



## 2020 – 2021 Continuing Approval Review Report North American University

### PURPOSE

Texas Education Agency (TEA) Program Specialists, Vanessa Alba and Lorrie Ayers conducted a five-year Virtual On-Site Continuing Approval Review of the educator preparation program (EPP) for North American University on October 20-22, 2020. Per 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...". Dr. Halil Tas, Director, was identified as the program Legal Authority and the primary EPP contact for the review process. North American University was approved as an EPP on June 17, 2011. At the time of the review, the EPP was rated Accredited-Probation Year 1. The risk level was Stage 1 (high). The EPP reported 18 finishers for the 2018-2019 reporting year and ten (10) finishers for 2019-2020.

At the time of the review, North American University was approved to certify candidates in the following classes: Teacher and Principal/Principal as Instructional Leader (PIL). The EPP is approved to offer the undergraduate, alternative certification program (ACP), and post-baccalaureate (PB) routes to certification.

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 TEA administers TAC required by the Texas legislature for the regulation of all EPPs in the state. (See the complete [TAC](#) for details.) The five-year Continuing Approval Review was conducted in a "Virtual On-site" format where EPP staff submitted requested documents to TEA for review.

The scope of this review included: 1) verifying compliance with Texas Administrative Code and Texas Education Code as applicable to all certification classes in all certification routes offered by the EPP; and 2) developing a plan for improvement based on review data, performance indicators identified in 19 TAC §229.4, and self-reported EPP information provided in the Status Report. A Compliance Plan was developed to address plans for quality improvement. Evidence of compliance was measured using a rubric aligned to TAC.

EPP staff participating in the review at various stages were: Dr. Faruk Taban, Provost; Dr. Halil Tas, legal authority & program director; Mr. Mustafa Maldar, certification officer & field supervisor; Dr. Karman Kurban, teacher & principal program professor and field supervisor; Dr. Ann M. Smith, teacher program professor & field supervisor; Dr. Harun Yilmaz, teacher & principal program professor; Dr. Wendy Schultze, teacher & principal program professor and field supervisor; Kerime Sari, teacher program professor & field supervisor; and Dr. Linda Hart, teacher program professor.



## **DATA ANALYSIS**

Information concerning compliance with TAC governing EPPs was collected by a variety of means. A Status Report and related program documents were submitted to TEA on October 2, 2020. Additional EPP documents, including records for 21 candidates as follows: 11 teacher files and ten (10) principal/PIL files were submitted on October 19, 2020. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data was used to evaluate the evidence.

## **FINDINGS, COMPLIANCE ISSUES, and RECOMMENDATIONS**

“Findings” indicate evidence collected during the review process. If the program is “not in compliance” with any identified component, the program should consult the TAC and correct the issue immediately. A “Compliance Plan” or “Next Steps” may be drafted during the review that identifies compliance issues to be addressed and a timeline for completion. “Recommendations” are suggestions for general program improvement and no follow-up is required.

### **COMPONENT I: GOVERNANCE – 19 Texas Administrative Code Chapter 228**

#### **Findings**

- North American University (NAU) provided advisory committee (AC) meeting minutes and agendas noting that the AC is composed of six public/private school representatives; one Education Service Center (ESC) representative; three institute of higher education (IHE) representatives; and two community/business representatives. [19 TAC §228.20(b)]
- It was reported that advisory committee members were informed of their roles and responsibilities at each meeting per agenda minutes provided. TEA used the Status Report and agendas as evidence. Meeting frequency met requirements. NAU provided meeting agendas/minutes for meetings on the following dates: October 25, 2018; April 18, 2019; October 24, 2019; April 16, 2020; and October 8, 2020, as evidence of compliance. The EPP reported that it meets twice per academic year and each agenda reflected that members were trained at each meeting. [19 TAC §228.20(b)]
- The advisory committee provided input given on design, delivery, evaluation, and major policy decisions at every meeting, except for the October 25, 2018 meeting where no major policy decisions were discussed. Much of the discussion revolved around adding a school counselor program and a Core Subjects EC-6 undergraduate program. It was also noted that the principal program was discussed at three meetings as follows: October 25, 2018; April 18, 2019; and April 16, 2020. The discussions revolved around the redesign of the principal program based on changes in TAC and evaluation of the current program at that time, review of the Accredited–Probation Year 1 status for 18-19 due to principal pass rates, and a review of the principal curriculum. [19 TAC §228.20(b)]
- The governing body has provided sufficient support and resources for the North American University teacher and principal programs. The legal authority’s participation in all aspects of the review served as evidence of compliance. [19 TAC §228.20(c)]



- North American University has a published calendar of activities for each of its programs. Evidence in the form of a calendar of activities was found within the initial teacher handbook, ACP handbook, and principal handbook, all posted on the [NAU website](#). [19 TAC §228.20(g)]
- North American University submitted the Status Report for the EPP Review in advance of the due date on October 2, 2020, as required. [19 TAC §228.10(b)(1)]
- North American University has been approved to offer clinical teaching at the time of the initial EPP application approval. The application is on file with TEA. [19 TAC §228.10(c)]

#### **Compliance Issues to be Addressed** (see Compliance Plan)

- None.

#### **Recommendations**

- It is recommended that NAU focus AC meetings on current programs that it is already approved to offer rather than focusing on the undergraduate and school counselor programs that it wants to add. This will allow the EPP to focus on the tasks at hand, namely the principal program pass rates and how the EPP intends to bring those scores up to be able to move back to an accreditation status of Accredited.
- Because the AC is meeting remotely, NAU is advised to collect attendance at each meeting by retaining evidence of members that log into each meeting.

