



## Desk Audit Compliance Audit Report 2015-2016 University of Houston – Downtown

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.

**Contact Information:** Ronald S. Beebe, Ph.D., Associate Professor and Chair – Department of Urban Education

**County/District Number:** 101-512

**SBEC Approval Date:** July 11, 1995

Texas Education Agency (TEA) Educator Preparation Program Specialist, Vanessa Alba, conducted a compliance desk audit of the University of Houston – Downtown Educator Preparation Program (EPP), located at One Main Street, Commerce Bldg. Suite C440, Houston, TX 77002, in February, 2016, 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 Traditional Undergraduate Program and the EC-6 curriculum. The program's accreditation status is "Accredited".

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

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

### **Data Analysis:**

Information concerning compliance with TAC governing educator preparation programs (EPPs) was collected by various qualitative means. A self-report was submitted to the TEA on February 1, 2016. A TEA review of documents, student records, course material, and curriculum correlations charts provided evidence regarding compliance. In addition, TEA staff sent electronic questionnaires to University of Houston – Downtown EPP stakeholders. A total 329 out of 1,181 (28%) responded to the questionnaires as follows: 11 out of 47 (23%) advisory committee members; 87 out of 423 educator candidates (21%); 30 out of 114 (26%) principals;

185 out of 564 (33%) cooperating teachers/mentors; and 16 out of 33 (48%) 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. A Compliance Plan may be drafted during the desk audit that identifies compliance issues to be addressed. A timeline for completion will be agreed upon between TEA and EPP staff. “Recommendations” are suggestions for general program improvement and no follow up is required.

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

Communication between the TEA program specialist and the University of Houston – Downtown EPP Associate Professor and Chair, Ronald S. Beebe, Ph.D., and Dr. Kasi Bundoc, Ed.D., Director, Center for Professional Development of Teachers occurred via phone conference on April 6, 2016 to discuss findings and request additional information. Additional items were submitted by the program via email on April 12, 2016. The audit was closed on April 12, 2016.

The Compliance Plan was submitted and agreed upon on April 22, 2016 via email. The plan was developed to guide implementation of corrections necessary to come into compliance.

The following are the findings of the desk audit.

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

### **Findings:**

1. Ronald S. Beebe, Ph.D., Associate Professor and Chair – Department of Urban Education and Dr. Kasi Bundoc, Ed.D., Director, Center for Professional Development of Teachers provided support, participated in all aspects of the desk audit, and are 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 35 members representing two (2) groups: 30 members represent public/private K-12 schools; and five (5) represent higher education. A list of advisory committee members and original sign-in sheets from the meetings were provided as evidence of membership. Because the advisory committee consists of members from only two (2) out of the four (4) groups identified in TAC, the University of Houston – Downtown (U of H-Downtown) EPP does not meet minimum requirements for advisory committee composition [TAC §228.20(b)].
3. There was evidence in minutes and agendas verifying Advisory Committee meetings were held during the past three academic years. Meeting dates were verified as follows:
  - February 26, 2014 -14 members present

- March 31, 2014 - 10 members present
- November 19, 2014 - 11 members present (AC Training occurred)
- April 27, 2015 - 33 members present
- June 4, 2015 – On this date, an email was sent to AC members requesting feedback from the previous meeting. Minutes for review were attached to the email.
- The Advisory Committee has met once in 2015-2016 on October 13, 2015 – 22 members present (AC Training occurred).

The Advisory Committee has met 6 times as follows: three time in 2013-2014, twice and an email sent in 2014-2015, and once in 2015-2016). University of Houston – Downtown EPP meets TAC §228.20(b) minimum requirements for advisory committee meetings twice during each academic year (September 1-August 31).

4. Agendas, minutes, and attendance records provided evidence that the members assist in the design, delivery, evaluation, and major policy decisions of the EPP [TAC§228.20(b) and TAC §228.1(a)].
5. There was an advisory committee training held on November 19, 2014. Training was also held on October 13, 2015. There is a Training Handbook and bylaws for advisory committee members. The University of Houston – Downtown EPP meets minimum requirements of yearly advisory committee training per TAC §228.20(b).

