



## Compliance Audit Report 2011-2012 Paul Quinn College Generalist EC-6

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.

**Contact Information:** Dr. Kizuwanda Grant

**County/District Number:** 161501

**SBEC Approval Date:** 7/20/1999

Texas Education Agency program specialists Dr. Mary S. Black and Vanessa Alba conducted a compliance audit of the Paul Quinn College (PQC) initial educator certification program on March 14-16, 2012, as required by Texas Administrative Code §228.10(c).

### **Background:**

A previous compliance audit of Paul Quinn College was conducted by the Texas Education Agency in April 2008. Paul Quinn was rated as fully accredited by TEA at that time. In the 2008-2009 academic year, Paul Quinn's accreditation status with the Southern Association of Colleges and Schools (SACS) dropped to probationary. In the summer of 2009, SACS voted to remove Paul Quinn from membership. Paul Quinn instituted legal proceedings against SACS, and a court injunction returned PQC to full accreditation status, which remained in effect until the lawsuit was settled.

In spring 2010, PQC gained candidacy status in the Transnational Association of Christian Colleges and Schools (TRACS). In April 2011, TRACS fully accredited the school. TRACS is fully recognized by the United States Department of Education and the Texas Higher Education Coordinating Board (THECB). Paul Quinn College received a letter from the THECB on November 3, 2011, granting the college a Certificate of Authority to award Bachelor of Science degrees in various fields, including Education-Physical Education, and Education-Early Childhood to 6<sup>th</sup> Grade. That certificate expires on October 27, 2013.

Paul Quinn College received a letter from the THECB on February 22, 2012, stating that the THECB identified TRACS as a recognized accrediting agency for the State of Texas at its January 26, 2012, meeting. Paul Quinn's accreditation by SACS formally ended in February 2012.

In a conference call on March 16, 2012, with Dr. Janice Lopez, TEA Director of Certification and Standards, Dr. Michael Sorrell, President of Paul Quinn College, Dr. Kizuwanda Grant, Vice President of Academic Affairs for Paul Quinn, and TEA program specialists Vanessa Alba and Mary S. Black, Dr. Lopez affirmed that TRACS accreditation was sufficient for college degrees used to fulfill requirements for standard educator certification in Texas.

There has been considerable turnover in faculty and staff at Paul Quinn College since 2008, along with a pronounced drop in student enrollment. These facts reflect the disarray of the college as a whole during this time. When Dr. Grant arrived at Paul Quinn in spring 2010, as the new program chair, she immediately identified the following issues:

- Non-functioning advisory committee
- Academic advising was not adequate
- Degree plans were incorrect
- THEA exam was being used incorrectly
- Faculty mismatch in terms of teaching assignments
- Poor planning concerning certification outcomes
- Disorganized student records
- Out-of-date courses and materials
- Lack of program documentation
- Lack of website presence
- Poor relationship with local schools

Thirty-five students were enrolled in teacher education at Paul Quinn for 2010-2011, eight graduated, but none became certified as teachers. In 2011-2012, 46 students are enrolled in the teacher education program, with five pending graduates. None are on track for certification. Three are currently student teaching.

This report will detail current issues of compliance with Texas Administrative Code and report progress in the past two years.

### **Data Collection and Analysis:**

Information concerning compliance with Texas Administrative Code (TAC) governing educator preparation programs was collected by various qualitative means. Paul Quinn College submitted a self-report to the Texas Education Agency prior to the March 2012, compliance audit. An on-site review of documents, student records, course material, online courses, and curriculum correlations charts provided evidence regarding compliance. In a departure from usual TEA procedure, no electronic questionnaires were sent to PQC educator certification participants by

TEA due to exceedingly low numbers of participants. Qualitative methods of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. Evidence of compliance was measured using a rubric correlated to Texas Administrative Code.

### **Opening and Closing Sessions:**

An opening session on March 15, 2012, was attended by four individuals including Dr. Kizuwanda Grant, Director of the educator certification program at PQC, Mike Myers, field supervisor, Doretha Allen, teacher in a local school district and adjunct professor at PQC, and Dexter Dumas, also an adjunct professor. Mary Black provided advisory committee training to this group and left the information for Dr. Grant to use as needed.

A closing session was held March 16, 2012 with President Sorrell and Dr. Grant. The conference call with Dr. Lopez was conducted during this time.

## **COMPONENT I: COMMITMENT AND COLLABORATION - Texas Administrative Code (TAC) §228.20 – GOVERNANCE OF EDUCATOR PREPARATION PROGRAMS**

### **FINDINGS:**

Program support was indicated by the governing body of Paul Quinn College per TAC §228.20(c) as evidenced by the participation of Dr. Grant and President Sorrell in various aspects of the compliance audit.

