



# Compliance Audit Report 2014-2015 Rice Educational Entrepreneurship Program

According to Texas Administrative Code (TAC) §228.10(c), "An entity approved by the SBEC under this chapter...shall be reviewed at least once every five years under procedures approved by the Texas Education Agency (TEA) staff; however, a review may be conducted at any time at the discretion of the TEA staff." Per TAC §228.1(c), "All educator preparation programs are subject to the same standards of accountability, as required under Chapter 229 of this title." The Texas Education Agency administers Texas Administrative Code required by the Texas legislature for the regulation of all educator preparation programs in the state. Please see the complete Texas Administrative Code at [www.tea.state.tx.us](http://www.tea.state.tx.us) for details.

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**County/District Number:** 101718

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Program Specialist, Lorrie Ayers, and Program Manager, Sandra Nix, conducted a Texas Education Agency Compliance Audit of Rice Educational Entrepreneurship Principal Program on January 20 – January 22, 2015. The focus of the compliance audit was the Principal certification program. The following are findings and recommendations for program improvement.

## **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 §241.

## **Data Analysis:**

Information concerning compliance with Texas Administrative Code (TAC) governing educator preparation programs was collected by various qualitative means. A self-report was submitted to the Texas Education Agency. An on-site review of documents, student records, course material, online courses, and curriculum correlation charts provided evidence regarding compliance. In addition, electronic questionnaires developed by TEA staff were sent to Rice Educational Entrepreneurship Program (REEP) stakeholders. A total of fifty-one (51) out of one hundred twenty-six (126) questionnaires or 40% were received as follows: Six (6) out of twelve (12) advisory committee members or 50%; eighteen (18) out of fifty-four (54) principal candidates or 33%; thirteen (13) out of thirty-nine (39) site supervisors/mentors or 33%; and fourteen (14) out of twenty-one (21) field supervisors or 67% responded. Qualitative and quantitative

methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. 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 is required to correct the issue IMMEDIATELY. An action plan may be drafted during the visit that identifies compliance issues to be addressed and a timeline for completion. Program “recommendations” are suggestions for general program improvement and no follow up is required.

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

The opening session on January 20, 2015 was attended by Andrea Hodge, Lawrence Kohn, Shea Bledsoe, Zachary Garcia, and Kim Huseman.

The closing session on January 22, 2015 was attended by Andrea Hodge, Lawrence Kohn, Shea Bledsoe, Zachary Garcia, and Kim Huseman. During the closing session, REEP and TEA staff developed an action plan to address compliance issues.

## **COMPONENT I: Governance of Educator Preparation Programs- Texas Administrative Code (TAC) §228.20**

### **FINDINGS:**

- 1) The Rice Educational Entrepreneurship Program campus facilities are in appropriate condition with new technology. Participation of the staff during all phases of the audit indicates the staff’s support and commitment to the success of the Principal preparation program.
- 2) The Advisory Committee consists of twelve (12) members representing business and community (6), public and private schools (4), and higher education (2).
- 3) Numerous emails from program director to advisory board members show members are being kept updated on REEP activities. Handouts given to members for advisory committee meetings pertain to program design, delivery, evaluation, and policy decisions; however, there is little evidence that committee members are having interactive discussions regarding program design, delivery, evaluation, and policy decisions.
- 4) Advisory committee meeting minutes, agendas, or follow up emails provide evidence that program has at least 2 advisory committee meetings per year.

Based on the evidence presented, Rice Educational Entrepreneurship Program is **IN COMPLIANCE** with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.

## GENERAL RECOMMENDATIONS:

- 1) Include more advisory committee members that are certified and acting in educational capacities such as principals and HR directors.
- 2) Be diligent in maintaining detailed formal documentation of agendas, attendance rosters, and minutes for future advisor committee meetings;
- 3) Explore creative ways to conduct advisory committee meetings such as SKYPE or WebEx.
- 4) Provide Continuing Professional Development (CPE) hours for participation in advisory committee activities for those members who need hours for certificate renewal.

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

### FINDINGS:

- 1) Rice Educational Entrepreneurship Program requires a minimum GPA of 3.0 for admissions per documentation in candidate folders and on website. This requirement is applied equitably across all applicants.
- 2) Evidence in candidates' records and on application indicates the following are required for admissions: a) GMAT scores; b) resume; c) two letters of reference; and d) two essays.
- 3) Evidence in candidates' records indicates candidates complete a 'four part' interview consisting of two telephone interviews and two face-to-face interviews.
- 4) Evidence in candidates' records includes an application and official transcripts.
- 5) Admission information posted on-line identified three options for determining English proficiency for in-coming candidates including TOEFL, Pearson Test of English Academic (PTE), and International English Language Testing System (IELTS). After TEA personnel identified that the TOEFL is the only test approved by the State Board for Educator Certification, REEP personnel removed the other two test options from the website before the audit closed.
- 6) Candidate service records verifying two years of service were not found in candidates' records. Before the audit closed, REEP personnel requested service records from school districts and updated their website to reflect a service record as a requirement for admission.
- 7) There is no evidence in candidates' records verifying valid teaching certificates for two candidates.

Based on the evidence presented, Rice Educational Entrepreneurship Program is **NOT IN COMPLIANCE** with TAC §227 - Admission Criteria.

### **COMPLIANCE ISSUES TO BE ADDRESSED (per Action Plan):**

- 1) Provide a copy of a valid teaching certificate for each of the two candidates whose certificates could not be verified.

### **GENERAL RECOMMENDATIONS:**

- 1) Require candidates to sign a FERPA agreement upon acceptance into program. Retain signed agreements in individual candidates' records.

