



Compliance Audit Report 2014-2015 University of St. Thomas

According to 19 Texas Administrative Code (TAC) §228.10(b), "An entity approved by the SBEC under this chapter shall be reviewed at least once every five years under procedures approved by the TEA staff; however, a review may be conducted at any time at the discretion of the TEA staff." Per 19 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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County/District Number: 101-508

SBEC Approval Date: July 10, 1971

Texas Education Agency (TEA) Educator Preparation Program Specialist, Vanessa Alba, conducted a five-year Continuing Approval Review of the University of St. Thomas educator preparation program (EPP), located at 3800 Montrose Blvd., Houston, TX 77006, in July/August 2016, as required by 19 Texas Administrative Code (TAC) §228.10(b) and TAC §229.6(a) which states that educator preparation programs "shall be reviewed at least once every five years". The focus of the review was the Traditional Undergraduate Program and the EC-6 curriculum. Relevant documents were submitted to TEA for review in a "Desk Review" format. The program's accreditation status is "Accredited". The following are the findings of the review.

Scope of the Compliance Audit:

The scope of this review is restricted solely to verifying compliance with 19 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 the TEA on July, 15, 2015. 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 St. Thomas EPP stakeholders. A total of 29 out of 78 (37%) responded to the questionnaires as follows: 8 out of 18 (44%) advisory committee members; 5 out of 17 (29%) educator candidates; 7 out of 18 (39%) principals; 4 out of 19 (21%)

cooperating teachers/mentors; and 5 out of 6 (83%) 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 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. A Compliance Plan was drafted after the close of the audit that identifies compliance issues to be addressed. A timeline for completion was agreed upon between TEA and EPP staff. “Recommendations” are suggestions for general program improvement and no follow up is required.

Ongoing Communication and Compliance Plan:

Communication between TEA program specialists and the University of St. Thomas Dean and staff occurred after the first review of documents on August 22, 2016. The following people were in attendance: Dr. Paul Paese, Dean, Dr. Rick Krustchinsky, Associate Dean for the Undergraduate Program, Ms. Debbie Fernandez, Assistant for the Undergraduate and Public School of Educational Leadership (PSEL) programs, Ms. Paula Hollis, Certification Officer and Dr. Robert LeBlanc, Faculty Member & former Dean. The program then submitted additional required documentation for TEA review. The review was closed on August 31, 2016.

COMPONENT I: COMMITMENT AND COLLABORATION – 19 TAC §228.20

Findings:

1. Dr. Robert LeBlanc, former Dean submitted the self-report, provided support, participated in all aspects of the desk review, and has been accountable for the quality of the EPP and the candidates recommended for certification. It is important to note that a change in leadership occurred and Dr. Paul Paese, current Dean also participated in all aspects of the desk review and is currently accountable for the quality of the EPP and the candidates whom the program recommends for certification [19 TAC §228.20(c) and TAC §228.2(8)];
2. The advisory committee currently consists of 18 members representing two (2) groups. Seventeen (17) members represent public/private K-12 schools and 1 member represents the Education Service Center (ESC). A list of advisory committee members and original sign-in sheets from advisory committee meetings was provided as evidence of membership. The University of St. Thomas does not meet 19 TAC §228.20(b) minimum requirements for advisory committee composition;
3. Agendas and dated meeting minutes verified that advisory committee meetings were held during the past five (5) academic years. Meeting dates were verified as follows:

2010-2011 Academic Year:
 - June 16, 2011 – 16 members present
2011-2012 Academic Year
 - October 18, 2011 – 5 members present
 - June 5, 2012 – 9 members present

2012-2013 Academic Year:

- October 16, 2012 – 15 members present
- June 11, 2013 – 8 members present

2013-2014 Academic Year

- No meetings held

2014-2015 Academic Year:

- October 24, 2014 – 7 members present

There was one meeting held during the 2010-2011 academic year, the June 11, 2013 advisory committee meeting minutes were incomplete, no meetings were held in 2013-2014 and one meeting was held in the 2014-2015 academic year because at the time the review was scheduled, the program had only held one committee meeting. As a result, the University of St. Thomas EPP does not meet 19 TAC §228.20(b) minimum requirements for advisory committee meetings twice during each academic year (September 1-August 31);

4. Agendas, minutes, and attendee records indicated that the members assist in the design, delivery, evaluation, and major policy decisions of the EPP and meet the minimum requirements of 19 TAC §228.20(b) and TAC §228.1(a); and
5. There were no advisory committee meeting minutes, agendas, or attendance records to document that advisory committee members were advised of their roles and responsibilities each academic year. The University of St. Thomas does not meet minimum requirements of yearly Advisory Committee training per 19 TAC §228.20(b).

