at NAU. During the closing session an action plan was developed to guide implementation of corrective actions and general recommendations.

**FINDINGS:**

1. The advisory committee currently consists of 6 members. Two (2) members of the advisory committee represent the Education Service Center (ESC), one (1) member represents institutions of higher education, and three (3) members represent business and community. TEA strongly recommends that NAU add advisory committee members from the public, private, or charter school systems. NAU staff indicate new members from K-12 sector will join the advisory committee soon. North American University meets TAC §228.20(b) minimum requirements for advisory committee composition.
2. Agendas, minutes, and attendee records are evidence of advisory committee meetings held on these dates: 11/20/10 (2010-2011 reporting year), 9/10/11 and 5/12/12 (2011-2012 reporting year), 10/27/12, 2/25/13 and 5/20/13 (2012-2013 reporting year), 10/28/13 and 4/21/14 (2013-2014 reporting year) and 10/28/14 (2014-2015 current year). [TAC §228. 20(b)].
3. According to TAC 228.20(b), the advisory committee shall assist in the design, delivery, evaluation, and major policy decisions of the educator preparation program. Meeting minutes provide evidence that the advisory committee addresses delivery, design, and major policy decisions but not program evaluation.
4. Meeting minutes provide evidence that the design delivery, evaluation, and major policy decisions of Texas Gulf Foundation are not discussed.
5. Advisory committee minutes are not detailed and do not reflect the interactions among members and staff.
6. Responses to questionnaires indicate that some advisory committee members do not understand their roles and responsibilities.

**COMPLIANCE ISSUES TO BE ADDRESSED:**

1. No documented collaboration on program evaluation by Advisory Committee.
2. No discussions of Texas Gulf Foundation ACP business in Advisory Committee meetings.
3. Some advisory committee members do not understand their roles and responsibilities.

**COMPLIANCE RECOMMENDATIONS:**

1. Include discussions of annual program evaluation in Advisory Committee meetings and request input for program improvement.
2. Upon merger of NAU and TGF, include discussions of design, delivery, evaluation and major policy decisions for both programs in advisory committee meetings. Document in detailed meeting minutes.
3. Review the roles and responsibilities with advisory committee members annually.

## **GENERAL RECOMMENDATIONS:**

1. To secure a broad spectrum of ideas and views, consider increasing the diversity of the advisory committee by adding representatives from the K-12 sector, such as human resource directors, superintendents, principals, cooperating teachers/mentors, or former candidates. Also consider inviting a current candidate to be part of advisory committee meetings.
2. Prepare an advisory committee handbook for committee members. Use the handbook for training those members who cannot attend the face-to-face training.
3. To increase participation in advisory committee meetings, explore the use of technology such as webinars, WebEx, conference calls, etc. to encourage virtual meeting attendance.
4. Take detailed minutes of the meeting to reflect interactive discussions among members.
5. Use a template (TEA provided or created by EPP) to ensure all required areas are discussed during the advisory committee meetings.

**Based on the evidence presented, North American University and Texas Gulf Foundation are not in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.**

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

### **FINDINGS:**

1. According to information found on the North American University and Texas Gulf Foundation websites and in the self-report, all candidates are required to have the following: 2.5 grade point average (GPA) on transcripts, a completed application, a successful interview, and 12-15 hours in the content area in which certification is sought. Documentation for out-of-country candidates in the TGF candidate folders indicates these candidates are admitted with lower GPA's due to calculation errors in the foreign transcript review. TGF does not meet TAC requirements for admission to a certification program [TAC §227.10(a)(7)].
2. North American University currently does not have candidates from out-of-country, but has procedures in place for transcript evaluation. Due to misinformation received by NAU, there is currently no TOEFL requirement in place for out-of-country candidates to demonstrate English proficiency.
3. The TGF program allows candidates employed in charter schools to take the content test under the charter school route while concurrently enrolled in the Texas Gulf Foundation program. This process circumvents the accountability system in TAC §229 and is not allowed.
4. The program maintains candidate records for five years in a secure environment.

## **COMPLIANCE ISSUES TO BE ADDRESSED:**

1. For out-of-country candidates, admission GPA is being recalculated from calculation provided by the transcript review vendor.
2. There is no TOEFL requirement for determining English proficiency of out-of-country candidates for the purpose of admission to the EPP.
3. Candidates who have been admitted to EPP are being given test approval by the charter school in which they are employed and not by the EPP.

