

Desk Audit Compliance Audit Report 2014-2015 Southwestern University

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

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Texas Education Agency Education Preparation Program Specialists, Vanessa Alba and Lorrie Ayers, conducted a desk compliance audit of Southwestern University Educator Preparation Program (EPP), located at 1001 E. University Ave., Georgetown, TX 76626, on July 6, 2015, as required by Texas Administrative Code (TAC) §228.10(c) and TAC §229.6(a) which states that educator preparation programs "shall be reviewed at least once every five years". The focus of the audit was the Traditional Undergraduate Program. The program's accreditation status is "Accredited". The following are the findings of the desk audit.

Scope of the Compliance Audit:

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

Data Analysis:

Information concerning compliance with TAC governing educator preparation programs was collected by various qualitative means. A self-report was submitted to TEA on July 6, 2015. A TEA review of documents, student records, course material, and curriculum correlations charts provided evidence regarding compliance. In addition, TEA sent electronic questionnaires to Southwestern University EPP stakeholders. A total of 39 out of 154 (25%) responded to the questionnaires as follows: 7 out of 22 (32%) advisory committee members; 12 out of 51 educator candidates (24%); 3 out of 25 (12%) principals; 16 out of 53 (30%) cooperating teachers/mentors; and 1 out of 3 (33%) 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 is required to correct the issue IMMEDIATELY. An action plan was drafted during the desk audit that identified compliance issues to be addressed. A timeline for completion was agreed upon between TEA and the program. Program recommendations are suggestions for general program improvement and no follow up is required.

Ongoing Communication and Action Plan:

A communication between TEA program specialist and the Southwestern University EPP Certification Officer and Department Chair occurred via phone conference on June 20, 2015 to discuss findings and request additional information. A follow-up call with the Certification Officer occurred on August 5, 2015.

The action plan phone conference was held on, 2015, and was attended by the same individuals. The action plan was developed to guide implementation of compliance issues. General recommendations were incorporated into the report.

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

FINDINGS:

1. Sherry Adrian, Certification Officer, and Michael Kamen, Department Chair, participated in the audit conference. Sherry Adrian provided support and is accountable for the quality of the educator preparation program and the candidates whom the program recommends for certification [TAC §228.20(c) and TAC §228.2(8)].
2. The advisory committee currently consists of 15 members. Twelve members of the advisory committee are from public/private schools, one member represents an institution of higher education, one member represents the Education Service Center (ESC), and one member represents business and community. Southwestern University EPP meets TAC §228.20(b) minimum requirements for advisory committee composition.
3. Minutes and agendas verifying advisory committee meetings were held twice during the past three academic years as follows: for the 2013-2014 academic year: November 13, 2013 (12 members present) and April 16, 2014 (9 members present). Advisory committee meetings were held as follows for the 2012-2013 academic year: October 9, 2012 (11 members present) and April 29, 2013 (9 members present). Advisory committee meetings were held as follows for the 2011-2012 academic year: November 14, 2011 (13 members present) and April 20, 2012 (13 members present).
4. Agendas, minutes, and attendee records indicating that the members assist in the design, delivery, evaluation, and major policy decisions of the EPP were available as evidence of compliance.
5. A Letter of Invitation detailing roles and responsibilities dated 2009 was provided in the document review showed that the program approved the roles and responsibilities of each member [TAC §228.20(b)].

Compliance Issues to be addressed:

None

Recommendations:

- Rotate the terms of the Advisory Committee members to bring fresh ideas and insights to the group;
- Consider an Advisory Committee Handbook and/or Bylaws for the purpose of ensuring strong continuity of the Advisory Committee as membership changes; and
- Provide an incentive to the members of the Advisory Committee for their involvement and assistance with the Southwestern University Educator Preparation Program (EPP) by providing Continuing Professional Education (CPE) credit to members who need CPE hours for the renewal of their Texas certificates.