Compliance Issues to be addressed:

- 19 TAC §228.20(b) – Require the advisory committee to be a representative group consisting of members from at least 3 out of 4 groups (ESCs, public/private schools, institutions of Higher Education, business/community); and
- 19 TAC §228.20(b) - Require the advisory committee to provide yearly training for its members & document that the training has occurred.

Recommendations:

- Consider using the TEA Advisory Committee Training power point to train members. Send it via email with read receipt and maintain copies of the emails as documentation that yearly training has occurred for the program; and
- Provide an incentive to the members of the advisory committee for their involvement and assistance with the University of St. Thomas EPP by providing Continuing Professional Education (CPE) credit to members who need CPE hours for the renewal of their standard Texas certificates.

Based on the evidence presented, the University of St. Thomas Educator Preparation Program is not in compliance with 19 Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.

COMPONENT II: ADMISSION CRITERIA – 19 TAC §227.10

Findings:

1. The University of St. Thomas EPP admission requirements as identified on the website and in the self-report require the applicant to:
 - 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) [19 TAC §227.10(a)(1), TAC §227.5(2) and TAC §230.11];
 - Have a minimum admission GPA of 2.75 or at least a 2.75 in the last 60 semester credit hours [19 TAC §227.10(a)(3)];
 - Have a minimum of 12 semester credit hours in the subject-specific content area for the certification sought or 15 semester credit hours in math or science [19 TAC §227.10(a)(4) and TAC §227.1(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 [19 TAC §227.10(a)(5) and TAC §230.37(a)];
 - Demonstrate English language proficiency skills as specified in §230.11(b)(5) by meeting the minimum score requirement on the TOEFL or by earning an advanced degree from a university where the language of instruction is English; [19 TAC §227.10(a)(6)]
 - Submit an application [19 TAC §227.10(a)(7)];
 - Complete an interview or other screening instrument to determine if the applicant's knowledge, experience, skills, and aptitude are appropriate for the certification sought [19 TAC §227.10(a)(7)];
 - Obtain approval by the teacher education faculty, receive approval by the College Committee on Teacher Education and submit a positive recommendation from the teacher education advisor [19 TAC §227.10(b)];
 - Applicants are also required to submit a reference form [19 TAC §227.10(b)];
 - Out of country applicants are required to meet the minimum academic criteria through credentials from outside the United States that are determined to be equivalent to those when evaluated by a TEA approved transcript evaluation service. [19 TAC §227.10(e)];
2. Records for fifteen (15) candidates were reviewed to verify that admission requirements have been followed;
3. Transcripts in each of the fifteen (15) records reviewed provided evidence to verify that all candidates were enrolled in University of St. Thomas, a school accredited by the

Southern Association of Colleges and Schools (SACS) [19 TAC §227.10(a)(1), TAC §227.5(2); and TAC §230.11];