Based on the evidence presented, North American University was in compliance with 19 TAC Chapter 228 – Governance of Educator Preparation Programs.

### **COMPONENT II: ADMISSION - 19 Texas Administrative Code Chapter 227**

#### **Findings**

- North American University has informed applicants of the required information about the EPP as follows:
- Candidates must undergo a criminal background check prior to employment as an educator was found in candidate handbooks and on the website. [19 TAC §227.1(b)(1)]
- Candidates must undergo a criminal history evaluation prior to clinical teaching was found on the website. [19 TAC §227.1(b)(2)]
- Admission requirements were found on the website for each program and contained within candidate handbooks. [19 TAC §227.1(c)(1)]
- EPP completion requirements were found in candidate handbooks located on the website. [19 TAC §227.1(c)(2)]
- The effects of supply and demand were found in candidate handbooks on the website. [19 TAC §227.1(c)(3)(A)]
- The performance of the EPP over time for the past five years and Compliance Reports for the EPP was found on the website. [19 TAC §227.1(c)(3)(B)]
- North American University has not informed applicants and candidates about the required information regarding criminal history. The information was not found. [19 TAC §227.1(d)]



- A total of 21 candidate files were reviewed for admission requirements. They included five undergraduate teacher files, six alternative certification program (ACP) teacher files, and ten non-teacher files principal files. Evidence was found in all files that the EPP met the required institution of higher education (IHE) enrollment or degree requirements. Ten out of 11 (91%) of the undergraduate and ACP teacher candidates were enrolled at the time of admission and the ACP candidates held a bachelor's degree as noted on transcripts provided for review. All ten (100%) of the non-teacher principal/PIL candidates held the required degree at the time of admission. The program met the requirement as prescribed. [19 TAC §227.10(a)(1-2); 19 TAC §241.5; 19 TAC §241.45]
- Teacher candidates have met the minimum GPA requirement for admission. The teacher candidate GPA range was 2.53-3.69 in nine out of eleven (81%) of the files reviewed. The GPA for the tenth file was not found but was reported as below 2.5. The eleventh file contained no documents because the candidate was a finisher of another program and was in the EPP for test approval only. The program requirement for teacher admission is 2.5. The EPP has sometimes admitted candidates with less than a 2.5 in the last 60 hours or the graduate GPA was used for admission consideration as allowed. The non-teacher principal GPA range in the ten files reviewed was 2.53-4.0. The program GPA requirement for non-teacher admission is also 2.5. The program met the requirement as prescribed. [19 TAC §227.10(a)(3)(A)]
- One out of 11 teacher files reviewed contained evidence of a GPA of 2.43 and the EPP reported a 2.43, which is less than the 2.5 GPA required for admission. There was a pre-admission content test (PACT) score, but no evidence of extraordinary circumstance and no work experience equivalent. The program did not meet the requirement as prescribed. [19 TAC §227.10(a)(3)(B)]
- Teacher applicants are required to demonstrate content knowledge prior to admission by having 12 hours in the content area for which they are admitted, 15 hours if the content area is math or science at grade 7 or above, or pass a pre-admission content test (TX PACT) prior to admission. Ten out of 11 candidates (91%) met the requirement. One candidate file did not contain any evidence because that candidate was a finisher in another EPP and was at North American University for test approval only. The program met the requirement as prescribed. [19 TAC §227.10(a)(4)]
- Non-teacher candidates reviewed met the minimum certification and degree requirements prior to admission. Service records, official transcripts, and teaching certificates served as evidence of compliance. Nine out of ten files (90 %) contained a service record. Five out of ten (50%) of the candidates reviewed were admitted before the effective date. One out of ten (10%) contained no service record at admission. Four out of ten (40%) had no deficiencies. All candidates contained the appropriate bachelor's or master's degree as required, and ten out of ten candidate files reviewed (100%) had a valid teaching certificate. The program met the requirement as prescribed. [19 TAC §227.10(a)(5)]
- Applicants must demonstrate basic skills prior to admission. Ten out of 11 (91%) teacher files contained evidence of a transcript or contained college-level coursework that met the exemption requirement in 19 TAC §4.54. All ten (100%) of non-teacher candidates met the requirement with an official transcript noting the degree conferred. The program met the requirement as prescribed. [19 TAC §227.10(a)(6)]



- All applicants must demonstrate proficiency in English language skills prior to admission. Eight out of 11 (73%) teacher candidates held a degree at admission. The ninth candidate file contained a Test of English as a Foreign Language (TOEFL) score, and one file contained no documents because that candidate was admitted as a finisher for testing only. All ten principal/PIL candidates held a degree at admission per transcripts reviewed. It was noted that these individuals mostly had degrees from out-of-country, were processed through an additional degree at NAU, and then admitted to the EPP with that degree. The principal/PIL files had all completed all coursework for the EPP prior to admission. The program met the requirement as prescribed. [19 TAC §227.10(a)(7)]
- All ten out of 11 (91%) of teacher files reviewed contained a completed application and the eleventh candidate was only admitted as a finisher for test approval only and had no documentation. From this point on, only the ten teacher files will be addressed. All principal/PIL candidates (100%) contained an application. [19 TAC §227.10(a)(8)]
- An applicant for admission must be screened to determine appropriateness for the certification sought. Principal candidates require more than one screen. All ten teacher candidate files contained evidence of an interview scored on a rubric and met the requirement as prescribed. All ten principal/PIL candidate files contained evidence of an interview scored on a rubric. None of the principal/PIL candidate files contained evidence of a second screen. The principal/PIL candidates did not meet the requirement as prescribed. [19 TAC §227.10(a)(8); 19 TAC §241.5; 19 TAC §241.45]
- Neither the teacher nor principal program had any other academic or additional requirements for admission. [19 TAC §227.10(a)(9); 19 TAC §227.10(b)]
- All ten out of 11 teacher candidates and ten principal/PIL candidates were not prior finishers. The eleventh teacher candidate was admitted for test approval only as a finisher from another program. The program met the requirement as prescribed. [19 TAC §227.10(c)]
- All candidate files with one or more credentials from out-of-country contained evidence of transcript reviews from an approved service. The program met the requirement as prescribed. [19 TAC §227.10(f)]
- All applicants are required to be formally admitted. Nine out of 11 (82%) teacher files contained a signed formal offer of admission letter. One file had no admission letter, and one had no documentation at all. All ten principal/PIL candidate files contained evidence of a signed formal offer of admission letter. The effective date of formal admission was found in the letters for all files reviewed. All candidates were admitted after beginning coursework and training. The formal offers of admission accepted by the candidates, testing history, and degree plans served as evidence for each file reviewed. The program did not meet the requirements as prescribed. [19 TAC §227.17(b-d); 19 TAC §227.17(f)]