A reconstituted advisory committee consists of five members. Three members represent local schools and districts and two members represent higher education. Dr. Grant indicated that more members would be added in the future to represent regional education service centers and local business and community. PQC meets TAC §228.20(b) requirements for advisory committee composition.

The first advisory committee meeting of this academic year was held on February 9, 2012. Five people attended according to the sign-in sheet. Per the agenda, discussion included current educator preparation program requirements, a two-year timeline for improvement, challenges such as new admission standards, and proposed changes to the program. The next meeting is scheduled for April 5, 2012. The tentative agenda for that meeting includes review and discussion of the March 2012 TEA audit, the new advisory committee handbook, TRACS recognition, field-based experience, and nominations for committee representatives from community and local businesses. The program meets the requirements of two advisory committee meetings for the current academic year as required by TAC §228.20(b).

No advisory committee minutes, agendas, or attendance records for the intervening years between 2008 and 2012 were available. Since records for past advisory committee meetings were not available, the program could not provide evidence of two consecutive advisory committee meetings. Since the program was in a state of confusion, the advisory committee could have assisted Dr. Grant by providing input into design, delivery, and evaluation of the situation and provided corrective assistance.

**Based on the evidence presented, Paul Quinn College is not in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.**

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

### FINDINGS:

To enter a teacher certification program in Texas, applicants must provide evidence of a four year degree from an accredited institution of higher learning, or be in the process of receiving one from the same institution [TAC §227.10(c)]; a grade point average (GPA) of 2.5 or greater [TAC §227.10(A)]; twelve (12) semester credit hours in a content field [TAC §227.10(C)]; demonstrate mastery of basic skills using the THEA or the Texas Success Initiative [TAC §227.10(4)]; demonstrate adequate oral communication skills in an informal interview [TAC §227.10 (a)(5)]; submit an application [TAC §227.10(6)]; participate in a structured interview or other screening instrument [TAC §227.10(6)]; and meet any other requirements the program determines and applies equally to all applicants [TAC §227.10(7)].

In a review of ten candidate records by TEA program specialists, many candidate files had insufficient evidence to document that all admissions requirements are currently being met by the Paul Quinn College educator certification program. For example, it could not be determined if all candidates had the required 2.5 GPA because of inadequate documentation. Similarly, some candidate files did not contain an application to the program. Likewise, there was no evidence that applicants had received an interview by the program to determine suitability for enrollment. No calculations were available to show that applicants had the necessary 12 semester hours of content field coursework.

Statements in the new Student Teaching Handbook, which was reviewed by TEA, indicated that applicants will be expected to meet all criteria for admission set by Texas Administrative Code in the future. Dr. Grant has created admissions interview questions and a scoring rubric. The interview process has not yet been put into practice, but is scheduled to begin with candidates entering the program in the fall 2012. However, Dr. Grant informally interviewed all students in the teacher education program in fall 2011, and found that some had not completed requirements to be official candidates. Candidates' files have been reorganized in the past year, and the files of candidates currently in student teaching are complete.

There are no out-of-country applicants enrolled in the program. The program is aware of the criteria for having out-of-country applicants demonstrate competence in the English language by submission of an official minimum score on the written or computer-based Test of English as a Foreign Language (TOEFL) [TAC §227.10 (a)(5)]. In addition, the applicant must have his/her transcripts from an out-of-country non-English speaking university evaluated by an approved evaluation service [TAC §227.10(7)].

Accurate information about admission criteria is currently available on the Paul Quinn website, and in new brochures [TAC §227.10(7)].

According to the self-report, Dr. Grant temporarily suspended admission to educator preparation during 2010-2011, for candidates who were not already taking courses in the major. During this suspension, she was able to verify that candidates who had completed more than 12 semester hours had met all admission requirements and were on track for program completion. New

admissions to the program are planned to resume this spring for fall 2012. Dr. Grant discussed the possibility of required applicants to pass the TExES exams prior to admission, but was advised by TEA program specialists that this is not an option for undergraduate college programs. Only persons already holding a bachelor's degree from a regionally-accredited four-year institution of higher education are eligible to take the Pre-Admission Content Exam (PACT).

**Based on the evidence presented, Paul Quinn College is not in compliance with TAC §227.10 – Admission Criteria.**

### **COMPONENT III: CURRICULUM - Texas Administrative Code (TAC) §228.30 – Educator Preparation Curriculum**

#### **FINDINGS:**

For the purposes of the current compliance audit, only the curriculum for the Generalist EC-6 certification was reviewed by TEA. Three alignment charts for the mandated 17 topics in TAC §228.30 (b), Pedagogy and Professional Responsibilities (PPR) standards, and Texas Essential Knowledge and Skills (TEKS) standards reflected that all topics mandated in TAC are included in Paul Quinn's courses. No curriculum alignment chart was provided by the program for Generalist EC-6 certification field, and a new one was emailed to Dr. Grant March 15, 2012.