4. Based on a review of transcripts, candidates in were admitted with a GPA range of 2.5-3.9. While the GPA does not correspond to what is listed on the website or in the Self-Report, it meets minimum requirements for admission. It was also noted that the application required a minimum GPA of 2.5. TEA discussed a recommendation that the program align all admission documents to reflect the program's admission requirement GPA [19 TAC §227.10(a)(3)];
5. There was no documentation provided, such as transcript review worksheets, to verify that each of the fifteen (15) candidates was admitted with a minimum of 12 semester credit hours in the subject-specific content area for the certification sought, or 15 semester credit hours in math or science. The program did not meet the requirement as prescribed [19 TAC §227.10(a)(4)(A); TAC §227.10(a)(4)(B); TAC §227.1(a)];
6. Documentation in the 15 candidate records reviewed indicated that candidates met the basic skills requirement in reading, written communication and mathematics. Candidate records contained SAT/ACT/THEA scores or transcripts reflecting a conferred Bachelor's degree [19 TAC §227.10(a)(5)];
7. None of the candidates' reviewed were admitted from out-of-country. [19 TAC §227.10(a)(6); TAC §230.11(b)(5); TAC 227.10(e)];
8. Each candidate record contained a completed and signed paper application. It is important to note that 13/15 (87%) of the applications contained dates. All applications specified a 2.5 GPA requirement [19 TAC §227.10(a)(7)];
9. Applicants are interviewed by teacher education faculty prior to admission although there was no evidence of an interview retained in any of the records reviewed. There were no criteria, such as standard questions, a rubric, or a cut score established for the admission interview. Student reflections were identified in records. The program did not meet the requirement as prescribed [19 TAC §227.10(a)(7)];
10. Letters of recommendation were found in all records reviewed. Each record contained either 3 or one letter of recommendation, depending on if the candidate was an undergrad or post-bac [19 TAC §227.10(b)];
11. A completed reference form was retained in each record reviewed. Each question on the form was scored on 10 criteria with a rating scale of Exceeds Expectations, Meets Expectations or Below Expectations for each [19 TAC §227.10(b)];
12. The admissions requirements are published on the University of St. Thomas website, but not all admissions criteria are listed [TAC §227.10(a)(8)]; and
13. Based on a review of records for 15 candidates, the EPP retains records for a period of eight (8) years. Records are stored securely in paper format. All records are kept in a locked file in the School of Education. The Registrar maintains an academic file for each candidate indefinitely [19 TAC 228.40(d)].
14. The University of St. Thomas EPP staff were advised of future implementation of new rules as follows:

Formal Admission 19 TAC §227.17:

(a) For an applicant to be formally admitted to an educator preparation program (EPP), the applicant must meet all of the admission requirements specified in 227.10 of this title (relating to Admission Criteria).

(b) For an applicant to be formally admitted to an EPP, the EPP must notify the applicant of the offer of formal admission in writing by mail, personal delivery, facsimile, email, or an electronic notification.

(c) For an applicant to be considered admitted to the EPP, the applicant must accept the offer of formal admission in writing by mail, personal delivery, facsimile, email, or an electronic notification. The program currently requires a formal admission letter and that was noted in files reviewed.

19 §227.19(a) Incoming Class Grade Point Average:

(a) The overall grade point average (GPA) of each incoming class admitted between September 1 and August 31 of each year by an educator preparation program (EPP), including an alternative certification program, may not be less than 3.00 on a four-point scale or the equivalent. In computing the overall GPA of an incoming class, an EPP may:

(1) Include the GPA of each person in the incoming class based on all coursework previously attempted by the person at an accredited institution of higher education from which:

(A) The applicant is currently enrolled (undergraduate university program formal admission, alternative certification program contingency admission, or post-baccalaureate program contingency admission); or

(B) The most recent bachelor's degree or higher degree was conferred (alternative certification program formal admission or post-baccalaureate program formal admission); or

(2) Include the GPA of each person in the incoming class based only on the last 60 semester credit hours of all coursework attempted by the person at an accredited institution of higher education from which:

(A) The applicant is currently enrolled (undergraduate university program formal admission, alternative certification program contingency admission, or post-baccalaureate program contingency admission); or

(B) The most recent bachelor's degree or higher degree was conferred (alternative certification program formal admission or post-baccalaureate program formal admission).

(b) A person seeking career and technical education certification is not included in determining the overall GPA of an incoming class.

(d) The date of formal admission shall be effective upon the applicant's acceptance of the offer of formal admission.

Compliance Issues to be addressed:

- 19 TAC §227.10(a)(4) – Demonstrate, such as with a tracking sheet, that applicants are admitted with a minimum of 12 semester credit hours in the subject-specific content area for the certification sought or 15 semester credit hours in math or science at grades 7 or above.
- 19 TAC 227.10(a)(7) - Require an interview or screening instrument for each applicant with a cut score scored on a rubric.

General Recommendations:

- Review the admission requirements on the website, the application, and any other documents that are published to ensure that they are aligned and there is no question about requirements for admission; and
- Consider having more than one person interview applicants to eliminate bias in the interview process.

Based on the evidence presented, the University of St. Thomas Educator Preparation Program is not in compliance with 19 TAC §227.10 - Admission Criteria.