Based on the evidence presented, Southwestern University Educator Preparation Program (EPP) is 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 Southwestern University EPP admission requirements as identified on the website require the applicant to:
 - A. Be enrolled in an educator preparation program from an institution of higher education that is accredited by a regional accrediting agency, as recognized by the Texas Higher Education Coordinating Board (THECB) [TAC §227.10(a)(1) and TAC §230.11)];
 - B. Have a minimum 2.5 GPA or at least a 2.5 in the last 60 semester credit hours [TAC §227.10(a)(3)(A)];
 - C. 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)(4) and TAC §230.37(a)];
 - D. Demonstrate oral communication skills as listed in TAC §230.11(b)(5), a TOEFL oral speaking passing score of 26 and a foreign transcript evaluation by a TEA approved evaluation service [TAC §227.10(a)(5)];
 - E. Submit an application [TAC §227.10(a)(6)];
 - F. Have a grade of at least C- in an English composition course [TAC §227.10(a)(6)];

- G. Submit a proposal prior to engaging in and completing an interactive, sustained intercultural experience and keep a journal that documents and reflects on the selected experience, including no fewer than 20 hours [TAC §227.10(a)(6)];
 - H. Complete a post-experience reflection paper submitted to and approved by department faculty to finalize the admission requirement [TAC §227.10(a)(6)];
 - I. Complete a successful background check [TAC §227.10(a)(7) and TAC §227.101(c)]; and
 - J. Provide proof of professional insurance for seniors in the field-based program and student teaching through membership in a statewide teacher organization [TAC §227.10(a)(7)].
- 2. A review of ten (10) candidate records verified that admission requirements are followed.
 - 3. Transcripts for each of the ten (10) candidates revealed a GPA range of 3.13-4.0 on transcript worksheets [TAC §227.10(a)(3)(A)];
 - 4. All files reviewed documented that candidates met the basic skills requirement in reading, written communication and mathematics as verified on transcripts by SAT, TAAS, ACT, TAKS, or THEA [TAC §227.10(a)(4) and TAC §230.37(A)].
 - 5. There were no out-of-country candidate files reviewed. However, the Director of Admissions for the university is responsible for verification if the need arises [TAC §227.10(a)(5); TAC §227.10(e); TAC §230.11(b)(5)].
 - 6. All files reviewed contained a completed signed and dated application [TAC §227.10(a)(6)];
 - 7. All files contained evidence of the Interview scored with a rubric [TAC §227.10(a)(6)];
 - 8. All applicant files were reviewed for the Dispositions to Teach scored on a rubric. All 10 files reviewed contained evidence of the Dispositions to Teach. [TAC §227.10(a)(6)];
 - 9. All files reviewed contained an admissions check sheet noting that the Intercultural Experience had been completed. It was also noted that 8 out of 10 candidate files reviewed contained the actual documentation that the candidate completed the requirement. The program met the admissions requirement of Intercultural Experience [TAC §227.10(a)(6)];
 - 10. All files reviewed contained evidence that candidates had a grade of B or better in an approved writing course (EDU 40-494 or EDU 40-593) [TAC §227.10(a)(6)];
 - 11. All candidate files were reviewed for any other academic criteria for admission that are published and applied consistently to all applicants. The program requires proof of liability insurance. All 10 files reviewed contained evidence that the requirement was met [TAC §227.10(a)(7)].
 - 12. There were no candidates admitted who met the exception to the minimum GPA requirement. [TAC §227.10(a)(3)(B)];

13. The program requires all applicants to complete a successful background check. All files reviewed contained evidence that this requirement was met [TAC §227.10(a)(7) and TAC §227.101(c)].
14. All student records for current students and those certified since 1980 that evidence a candidate's eligibility for admission to the program and evidence completion of all program requirements are kept in hardcopy format in the Certification and Testing Coordinator's Office located in Mood-Bridwell 234. The program is working toward maintaining electronic files. TEA program specialist verified via phone conference call that records are in a secure location and kept for a period of five years after candidate program completion [TAC 228.40(d)].

Compliance Issues to be addressed:

- None

General Recommendations:

- Consider requiring more than one person to interview prospective candidates to ensure inter-rater reliability and to ensure that all potential interview bias is eliminated;
- Consider requiring a cut score on the Dispositions to Teach to ensure that all applicants meet a standard requirement; and

Based on the evidence presented, Southwestern University EPP is 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 Pedagogy and Professional Responsibilities (PPR) EC-12 content.
2. The PPR EC-12 alignment chart, syllabi, course outlines, and focused field-based experiences verified that the content is taught in the PPR coursework [TAC §228.30 (a)]
3. A TEKS Correlation Alignment Chart completed by the program served as evidence that the relevant Texas Essential Knowledge and Skills (TEKS) are taught to all candidates. It was also noted that candidates were required to complete weekly lesson plans using a Lesson Plan Template based on TEKS to ensure alignment to the applicable TEKS [TAC §228.30 (a)].
4. The structured assessments used by the program included candidate records showing the grade earned, progression through the program by verifying assessments, and syllabi detailing the assessments used in each course [TAC §228.40 (a)].
5. A review of the syllabi revealed that lesson plans, activities to be completed based on standards, and assessments were found in EDU 43-443, a PPT presentation, EDU 42-773, and EDU 45-773. [TAC §228.30(b)].
6. It was noted that reading instruction was taught in EDU 45-773-783. The program also utilizes the Florida Center for Reading Research (FCRR) for reading instruction

materials. All five components of reading (phonemic awareness, phonics, fluency, vocabulary, and comprehension) are taught within the specific reading courses [TAC §228.30(b)(1)].