A review of course syllabi found that syllabi do not include certification standards. A review of the teacher preparation curriculum needs to be conducted and closely aligned with certification standards set by the State Board for Educator Certification.

Six hours of test preparation is required for candidates prior to TExES testing as per TAC §228.30(b)(17) and TAC §228.35(a)(3)(C). Paul Quinn College currently offers 52 clock hours of test preparation on 13 Saturday mornings during the semester prior to testing.

**Based on evidence presented, Paul Quinn College is not in compliance with Texas Administrative Code Section §228.30 – Educator Preparation Curriculum.**

### **COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT - Texas Administrative Code (TAC) §228.35 – PREPARATION PROGRAM COURSEWORK AND/OR TRAINING**

#### **FINDINGS:**

Currently, Paul Quinn College offers educator preparation in a face-to-face format with the exception of two online courses, *Technology in Teaching* and *Children's Literature*. According to the self-report, the total program consists of 300 clock hours, as mandated in TAC §228.35. However, if the total semester hours of required coursework for the Generalist EC-6 certification are calculated, the total number of clock hours is 1,065, which is more typical for colleges and universities.

Documentation of the minimum required 30 clock hours of field-based experience prior to student teaching found in student records was incomplete. Some student files had no field-

experience logs, and one showed completion of only 26 hours. A draft of a new field-based observation log for candidates was reviewed during the audit.

A written memo of student teaching placement information verified that student teaching takes place in actual school settings rather than a distance learning lab or virtual school setting [TAC §228.35(d)(2)(C)(ii)].

According to TAC §228.35(e), all educator preparation programs are responsible for providing mentor/cooperating teacher training that is scientifically-based or verify that training was provided by a school district or education service center. No evidence of such training from past years was available. Dr. Grant intends to initiate training in fall 2012 and has drafted sections of the Student Teaching Handbook to address the role of the cooperating teacher.

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. Paul Quinn College currently has one field supervisor for the three student teachers this spring. This field supervisor is an experienced educator and meets with Dr. Grant often for training and to discuss candidates' progress. Copies of email messages between Dr. Grant and the field supervisor were offered as evidence. Initial contact within the first three weeks of the assignment by the field supervisor as required by TAC §228.35(f) occurred January 9, 2012, during a face-to-face meeting. This initial contact was verified by a copy of an email to the student teachers and the field supervisor.

A total of three observations [TAC §228.35(f)(4)] must be conducted during the student teaching assignment and must be at least 45 minutes in duration [TAC §228.35(f)]. TAC §228.35(f) also states that the first observation must be conducted within the first six weeks of student teaching. Furthermore, TAC §228.35(f) requires that the field supervisors document observed instructional practices and provide written feedback through an interactive conference with the candidate. Observation evaluation forms are not currently being used with student teachers, nor were any found in a review of the candidates' records. Instead the field supervisor has been writing memoranda to Dr. Grant to comment on each student teacher's observation. Each report states the time in/out at the student teaching site, and affirms that the field supervisor discussed the observation and provided verbal feedback to the candidate on a specific date. The reports also state that the field supervisor spoke with the cooperating teacher about the observation on each visit. Each visit lasted approximately two hours.

TAC §228.35(f) requires the program to provide a copy of the written observation feedback to the candidate's campus administrator. No evidence was presented to verify this. In addition, there was no documentation that any additional informal observations and coaching was provided by the program as specified in TAC §228.35(f).

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

**COMPONENT V: PROGRAM EVALUATION – Texas Administrative Code (TAC) §228.40 – ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT.**

**FINDINGS:**

No documentation of program benchmarks or assessments was evident in the records for past years. This issue was discussed with Dr. Grant.

Two one-semester hour courses for TExES test preparation are required, according to the degree plan leading to the Generalist EC-6 certification. Readiness for testing [TAC §228.40(b)] is determined by completion of these two courses, which actually consist of 52 clock hours on Saturday mornings, far exceeding the required six hours in TAC §228.35. According to TAC §228.40(b), the program shall not grant test approval for the pedagogy and professional responsibilities test until the candidate has met all the requirements for admission to the program and has been fully accepted into the educator preparation program.