COMPONENT III: CURRICULUM – 19 TAC §228.30**Findings:**

1. The curriculum review focused on the EC-6 certification field content;
2. The 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 Core Subjects EC-6 alignment chart, the Pedagogy & Professional Responsibilities EC-12 (PPR EC-12) alignment chart, the Technology Applications Alignment Chart, syllabi and course outlines were provided for review. All syllabi submitted referenced the TExES exams and not the educator standards. Based on the documents and course

materials provided for review there was not enough evidence to support that the curriculum is standards-based [19 TAC §228.30(a)];

4. A Texas Essential Knowledge and Skills (TEKS) Correlation Alignment Chart completed by the program and course syllabi provided limited evidence that the TEKS are addressed in the curriculum. The only course that addressed TEKS was *Curriculum & Instruction*. The program did not meet the requirement as prescribed 19 TAC §228.30 (a);
5. Information on course syllabi provided evidence that assessments are used in each course. It was noted that the program uses quizzes, tests, Midterms and Finals. However, it could not be determined if the assessments were structured, performance-based or if they measured the candidates' progress through the EPP. There were no rubrics associated with assessments to determine the level of mastery. The program did not meet the requirement as prescribed [19 TAC §228.40(a)];
6. A review of course outlines, activities, and assessments for EDUC 3304 was provided to evidence that the curriculum relies on scientifically-based research to ensure teacher effectiveness and aligns to the TEKS. An example of a rubric for *Effective Teacher Skills* included the following: A group presentation grade, individual grade given by peers and an average of the two. The *Effective Teacher Portrait Project* was scored on content as follows: Substance, neatness, originality and style. There was no evidence to support that the coursework and training is sustained, rigorous, interactive, student-focused, and performance-based. Based on what was presented for review, the program did not meet the requirement as prescribed [19 TAC §228.30(b)];
7. Syllabi and representative coursework provided evidence that coursework and training are sustained, rigorous, interactive, student-focused, and performance-based and professional development is sustained, intensive, and classroom focused. The coursework and training does not meet requirements as prescribed [19 TAC §228.30(b) and TAC §228.35(a)(2)];
8. Reading instruction is taught in ED 3305 – Reading in the Content Area and in RDGED 4325 – Diagnosis & Remediation of Reading Difficulties. The five (5) required components of reading, phonemic awareness, phonics, fluency, vocabulary, and comprehension, are taught within the reading courses. It was noted that ED 3305 was reflected on the degree plan for all except EC-6 candidates [19 TAC §228.30(b)(1)];
9. The code of ethics and standard practices for Texas educators, as described in TAC §247, are provided to candidates in an “Old Student Handbook Adapted from Texas Tech” with the Code of Conduct noted on pages 6-7. There was limited evidence that the Educators’ Code of Ethics is addressed in any coursework. The program did not meet the requirement as prescribed [19 TAC §228.30(b)(2)];
10. The skills and competencies captured in the Texas teacher standards, as indicated in Chapter 149 of this title (relating to Commissioner's Rules Concerning Educator Standards) are reflected in the coursework: [19 TAC §228.30(b)(3)]
 - Instructional planning and delivery is addressed in ED 3304 Curriculum & Instruction. The syllabus is dated 2005. Candidates are required to write a lesson plan and teach two mini-lessons for 25% of the grade. Syllabi, alignment charts and a review of coursework served as evidence [19 TAC §228.30(b)(3)(A)];

- Knowledge of students and student learning are addressed in EDUC 3101/ EDUC BIE 3339A Multicultural Populations. Syllabi, alignment charts and a review of coursework served as evidence [19 TAC §228.30(b)(3)(B)];
 - Content knowledge and expertise is addressed in the following coursework: EDUC 3102 Field Experience Seminar III Culminations; EDUC 4360/4361/4363/4364/4370/4371; Student Teaching; and EDUC 3100 Field Experiences Seminar I – Exploration. Syllabi, alignment charts and a review of coursework served as evidence [19 TAC §228.30(b)(3)(C)];
 - Learning environment is addressed in EDUC 3102 Classroom Management and in EDUC 4338/5311 – Classroom Management. Syllabi, alignment charts and a review of coursework served as evidence [19 TAC §228.30(b)(3)(D)];
 - Data-driven practice is addressed in EDUC 3306A – Early Childhood Through Elementary Age Learning. Syllabi, alignment charts and a review of coursework served as evidence of compliance [19 TAC §228.30(b)(3)(E)];
 - Professional practices and responsibilities are addressed in the following coursework: EDUC 4360/4361/4363/4364/4370/4371 and Student Teaching. Syllabi, alignment charts and a review of coursework served as evidence of compliance [19 TAC §228.30(b)(3)(F)];
11. Instruction in detection and education of students with dyslexia as indicated in the Texas Education Code (TEC) §21.044(b) is provided in RDG 3303. A presentation based on a lesson plan is required. Reading 3305 – Foundations of Reading requires 2 exams (30%), a reaction paper (30%), a group presentation (25%) and participation (15%). SPED 4320 Exceptionality in Today’s Schools also addresses dyslexia. [19 TAC §228.35(b)(4)];
12. Instruction in detection and education of students with mental and emotional disorders, as indicated in the TEC §21.044(c-1-2)] was provided to candidates in SPED 4320 Exceptionality in Today’s Schools [19 TAC §228.35(a)(5)]; and
13. In questionnaire responses, educator candidates and mentor/cooperating teachers reported the following regarding the EPPs delivery of instruction in the following areas:

Instruction Provided in the Following Areas:	Candidates Yes/No/Don't Know	Mentor/Cooperating Teachers Yes/No
Provide reading instruction in your certification field and grade level covering	100% / 0% / 0%	67% / 33%

phonics, phonemic awareness, fluency, vocabulary development, and comprehension strategies		
Identifying and modifying instruction for students diagnosed with Dyslexia	100% / 0% / 0%	-
Providing support & modifications for students diagnosed with mental or emotional disorders	100% / 0% / 0%	-
Use TEKS specific to your certification field	100% / 0% / 0%	75% / 25%
Administer the STAAR or end of course exams	100% / 0% / 0%	67% / 33%
Design clear, well organized, sequential lessons that build on students' prior knowledge	100% / 0% / 0%	75% / 25%
Design developmentally appropriate standards-based lessons	100% / 0% / 0%	75% / 25%
Design lessons to meet the needs of diverse learners	100% / 0% / 0%	67% / 33%
Establish and communicate consistent routines for effective classroom management, including clear expectations for student behavior	100% / 0% / 0%	-
Set individual and group learning goals and communicating these goals to students and families	100% / 0% / 0%	67% / 33%
Model ethical and respectful behavior and demonstrate integrity as defined in the Texas Educator's Code of Ethics	-	75% / 25%

Compliance Issues to be addressed:

- 19 TAC §228.30(a) - Conduct an alignment of EC-6 curriculum to ensure that it based on educator standards;
- 19 TAC §228.30(a) – Update the EC-6 curriculum to address the relevant Texas Essential Knowledge and Skills (TEKS);
- 19 TAC §228.40(a) - Require candidates to complete structured assessments throughout the EPP;
- 19 TAC §228.30(b) - Provide a curriculum that relies on scientifically based research to ensure teacher effectiveness and align to the TEKS;
- 19 TAC §228.30(b) - Require the coursework and training be sustained, rigorous, interactive, student-focused, and performance-based; and
- 19 TAC §228.30(b)(2) - Provide instruction in the Educators' Code of Ethics.

Recommendations:

- Consider conducting an alignment of all curriculum for all certification fields offered by the University of St. Thomas educator preparation program to ensure that the curriculum offered is standards-based;
- Consider reviewing all certificate areas to determine where TEKS should be appropriately addressed within coursework offered; and
- Consider utilizing the TEA Ethics Videos and incorporate them into one of the courses required for certification.

Based on evidence presented, the University of St. Thomas Educator Preparation Program is not in compliance with 19 Texas Administrative Code §228.30 - Curriculum.

COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT – 19TAC §228.35

Findings:

1. University of St. Thomas EPP coursework and training ensure the educator is effective in the classroom. Degree plans were present in each of the 15 candidate's records reviewed [19 TAC §228.35(a)(1)];