#### **Compliance Issues to be Addressed** (see Compliance Plan)

- 19 TAC §227.1(d) NAU did not notify all applicants and enrollees of the (1) the potential ineligibility of an individual who has been convicted of an offense for issuance of a certificate on completion of the EPP; (2) the current SBEC rules prescribed in 19 TAC §249.16... and (3) the right to request a criminal history evaluation letter as provided in 19 TAC Chapter 227, Subchapter B...



Action: Notify all applicants and candidates of the preliminary criminal history requirement. Provide the Preliminary Criminal History Evaluation requirement in a link on the NAU website and provide the information in handbooks indicating where the requirement is posted as evidence of compliance.

- 19 TAC §227.10(a)(3)(B) NAU did not require applicants to meet the exception to the 2.5 minimum GPA requirement.

Action: Require all applicants that do not meet the minimum 2.5 GPA requirement to take/pass a Tx PACT exam for the content area for which they are seeking admission prior to admission; require the NAU director to sign a document that certifies each applicant's work, business, or career experience demonstrates achievement equivalent to the academic achievement represented by the GPA requirement; and provide a description of extraordinary circumstance. Post the exception to the minimum requirements on the EPP website as evidence of compliance.

- 19 TAC §227.10(a)(8) Require the principal as instructional leader (PIL) program to have more than one admissions screen.

Action: Determine what the 2<sup>nd</sup> screen will be for all PIL candidates. Provide a copy of the 2<sup>nd</sup> screen to TEA as evidence of compliance and submit one file for a newly admitted PIL candidate that includes the interview and the 2<sup>nd</sup> screen as evidence of compliance.

- 19 TAC §227.17(f) Teacher and principal candidates are provided coursework and training prior to formal admission.

Action: Do not provide any coursework or training to candidates until they are formally or contingently admitted. Submit one teacher file and one principal file containing the formal admission letter and the document for each noting the specific date coursework began so TEA can verify coursework has not begun until candidates were formally or contingently admitted.

### **Recommendations**

- It is recommended that more than two principal program staff screen applicants in the event that the screeners do not agree on the rating.
- Place all required information in one easily accessible landing site on the NAU website.
- Be aware of the criteria and documentation required for candidates admitted under the 10% exception.

Based on the evidence presented, North American University was not in compliance with 19 TAC Chapter 227 - Admission Criteria.

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

#### **Findings**

- TEA reviewed the English Language Arts & Reading (ELAR) 4-8 certificate curriculum documents provided, the ELAR 4-8 Scope & Sequence document provided, self-





reported information contained within the Status Report, and the EPP course syllabi to determine compliance. The purpose for selecting this certification field was to determine compliance with the new Science of Teaching Reading (STR) component associated with this certification field.

- North American University reported that the curriculum is based on educator standards and addresses the relevant Texas Essential Knowledge and Skills (TEKS) within the coursework the EPP identified in the Status Report. The evidence was verified in a review of the curriculum. It was noted that the syllabi reflected standards-based instruction but did not reflect STR standards alignment. While the EPP submitted an updated syllabus for ENGL 3330, it could not be verified that the EPP had implemented the STR standards. In conversations with program staff, it was determined that the STR attestation was received at TEA on 2/4/2020, but the EPP had not fully implemented the standards because they did not currently have candidates in the certification field. The program pulled back its STR attestation since the curriculum is not fully aligned and will resubmit once the alignment is complete. The EPP met the requirement for TEKS implementation, but not for the STR standards. [19 TAC §228.30(a)]
- North American University curriculum is research-based. The syllabi for ENGL 3329, ENGL 3330, and the 16 online modules all contained cited bibliographies of the research-based curriculum used. The EPP also gave credit to all videos used within the online coursework. [19 TAC §228.30(b)]
- The Educators' Code of Ethics is taught in Module 2 Code of Ethics online coursework. [19 TAC §228.30(c)(1)].
- The five domains of reading (phonics, phonemic awareness, vocabulary, comprehension, and fluency) are taught in EDUC 3330 and dyslexia instruction was found in Module 12 Special Populations and Module 16 Differentiated Learning. [19 TAC §228.30(c)(2)]
- Mental health, substance abuse, and youth suicide training were not found in the online coursework or on the scope & sequence for the certification field reviewed. The program did not meet the requirement as prescribed. [19 TAC §228.30(c)(3)]
- The skills educators are required to possess, the responsibilities they are required to accept, and the high expectations for students in this state are taught online in Module 13 Parent Conferences & Communication Skills. [19 TAC §228.30(c)(4)]
- The importance of building strong classroom management skills is taught in online Module 11 Classroom Management & Developing a Positive Learning Environment. [19 TAC §228.30(c)(5)]
- The framework in this state for teacher and principal evaluations is taught in the online Module 2 Code of Ethics. It was noted that training in T-TESS was also found in the course. EPP staff were advised to update the information related to T-TESS because there were 2016-2017 references to changes in T-TESS, it is now 2020-2021, and those references are outdated. [19 TAC §228.30(c)(6)]
- Appropriate relationships, boundaries, and communications between educators and students are taught in the online Module 2 Code of Ethics. [19 TAC §228.30(c)(7)]
- Instruction in digital learning, including a digital literacy evaluation followed by a prescribed digital learning curriculum, was not found. TEA met with EPP staff and provided guidance on where to locate the International Society for Technology in