## **COMPONENT III: CURRICULUM - Texas Administrative Code (TAC) §228.30 & §241**

### **FINDINGS:**

- 1) The REEP curriculum combines coursework in business administration (MBA) and educational leadership. However, it also offers just principal certification without the MBA.
- 2) A curriculum review indicates the curriculum is aligned with principal standards and relevant standards are noted in the syllabi and/or coursework.
- 3) Course syllabi and activity detail in course overviews reveal that coursework is sustained, rigorous, and interactive. Use of case studies indicates the curriculum is performance-based and student-focused.
- 4) The presence of bibliographic information in course overview materials and the use of experts as guest speakers are evidence that curriculum relies on scientifically based research.
- 5) There is little evidence in course curriculum materials that REEP is consistently using assessments to measure candidate mastery of knowledge and skills of the principal standards. Exit Tickets are used as the primary assessment; however, a review of the Exit Ticket questions indicates they are a qualitative measurement of a candidate's perception of program components and do not measure the candidate's knowledge or skills required by the principal standards.

Based on evidence presented, Rice Educational Entrepreneurship Program is **NOT IN COMPLIANCE** with Texas Administrative Code Sections §228 and §241 – Curriculum.

### **COMPLIANCE ISSUES TO BE ADDRESSED (per Action Plan):**

- 1) Create and utilize appropriate formal formative assessments to determine mastery of knowledge and skills of the principal standards.

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

### FINDINGS:

- 1) Per syllabi and course overviews, REEP provides candidates with more than 200 hours of coursework.
- 2) Documentation in candidates' records indicates that candidates are required to complete all coursework prior to being recommended for a Principal certificate. Candidates are appropriately recommended for probationary certificates.
- 3) REEP provides candidates with a practicum experience called a "Leadership Project", but there is no documentation that verifies that candidates complete the required 160 hours within this practicum.
- 4) Coaching logs in candidates' records are evidence that candidates are assigned site supervisors (mentors) during practicum experience.
- 5) There is no evidence that site supervisors (mentors) are provided training; however, REEP has a handbook developed to train site supervisors. The handbook contains expectations for site supervision, explains the practicum process, and in future will be sent via email with read receipt to all site supervisors (mentors) beginning February 2015.
- 6) Documentation in candidates' records is evidence that candidates are assigned certified field supervisors who are trained in field supervision; however, documentation of Field Supervisor attendance at training is not available.
- 7) Observation forms in candidates' records do not appropriately document 135 total minutes of observations in three formal observations. In addition, they do not reflect that an interactive conference is held after the observation. There is no evidence these observation results are submitted to site supervisor (mentor). Note: Prior to audit close, observation forms were redesigned to reflect evidence of all observation information required by TAC.

Based on evidence presented, Rice Educational Entrepreneurship Program is **NOT IN COMPLIANCE** with Texas Administrative Code Section §228.35 – Preparation Program Coursework and/or Training.

### COMPLIANCE ISSUES TO BE ADDRESSED (per Action Plan):

- 1) Evaluate the Leadership Project to specifically identify that 160 clock hours are completed. Have candidates submit logs that reflect completion of the 160 clock hours. Retain in each individual candidate record for future audit purposes.
- 2) Ensure that Field Supervisors conduct three formal observations for a total of 135 minutes, following each observation with an interactive conference. Document the observation and conference on the observation form with signatures as evidence.

- 3) Submit copies of completed observation forms to the site supervisor (mentor) assigned to the candidate. Obtain a signature of receipt on the original observation form or send the observation results via email with a read or delivery receipt. Retain this documentation in candidates' records for audit purposes.

#### **GENERAL RECOMMENDATIONS:**

- 1) Avoid employing field supervisors that are on contract with school districts to observe candidates employed in the same district.
- 2) Provide CPE credit to site supervisors who need hours for certification renewal.

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

#### **FINDINGS:**

- 1) REEP has numerous benchmarks to document candidate progress through program, including periodic assessments of leadership growth through reviews after each semester, following the Summer Institute, and a final review. Candidates' conduct and adherence to policies are also reviewed.
- 2) Pre-assessments and practice exams are administered to determine the candidates' readiness to test. Candidates must achieve a minimum score of 75 on the practice exam prior to testing.
- 3) REEP has numerous sources of both internal and external feedback which are used to optimize the program. Candidates are surveyed during coursework. Several outside surveys conducted by Johns Hopkins University are available as evidence of external evaluations.

Based on evidence presented, Rice Educational Entrepreneurship Program is **IN COMPLIANCE** with Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates for Certification and Program Improvement.

#### **GENERAL RECOMMENDATIONS:**

- 1) Create a step-by-step process to appropriately address candidate complaints.

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

### **FINDINGS:**

- 1) Candidates are provided a handbook which states “All candidates are expected to adhere to the Code of Ethics...” (p. 12). Candidates sign a handbook read/understand page.
- 2) The Code of Ethics handbook page refers candidates to TAC to find the Code of Ethics and does not specifically detail the Code on the handbook page.
- 3) Staff have not historically signed an agreement to abide by the Educator Code of Ethics; however, before the close of the audit, signed agreements were presented to TEA auditors.

Based on evidence presented, Rice Educational Entrepreneurship Program is **IN COMPLIANCE** with Texas Administrative Code §228.50 – Professional Conduct.

### **GENERAL RECOMMENDATIONS:**

- 1) Continue to require additional staff to sign agreements to abide by Educator Code of Ethics.
- 2) Change handbook page 12 so that the Educator Code of Ethics is specifically listed on the page or refer directly to §247.2.

## **GENERAL 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 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.
- Ensure that TEA staff has the most current contact information by sending update emails to the assigned program specialist.