7. The code of ethics and standard practices for Texas educators, pursuant to Chapter 247 of this title (relating to Educators' Code of Ethics) is taught within a training module that candidates are required to take. Candidates are required to sign an ethics agreement that is placed in their file [TAC §228.30(b)(2)].
8. The coursework and training is sustained, interactive, student-focused, performance-based and included the required subject matter as required in TAC §228.30(b)(3)(A-E). PPR alignment charts, syllabi, and course outlines provided evidence of compliance. This specifically included instructional planning and delivery [TAC §228.30(b)(3)(A)] An instructional planning PPT, lesson planning format, and *Thinking Through Teaching* assignments are required throughout the program; knowledge of students and student learning [TAC §228.30(b)(3)(B)]; content knowledge and expertise [TAC §228.30(b)(3)(C)]; learning environment [TAC §228.30(b)(3)(D)]; and data-driven practice [TAC §228.30(b)(3)(E)].
9. Professional practices and responsibilities are adequately addressed within the PPR EC-12 coursework [TAC §228.30(b)(3)(E)].
10. Instruction in detection and education of students with dyslexia as indicated in the Texas Education Code (TEC) §21.044(b) was provided to candidates in EDU 43-443 [TAC §228.35(a)(4)].
11. Instruction in detection and education of students with mental and emotional disorders, as indicated in the Texas Education Code (TEC), §21.044(c-1) and (c-2) was provided to candidates in EDU 43-404; EDU 43-453; PSY 33-333; Alignment Charts were also provided for the 3 aforementioned courses. Assigned readings, assignments, exams, and lesson plans were required. Candidates were also required to conduct a problem-based intervention and conduct a field based activity with observational data. Additional evidence provided in the document review included presentation slides, readings, and handouts [TAC §228.35(a)(5)].
12. The advisory committee members indicated that they felt the students need more content knowledge, especially at the secondary level. There needs to be more collaboration between subject area faculty and the secondary program.

Educator candidates and mentor/cooperating teachers reported the following regarding instruction in their respective questionnaires:

Instruction Provided in the Following Areas:	Candidates	Mentor/Cooperating Teachers
	Yes/No/Don't Know	Yes/No
Reading Instruction for all certification areas at all grade levels	91% / 9% / 0%	93% / 7%
Dyslexia Training	82% / 18% / 0%	

Child/Adolescent Development	100% / 0% / 0%	100% / 0%
Instructional Methods for Motivating Students	100% / 0% / 0%	100% / 0%
Theories of How People Learn	100% / 0% / 0%	93% / 7%
TEKS Organization, Structure, Skills	100% / 0% / 0%	93% / 7%
Utilizing TEKS in Content Areas	100% / 0% / 0%	86% / 14%
Teacher Responsibilities for Administering the STAAR or End of Course Exams	82% / 9% / 9%	77% / 23%
How to Develop a Lesson Plan	100% / 0% / 0%	100% / 0%
Process of Curriculum Development	91% / 9% / 0%	93% / 7%
How to Utilize A Variety of Classroom Assessments with Students	100% / 0% / 0%	100% / 0%
How to Use Formative Assessments to Diagnose Student Learning Needs	100% / 0% / 0%	93% / 7%
Models and Methodologies in Classroom Management Prior to Placement as a Teaching Candidate	100% / 0% / 0%	86% / 14%
Laws and Strategies Regarding Students with Special Needs	100% / 0% / 0%	86% / 14%
Teaching Strategies for Students Designated as GT	91% / 9% / 0%	75% / 25%
Standards and Teaching Strategies for Students with Limited English Proficiency	91% / 9% / 0%	93% / 7%

Conducting Parent Conferences	100% / 0% / 0%	79% / 21%
Variety of Instructional Strategies in Your Classroom	100% / 0% / 0%	100% / 0%
Differentiating or Changing Instruction to Meet Individual Student Needs	100% / 0% / 0%	
Characteristics and Identification of Students with Mental or Emotional Disorders	100% / 0% / 0%	

Compliance Issues to be addressed:

- None

Recommendations:

- Strengthen the secondary level content by collaborating with the subject area faculty and the secondary program staff.