Education (ISTE) standards for educators and discussed how to provide a digital literacy evaluation followed by a prescribed digital learning curriculum to all candidates in all certification fields and the principal class within the technology course currently offered by the EPP. The program did not meet the requirement as prescribed. [19 TAC §228.30(c)(8)]

- Instruction in the English Language Proficiency (ELPs) standards was not found in coursework, online coursework, or the scope & sequence for the ELAR 4-8 certification field. The program did not meet the requirement as prescribed. [19 TAC §228.30(d)(1)]
- Reading instruction, including content-area literacy, was found in ENGL 3329, ENGL 3330, online Module 15 Instructional Strategies, and online Module 7 TEKS in the Content Areas. [19 TAC §228.30(d)(2)]
- The skills and competencies captured in the Texas teacher standards in 19 TAC Chapter 149, Subchapter AA were taught in online Module 2 Code of Ethics, Module 3 Human Growth & Development, Module 4 Motivating Learners, Module 6 TEKS organization, structure, skills, Module 7 TEKS in the content area, Module 9 Curriculum Development & Planning, Module 11 Classroom Management & Developing a Positive Learning Environment, Module 12 Special Pops, Module 12 Parent Conferencing & Communication Skills, Module 15 Instructional Strategies, and Module 16 Differentiated Instruction. [19 TAC §228.30(d)(4)]
- Instruction in data-driven practice was not found in any coursework reviewed. The program did not meet the requirement as prescribed. [19 TAC §228.30(d)(4)(e)]
- The principal standards prescribed in Chapter 241 relating to certification as a principal and captured in the Texas administrator standards, as indicated in Chapter 149, Subchapter BB are taught in EDUC 5314 Instructional Leadership and EDUC 5320. The EPP provided the syllabi as evidence of compliance. It is important to note that North American University has undergone a principal program curriculum revision recently to align with current PIL requirements. The program also only had one PIL test taker in 19-20 and that candidate passed the exam. [19 TAC §228.30(e)]

### **Compliance Issues to be Addressed (see Compliance Plan)**

- 19 TAC §228.30(a) The entire ELAR 4-8 program is not completely aligned to the STR standards.  
Action: Fully align the ELAR 4-8 curriculum and the ELAR/Social Studies 4-8 curriculum to the STR standards.
- 19 TAC §228.30(c)(3) Mental health, substance abuse, & youth suicide training was not provided to all candidates.  
Action: Require mental health, substance abuse, & youth suicide training for all candidates in all certification fields & the principal class.
- 19 TAC §228.30(c)(8)(A-C) Instruction in digital learning with a pre-assessment followed by a prescribed curriculum was not provided to all candidates.  
Action: Require instruction in digital learning with a pre-assessment followed by a prescribed curriculum to be taught to all candidates in all certification fields & the principal class.





- 19 TAC §228.30(d)(1) Instruction in English Language Proficiency Standards is not provided to all teacher candidates.  
Action: Require all candidates to receive instruction in the English Language Proficiency Standards.
- 19 TAC §228.30(d)(4) Instruction in data-driven practice was not provided to all candidates.  
Action: Require all candidates to receive instruction in data-driven practice.

### Recommendations

- Update all online modules to reflect North American University and not Gulf Educator Certification Program, which is now closed.
- Remove any TEA logos, current or outdated, from the online coursework because the EPP is not approved to use TEA logos.
- Update the online course with T-TESS to include current T-TESS information.

Based on the evidence presented, North American University was not in compliance with 19 TAC §228.30-Curriculum.

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

### Findings

- TEA reviewed the ELAR 4-8 certification field. NAU provides candidates with adequate preparation and training that is sustained, rigorous, interactive, and prepares candidates to be effective in the classroom. ENGL 3330 Literacy Assessment & Intervention was the only course that was performance-based. It included a performance-based assessment (PBA) that was a case study with an aligned rubric that was standards-based. ENGL 3329 Principles in Reading & Writing consisted of weekly quizzes, unit assignments, library article review, library article PowerPoint requirement, literacy teacher observations, a Midterm Project, and a Final Project. The program met the requirement for adequate preparation and training, but not performance-based coursework. [19 TAC §228.35(a)(1-2)]
- All certified candidates held a degree prior to standard certification. Seven out of 11 teacher candidates and five out of ten principal/PIL candidates reached the point of standard certification. Benchmark documents and transcripts served as evidence of compliance. The program met the requirement as prescribed. [19 TAC §228.35(a)(3)]
- North American does not have procedures for allowing relevant military experiences or procedures for allowing prior experience, education, or training in place. The program did not meet the requirement as prescribed. [19 TAC §228.35(a)(5)(A-B)]
- NAU offers some coursework online in the various certification fields and classes per the Status Report documents and the Scope & Sequence provided. The program provides 17 online courses offered to all candidates. Course 17 is specific to the Math/Science/Tech Apps certificates only. NAU provided the *Accrediting Commission of Schools & Colleges* online accreditation document that is valid beginning February 26,



