



# Compliance Audit Report 2015-2016 East Texas Baptist 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](http://www.tea.texas.gov) for details.

**Contact Information: Dr. John Sargent**

**County/District Number: 102501**

**SBEC Approval Date: July 21, 1989**

Program Specialist, Mixon Henry, conducted this Texas Education Agency Training Compliance Audit of East Texas Baptist University (ETBU) at East Texas Baptist University campus in Marshall, Texas, on March 22-23, 2016. The focus of the compliance audit was Core EC-6 the Pedagogy and Professional Responsibility curriculum required for initial teacher certification.

In the spring of 2015, Dr. John Sargent was named and served as the Chair of the School of Education at East Texas Baptist University. He was placed in charge of the certification processes for the university. As the audit proceeded, it was apparent that Dr. Sargent reviewed Texas Administrative Code and implemented several changes to align their processes to TAC rule. These changes were implemented prior to ETBU being notified of the compliance audit on September 11, 2015. As the audit proceeded, it was noted that historically some items could be issues according to TAC, but had been corrected during the tenure of Dr. Sargent. Furthermore, additional data was reviewed to clarify the compliance corrections. Reviewing additional data reinforced ETBU's adherence to Texas Administrative Code. Dr. Sargent was named the Dean of the School of Education at ETBU, February of 2016. It was clear Dr. Sargent understood TAC rule and East Texas Baptist University's processes were in compliance.

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

The scope of this audit is restricted solely to verifying compliance with Texas Administrative Code §227, §228, §229, §230 and §149.

## **Data Analysis:**

Information concerning compliance with Texas Administrative Code (TAC) governing educator preparation programs was collected by various qualitative means. A self-report was submitted to the Texas Education Agency on February 22, 2016. A review of documents, student records, course material, online courses, and curriculum correlations charts provided evidence regarding compliance. In addition, electronic questionnaires developed by TEA were sent to East Texas Baptist University stakeholders and responses are as follows: Thirteen (13) out of fifteen (15) advisory committee member; twenty-seven (27) out of one hundred four (104) clinical teachers/interns; seventeen (17) out of twenty-one (21) principals; forty-eight (48) out of one hundred thirty-seven (137) cooperating teachers/mentors, and nine (9) out of nine (9) field supervisors responded. Qualitative and quantitative methodologies 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 correct the issue IMMEDIATELY. A “compliance plan” may be drafted during the audit that identifies compliance issues to be addressed and a timeline for completion. Program “recommendations” are suggestions for general program improvement and no follow up is required.

## **Audit Process:**

TEA presented a training, interactive audit which required participation of ETBU Dean John Sargent, Dr. PJ Winters, Stacie Ray, Tina McNeely, Sandra Spencer, Dr. Karen Gentsch, Judy Hogberg, Dr. Lara Cavin, Connie Player, and Dr. Kristy Duckworth. They assisted Mr. Mixon Henry in the review of evidence. All documents, except for student records, were submitted in advance of the on-site audit. At the end of the review of the documents and student records and completion of the deliverable documents, the audit rubric was scored and results shared with the ETBU Dean, Dr. John Sargent and staff. No Compliance Plan was needed as no compliance issues were noted in the audit.

The following are findings and recommendations for program improvement.

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

### **FINDINGS:**

- Program support was indicated by the governing body of East Texas Baptist University per TAC §228.20(c) as evidenced by the participation and cooperation of ETBU Dean John Sargent and staff in various stages and steps of the compliance audit.