2. Candidates are required to complete 355 or 315 clock-hours depending on the certification field that the candidate is seeking [19 TAC §228.35(a)(3); TAC §228.2(5)];
3. Candidates are required to complete 75 clock-hours of field-based experiences (FBE) in Field Experiences 1, 2 and 3. Fourteen (14) out of 15 (93%) records reviewed contained evidence of completed FBEs. One candidate used a work service, which did not meet the FBE requirements. Candidate logs signed by the observed teacher and candidate reflections served as evidence. FBEs took place in coursework prior to clinical teaching or internship in approved public or private schools [19 TAC §228.35(a)(3); TAC §228.35(d)(1); and TAC §228.2(9)];
4. All candidates complete 280 or 240 clock-hours of coursework and training prior to clinical teaching or internship depending on the certification field. A review of curriculum, degree plans and course/module schedules provided evidence for the records reviewed [19 TAC §228.35(a)(3)(B)];
5. The University of St. Thomas EPP requires candidates to complete 12 weeks of clinical teaching or a full-year internship. There were 12 clinical teacher and 3 intern records reviewed. Clinical teaching placement lists, degree plans in candidates' records and requirements stated in handbooks served as evidence of compliance [19 TAC §228.35(d)(2); TAC §228.2(4); and TAC §228.2(12)];
6. Placement lists with start and end dates in 15 of the candidates' records provided evidence that the clinical teaching or internship experience occurred in an actual school setting rather than a distance learning lab or virtual school setting. All candidates were placed in public schools for clinical teaching or internship. One of the records lacked the name of the school where the clinical teaching/internship experience took place [19 TAC §228.35(d)(2)(B)(ii)];
7. All coursework and training is completed prior to EPP completion and standard certification. Benchmarks documents, degree plans and candidate transcripts served as evidence for all records reviewed [19 §228.35(a)(4)];
8. Each of 7/15 (47%) candidates was assigned a cooperating teacher in the clinical teaching assignment or a mentor teacher in an internship assignment in an actual public/private school setting. The program requirements were noted in the Handbook. A candidate placement list with cooperating or mentor teacher assigned and campus name served as evidence of compliance for 7/15 (47%) records reviewed. The program did not meet the requirement as prescribed [19 TAC §228.35(e); TAC §228.2(6); and TAC §228.2(14)];
9. EPP documentation did not contain enough evidence to support that mentors and cooperating teachers received training. Records showed that training was provided during the following weeks: week of August 6, 2012; week of August 15, 2011; and week of August 13, 2012. However, there was no evidence of who attended the trainings and no sign-in sheets. A handbook that was last revised January 14, 2014 was provided for review. The program did not meet the requirement as prescribed [19 TAC §228.35(e)];
10. The University of St. Thomas has 13 field supervisors. All hold a valid teacher or administrator certificate. Resumes/vitae detailing field supervisor credentials, along with current certifications, were provided for review. Candidate placement lists containing field

supervisor assignments in each of the candidate's records provided evidence that each candidate was assigned a field supervisor [19 TAC §228.35(f) and TAC §230.37(c)(2)];

11. It could not be verified that field supervisors receive annual training. Field supervisor training was provided the week of August 8, 2011. There was no evidence of who attended the training and no sign-in sheets or method of documenting attendance. The program also did not provide field supervisor training for the past 3 academic years as required. A Student Teaching Handbook, dated January 14, 2014, was provided for review. The program did not meet the requirement as prescribed [19 TAC §228.35(f)];
12. Field supervisors made initial contact with candidates within the first three (3) weeks of the clinical teaching or internship assignment as required for 3/15 (20%) of candidates. Those candidate records reviewed contained a document signed by the candidate and the field supervisor verifying the start date of student teaching or internship and the date the first contact was made. First contact was face-to-face. The program did not meet the requirement as prescribed [19 TAC §228.35(f)];
13. According to documentation found in the Student Handbook, candidates are required to receive three (3) observations during the 12 week clinical teaching or full-year internship assignment. All records reviewed contained three (3) observations. The observation forms were signed by the field supervisor and candidate and served as evidence of compliance [19 TAC §228.35(f)(4)];
14. Each observation is required to be 45 minutes in length, conducted by the field supervisor, and must occur on the candidate's site in a face-to-face setting. The observation forms with start and stop times noted served as evidence of compliance [19 TAC §228.35(f)(1)];
15. The first observation occurred within the first 6 weeks of assignment for 9 out of 15 (60%) candidates reviewed. Dated observation instruments were provided as evidence. The start date of assignment was provided in all records reviewed. The program did not meet the requirement as prescribed [19 TAC §228.35(f)(2)];
16. Signed and dated observation documents in all of candidate's records reviewed verified that each field supervisor documented instructional practices observed and provided written feedback through an interactive conference with each candidate [19 TAC §228.35(f)];
17. A copy of each observation was not provided to the candidate's campus administrator. The observation document was sometimes checked by the field supervisor and sometimes not. It was never documented that the campus administrator or designee received a copy of the written feedback. The program did not meet the requirement as prescribed [19 TAC §228.35(f)]; and
18. There was evidence of multiple observations in addition to the three required. There were a few formal logs noting additional observations. One (1) log reflected additional contacts with candidate via email. The program met the requirements of informal observations and coaching as prescribed [19 TAC §228.35(f)].

