



## Compliance Audit Report 2014-2015 Texas College

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. Mary Heape / Octavia Brown

**County/District Number:** 212502

**SBEC Approval Date:** May 1989

Texas Education Agency Program Specialists, Lorrie Ayers and Mixon Henry, conducted a five year Continuing Approval Compliance Audit of Texas College, 2404 North Grand Avenue, Tyler, TX 75702, on March 10-12, 2015 as required by Texas Administrative Code (TAC) §229. The following are the findings of the audit.

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

The scope of this audit is restricted solely to verifying compliance with Texas Administrative Code §227, §228, §229, 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 February 20, 2015. An onsite review of documents, student records, EC-6 and PPR EC-12 course materials, and curriculum correlations charts provided evidence regarding compliance. In addition, TEA sent electronic questionnaires to Texas College stakeholders. The following responses were recorded: four (4) out of nine (9) or 44% from Advisory Committee members; three (3) out of twelve (12) or 25% from principals; one (1) out of fourteen (14) or 7% from educator candidates; and twelve (12) out of twenty-six (26) or 46% of mentor teachers. Overall twenty (20) out of sixty-one (61) stakeholders or 33% responded to the questionnaires. 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 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. “General Recommendations” are suggestions for general program improvement and no follow up is required.

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

The opening session on March 10, 2015, was attended by Mary W. Heape, Erin Reynolds, Barbara Cade, Hamad Ali, Orenthia Mason, Robert Harper, Tiffany Lloyd-Bullock, Sonja Warren, Brenda J. Conley-Hillmon, Gloria Young, Touncel Smith, Darryl D. Williams, Linda Johnson, Arthur Allen, Randal Urwiller, Cynthia Marshall-Biggins, Octavia M. Brown, Keith Garcia, and Rosia Edwards. During the opening session Texas College staff presented information about Texas College including performance data and projected growth. Texas Education Agency staff presented information including Texas College data and feedback gathered from stakeholder questionnaires.

The closing session was held on March 12, 2015, and was attended by Octavia M. Brown, Sonja Warren, Touncel Smith, Gloria Young, Brenda Conley-Hillmon, Barbara Cade, Robert Harper, and Mary W. Heape. During the closing session an action plan was developed to guide correction of compliance issues and to provide general recommendations for program improvement.

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

### **FINDINGS:**

- 1) Staff participation in the opening and closing sessions as well as their assistance in the audit are evidence that Texas College personnel are actively engaged in the success of the educator preparation program. The Texas College facilities are in good condition with construction of new buildings in progress.
- 2) The Advisory Committee currently consists of 12 members. Four (4) members of the Advisory Committee represent public or private K-12 schools, four (4) members represent higher education, two (2) members are employed by Texas College, and two (2) members represent business and community interests. Texas College meets TAC §228.20(b) minimum requirements for Advisory Committee composition.
- 3) Agendas, minutes, and attendee records for Advisory Committee meetings held on November 14, 2014, and on January 30, 2015, are evidence that members are trained in their roles and responsibilities and that members discuss “design, delivery, program evaluation, and major policy decisions” of the educator preparation program. [TAC §228.20(b)].

Based on the evidence presented, Texas College is **In Compliance** with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.

### **RECOMMENDATIONS:**

- 1) Consider giving CPE credits to Advisory Committee members for their participation where appropriate.

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

### **FINDINGS:**

- 1.) Documents in candidates' records' provide evidence that candidates are currently admitted with a GPA of 2.5. According to program staff, in the future the GPA requirement will increase to 2.75.
- 2.) For one candidate admitted with a GPA below 2.5, there is no documentation of the exception used to grant admission.
- 3.) Historically, basic skills assessments have not been consistently applied; however, current records provide evidence of consistent application of basic skills assessments for all incoming candidates.
- 4.) Texas College has reading, writing, and math courses that provide skills remediation when necessary.
- 5.) Texas College has no out-of-country or out-of-state candidates at this time.
- 6.) Admission criteria include: application, interview, official transcript, resume, degree plan, copy of state ID, oral proficiency questionnaire, signed ethics agreement, two writing samples, three letters of reference, and a criminal background check.
- 7.) Candidates' records are kept in a secure, locked location according to TAC §228.40.