2018, for five years as evidence of compliance. The program met the requirement as prescribed. [19 TAC §228.35(a)(6)(C-D)]

- The candidate ACP Handbook for the teacher class stated that NAU offers 305 clock-hours of coursework, but it was noted that 6 hours of test preparation and 10 hours for the standard certification process cannot be used toward the total hours required for teacher certification. The total hours were determined to be 289 clock-hours. The total hours required for the ACP teacher program also did not correspond to the Scope & Sequence provided for the ELAR 4-8 certification field reviewed. Those hours totaled 379 clock-hours. Removing the six (6) hours of test prep and ten (10) hours for the standard certification process, the total hours were 363 clock-hours. It was also noted in the previous NAU EPP Review that the program did not have the required hours for standard certification. The program did not meet the requirement as prescribed. [19 TAC §228.35(b)]
- NAU offers a 36-semester hour master's degree for principal/PIL certification. All principal/PIL candidates had evidence of the degree earned and the hours required met the requirement as prescribed. [19 TAC §228.35(c)]
- Seven out of 11 (64%) of the teacher candidates completed 150 clock-hours of required coursework and field-based experiences (FBEs) prior to clinical teaching or internship. Two out of 11 (18%) completed FBEs after the start of the internship and one out of 11 (1%) had not reached the point of FBEs in the program yet. The EPP provided syllabi and transcript documentation for each file reviewed as evidence that each candidate completed the requirement as prescribed. Of the candidates that completed FBEs, three completed them in one setting only, six completed them in more than one setting, one contained no documentation, and one had not yet reached the point of FBEs. Six out of 11 files contained evidence of 15 clock-hours or more of interactive FBEs, three out of eleven had fewer than 15 clock-hours of interactive FBEs, one out of eleven contained no documentation, and one out of eleven had not reached the point of FBEs. The program did not meet the requirement as prescribed. [19 TAC §228.35(b)(2); 19 TAC §228.35(e)(1)(A-B)]
- Eight out of ten (80%) of teacher candidates completed more than 30 clock-hours of field-based experiences (FBEs). Signed logs signed by the observed teacher served as evidence of compliance. One file contained no evidence and one file contained fewer than 30 clock-hours of FBEs. The eleventh file was admitted as a finisher from another EPP for test approval only. The program met the requirement as prescribed. [19 TAC §228.35(b)(1)]
- Seven out of 11 teacher candidates reached the point of standard certification, the remaining three had not reached the point of standard certification, and the eleventh file contained no documentation because that candidate was a finisher in another EPP. The candidates completed either clinical teaching or internship. Nine out of eleven candidate files contained evidence of placement documentation with an intern or probationary certificate. One candidate had not reached the point of clinical teaching or internship and one contained no evidence at all. The program met the requirements as prescribed. [19 TAC §228.35(e)(2); 19 TAC § 228.35(e)(2)(A)]
- Two out of eleven candidates completed clinical teaching. Candidates in clinical teaching must complete a minimum of 14 weeks (70 days) or 28 weeks (140 half days). In the



documentation provided, it was noted that the candidates completed 66 and 67 days, respectively. The program did not meet the requirement as prescribed. [19 TAC § 228.35(e)(2)(A)(i)]

- The two clinical teachers were observed using an observation instrument that measured candidate proficiency. Observation documents served as evidence of compliance. There was no evidence that there was any documentation from the field supervisor or cooperating teacher that the candidates should be recommended for standard certification. The requirement went into effect on 12/20/2018. The program did not meet the requirement as prescribed. [19 TAC § 228.35(e)(2)(A)(iii)]
- Seven candidates completed an internship year. The dates on the certificates and the observation instruments served as evidence of compliance that the internship was for a full year. The observation instrument captured candidate proficiency in the standards. All candidates were placed in charter schools. The statements of eligibility served as evidence of compliance. One of the seven candidates was a science candidate that was assigned to a physics class for 1.5 hours and all other classes were engineering and math. All other class assignments met the requirements. Candidates in the internship year spent a minimum of four hours in the content area for which they were to be certified as required. All candidates were placed on an intern or probationary certificate during the internship year. Two of the seven candidates were placed in internship extensions that met requirements for field supervision and reasons for the extension as prescribed. [19 TAC § 228.35(e)(2)(B); 19 TAC § 228.35(e)(2)(B)(iii); 19 TAC § 228.35(e)(2)(B)(iv); 19 TAC § 228.35(e)(2)(B)(v)]
- Candidates in the internship only received recommendations for a successful internship year from the mentor teacher. There was no evidence provided that the field supervisor recommended to the EPP that the candidate had completed a successful internship year. Of the seven in the internship year, four had a recommendation from only the mentor teacher, two had no recommendation, and one was in progress. The requirement that both the field supervisor and mentor must recommend to the EPP that the candidate was successful in the internship year went into effect on 12/20/2018. The program did not meet the requirement as prescribed. [19 TAC § 228.35(e)(2)(B)(vii)]
- NAU provided on-going support to the seven candidates completing internships. Additional observation documentation served as evidence of compliance. The program met the requirement as prescribed. [19 TAC § 228.35(e)(2)(B)(vi)]
- All candidates in an internship or clinical teaching experienced the start of the school year during the internship or clinical teaching assignments in actual school settings. There was no evidence that the candidate had an administrative role over the mentor/cooperating teacher or was related to the field supervisor/mentor/cooperating teacher. Observation documentation and SOEs served as evidence of compliance. The program met the requirements as prescribed. [19 TAC § 228.35(e)(4); 19 TAC § 228.35(e)(6); 19 TAC § 228.35(e)(7)]
- All ten principal/PIL candidates completed a practicum. It was noted in documents provided for review, that five out of ten (50%) completed a practicum that was less than 160 clock-hours. Proficiency in the standards was not captured on the observation instrument. Candidates met with the field and site supervisors to discuss the progress the candidate was making and then the candidates would write a written reflection of



their experiences at that point. The program did not meet the requirement as prescribed. [19 TAC § 228.35(e)(8)]