- The advisory committee consists of fifteen (15) members: four (4) members are from local school districts, four (4) members is from higher education, one (1) member represent education service center, and six (6) members of the business and community category. ETBU meets TAC §228.20(b) requirements for advisory committee composition.
- East Texas Baptist University provided evidence of two (2) advisory committee meetings over the last three academic years. Agendas, minutes, and sign in sheets were available as evidence of past advisory committee meetings. There was a discussion on ways to increase attendance at advisory committee meetings. Some recommendations included presenting meetings via webinars, phone conferences, or other technology formats. Additionally, it was suggested to send the recorded minutes to all members and request feedback. The program meets the requirements for conducting a minimum of two advisory committee meetings per academic year as required by TAC §288.20(b).
- ETBU verified the required items of design, delivery, program evaluation, and major policy decisions in the advisory committee minutes as required by TAC §228.20(b).
- East Texas Baptist University documented training the advisory committee members on their roles and responsibilities on October 2, 2014 and November 12, 2015 using the TEA power point. The program presented sign-in sheets to verify the attendance.

**Compliance Issues to be addressed:**

- No compliance issues noted

**Recommendations:**

- Consider rolling terms for advisory committee members in order to add new points of view;
- Establish what constitutes a quorum in order to conduct advisory committee business;
- Explore the use of technology to conduct the advisory committee meetings;
- Provide Continuing Professional Education (CPE) credit to the advisory committee members who need to earn hours toward certification renewal.

Based on the evidence presented, East Texas Baptist University 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:**

- The GPA program requirement for admission was a 2.75 GPA as of June of 2014. When reviewing candidate records, one GPA was below the 2.75 GPA, but the

admissions date was prior to the June 2014 change in admissions. In reviewing candidate records, all ten (10) records met the states requirements of 2.5 and ETBU's published GPA criteria of 2.75. TAC rule for candidates with low GPAs and the process to allow entry into the program was reviewed.

- Transcripts from accredited universities and colleges verified the required 12 hours in the candidates' specific content field or 15 hours in Mathematics and Science (10 of 10 candidate records). [TAC§227.10(a)(3)(C)].
- Ten of ten candidate records had an application [TAC§227.10(a)(6)].
- Basic skills for the traditional candidates were satisfied through SAT, TAC, and THEA. These were identified on transcripts in candidate records. The Post- Baccalaureate candidates completed a bachelor's degree as identified in the Texas Success Initiative (TSI) exemption. In addition, the program also had documentation of past testing to identify basic skills had been met.
- Evidence of interviews were found in candidates' records. ETBU utilizes a rubric with a cut score required for admission. Each applicant interviews with two instructors. This formal process started in the spring of 2015. A review of additional records of current candidates was conducted to verify the interview had been implemented. The review of five additional records verified the implementation. Additionally, the program uses another set for screening devices: Traits list (identified characteristic for the disposition to teach) submitted by candidates' instructors. This list also has a cut score for use as a screening device for entry. Finally, a writing sample is submitted and evaluated with a rubric and cut score. The program meets the requirement of interview or other screening devices. The program's search for meaningful screening devices is a clear indicator of evaluating candidates prior to admissions which meets TAC§227.10(a)(6).
- Required references were found in the candidates' records to verify the adherence to the program's additional requirements.
- Requirements for admission to the program are posted on the East Texas Baptist University's website. These requirements are applied consistently to all candidates (TAC§227.10(a)(7)).
- There were no out-of-country applicant chosen in the folder review. Candidates' whose first language is not English must demonstrate competence in the English language by submission of an official minimum score on the written or computer-based Test of English as a Foreign Language (TOEFL) with a speaking score of 26. Additional requirements include transcript reviews of an out-of-country non-English speaking university by an approved evaluation service. [TAC §227.10(7)].

**Compliance Issues to be addressed:**

- No compliance issues were noted.

**Recommendations:**

- Consider limiting the additional requirements to items that address the skills, knowledge, and disposition of successful applicants.

- Consider a reading skills evaluation per candidate to identify the skills needed to be successful on standardized testing and daily use in the classroom.

Based on the evidence presented, East Texas Baptist University is **in compliance** with TAC §227 - Admission and Certification Criteria.