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

- There is no documentation of the exception used to admit a candidate with a GPA lower than 2.5.

Based on the evidence presented, Texas College is **Not in Compliance** with Texas Administrative Code §227.10 - Admission Criteria.

## **COMPLIANCE RECOMMENDATIONS (see Action Plan):**

- For each candidate admitted into program with a GPA below the minimum (new program minimum is to be 2.75), include documentation of the extraordinary circumstance supporting the exception signed by the Dean or Director and placed in the candidate's record.

## **RECOMMENDATIONS:**

- Consider raising THEA reading score requirement.
- Consider stream-lining candidate records to maintain appropriate documentation while eliminating excess paperwork.

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

### **FINDINGS:**

- 1) Texas College is part of a consortium composed of 5 institutions of higher education. Some of the coursework is shared among all schools in the consortium and those courses are completed on-line.
- 2) Syllabi of Texas College face-to-face courses provide evidence that curriculum is standards-based; however, syllabi for shared on-line courses do not reflect educator standards.
- 3) Based on the syllabi provided, including those for the shared courses, there is limited evidence that curriculum is rigorous, performance-based, and interactive.
- 4) Based on the syllabi provided, including those for the shared courses, there is evidence that some courses have standards-based assessments appropriately aligned with the course content and some do not.
- 5) There is limited evidence that TEKS are appropriately addressed in relevant coursework.
- 6) Required reading instruction is found in Reading 3312 and in ENGL 4322 for Generalist EC-6 candidates and in Reading 4314 for all other content areas.
- 7) Instruction in data-driven practice is limited in curriculum.
- 8) Mandatory training in identification and education of students with mental health disorders is not evident in curriculum.
- 9) Instruction in educator code of ethics is embedded in curriculum and generally taught using the TEA recommended YouTube videos.
- 10) Instruction in characteristics and identification of dyslexia and strategies for teaching students with dyslexia is embedded in curriculum using both Region X training and in the on-line shared course, SEDL 2301

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

- TEKS instruction cannot be verified in coursework.
- There is limited evidence that curriculum is rigorous, interactive, and performance-based.
- Many courses lack appropriate standards-based assessments and/or assessments aligned with course content.
- Instruction in “data-driven practice” is limited in curriculum.
- Training in identification and education of students with mental health disorders is not evident in curriculum.
- Based on information provided, shared, on-line courses do not contain standards-based content.

Based on evidence presented, Texas College is **Not in Compliance** with Texas Administrative Code Section §228.30-Curriculum.

## **COMPLIANCE RECOMMENDATIONS (see Action Plan):**

- Identify and update appropriate courses in which candidates should be taught to use TEKS to inform standards-based instruction, including TEKS framework, language of the TEKS, designing lessons using appropriate content area TEKS, assessing student mastery of TEKS, and evaluating vertical alignment of TEKS.
- Evaluate content and rigor of educator preparation courses to ensure all standards are addressed. Add projects and activities with practical applications where relevant. Redirect curriculum from focus on knowledge toward more practice of skills. Require more deliverables for activities that encourage candidates to demonstrate mastery of standards.
- Evaluate the assessments used in each course to align them with the standards and content being taught in each course.
- Add activities into appropriate courses to give candidates practice interpreting campus and student performance data, and using data to create lesson plans and design remediation.
- Identify and update a course to include the following components of mental health training: “(i) characteristics of common mental and emotional disorders; (ii) identification of common disorders; and (iii) effective, strategies for teaching students with mental and emotional disorders”. Or, consider inviting the local health department to deliver training to educator candidates in a course or as a seminar topic during the practicum seminars.

## **GENERAL RECOMMENDATIONS:**

- Texas College is in a consortium with four other colleges and universities. Each school offers online classes that are taken via distance learning by candidates in all 5 schools. All member schools should review content of shared courses to insure all standards are being adequately taught.
- Shared courses should be given the same course number on each campus to avoid confusion when referencing and accessing courses.
- Consider issuing certificates of completion for trainings such as STAAR and mental health for candidates to include in portfolio for employment.