**Compliance Issues to be addressed:**

- Expand the Advisory Committee to include membership from at least three (3) out of the four (4) groups identified in TAC §228.20(b). Add members from the regional education service center (ESC) and business/community interests. U of H – Downtown staff should not be the majority of members on the advisory committee [TAC §228.20(b)]; and
- Require Advisory Committee members to be trained on their roles & responsibilities each year (an academic year is September 1-August 31) [TAC §228.20(b)].

**Recommendations:**

- Consider adding former students to the Advisory Committee membership to provide the perspective of a student;
- Consider sending advisory committee training to members with a delivery/read receipt each year to ensure members are trained annually;
- 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 University of Houston - Downtown 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, University of Houston – Downtown 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**

### **Findings:**

1. The U of H - Downtown EPP admission requirements are identified on the website and require the applicant to:
  - Be enrolled in an EPP 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)(1), TAC §227.5(2) and TAC §230.11];
  - Have a minimum GPA of 2.5 or at least a 2.5 in the last 60 semester credit hours [TAC §227.10(a)(3)(A)];
  - Demonstrate basic skills in reading, written communication and mathematics as demonstrated by a satisfactory scores on the Texas Higher Education Assessment (THEA) or an approved exemption [TAC §227.10(a)(5) and TAC §230.37(a)];
  - Submit an application [TAC §227.10(a)(6)];
  - Complete an interview [TAC §227.10(a)(6)];
  - Complete a written assessment [TAC §227.10(a)(6)]
  - Submit three (3) letters of recommendation [TAC §227.10(a)(7)];
  - Be formally admitted and accept the formal admission invitation [TAC §227.17(a)].
2. Admission records for twenty-two (22) candidates were reviewed.
3. Official transcripts in candidates' records verified that each candidate was enrolled as either an undergraduate or post-baccalaureate student at U of H – Downtown in the College of Education. [TAC §227.10(a)(1), TAC §227.5(2) and TAC §230.11]
4. Official transcripts in candidates' records verified that candidates were admitted within a GPA range of 2.5-3.0. TAC §227.10(a)(3)(A)]
5. All candidates met the basic skills requirement in reading, written communication and mathematics as verified on candidates' transcripts. [TAC §227.10(a)(5) and TAC §230.37(A)]
6. Official transcripts and transcript review worksheets provided evidence that candidates were admitted with at least 12 semester credit hours in the declared certification field, or 15 semester credit hours if seeking certification in math or science at grade 7 and above. [TAC §227.10(a)(4)(A-B)]

7. Each of the candidate records reviewed contained a completed, signed and dated, electronic or paper application. [TAC §227.10(a)(6)]
8. According to the self-report, an admission interview was required beginning in the spring of 2015. A copy of the Applicant Interview Questions, along with a rubric that measured responses on five indicators using a 4-point scale, was submitted for review. Evidence of the completed interview rubric was not found in any of the candidates' records reviewed. [TAC §227.10(a)(6)]
9. A written assessment was required beginning in the Spring of 2015, but evidence of that completed assessment was not found in any of the candidates' records reviewed. [TAC §227.10(a)(6)];
10. Applicants to the Post-Baccalaureate (Post-Bac) program are required to submit three (3) letters of recommendation which were found in 8/9 (89%) Post-Bac records reviewed [TAC §227.10(a)(7)];
11. Records that evidence a candidate's eligibility for admission to the program and completion of all program requirements are kept securely in paper format for a period of 5 years. [TAC 228.40(d)].
12. The following rule updates, effective March 1, 2016, were reviewed with educator preparation program staff:
  - Formal Admission TAC §227.17(a); and
  - Incoming Class Grade Point Average TAC §227.19 (a)

**Compliance Issues to be addressed:**

- Require all applicants to participate in a structured interview and retain documentation, such as the rubric used to score the interview, in the candidates' records. [TAC §227.10(a)(6)]

**Recommendations:**

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

**Based on the evidence presented, University of Houston - Downtown is not in compliance with TAC §227.10 - Admission Criteria**