Compliance Issues to be addressed:

- 19 TAC §228.35(e) - Provide a mentor or cooperating teacher for all candidates in internship or clinical teaching;
- 19 TAC §228.35(e) - Provide annual mentor/cooperating teacher training. Document the date that the training occurs. Require mentor/cooperating teachers to sign-in. Retain sign-in sheets in EPP records;
- 19 TAC §228.35(f) - Provide annual field supervisor training. Document the date that the training occurs. Require field supervisors to sign-in. Retain sign-in sheets in EPP records;
- 19 TAC §228.35(f) - Require each field supervisor to make initial contact with each candidate within the first three (3) weeks of the clinical teaching/internship assignment. Document the date of the first contact & require the candidate and field supervisor to sign that the first contact occurred;
- 19 TAC §228.35(f) - Require each field supervisor to conduct the first observation of each candidate within the first six weeks of assignment in clinical teaching or internship. Document the results of the observation on the observation form utilized by University of St. Thomas. Ensure that the field supervisor, candidate & campus principal or designee receive a copy of that written feedback. Maintain a copy of that documentation in each candidate's record; and
- 19 TAC §228.35(f) - Require each field supervisor or designee to sign for their copy of each observation of the candidate. Maintain a copy of that documentation in each candidate's record.

Recommendations:

- Consider utilizing a standard observation instrument for each observation conducted by the field supervisor. This will assist the program in ensuring that the observations occur as prescribed and appropriate documentation is maintained;
- Consider sending mentor/cooperating teacher training material via email with read receipt to mentor/cooperating teachers each year. Maintain the email correspondence in EPP records for auditing purposes;
- Consider sending field supervisor training material via email with read receipt to field supervisors each year. Utilize the TEA Field Supervisor Training Power point. Maintain the email correspondence in EPP records for auditing purposes; and
- Consider sending the observation documentation for each candidate to the campus principal via email with read receipt. Maintain that evidence in each candidate's record.

Based on evidence presented, the University of St. Thomas Educator Preparation Program is not in compliance with 19 Texas Administrative Code Section §228.35 – Program Delivery and On-Going Support.

COMPONENT V: PROGRAM EVALUATION – 19 TAC §228.40

Findings:

1. The University of St. Thomas EPP has established benchmarks to ensure that candidates are prepared to receive standard certification. Documentation detailing the benchmark activity, timeline, and person responsible, and documents in the candidate record showing progression through the program were provided as evidence for candidates' records reviewed. Program benchmarks include: admission GPA noted, undergraduate FBE's 1, approval by the College Committee, undergraduate FBE's 2 and 3; a passing score on TExES exams documented by the program, successful completion of clinical teaching or internship, and graduation. Each of the benchmarks described were found in the 15 records reviewed. The program met the requirement as prescribed [19 TAC §228.40(a)];
2. The program provided evidence of the readiness of each candidate to take the appropriate certification assessment of pedagogy and professional responsibilities, including professional ethics and standards of conduct. Policies and procedures for detailing the criteria for testing are available to candidates in the Student Handbook. Documentation in the form of the benchmark achieved with the date test was passed was found in 15 records reviewed. The University of St. Thomas EPP met the requirement of determining each candidate's readiness to test as prescribed [19 TAC §228.40(b); TAC §230.21(b)];
3. The EPP does not grant test approval for the pedagogy and professional responsibilities assessment until a candidate has met all of the requirements for admission and has been fully accepted into the EPP. Each candidate record reviewed contained a dated document noting the date of test approval for the PPR EC-12 exam. The dated letter of admission to the EPP, signed by each candidate, also served as evidence of compliance [19 TAC §228.40(b)]; and
4. As required in 19 TAC §228.40(c), The University of St. Thomas EPP staff continuously evaluate 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. Advisory committee meeting agendas and minutes served as evidence of compliance. Additional evidence included documentation detailing the evaluation activity, timeline, and person responsible. The program also provided the following evidence for the 2011-2014 academic years: The overall pass rate for each academic year, pass rate by certification field, Candidate Exit Survey information, employment information for the 2011-2015 academic years, and a list of enrolled candidates for the 2014-2015 academic year.