- All ten principal practicum assignments took place in an actual school setting. Placement information, site supervisor agreements, and campus administrator authorization documents served as evidence of compliance. Candidates did not have an administrative role over the site supervisor and were not related to the field supervisor or site supervisor. The observation documents served as evidence of compliance. The program met the requirements as prescribed. [19 TAC § 228.35(e)(8)(A-B)]
- There was no evidence provided that the field supervisor and site supervisor recommended to the EPP that the principal/PIL candidates were successful in their practicum assignments. The program did not meet the requirement as prescribed. [19 TAC § 228.35(e)(8)(D)]
- One out of ten (10%) completed the practicum out-of-state in Oklahoma. The EPP had an application on file for that candidate. All other candidates complete the practicum in-state. The program was advised that all practicum assignments must be completed in Texas. If a candidate is seeking to complete a practicum out-of-state, the EPP must complete an application to be approved prior to placement out-of-state. [19 TAC § 228.35(e)(9)]
- Each candidate in an internship, clinical teaching, or practicum assignment must have a mentor, cooperating teacher, or site supervisor. All seven candidates in an internship contained evidence of the mentor agreement and/or observations. The two candidates in clinical teaching assignments also contained evidence of the cooperating teacher's agreement and/or observations in their files. Nine out of ten (90%) of the principal/PIL candidates contained evidence in their files of a site supervisor agreement. The program met the requirement as prescribed. [19 TAC § 228.35(f)].
- None of the teacher or principal/PIL candidate files contained evidence that the mentor teacher, cooperating teacher, or site supervisor met the qualification requirements to serve as such. The documentation provided did not capture the qualifications. The program did not meet the requirement as prescribed. [19 TAC § 228.2(14); 19 TAC § 228.2(26); 19 TAC § 228.2(33)]
- Mentors, cooperating teachers, and site supervisors are required to be trained within the first three weeks of assignment to a candidate. No evidence was provided that the individuals assigned to candidates were trained. The program did not meet the requirement as prescribed. [19 TAC § 228.35(f); 19 TAC § 228.2(14); 19 TAC § 228.2(26); 19 TAC § 228.2(33)]
- All candidates in clinical teaching, internship, or practicum assignment must be assigned a field supervisor. The seven candidates in an internship, two candidates in clinical teaching, and nine out of ten (90%) practicum candidates were assigned a field supervisor. The field supervisor signatures on the observation instruments served as evidence of compliance. [19 TAC § 228.35(g); 19 TAC § 228.35(h)]
- Field supervisors are required to be qualified. There was no evidence provided by NAU that any of the field supervisors assigned to candidates in an internship, clinical teaching, or practicum were qualified. Field supervisors are required to be trained within the first three weeks of assignment to a candidate. Only one field supervisor held a training certificate for the TEA approved training. There was no evidence that any field



supervisor had received local training. The program did not meet the requirements as prescribed. [19 TAC §228.35(g); 19 TAC §228.35(h)]

- A field supervisor cannot be employed by the same school where the candidate is completing the clinical teaching, internship, or practicum assignment. A mentor cooperating teacher, or site supervisor may not also serve as a candidate's field supervisor. None of the candidates was in that type of situation. The program met the requirement as prescribed. [19 TAC §228.2(18)]
- Field supervisors are required to make initial contact with each candidate completing clinical teaching, internship, or practicum within the first three weeks or first quarter of the assignment. Of the nine teacher candidates that completed clinical teaching or internship, only two files (22%) contained evidence of initial contact as required. The evidence presented was field supervisor logs with the contact date and method of contact. None of the principal/PIL candidates (100%) had any evidence of initial contact within the first quarter of the assignment. The program did not meet the requirement as prescribed. [19 TAC §228.35(g); 19 TAC §228.35(h)]
- For each formal observation conducted by the field supervisor of the candidate completing clinical teaching internship, or practicum, there must be an individualized pre- and post-observation conference. The post-observation conference must be synchronous and interactive. Neither the pre- nor the post-observation conference needs to be on-site. The seven candidates completing an internship year contained no evidence of the pre- or post-observation conference at each formal observation. There was only evidence of a signed observation document for each formal observation. For the two candidates that completed clinical teaching, there was no evidence that a pre-observation conference occurred at each formal observation. The post-observation conference documentation was inconsistent and was a part of the signed, dated observation documentation provided for review. None of the principal/PIL candidate files contained evidence of a pre- or post-observation conference. The program did not meet the requirement as prescribed. [19 TAC §228.35(g); 19 TAC §228.35(h)]
- For each formal observation, the field supervisor is required to document the instructional practices observed. The nine candidates in clinical teaching and internship assignments contained evidence on the formal observation instrument that instructional practices observed were documented. For teacher candidates, the program met the requirement as prescribed. It was found in the observation documentation for principal/PIL candidates completing a practicum, that meetings were held about the practicum at each formal observation instead of actual formal observation. It was also noted that the formal observation instrument did not capture the instructional practices observed. The program did not meet the requirement as prescribed for principal/PIL candidates. [19 TAC §228.35(g); 19 TAC §228.35(h)]
- All candidates completing an internship, clinical teaching, or practicum assignment contained evidence that the candidate received written feedback about the observation. The evidence presented was signatures on observation instruments or other attestation documents. The program met the requirement as prescribed. [19 TAC §228.35(g); 19 TAC §228.35(h)]
- Each field supervisor is required to provide each candidate completing an internship, clinical teaching, or a practicum with informal observations and coaching. Of the nine