**FINDINGS:**

- East Texas Baptist University is approved to offer teacher certification in eighteen (18) content fields, one (1) supplemental field, and one (1) professional certification field.
- The program curriculum is presented in a face-to-face format.
- In reviewing the content and Pedagogy and Professional Responsibilities curriculum, it was noted that the educator standards were identified in the syllabi or modules, as well as identified specific topics required in the curriculum. This meets the requirement of TAC §228.30(a);
- The content and Pedagogy and Professional curriculum addressed the relevant Texas Essential Knowledge and Skills (TEKS). Additionally, TEKS are reflected in the activities, assessments, candidates' lesson plans, specifically MATH 3351; MATH 3352; GSCI 3308; SSCI 3306; EDUC 3705; FNAT 3302 [TAC §228.30(a)];
- Knowledge and skill assessments were noted in the curriculum. The majority of the activities that were incorporated in curriculum, require both knowledge and skills to be successful. There were enough assessments to indicate mastery of the knowledge and skills identified in educator standards within the curriculum.
- Sufficient evidence was presented to verify that all candidates received instruction in: dyslexia and mental and emotional health [TAC §228.30(a)(4)]. The coursework covering Dyslexia is noted in EDUC 3302, READ 3318, READ 5318, and EDUC 5302. The Mental Health training is found in courses EDUC 3323, READ 3318, EDUC 3353, EDUC 5318, and EDUC 5340.
- Instruction in reading (five elements: phonetics, phonemic awareness, vocabulary, reading comprehension, and fluency) can be identified in the following coursework READ 3318, READ 3317, READ 3305, READ 3316, READ 3320, and READ 3364 TAC §228.30(b).
- Instructors at East Texas Baptist University are certified educators with a masters and/or doctorate degrees.

**Compliance Issues to be addressed:**

- No compliance issues were noted.

**Recommendations:**

- Increase the number of lesson plans required to be created, critiqued, or expanded by the candidates in every course leading to certification in order to mirror the expectations for practicing classroom teachers to plan, instruct, and assess instruction. Provide an instructional scenario and have the candidate plan the lesson to adapt to several variables (learning style, differentiation, etc.) Provide a completed lesson plan and have the candidates modify it according to several variables. Also, have candidates complete a series of interrelated lessons into a unit of instruction to develop the skill of building on knowledge.

- Provide more differentiating instruction strategies in special populations' coursework (Gifted and Talented and Limited English Proficiency identified in mentor questionnaires).
- Develop additional coursework which deals with data management and interpretation to determine and address the learning needs of students.
- Utilize the TEA developed training for meeting "Teachers' Responsibilities for the STAAR test administration at <http://texas.testsecuritytraining.com/TestAdministratorTraining.aspx>. It may be used for a whole group or individually. A certificate can be printed upon completion and counted toward the required 300 clock hours. This is the same training that teachers must complete prior to STAAR testing.
- Utilize the dyslexia information found on the TEA website at <http://www.tea.state.tx.us/index2.aspx?id=4434> or at <http://www.region10.org/dyslexia/>.
- Utilize the mental and emotional health training approved by the Department of Human Resources and TEA. You may use any resources from other mental health organizations that you feel addresses the requirements of the law.
- Utilize the ethics training and the assessment of the training found at <https://www.youtube.com/playlist?list=PLYCCyVaf2g1vuF3qIz1NjEWFEMtxaBMvC> or use the information below.

A breakdown of the [ethics training](#) (outside source) is available.

The training is located on our TEA YouTube channel, and a playlist called "Texas Education Agency Teacher Ethics Training" is available to stream the ten video segments. Assessment for the training is available [here](#), and while it is not required, it is recommended.