Evaluation of the program’s design and delivery of the curriculum should be continuous per TAC §228.40(c). Information such as performance data, scientifically-based research practices, and the results of internal and external assessments should be included in the evaluation process. According to the self-report, Paul Quinn uses a variety of data to evaluate the program and curriculum. This was verified by review of the Campus Wide Assessment Plan.

Student records lacked documents of admission or completion of the program requirements as prescribed by TAC. Documents have not been retained for five years as mandated by TAC §228.40(d). Currently, a system has been instituted to correct this, and candidate files are now kept in a locked office.

**Based on evidence presented, Paul Quinn College is not in compliance with Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates for Certification and Program Improvement.**

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

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

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

**Current Accreditation Status**

Paul Quinn College is currently “Accredited-With Action Plan”.

## Standard I: Results of Certification Exams

Pass Rate Performance:	2008-2009 Final 80% Standard	2009-2010 70% Standard	2010-2011 75% Pass Rate
Overall:	No data	33% (2 test-takers)	0 (3 test-takers)

### Program Recommendations:

The following are recommendations based on the findings of the compliance audit. If the program is NOT in compliance with any identified component, please consult the Texas Administrative Code and correct the issue IMMEDIATELY. A Compliance Status Report will be required every sixty days until the compliance issues are totally corrected.

Program recommendations are suggestions for general program improvement and no follow up is required.

### Program Compliance Recommendations: (to be completed immediately)

#### Texas Administrative Code §228.20

- Ensure that the advisory committee reviews field-based experiences;
- Conduct two advisory committee meetings each academic year;
- Discuss program evaluative data from various sources with the advisory committee annually.

#### Texas Administrative Code §227.10

- Ensure that all candidates admitted have a minimum 2.5 GPA;
- Ensure that all candidates admitted have completed at least 12 semester credit hours in their content field;
- Ensure that all applicants submit a formal written application, and that the application is retained in student records;
- Ensure that all applicants receive a formal oral interview to determine dispositions towards teaching, evaluated with a rubric. Keep the rubric and other documentation in the candidates' records;
- Ensure that any applicant admitted with less than a 2.5 GPA is approved by the director and that such candidates consist of less than 10% of any one cohort.

#### Texas Administrative Code §228.30

- Document that educator standards approved by the State Board for Educator Certification are the basis for the curriculum of each certification field;
- Redesign the Generalist EC-6 degree plan to place greater emphasis on content and teaching strategies, including art, music, theater and health;
- Add the applicable standards approved by SBEC for each certificate to the course syllabi;

### Texas Administrative Code §228.35

- Document a minimum of 30 clock hours of field-based experience prior to student teaching for each candidate and retain documentation in the candidates' records;
- Develop a policy statement for the student handbook concerning procedures for allowing previous experience to count for certain requirements in the educator preparation program. For example, will you allow candidates to substitute recent substitute teaching for some of the field-based observations?
- Implement annual training for cooperating teachers and field supervisors and document this with agendas and attendance records;
- Document initial contact between field supervisor and student teachers via phone record, email, or initial by candidate on field supervisor's log;
- Document three formal observations of student teachers by the field supervisor using a standardized observation instrument. Keep copies in candidates' records. Include date, time in/out, written feedback, and signatures of student teacher and field supervisor;
- Provide a copy of each observation to the campus administrator and document delivery;
- Document any additional coaching or support given by the field supervisor to the student teacher. This can be by means of phone or email logs. Document in the field supervisor's log.

### Texas Administrative Code §228.40

- Design a series of benchmarks for the program, such as meeting with an advisor each semester and successful completion of each course, and document that candidates proceed through the process in an orderly fashion.
- Retain documentation that evidence a candidate's eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after program completion. Maintain records in a secured environment.

## **GENERAL PROGRAM RECOMMENDATIONS:**

### Component I:

- Add a representative of local business or community to the advisory committee;
- Consider expanding the depth of the advisory committee by including human resource directors, principals, and possibly a cooperating teacher/mentor or past candidate among others. This will allow greater input when some of the members are unable to attend the meeting; and
- Continue advisory committee training on an annual basis to prepare any new members for their roles and responsibilities and to familiarize the members with TAC rules.

### Component III:

- Consider redesigning TExES test preparation. Use the free, online T-Cert training for PPR test preparation. Keep copies of candidate completion certificates in student records; and
- Require candidates to download the test preparation manual for the appropriate certification area from [www.texas.ets.org](http://www.texas.ets.org), and complete the practice exercises.

#### Component IV

- Consider having students sign a FERPA letter, upon admission, stating that information on student teaching observations can be provided to the campus administrator; and
- Have field supervisors deliver Student Teaching Handbook to cooperating teachers and show them the training materials. Document this and keep in candidates' records.