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

## Findings:

1. The curricular scope of the desk audit focused on the EC-6 certification field content;
2. U of H – Downtown EPP staff were advised about the following new requirements in Texas Education Code (TEC) §21.044(g):
  - Consistent and accurate information must be provided to all educator candidates on the high expectations in the state;
  - Consistent and accurate information must be provided to all enrolled educator candidates on the responsibilities that educators are required to accept;
  - Consistent and accurate information must be provided to all applicants and enrolled candidates on the skills that educators are required to possess;
  - Consistent and accurate information must be 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 must be provided to all enrolled candidates on the importance of building strong classroom management skills.
3. The EC-6, PPR EC-12, and Technology Applications alignment charts, along with the syllabi and course outlines, were provided as evidence of a standards-based curriculum. In addition, the educator standards are identified in the student handbook. Syllabi, course outlines & alignment charts with standards identified served as evidence [TAC §228.30(a)];
4. A TEKS Correlation Alignment Chart, syllabi, lesson plans, and focused field-based experiences served as evidence that the relevant Texas Essential Knowledge and Skills (TEKS) are taught to all candidates. The TEKS are also discussed in the Student Handbook on pages 4-7. [TAC §228.30 (a)];
5. Syllabi detailing the assessments used in each course were provided. Transcripts provided evidence that each candidate completed the required courses. [TAC §228.40(a)];
6. A review of course outlines, activities and assessments provided evidence that the curriculum relied on scientifically based research to ensure teacher effectiveness and were aligned to the TEKS [TAC §228.30(b)];
7. Syllabi and representative coursework provided evidence that coursework and training are sustained, rigorous, interactive, student-focused, and performance-based. [TAC §228.30(b) and TAC §228.35(a)(2)];
8. Reading instruction was taught in Reading 3303, 4303, 4306, BED 3311 and 4301 [Spanish(SPN)] ELAR and MAT 6310-Reading in the Multicultural Classroom. The five (5) components of reading including fluency, phonemic awareness, phonics, vocabulary, and comprehension were identified in these courses. [TAC §228.30(b)(1)]
9. The code of ethics and standard practices for Texas educators as defined in TAC §247, are specifically taught in PED 3305 and also addressed in PD 3-Student Teaching and in PED 4380/438-Field Experience Course. [TAC §228.30(b)(2)]

10. The skills and competencies captured in the Texas teacher standards as defined in TAC §149 [TAC 228.30(3)] include:

- Instructional planning and delivery is addressed in the following coursework: PED 3305-Lesson Plan Design Template, RDG 3303, RDG 4303, RDG 4306, BED 3311, BED 4301(SPN ELAR), EED 3315-Science Methods, EED 3312-Math Methodology EC-6, MAT 5319-SS Methods, MAT 5311-Math Methodology EC-6, PED 3303-Teaching MS Environmental Science, and EED 3311-EC-6 SS. [TAC 228.30(3)(A)];
- Knowledge of students and student learning are addressed in the following coursework: PED 3305, RDG 3303, RDG 4303, RDG 4306, BED 3311, BED 4301 (SPN ELAR), EED 3315-Science Methods, and PED 3303-Teaching MS Environmental Science. Syllabi, alignment charts and a review of coursework served as evidence [TAC 228.30(3)(B)];
- Content knowledge and expertise is addressed in the following coursework: TDG 3303, PED 3305, RDG 4303, RDG 4306, BED 3311, BED 4301 (SPN ELAR), EED 3315-Science Methods. Syllabi, alignment charts and a review of coursework served as evidence [TAC 228.30(3)(C)];
- Learning environment is addressed in the following coursework: PED 3305, RDG 4306/4303, BED 3311, BED 4301 (Spn ELAR) and EED 3315-Science Methods. Syllabi, alignment charts and a review of coursework served as evidence [TAC §228.30(b)(3)(D)];
- Data-driven practice is addressed in PED 3305 and RDG 3303. Syllabi, alignment charts and a review of coursework served as evidence [TAC §228.30(b)(3)(E)];
- Professional practices and responsibilities are addressed in PED 4380-Field Experience Course, BED 3311, BED 4301 (Spn ELAR) and PD 3-Student Teaching (15 weeks/75 days). Syllabi, alignment charts and a review of coursework served as evidence [TAC §228.30(b)(3)(F)];

11. Instruction in detection and education of students with dyslexia was provided to candidates in PED 3305 and RDG 3303 [TAC §228.35(a)(4)]; and

12. Instruction in detection and education of students with mental and emotional disorders, was provided to candidates in EED 3315, PED 3305, PED 4380/4381, SOSE 4303/4304 and EED 4301/4302/4304 [TAC §228.35(a)(5)].