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

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

FINDINGS:

1. Southwestern University EPP undergraduate program curriculum review revealed that the program has a total of 2465-2540 clock-hours, depending on the certificate area [TAC §228.35(a)(1) and TAC §228.2(5)]. The program requires that candidates complete 1725-1980 clock-hours of coursework and training [TAC §228.35(a)(3) and TAC §228.2(5)] and 46-347.5 clock hours of field-based experiences prior to student teaching. The total program hours and program hours prior to student teaching provided in the document review were verified in the degree plan and program hours chart.
2. While candidates are required to complete from 46-347.5 clock-hours (varies by certificate area) of field-based experiences prior to student teaching, documentation for the 10 files reviewed was incomplete. The program did provide additional documentation regarding field-based experiences. However, the field based experience documentation provided indicated that the field-based experiences were completed in a placement that was similar to the student teaching placement and not in a variety of educational settings. In conversations with the Southwestern University Certification Officer, the TEA

program specialist specifically clarified the need for candidates to have the opportunity to complete field-based experiences prior to student teaching in elementary, middle, and high school settings in classrooms that are different from the candidate's anticipated certification field. The rationale being that the candidate may observe/interact in a different classroom setting which may lead to certification in a different certification field. Only three files provided sufficient evidence that field-based experiences were completed as prescribed. Field-based experiences did not meet the requirements as prescribed [TAC §228.35(a)(3); TAC §228.35(d)(1); TAC §228.2(9)].

3. The field-based experiences were completed in the semester prior to student teaching. The Field-based experiences spreadsheet provided by the program served as documentation [TAC §228.35(d)(1)].
4. The program requires candidates to complete more than 80 clock-hours of coursework and training prior to student teaching. The evidence presented was a candidate benchmark chart [TAC §228.35(a) (3)(B)].
5. The program did not provide sufficient evidence to document that field-based experiences prior to student teaching were in a variety of educational settings with diverse student populations, including observation, modeling, and demonstration of effective practices to improve student learning. The program provided documentation that each professor is responsible for monitoring completion of field-based experiences. Each professor gathers student material and assigns grades, but the program does not keep documentation in each candidate's certification file. It also appeared, from the documentation provided, that candidates completed field-based experiences in a similar setting as the actual student teaching practicum. As a result of the lack of sufficient documentation, the program does not meet the requirement as prescribed [TAC §228.35(a)(3)(A); TAC §228.35(d)(1)(A-E)].
6. The program requires all coursework and training to be completed prior to educator preparation program completion and standard certification. Evidence was found in the ten candidate records noting where each candidate was in the process of program completion. This included benchmarks, a review of the program's schedule of coursework, candidate records, degree plans, and transcripts [TAC §228.35(a)(4)].
7. The program allows candidates to complete student teaching, clinical teaching, or internship depending on if the candidate is in an initial, post-bac, or alternative certification track within Southwestern University EPP. All files reviewed were for candidates that had completed student teaching. Placement information in candidate records provided verification that 9 out of 10 candidates (10 files reviewed) were in an appropriate student teaching placement that matched the certification field that the candidate was seeking [TAC 228.35(d)(1); TAC §228.35(d)(2)(A); TAC §228.2(4)].
8. All student teaching placements took place in an actual school setting. Documentation was verified for 9 out of 10 files reviewed. The documentation provided was the Student Teaching Contract with the public elementary, middle or high school. The program also submitted additional evidence that included the name of the cooperating teacher. The program met the requirement as prescribed [TAC §228.35(d)(2)(C)(ii)].
9. Nine out of 10 files reviewed provided evidence that candidate was assigned a cooperating teacher in an actual public/private school setting. The program met the requirement as prescribed [TAC §228.35(e); TAC §228.2(6)].