**Module 1 (3 video segments)** - Boundaries, approximately 25 minutes in length

**Module 2 (2 video segments)** - Social Media, approximately 10 minutes in length

**Module 3 (3 video segments)** - Anger Management, approximately 10 minutes in length

**Module 4 (2 video segments)** - Behavior off Campus, approximately 10 minutes in length

The purpose of this training is to make teachers aware of their actions and hold them accountable for their behavior. Organizations are encouraged to keep a record signed by the educator that they have been trained on ethics. We also encourage teachers and education organizations to revisit ethics regularly to ensure that educators know and understand the district procedures in case an issue ever arises.

Based on evidence presented, East Texas Baptist University is **in compliance** with Texas Administrative Code Section §228.30 – Educator Preparation Curriculum.

## **COMPONENT IV: Preparation Program Coursework and/or Training (TAC) §228.35**

### **FINDINGS:**

- The total program consists of 900+ clock hours depending on whether the candidate is a primary or secondary candidate TAC §228.35(a)(3). This was verified by transcripts and a degree plan.
- One hundred seventy-five (175) clock hours of field-based experience (FBE) are required by the ETBU. Additionally, there are two lessons taught by candidates and observed by university instructors during the FBE experience. Finally, a comprehensive paper is submitted in which the candidate describes the experiences during the FBE activities. The program addresses the variety of setting by choosing two different school environments, as it is reflected in the community. These environments have a variety of ethnicity and socio-economic student populations. The program meets the requirements of TAC §228.35(d). Discussions were held on how to increase the variety with age group expansions to provide even greater variety for candidates.
- All coursework and training is completed prior to clinical teaching or internship which meets TAC §228.35(a)(3)(B). ETBU uses transcripts and a degree plan to monitor the progress of candidates. Clinical teaching is the final class or course for candidates.
- Candidate that were identified as a clinical teachers are required to complete a minimum of 14 weeks per TAC §228.35(d)(2)(A).
- According to TAC §228.35(e), East Texas Baptist University candidates were assigned mentors or cooperating teachers. ETBU trains the cooperating teachers and had sign-in sheets and training material to verify the training.
- Supervision of each candidate is conducted with the structured guidance and regular ongoing support of experienced educators. The field supervisors are instructional staff. They are all certified educators and have been trained by the university. This was verified by sign-in sheets and training material. This satisfies TAC §228.35(f) for training of field supervisors.
- Initial contact by the field supervisor was completed on campus the day prior to the start of the clinical teaching assignment as required by TAC §228.35(f). This is a face-to-face meetings where roles and responsibilities are explained. Additionally, expectations of candidate's behavior and physical appearances are discussed. This was verified in candidate folders by sign-in sheets.
- Four (4) observations are conducted by ETBU which meets standards outlined in TAC §228.35(f)(3), during the clinical teaching experience. Records of four observations were found in the candidates' records.

- The four observations forms [TAC §228.35(f)(4)] indicated a start and stop time reflecting at least 45 minutes in duration [TAC §228.35(f)].
- The first observation was conducted within the first three weeks of clinical teaching or internship as recorded on the observation forms in candidates' records and field supervisor logs TAC §228.35(f)(2).
- The field supervisors documented instructional practices observed during the observation. The interactive conference with the candidates is documented on the observation form and was found in candidate records TAC §228.35(f).
- The program provided a copy of the written feedback to the candidate's campus administrator which is required by TAC §228.35(f). Copies were provided to the campus administrators and a signatures denoted receipt.

**Compliance Issues to be addressed:**

- Require No compliance issues were noted.

**Recommendations:**

- Provide mentor teachers continuing professional education credit (CPE) for assisting a beginning teacher. (45 clock hours)

Based on evidence presented, East Texas Baptist University is **in compliance** with Texas Administrative Code Section §228.35 – PROGRAM DELIVERY AND ON-GOING SUPPORT.