13. In questionnaire responses, educator candidates and mentor/cooperating teachers reported the following regarding candidate preparation:

<b>Instruction Provided in the Following</b>	<b>Candidates</b>	<b>Mentor/Cooperating</b>
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<b>Areas:</b>	<b>N = 87</b> Yes/No/Don't Know	<b>Teachers</b> <b>N = 185</b> Yes/No
Deliver reading instruction in your certification field and grade level covering phonics, phonemic awareness, fluency, vocabulary development, and comprehension strategies	93% / 5% / 1%	87% / 13%
Provide modifications for students diagnosed with Dyslexia	72% / 24% / 4%	48% / 53%
Provide modifications for students diagnosed with mental or emotional disorders	81% / 14% / 4%	56% / 44%
Use TEKS specific to your certification field	94% / 6% / %	96% / 4%
Administer the STAAR or end of course exams	64% / 29% / 7%	63% / 38%
Design clear, well organized, sequential lessons that build on students' prior knowledge	96% / 4% / %	94% / 6%
Design developmentally appropriate standards-based lessons	99% / % / 1%	94% / 6%
Design lessons to meet the needs of diverse learners, adapting methods when appropriate	96% / 4% / 0%	-
Communicate clearly and engage students in a manner that encourages a student's persistence and best efforts	99% / 1% / 0%	95% / 5%
Lead class discussions and activities that provide opportunities for developing higher order	96% / 3% / 1%	90% / 10%

thinking skills		
Check for understanding and give immediate feedback, and make lesson adjustments as necessary	96% / 1% / 3%	92% / 8%
Instill the belief that all of your students have the potential to achieve at high levels	97% / 3% / 0%	95% / 5%
Acquire, analyze, and use background information (familial, cultural, educational, linguistic, and developmental characteristics) to engage students in learning	96% / 4% / 0%	92% / 8%
Apply major concepts, themes, multiple perspectives, assumptions, inquiry, structure, and real-world applications of your grade-level and subject-area content	97% / 1% / 1%	91% / 9%
Design and execute lessons that are consistent with the concepts of your specific discipline and are aligned to state standards	97% / 3% / 0%	95% / 5%
Present content-specific pedagogy that meets the needs of diverse learners	96% / 4% / 0%	90% / 10%
Create a mutually respectful, collaborative, and safe community of learners by using knowledge of students' development and backgrounds	99% / 1% / 0%	95% / 5%
Organize your classroom in a safe and accessible manner that maximizes	97% / 3% / 0%	89% / 11%

learning for all students		
Establish and communicate consistent routines for effective classroom management, including clear expectations for student behavior	99% / 1% / 0%	89% / 11%
Engage students in active learning as indicated by their level of motivation and on-task behavior	97% / 3% / 0%	-
Create and implement formal and informal methods of measuring student progress	96% / 3% / 1%	88% / 12%
Organize your classroom in a safe and accessible manner that maximizes learning for all students	97% / 3% / 0%	89% / 11%
Establish and communicate consistent routines for effective classroom management, including clear expectations for student behavior	99% / 1% / 0%	89% / 11%
Engage students in active learning as indicated by their level of motivation and on-task behavior	97% / 3% / 0%	
Create and implement formal and informal methods of measuring student progress	96% / 3% / 1%	88% / 12%
Set individual and group learning goals and communicating these goals to students and families	97% / 3% / 0%	83% / 17%
Collect, review, and analyze data to monitor student progress	96% / 4% / 0%	82% / 14%

Utilize data you collect and analyze to plan your instructional strategies	93% / 7% / 0%	80% / 20%
Reflect on your teaching practice to improve your instructional effectiveness	97% / 1% / 1%	-
collaborate with your colleagues and accept constructive feedback from peers and administrators	97% / 3% / 0%	95% / 6%
Seek out opportunities to lead students and other educators	91% / 6% / 3%	-
Model ethical and respectful behavior and demonstrate integrity as defined in the Texas Educator's Code of Ethics	97% / 3% / 0%	99% / 1%