candidates that completed clinical teaching or internship, four (44%) contained evidence in their files of informal observations and coaching. The evidence included field supervisor logs noting support provided and walk-through observations that reflected on-going coaching and support. None of the principal/PIL candidates contained evidence of on-going support and coaching. The only evidence that was provided was the three meetings that were considered to be the formal observation. The program did not meet the requirement as prescribed. [19 TAC §228.35(g); 19 TAC §228.35(h)]

- Field supervisors are required to cooperate with the candidate, cooperating teacher, mentor teacher, campus administrator, and site supervisor as applicable during clinical teaching, internship, or practicum. NAU provided mentor or cooperating teacher observations for teacher candidates and three-way conferences for principal/PIL candidates as evidence of compliance. The program met the requirement as prescribed. [19 TAC §228.35(g); 19 TAC §228.35(h)]
- Each formal observation conducted by the field supervisor must be 45 minutes in duration and must be on the candidate's site in a face-to-face format. All nine candidates that completed clinical teaching or internship contained observation documentation in their files noting that the observations were 45 minutes in duration. The first formal observation must be conducted within the first third of all clinical teaching assignments and the first six weeks of all internship assignments. The dates on the observation instruments for clinical teachers and interns served as evidence of compliance. The program met the requirements as prescribed. [19 TAC §228.35(g)(1); 19 TAC §228.35(g)(2)]
- Candidates on an intern certificate must have three formal observations during the first half of the assignment and two during the last half of the assignment. Candidates on a probationary certificate must have a minimum of three formal observations conducted during the first, second, and last third of the assignment. Seven candidates completed the internship on either an intern or probationary certificate. Six out of seven (86%) of the candidates were observed on the required schedule per the observation documents provided for review. The seventh candidate received fewer than the required observations. The program met the requirement as prescribed. [19 TAC §228.35(g)(3-4)]
- Candidates completing a 14-week full-day clinical teaching assignment must receive a minimum of one formal observation during the first, second, and last third of the clinical teaching assignment. Two candidates were in clinical teaching assignments. Observation documents were provided as evidence that both (100%) were observed on the schedule as required. The program met the requirement as prescribed. [19 TAC §228.35(g)(7-8)]
- Candidates completing a practicum must be observed for 135 minutes in all throughout the practicum assignment. The ten principal/PIL candidates did not receive formal observations as required. The documentation that was provided was three-way conferences documented on observation documents between the candidate, field supervisor, and site supervisor to discuss the progress during the practicum and to discuss the portfolio progress. The program did not meet the requirement as prescribed. [19 TAC §228.35(h)]
- All observations by the field supervisor of the ten principal/PIL candidates were conducted in a face-to-face format on the candidate's site. The observation meetings for





each principal/PIL candidate were spaced out during the first, second, and final third of the practicum. The dates on the observation instruments and field supervisor logs served as evidence of compliance. The program met the requirements as prescribed. [19 TAC §228.35(h)(2-3)]

### **Compliance Issues to be Addressed** (see Compliance Plan)

- 19 TAC §228.35(a)(2) Coursework and/or training were not performance-based.  
Action: Require all coursework to be performance-based.
- 19 TAC § 228.35(a)(5)(A) NAU did not establish specific criteria and procedures that allow military service member or military veteran candidates to credit verified military service, training, or education toward the training, education, work experience, or related requirements (other than certification examinations) for educator certification requirements, provided that the military service, training, or education is directly related to the certificate being sought.  
Action: Provide the criteria and specific procedures for military service members or veterans that allow prior coursework or training as required on the NAU website.
- 19 TAC § 228.35(a)(5)(B) NAU did not establish specific criteria and procedures that allow candidates who are not military service members or military veterans to substitute prior or ongoing service, training, or education, provided that the experience, education, or training is not also counted as a part of the internship, clinical teaching, or practicum requirements, was provided by an approved EPP or an accredited institution of higher education within the past five years and is directly related to the certificate being sought.  
Action: Provide the criteria and specific procedures for candidates who are not military service members or veterans that allow prior coursework or training as required on the NAU website and/ or in all handbooks.
- 19 TAC §228.35(b) NAU total hours do not equal 300 clock-hours.  
Action: Require candidates to earn a total of 300 clock-hours of coursework and training.
- 19 TAC §228.35(b)(1); 19 TAC §228.35(e)(1)(A-B) NAU did not require candidates to complete field-based experiences prior to clinical teaching or internship as required.  
Action: Require 30 clock-hours of FBEs prior to internship. Require the FBEs to be in a variety of settings. Require 15-clock hours of FBEs to be interactive. Retain evidence, such as dated FBE logs with the signature of the teacher observed, to be retained in each candidate file as evidence.
- 19 TAC § 228.35(e)(2)(A)(iii); Clinical teaching is successful when... the field supervisor and cooperating teacher recommend to the EPP that the candidate should be recommended for a standard certificate. If either the field supervisor or cooperating teacher does not recommend ... the person who does not recommend the candidate must provide documentation supporting the lack of recommendation to the candidate and either the field supervisor or cooperating teacher.