Compliance issues to be addressed:

- None

Recommendations:

- None

Based on evidence presented, the University of St. Thomas Educator Preparation Program is in compliance with 19 Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates of Candidates for Certification and Program Improvement.

COMPONENT VI: PROFESSIONAL CONDUCT – 19 TAC §228.50

Findings:

19 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. The University of St. Thomas did not provide evidence that the individuals preparing candidates (faculty/staff) had received any sort of ethics training; and
2. The University of St. Thomas provided limited documentation that candidates read & understand the Code of Ethics. The program provided a handbook and it could not be determined which course offered by the university had training regarding the Code of Ethics.

Compliance issues to be addressed:

- 19 TAC §228.50 - Require that all individuals preparing candidates receive, read, and acknowledge that they understand and will abide by the Code of Ethics. Maintain a copy of this documentation; and
- 19 TAC §228.50 - Require that all candidates receive, read, and acknowledge that they understand and will abide by the Code of Ethics. Maintain a copy of this documentation in each candidate's record.

Recommendations:

- Consider using the TEA Ethics Training for both faculty & candidates;
- Consider sending the Educators' Code of Ethics to faculty & staff at the beginning of each academic year via email with read receipt to ensure that each person has read, understands & will abide by the Code of Ethics; and
- Consider providing the Educators' Code of Ethics to candidates and require that they sign and date their review of the document to ensure that each person has read, understands & will abide by the Code of Ethics. Maintain the documentation in each candidate's file.

Based on evidence presented, the University of St. Thomas Educator Preparation Program is not in compliance with 19 Texas Administrative Code §228.50(a) regarding Professional Conduct.

COMPONENT VII: COMPLAINTS AND INVESTIGATIONS PROCEDURES – 19 TAC §228.70

1. As required in 19 TAC §228.70(b)(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 attempt to resolve complaints at the EPP level in a timely manner before a complaint is filed with TEA staff. The University of St. Thomas has a complaint policy on file with TEA and the policy is posted on the EPP website. It is specifically found on the Dean of Students webpage;
2. As required in 19 TAC §228.70, the EPP has not posted the EPP complaint policy in a conspicuous location and does not meet the requirement as prescribed [19 TAC §228.70(b)(2) and TAC §228.70(b)(3)]; and
3. The EPP has a system established to ensure that, upon request of an individual, the EPP will 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 written process is provided in the Student Handbook [19 TAC §228.70(b)(4)].

Compliance issues to be addressed:

- 19 TAC §228.70(b)(3) - Post the EPP Complaint Policy in a visible location in the College of Education.

Recommendations:

- None

Based on evidence presented, the University of St. Thomas Educator Preparation Program is not in compliance with 19 Texas Administrative Code §228.70 regarding Complaints and Investigations Procedures.

COMPONENT VIII: RULES FOR PROBATIONARY CERTIFICATES – 19 TAC §230.37

1. Three (3) of the 15 candidate reviewed completed an internship. Candidates were in an EC-6 placement, a LOTE Spanish EC-12 placement, and an Art EC-12 placement. Documentation of the placements came from the candidates' records reviewed [19 TAC §230.37(a)(2); TAC §230.37(b)(3)(B)]; and
2. Two (2) out of three candidates (67%) passed the content exam prior to issuance of the probationary certificate. The Generalist EC-6 candidate was improperly placed on the probationary certificate because the candidate did not pass the content exam until after placement in the classroom. The program did not meet the requirement as prescribed [19 TAC §230.37(e); TAC §230.37(e)(1)(B)(i)].

Compliance issues to be addressed:

- 19 TAC §230.37(e) – The University of St. Thomas EPP placed a candidate on a probationary certificate prior to passing the content exam at the elementary level. Require the program to ensure that candidates at the EC-6 level are not placed on a probationary certificate until after the Core Subjects EC-6 content exam has been passed.

Recommendations:

- Review each candidate's record to ensure that the candidate is not placed on a probationary certificate until after the required content exam has been passed.

Based on evidence presented, the University of St. Thomas Educator Preparation Program is in not compliance with 19 Texas Administrative Code §230.37 regarding Rules for Probationary Certificates.

Standard Recommendations for University of St. Thomas EPP:

- Align the verbiage of the University of St. Thomas EPP to the verbiage of Texas Administrative Code (TAC) (ex. Field supervisor, mentor/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 / meetings 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.