**Compliance Issues to be addressed:**

- None

**Recommendations:**

- None

**Based on evidence presented, University of Houston – Downtown is in compliance with Texas Administrative Code Section §228.30 - Curriculum.**

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

### Findings:

1. University of Houston – Downtown EPP coursework, degree plans, and course/module schedule revealed that candidates complete a total of 390 clock-hours of coursework and training in the traditional undergraduate program and 300 clock-hours in the Post-Bac program [TAC §228.35(a)(1) and TAC §228.2(5)]. Candidates in the Post-Bac program are also required to complete an additional 45 clock-hours of coursework.
2. Candidates in the undergraduate program are required to complete 270 clock hours of coursework prior to clinical teaching. Candidates in the Post-Bac program complete 225 hours prior to clinical teaching or internship. The degree plan noting coursework, and in which semester it was taken prior to clinical teaching or internship, was provided as evidence. A sample degree plan that identified when FBE occurred was evidence that the FBEs were completed prior to clinical teaching/internship [TAC §228.35(a)(3)(B)].
3. Candidates in the undergraduate program are required to complete 120 clock-hours of Field-Based Experiences (FBE) prior to clinical teaching. Post-Bac candidates complete 60 clock-hours of FBE prior to clinical teaching or internship. These hours are completed at two (2) different schools and in two (2) different grade levels in a variety of educational settings with diverse student populations. Candidate time logs signed by the teacher observed served as evidence of compliance for 19/22 (86%) records reviewed. The hours were also verified by the course instructor. U of H - Downtown met the FBE requirement as prescribed [TAC §228.35(a)(3); TAC §228.35(d)(1)(A-E); TAC §228.2(9)].
4. Based on a review of benchmarks, program schedules, degree plans, and transcripts in candidates' records, all coursework and training is completed prior to EPP completion and standard certification. [TAC§228.35(a)(4)].
5. U of H - Downtown requires candidates to complete clinical teaching for a minimum of 12 weeks or an internship for a full academic year. Student teaching placement lists with start and end dates noted the clinical teaching duration. [TAC 228.35(d)(1); TAC §228.35(d)(2)(A); TAC §228.2(4)].
6. Documentation on candidate placement lists provided evidence that student teaching or internship occurred in an actual school setting (public elementary, middle or high schools) for 20/22 candidate records reviewed [TAC §228.35(d)(2)(C)(ii)].
7. A candidate placement list with cooperating or mentor teacher assigned and start/end dates noted was evidence that 19/22 candidates were assigned a cooperating teacher or mentor teacher in an actual public/private school setting. Two (2) of the candidates had an educational aide exemption letter on file and were exempt from clinical teaching. [TAC §228.35(e); TAC §228.2(6)].
8. The U of H - Downtown EPP provided mentor/cooperating teacher training. An email verification with date of training was sent to 284 cooperating/mentor teachers. Training occurred annually from August 30, 2012 - February 25, 2015. Original signatures on documentation retained by the program verified training was received. Dated, sign-in

information for online training was retained by the EPP. Training materials were provided for review [TAC §228.35(e)].