10. While Southwestern University EPP provided mentor/cooperating teacher training, it could not be verified that the cooperating teachers attended the training. Training materials were submitted as evidence. The documentation submitted by the program to verify that training had occurred did not meet the requirements as prescribed [TAC §228.35(e)].
11. It was documented by the program and verified that each candidate was assigned a field-supervisor. There are five field-supervisors at Southwestern University. Each holds an appropriate in-state or out-of-state teacher/mid-management certificate. Certifications for field-supervisors were reviewed in the TEAL system. The field supervisors met the requirements as prescribed [TAC §228.35(f)].
12. The field supervisors did not receive yearly training as prescribed. As a result, the program did not meet the field-supervisor training requirement as prescribed [TAC §228.35(f)].
13. Southwestern University EPP provided evidence that field supervisors made initial contact within the first 3 weeks of assignment as required. Documentation was provided in 10 files reviewed. The program met the requirements of initial contact by the field-supervisor as prescribed [TAC §228.35(f)].
14. Each field supervisor conducted two observations, the Mid-Term and Final Observation, documented instructional practices observed, and provided written feedback through an interactive conference with the candidates. Additional candidate observations, with documentation and feedback, of the candidate occurred throughout the student teaching practicum. It was noted and discussed with the program staff that candidates had more than three observations by the field supervisor. Ten files were reviewed and only one file was lacking observations for the second half of the student teaching. The program met the requirements of field-supervision [TAC §228.35(f)(4)].
15. There was no evidence that the program provided a copy of the observation to the campus administrator. The program did not meet the requirements as prescribed [TAC §228.35(f)].
16. Candidates participated in weekly student teacher support meetings with peer support and faculty guidance. There was documentation provided for one candidate as requested by TEA. Additional documentation, which included sign-in sheets at the weekly support meetings, was provided. The program met the requirements of informal observations and coaching as prescribed [TAC §228.35(f)].

Compliance Issues to be addressed:

- Require the program to keep documentation of the 30 clock-hours of field-based experiences that candidates complete prior to student teaching, clinical teaching or internship [TAC §228.35(a)(3)];
- Require the program to provide and keep a record that mentor/cooperating teacher training occurs each year or allow the school district to provide that training [TAC §228.35(e)];
- Require the program to provide and keep a record that field supervisor training occurs each year [TAC §228.35(f)]; and
- Require the program provide the campus administrator with a copy of each observation of the candidate [TAC §228.35(f)].

Recommendations:

- Consider not allowing 50 clock-hours of School District Training as a part of total hours for candidates in the ACP;
- Consider providing Continuing Professional Education (CPE) credit to 0 field-supervisors, who need CPE hours for certificate renewal, for their annual field supervisor training; and
- Create a standardized Observation Form that is utilized by all field supervisors to ensure that all candidates receive the same type of feedback at each formal observation.

Based on evidence presented, Southwestern University Educator Preparation Program (EPP) is not in compliance with Texas Administrative Code Section §228.35 – Program Delivery and On-Going Support.

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

1. Southwestern University EPP has established benchmarks to ensure that candidates are prepared to receive standard certification [TAC §228.40(a)]. Documentation detailing the benchmark activity, timeline, and person responsible and the candidate record showing progression through the program by verifying benchmarks was provided as evidence for the 10 files reviewed.
2. The program provided evidence that the readiness of each candidate to take the appropriate certification assessment of pedagogy and professional responsibilities, including professional ethics and standards of conduct was determined as required. It was noted that four candidates had a student profile sheet verifying readiness to test. Additional documentation was provided that included dated emails to candidates, sign-in sheets for content area and PPR test prep, and a signed practice exam check-out for 10 files reviewed. It was also noted in two files that the program was allowing candidates to test and be certified in multiple certification fields. While Southwestern University met the requirement of determining each candidate's readiness to test, the program did not meet the requirement as prescribed because two candidates were allowed to be certified in multiple content areas [TAC §228.40(b); TAC §230.21(c)].
3. The program continuously evaluates the design and delivery of the educator preparation curriculum based on performance data, scientifically-based research practices, and the results of internal and external assessments [TAC §228.40(c)]. The evidence provided included candidate surveys from academic years 2012-2015, documentation detailing the evaluation activity, timeline, and person responsible, and agendas and minutes of advisory committee meetings. The documentation was signed by the director and an advisory committee member.

Compliance issues to be addressed:

- Allow a candidate to be admitted, trained, and certified in one content area [TAC §228.40(b); TAC §230.21(c)].

Recommendations:

None

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

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

1. TAC §228.50(a) states that during the period of preparation, the educator preparation entity shall ensure that the individuals preparing candidates and the candidates themselves demonstrate adherence to Chapter 247 of this title (relating to Educators' Code of Ethics).
2. The Southwestern University EPP staff and candidates (10 files reviewed) have signed a statement of reading, understanding, and abiding by the Code of Ethics.

Based on evidence presented, Southwestern University Educator Preparation Program (EPP) is in compliance with Texas Administrative Code §228.50(a) regarding Professional Conduct.

Standard Recommendations for Southwestern University EPP:

- Align the verbiage of Southwestern University to the verbiage of 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.