**COMPONENT V: Assessment and Evaluation of Candidates for Certification and Program Improvement – Texas Administrative Code (TAC) §228.40**

**FINDINGS:**

- East Texas Baptist University has benchmarks documenting a candidate's process through the program as prescribed by TAC §228.40(a). The benchmarks are the record of the completion of the following: pre-coursework and FBEs prior to entry into the program, successful interview, required content hours, acceptance into the certification program, maintenance of the 2.75 GPA, 175 hours of FBEs, completion of all required coursework, acceptance into clinical teaching, successful clinical teaching, graduation and degree conferred.
- Criteria to determine the candidate's readiness to test [TAC §228.40(b)] is explained in policies and procedures for candidates. The candidate must successfully complete coursework and take a practice exam. A grade of 80% or greater must be achieved prior to being recommended for the PPR exam.
- ETBU evaluates the program with internal and external feedback. Internally, ETBU provides a graduate survey (teacher education graduate feedback) which covers faculty, curriculum, and facilities), self-developed survey (clinical teachers experience feedback), Cooperating Teacher survey (feedback on experience with clinical teacher), and

Teacher Education Effectiveness Plan (yearly review of program). Externally, ETBU reviews the candidate exit surveys, principal surveys, and test data. The program has documented the presentation of the yearly evaluation to the advisory committee. This meets TAC §228.40(c) for program evaluation.

- According to TAC §228.40(d), the program retains documents that evidence a candidates' eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after program completion in a secure environment.

**Compliance Issues to be addressed:**

- No compliance issues were noted

**Recommendations:**

- Contact past graduates (1-2-3 years removed from program) for feedback and insight to what are their perspective of the strengths and weaknesses of the program.

Based on evidence presented, East Texas Baptist University is **in compliance** with Texas Administrative Code §228.40 – ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT.

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

**Findings:**

- ETBU has evidence that instructors and staff working with candidates have signed the Educator Code of Ethics. East Texas Baptist University provided the signed code of ethics form per staff member.
- Candidates are provided instruction about the Educator Code of Ethics in coursework, along with the TEA ethics training, and each candidate signed a copy of the Educator Code of Ethics. By the candidate's signature, they indicate that they have read, understand, and will abide by Chapter 247 of this title (relating to Educators' Code of Ethics).

**Compliance Issues to be addressed:**

No compliance issues noted

Based on evidence presented, East Texas Baptist University is **in compliance** with Texas Administrative Code §228.50 – Professional Conduct.

## **COMPONENT VII: Complaints and Investigations Procedures TAC§228.70**

### **Findings:**

- East Texas Baptist University adopted and sent to TEA staff, for inclusion in the EPP's records, a complaint procedure that requires the EPP to timely attempt to resolve complaints at the EPP level before a complaint is filed with TEA staff. [TAC 228.70 (1)]
- ETBU has posted on its website a link to the TEA complaints website and information regarding how to file a complaint under the EPP's complaint policy [TAC 228.70 (2)]
- ETBU has posted a notification at all of its physical site(s) used by employees and candidates, in a conspicuous location, information regarding filing a complaint with TEA staff in accordance with subsection (c)(1) of this section [TAC 228.70(3)].
- Upon request of an individual, the EPP shall provide information in writing regarding filing a complaint under the EPP's complaint policy and the procedures to submit a complaint to TEA staff in accordance with subsection (c)(1) of this section [TAC 228.70(4)].

### **Compliance Issues to be addressed:**

No compliance issues noted

Based on evidence presented, East Texas Baptist University Preparation Program (EPP) is **in compliance** with Texas Administrative Code §228.70(a) regarding Complaint Policy.

## **COMPONENT VIII: Rules for Issuances of Certificates (TAC) §230**

### **Findings:**

- For the recommendation for a standard certificate, East Texas Baptist University requires all coursework be completed, pass both the content exam and PPR exam, and have a successful clinical teaching Texas Administrative Code §230.37.

### **Compliance Issues to be addressed:**

No issues identified

Based on evidence presented, East Texas Baptist University Educator Preparation Program (EPP) **is in compliance** with Texas Administrative Code §230.37 regarding issuance of certificates.

### **General Recommendations:**

- 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.