## **COMPLIANCE RECOMMENDATIONS:**

1. For admission of out-of-country candidates, use the GPA provided by the transcript review vendor (Span Tran) and do not recalculate the GPA.
2. Require all of the out-of-country applicants to take the TOEFL and score 26 on the speaking portion, unless they have met the exceptions. Retain appropriate documentation in the candidate's folder.
3. EPP should either require incoming candidates to PACT or should recommend candidates for test approval when candidates meet program testing requirements.

## **GENERAL RECOMMENDATIONS:**

1. Align terminology to that in TAC (i.e. field supervisor, cooperating teacher, mentor, etc.).
2. Evaluate the reading efficiency of incoming candidates by adding an oral reading sample to the interview process. Ask the candidates to answer questions about what they have read.
3. Have candidates sign an acknowledgement which assures the program that the candidate has read, understood, and will abide by the Texas Educator's Code of Ethics. Place a copy of the Code of Ethics in each candidate's record. Detailed coverage of the Texas Code of Ethics must be covered in the coursework.

**Based on the evidence presented, North American University and Texas Gulf Foundation are not in compliance with TAC §227.10 - Admission Criteria.**

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

### **FINDINGS:**

1. Based on the North American University syllabi, TEKS instruction, reading instruction, and mandatory mental health training are not present in coursework.
2. There is no evidence that required mental health training is being taught in the TGF curriculum.
3. Pedagogy and Professional Responsibility coursework for NAU and TGF does not align with the new educator standards per TAC §149.1001.

4. North American University employs several adjunct professors who create, update, present and facilitate coursework. A review of their vitas indicate that all of these professors have appropriate graduate degrees and teaching credentials.
5. Texas Gulf Foundation's curriculum does not contain assessments to evaluate candidate mastery of educator standards or candidate progress through program. [TAC 228.40(a)].

### **COMPLIANCE ISSUES TO BE ADDRESSED:**

1. TEKS instruction and mandatory reading instruction are not present in NAU curriculum.
2. Mandatory mental health training is not present in NAU and TGF curricula.
3. TGF does not use adequate assessments to indicate candidate mastery of standards and progress through educator preparation program.

### **COMPLIANCE RECOMMENDATIONS:**

1. Evaluate and update the curriculum to insure TEKS instruction and all educator standards are the basis of the teacher education curriculum, TAC§228.30(a).
2. Evaluate and update curriculum for both programs to insure mandatory reading instruction and mental health training are included.
3. As required by TAC 228.40(a), Texas Gulf Foundation shall develop assessments that test mastery of educator certification standards and progress through program.

### **GENERAL RECOMMENDATIONS:**

1. Flip the teacher education courses to require the knowledge portion to be gained by the candidates outside of the required class period and use the in-class portion to focus on the skill attainment and application portion of becoming the practiced teacher.
2. Evaluate and alter current assignments as needed so that assignments yield more specific, standards-based responses that measure candidate knowledge.
3. Refrain from giving points or counting a percentage of the grade for attendance and participation.
4. Ensure all assessments evaluate the acquisition of the knowledge and application of skills.
5. Consider having candidates take the STARR release test to understand the expectations of students
6. Use TExES formatted questions in assessments in order for candidates to become familiar with the vocabulary, question format, and reasoning associated with answering the questions successfully.
7. Coursework and training should be sustained, rigorous, interactive, student-focused, and performance-based. Include more opportunities to demonstrate "skills" required for each specific certification area (i.e., lesson planning, differentiation, etc.).

**Based on evidence presented, North American University and Texas Gulf Foundation are not in compliance with Texas Administrative Code Section §228.30.**

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

##### **FINDINGS:**

1. Currently, the North American University initial teacher preparation program is delivered in a face-to-face format and Texas Gulf Foundation is online. NAU meets the 300 clock hour requirement, but TGF does not have the required hours.
2. There is no evidence that candidates in TGF complete the required 80 clock hours of training prior to starting an internship.
3. There is no evidence that 30 clock hours of field-based observations are completed by all candidates prior to starting an internship. Observation logs or other evidence of completion of the 30 clock hours are present in some candidates' folders but not in others. There is no evidence that the field based observations are focused and occur in a variety of schools, grade levels, or with diverse student populations. Additionally, there is no documentation that at least 15 clock hours of the observations are completed interactively with students.
4. In NAU, most candidates complete student teaching in 12 consecutive weeks. TGF candidates' complete an internship.
5. TGF does not consistently place candidates on probationary certificates when placing them in internships as required by TAC §228.35(d)(2)(B).
6. According to TAC §228.35(e), NAU and TGF are responsible for providing cooperating teacher/mentor training that is scientifically-based or verify that training has been provided by a school district or education service center. Per the self-report the programs use the TxBESS materials for training. Sign-in sheets provide evidence of mentor training.
7. 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 and is currently certified as an educator. Vitas of field supervisors confirm that field supervisors are appropriately certified. The observation forms used by TGF do not denote an interactive conference and do not provide space to record specific instructional practices observed.
8. Candidates' records contain documentation for four formal observations. Three observations are required by TAC §228.35(f). Field supervisor's logs contain evidence of additional informal observations and coaching.