9. The U of H – Downtown EPP employs 23 Field Supervisors. All hold an appropriate in-state or out-of-state teacher/mid-management certificate. Resumes/vitas detailing field supervisor credentials, along with current certifications, were provided for review. It was verified which field supervisor was assigned to each candidate. Candidate placement lists identifying field supervisor assignments for 20/22 records reviewed were provided as evidence that each candidate was assigned a field supervisor. Two (2) candidates were exempt from the clinical teaching/internship requirement and had an educational aide exemption letter on file. It was verified that field supervisors met the requirements as prescribed [TAC §228.35(f)].
10. The field supervisors receive annual training. Original signatures and dates on training sign-in sheets were provided as evidence. Training material (a handbook) was also provided [TAC §228.35(f)].
11. Field supervisor contact logs and documents in candidates' records established that 18 out of 22 candidates had first contact with a Field Supervisor within the first three (3) weeks of the assignment [TAC §228.35(f)].
12. U of H-Downtown requires Field Supervisors to conduct four (4) formal observations of candidates during a 12 week clinical teaching assignment. It was noted that field-supervisors within the program utilized different observation forms. Three (3) or four (4) completed observations were found in 19 out of 22 candidates' records. Candidates who had only three (3) observations had not yet completed the clinical teaching assignment. Two (2) of the 22 candidates were exempt from clinical teaching. Field supervisor contact logs, database, and online records were provided as evidence [TAC §228.35(f)(4)].
13. Start and stop times on observation documents in candidates' records established that observations were at least 45 minutes in duration. All observations were in face-to-face format [TAC §228.35(f)(1)].
14. Dates on observation documents and placement information verified that the first observation occurred within the first six (6) weeks of the teaching assignment for 19 out of 22 candidates reviewed [TAC §228.35(f)(2)];
15. A review of the observation documents in 19 of the 22 candidates' records revealed that field supervisors documented instructional practices observed and provided written feedback through an interactive conference with each candidate. Observation documents were signed by candidate and dated [TAC §228.35(f)];
16. A multi-copy observation instrument with principal distribution noted was evidence that the EPP provided a copy of each observation to the campus administrator. This evidence was identified in 19/22 candidate records reviewed. The program met the requirements as prescribed [TAC §228.35(f)].
17. One (1) candidate record was reviewed for evidence of informal observations and ongoing coaching. A Growth Plan developed and signed by both the candidate and the Field Supervisor provided evidence of ongoing coaching support [TAC §228.35(f)].

**Compliance Issues to be addressed:**

- None

**Recommendations:**

- Strongly consider utilizing a standard observation instrument for each observation conducted by the field supervisor of each candidate. This will assist the program in ensuring that the observations occur as prescribed and appropriate documentation is maintained by the program, field supervisor, candidate, and campus administrator.

**Based on evidence presented, University of Houston – Downtown is in compliance with Texas Administrative Code Section §228.35 – Program Delivery and On-Going Support.**

**COMPONENT V: PROGRAM EVALUATION – Texas Administrative Code (TAC) §228.40****Findings:**

1. University of Houston - Downtown has established benchmarks to ensure that candidates are prepared to receive standard certification. Documentation detailing the benchmark activity, timeline, and EPP staff member responsible for verifying completion were identified in candidates' records. [TAC §228.40(a)].
2. The program provided evidence of each candidate's readiness to take the appropriate certification assessment of pedagogy and professional responsibilities, including professional ethics and standards of conduct. A dated document and/or screenshot of an ECOS screen noting date of test approval for the Pedagogy and Professional Responsibilities EC-12 (PPR) exam was provided as evidence of compliance in the 20 records reviewed. Policies and procedures for detailing the criteria for testing are available to candidates in the Student Handbook. In response to a) the University of Houston – Downtown EPP Education Department assessment plan, and b) the change in TAC to limit the number of attempts on the TExES exams to five, test preparation and readiness to test have been incorporated into the two field-based courses PED 4380 and PED 4381. This change will take effect beginning with the spring 2016 semester. Currently, the aforementioned courses meet three times per semester in addition to the 60 clock-hours of field placement. Beginning in spring 2016, the remaining 12 weeks of class time will incorporate test preparation focused on the following exams: Core Subjects EC-6, ESL Supplemental, Bilingual Supplemental, and the PPR. [TAC §228.40(b); TAC §230.21(c)];
3. Dated admission documents and/or copies of emails, and an Educator Certification Online System (ECOS) screenshot containing testing information in candidates' records provided evidence that test approval for the PPR assessment is granted after the candidate is admitted into the EPP. [TAC §228.40(b)];

4. The following documents were submitted as evidence that the U of H – Downtown EPP continuously evaluates the design and delivery of the program: a timeline of activities with assigned responsible party identified and Advisory Committee minutes for five (5) meetings reflecting their participation in reviewing evaluative data. Based on the feedback, and to address the Provost’s request to reduce the number of hours in the degree plan, the EPP embarked on a year-long project to redesign the curriculum used in generalist and bilingual teacher preparation. In response to district demands for more ESL certified teachers, the structure of educator training was modified to include coursework supporting the ESL supplemental certification. The EPP also reviewed the Candidate Exit Survey Results for the 2012-2013 and 2015 academic years. In addition, using feedback from the department’s assessment plan and anecdotal evidence from previous graduates, the (former) EC-6 Bilingual Generalist curriculum was modified to incorporate coursework increasing the number of hours in content area methods instruction. The degree plans submitted with this desk audit reflect those changes [TAC §228.40(c)].