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

### **FINDINGS:**

- 1) Review of syllabi and degree plans indicates there are 45+ credit hours (or 675 clock hours) of coursework in the Generalist EC-6 program.
- 2) Documentation in candidates' records is evidence that candidates are not completing 30 hours of observations prior to completing the practicum. Documentation in some cases is inconsistent. Videos are sometimes used as part of observation hours.
- 3) Candidates enter student teaching during the last year of school. At least 40 credit hours of coursework are completed prior to the practicum.
- 4) Candidates complete a 14 week student teaching practicum. All placements are in TEA approved schools.
- 5) Each candidate is assigned a campus mentor and a university appointed Field Supervisor who are trained by the program in their roles and responsibilities. TEA training materials are used for Field Supervisor training.
- 6) Emails and observation forms in candidates' records provide documentation that meetings and observations and informal coaching between Field Supervisors and candidates is occurring according to TAC requirements. However, there is inconsistent evidence that an interactive conference takes place and there is no evidence that campus administrators receive a copy of the observation results.
- 7) There are currently no candidates placed in out-of-state or out-of-country practicums.

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

Compliance with field experience requirements (30 hours of observations) is inconsistent. The field-based observations must take place in a variety of educational settings with diverse

student populations and meet the following conditions: (A) authentic school settings in a public school accredited by the TEA or other school approved by the TEA for this purpose; (B) instruction by content certified teachers; (C) actual students in classrooms/instructional settings with identity-proof provisions; (D) content or grade-level specific classrooms/instructional settings; and (E) reflection of the observation.

Based on evidence presented, Texas College is **Not in Compliance** with Texas Administrative Code Section §228.35 – Program Delivery and On-Going Support.

### **COMPLIANCE RECOMMENDATIONS (see Action Plan):**

- Insure that 30 hours of field experiences take place in a variety of grade levels and settings and that a minimum of 15 of the hours are interactive. Insure the 30 hours occur in the time frame after official admission into EPP and before starting practicum.
- Design a means of tracking observation hours and experiences and retain documentation in candidates' records.
- Design a new observation form that does not rely on a PDAS format. Insure that the new form includes an opportunity for the Field Supervisor to document instructional practices observed. Provide training to Field Supervisors on format of observations and on conducting interactive conferences with candidates following observations.
- Provide a place on the observation form for the candidate and Field Supervisor to sign to verify that an interactive conference takes place.
- Send electronic copies of observation results to campus administrators and request a 'read receipt or delivery receipt' as documentation, or present a hard copy of the document and obtain signature from the administrator or his/her designee.

### **GENERAL RECOMMENDATIONS:**

- To better support candidates in preparing for certification exams, require candidates to pass certification exams prior to student teaching.
- Review first 60 hours of curriculum to allow education candidates to complete as much content coursework as possible prior to EPP admission.
- Consider giving CPE credit to mentor teachers. Mentor teachers may receive up to 45 clock hours in 5 years as CPE credit.

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

### **FINDINGS:**

- 1) Texas College has four levels of benchmarks that define candidate progress from entry into program through standard certification.
- 2) Candidate readiness to test is determined by completion of T-Cert and Certify Teacher programs and a passing score of 240 on a practice exam.
- 3) Texas College educator preparation program gathers internal data but has limited external feedback regarding program successes and improvements. Some feedback is gathered from mentors and principals (source is TEA-Principal Survey).

Based on evidence presented, Texas College **in Compliance** with Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates of Candidates for Certification and Program Improvement.

### **GENERAL RECOMMENDATIONS:**

- Consider conducting course surveys to get feedback on individual course effectiveness.
- Consider conducting surveys of former candidates (1-3 years into teaching career), mentor teachers, and principals to determine overall program effectiveness.

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

### **FINDINGS:**

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

1. Candidates are provided instruction in the Texas Educator Code of Ethics through their coursework and candidates sign an agreement of adherence to the code of ethics.
2. During the audit, Texas College staff and faculty submitted signed "agreements of adherence" to the Texas Educator Code of Ethics.

Based on evidence presented, Texas College is **In Compliance** with Texas Administrative Code §228.50(a) regarding Professional Conduct.

### **GENERAL PROGRAM RECOMMENDATIONS:**

- To insure continuity in record keeping and other related processes, create a procedures manual for the education program. Seek guidance from advisory committee.

### **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 updates to the assigned program specialist.