9. Historic observation forms in the NAU candidate folders do not verify that campus administrators receive copies of observations. Current candidate records, as of 2014, verify that campus administrators now receive copies of observations.

### **COMPLIANCE ISSUES TO BE ADDRESSED:**

1. Coursework for Texas Gulf Foundation does not equal 300 hours.
2. For TGF, field-based experience does not take place in a variety of settings, is not guided by program, and the required interactive component is not documented.
3. For TGF, there is no evidence that candidates are completing 80 hours of program coursework prior to beginning the 180 day practicum.
4. TGF is placing candidates in 180 day practicums without probationary certificates.
5. For TGF, the observation form is a check list that does not allow comments on specific instructional practices observed by Field Supervisors.

### **COMPLIANCE RECOMMENDATIONS:**

1. TGF must increase clock hours of training to meet the required 300 clock hours. TEA suggests adding relevant video clips and activities to be completed while logged into modules on-line; Completion of additional activities will allow candidates to practice application of concepts and demonstrate understanding of the material presented. Additionally, create a tracking system that documents the clock hours of training as the candidate moves through the program. Note completion of the required 80 hours of coursework prior to internship and completion of the required total 300 clock hours of training to complete the program.
2. Require 30 hours of field-based observations that are conducted in a variety of settings and grades levels with diverse student populations. Document the observations in each candidate's records [TAC §228.35(d)].
3. Require and document that 15 of the 30 clock hours of field-based observations are interactive with students.
4. All candidates choosing an internship as their practicum must be on a probationary certificate, regardless of the placement (public, private, or charter schools) [TAC 228.35].
5. Alter observation form to allow comments on specific instructional practices observed.

### **GENERAL RECOMMENDATIONS:**

1. Consider implementing a focused field-based observation tool;
2. Encourage meaningful suggestions for improving the candidate's specific teaching skills on the observation form.

3. Embed relevant activities to be completed while candidates are logged into the modules as evidence of attendance. These activities will also allow candidates to demonstrate acquisition of the lesson content.
4. Consider creating a new observation form that captures all of the required information of each observation: start and stop time, observation date, classroom location, grade content taught, specific observed teaching behaviors, interactive conference, and distribution of the observation to the campus administrator.

**Based on evidence presented, North American University and Texas Gulf Foundation are 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. Both programs have identified a set of benchmarks that each candidate must attain including benchmarks for certification testing, however, documentation of these benchmarks does not exist for all candidates. In addition, NAU has a degree plan for each candidate. TGF currently uses completion of modules as documentation of candidate progress.
2. Program evaluation has been on-going, but formal evaluative data collection has been limited.

### **COMPLIANCE ISSUES TO BE ADDRESSED:**

- None

### **COMPLIANCE RECOMMENDATIONS:**

- None

### **GENERAL RECOMMENDATIONS:**

1. Include the advisory committee in evaluation efforts.
2. Consider creating a survey questionnaire to collect external feedback from mentors, principals, and past candidates (1-3 years into teaching career) to gain an outside perspective in evaluating program.
3. Consider assigning a data manager to track candidate test data for all content and PPR testing. This will facilitate complete record keeping and will help identify candidates in need of remediation.

4. Use published testing data to evaluate program effectiveness.

**Based on evidence presented, North American University and Texas Gulf Foundation are 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:**

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).

1. Staff members are provided information on the Code of Ethics in staff meetings.
2. Candidates are provided instruction in the Texas Educators' Code of Ethics in the coursework as well as they are given a copy in the student handbook.
3. NAU candidates are not required to sign statements of understanding or agreements of adherence to Code of Ethics.

### **COMPLIANCE ISSUES TO BE ADDRESSED:**

- None

### **COMPLIANCE RECOMMENDATIONS:**

- None

**Based on evidence presented, North American University and Texas Gulf Foundation are in compliance with Texas Administrative Code §228.50(a) regarding Professional Conduct.**

### **Standard Recommendations for all Educator Preparation Programs:**

- 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 Certification & Standards 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.
- Ensure that TEA staff has the most current contact information by sending update emails to the assigned program specialist.