**Compliance issues to be addressed:**

- None

**Recommendations:**

- None

**Based on evidence presented, University of Houston – Downtown is in compliance with Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates of Candidates for Certification and Program Improvement.**

**COMPONENT VI: PROFESSIONAL CONDUCT – Texas Administrative Code (TAC) §228.50**

**Findings:**

TAC §228.50(a) states that “during the period of preparation, the educator preparation program shall ensure that the individuals preparing candidates and the candidates themselves adhere to Chapter 247 of this title (relating to Educators’ Code of Ethics)”.

1. U of H - Downtown did not provide documentation indicating that faculty/staff members had signed an agreement to adhere to the Educators’ Code of Ethics. The faculty/staff are required to view the TEA teacher ethics videos, but there is currently no process in place to document that the staff have viewed these videos.
2. 19 out of 22 (86%) candidate records reviewed contained signed statements of reading and understanding the Educators’ Code of Ethics. The Code of Ethics is also provided in the Student Handbook.

**Compliance issues to be addressed:**

- Require that all individuals preparing candidates review, and acknowledge that they have read, understand, and will abide by the Code of Ethics. Maintain documentation in EPP records for audit purposes. [TAC §228.50]

**Recommendations:**

- Consider using the TEA Ethics Training for both faculty and candidates.
- Consider using an email system at the beginning of each academic year whereby all faculty/staff associated with the EPP view the TEA ethics videos and acknowledge, via email read receipt, that each has read, understands and will abide by the Educators' Code of Ethics.

**Based on evidence presented, University of Houston - Downtown is not in compliance with Texas Administrative Code §228.50(a) regarding Professional Conduct.**

**COMPONENT VII: COMPLAINTS AND INVESTIGATIONS PROCEDURES – Texas Administrative Code (TAC) §228.70****Findings:**

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. U of H - Downtown has a complaint policy on file with TEA and the policy is posted on the EPP website. [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. The required documentation is posted in the Reception Office, in hallways & on the window of the establishment in a conspicuous location and meets the requirement as prescribed [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. The EPP has a system set up to ensure that this occurs and is located on file with TEA. The EPP meets the requirement as prescribed [TAC §228.70(b)(4)].

**Compliance issues to be addressed:**

- None

**Recommendations:**

- None

Based on evidence presented, University of Houston – Downtown is in compliance with Texas Administrative Code § regarding Complaints and Investigations Procedures.

## COMPONENT VIII: RULES FOR PROBATIONARY CERTIFICATES – Texas Administrative Code (TAC) §230.37

### Findings:

1. U of H - Downtown had seven (7) candidates placed on a probationary certificate in the grade level and subject area sought. For each record reviewed, the certification field and probationary certificate issued were aligned [TAC 230.37(a)(2); TAC 230.37(b)(3)(B)];
2. The five (5) elementary candidates were in appropriate placements in the subject area and at the grade level of certification sought. Based on information in ECOS, four (4) out of five (5) elementary candidates had passed the relevant content test prior to internship start date. One (1) candidate was placed in an internship one month prior to passing the appropriate content exam. The program met the requirement as prescribed [TAC §230.37(e)(1)(a)]; and
3. The two (2) candidates placed on probationary certificates at the middle/high school level had passed the appropriate content exam prior to placement per ECOS. [TAC §230.37(e)(1)(B)(1)].

### Compliance issues to be addressed:

- None

### Recommendations:

- Ensure that seeking a probationary certificate at the elementary level have passed an appropriate content exam prior to recommending the certificate.

### Standard Recommendations for University of Houston – Downtown:

- Align the verbiage used in the University of Houston - Downtown EPP to the verbiage in Texas Administrative Code (TAC) (ex. Field supervisor, cooperating teacher, candidate, 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.