Action: All programs must implement a process to collect the recommendation from the field supervisor and the appropriate campus personnel. Evidence must be retained in each candidate's record.

- 19 TAC §228.35 (e)(2)(B)(vii) An internship is successful when... the field supervisor and campus supervisor recommend to the EPP that the candidate should be recommended for a standard certificate. If either the field supervisor or campus supervisor does not recommend ... the person who does not recommend the candidate must provide documentation supporting the lack of recommendation to the candidate and either the field supervisor or campus supervisor.

Action: All programs must implement a process to collect the recommendation from the field supervisor and the appropriate campus personnel. Evidence must be retained in each candidate's record.

- 19 TAC §228.35(e)(8) Require the principal practicum to be a minimum of 160 clock-hours.

Action: Require candidates to document standards-based activities on logs. Enforce that the practicum must be 160 hours or more for the requirement to be complete.

- 19 TAC §228.35(e)(8)(D) A practicum is successful when the field supervisor and the site supervisor recommend to the EPP that the candidate should be recommended for a standard certificate.

Action: Require the field supervisor to recommend to NAU that the candidate was successful in the practicum and should be recommended for standard certification. If either the field supervisor or site supervisor does not recommend that the candidate for standard certification, that individual must provide documentation supporting the lack of recommendation. Retain evidence from each in the candidate file.

- 19 TAC §228.2(14); 19 TAC §228.2(26); 19 TAC §228.2(33) Mentors, cooperating teachers, and site supervisors did not have the qualifications required.

Action: Implement a process or document to capture the qualifications of cooperating teachers, mentors, site supervisors, and field supervisors. Retain the documentation in either individual candidate's records or EPP records.

- 19 TAC §228.35(f); 19 TAC §228.2(14); 19 TAC §228.2(26); 19 TAC §228.2(33) Mentors, cooperating teachers, and site supervisors were not trained within the first three weeks of assignment to a candidate.

Action: Develop training for cooperating teachers, mentors, and site supervisors that meets requirements in TAC or identify the campus training used to meet this requirement. Implement a process to capture evidence that cooperating teachers, mentors, and site supervisors have completed the required training (certificates of completion, sign-in sheets, or other concrete evidence of attendance). Retain evidence in either candidates' records or EPP records.



- 19 TAC §228.35(g); 19 TAC §228.35(h) Field supervisors assigned to candidates were not qualified or trained within the first three weeks of assignment to a candidate.  
Action: Develop a process to capture evidence that field supervisors attend EPP training. Develop a process to capture evidence that field supervisors attend TEA approved training.
- 19 TAC §228.35(g); 19 TAC §228.35(h) Field supervisors did not make initial contact with candidates in an internship or clinical teaching within the first three weeks, or practicum within the first quarter of assignment.  
Action: Implement requirement for field supervisors to document the date of the first contact with the candidate such as a field supervisor log, email evidence, or other documentation.
- 19 TAC §228.35(g); 19 TAC §228.35(h) Require a pre- and post-observation conference for each formal observation.  
Action: Implement the requirement that the field supervisor conducts pre-conferences and post-conferences with candidates surrounding each formal observation. Capture evidence on observation instrument, field supervisor log, or similar document. Retain evidence in each candidate's records.
- 19 TAC §228.35(h) For each formal observation conducted by the field supervisor of principal/PIL candidates, document educational practices observed.  
Action: Update the observation process and observation instrument for the principal program so that the field supervisor observes the candidate completing a standards-based task and educational practices observed are recorded on the observation instrument. Retain documentation in each candidates' records.
- 19 TAC §228.35(g); 19 TAC §228.35(h) Require the field supervisor to provide each candidate with informal observations and coaching.  
Action: Implement a process to collect documentation of ongoing coaching and support. Examples could be copies of observations performed by campus personnel, FS logs, or other documentation. Retain all records in each candidates' records.
- 19 TAC §228.35(h) Formal observations conducted by the field supervisor of the principal candidates were not 135 minutes in duration.  
Action: Update the observation requirement to ensure that the field supervisors are observing PIL candidates completing standards-based tasks and not just holding meetings with candidates.

### **Recommendations**

- EPP staff is reminded to ensure that candidates are in their internship assignment for four (4) hours per day in the subject area on the certificate seeking. Engineering does not allow a candidate opportunity to demonstrate proficiency in the Science 4-8 standards.



- All out-of-state practicum and clinical teaching assignments require an out-of-state placement application that must be pre-approved prior to placement out-of-state. That application includes the specific reasons why the out-of-state placement may be approved. TEA will provide the application to the EPP at the request of the NAU staff.

Based on the evidence presented, North American University was not in compliance with 19 TAC §228.35 – Program Delivery and On-Going Support.

## **COMPONENT V: ASSESSMENT AND EVALUATION OF CANDIDATES AND EPP – 19 TAC §228.40**

### **Findings**

- NAU has established benchmarks to measure candidate progress. All files reviewed contained degree plans and checklists in candidate records noting where the candidate was in the program. The program met the requirement as prescribed. [19 TAC §228.40(a)]
- NAU has structured assessments to measure candidate progress. The EPP provided a Science of Teaching Reading (STR) performance assessment evaluated on an STR rubric in Reading Pedagogy, Reading Development Foundational Skills, and Reading Development Comprehension with levels of proficiency (unacceptable, Developing, Proficient, and Target) noted as evidence of performance assessments. [19 TAC §228.40(a)]
- NAU does not have processes in place to ensure that candidates are prepared to be successful in their certification exams. Eight out of ten (80%) teacher candidates contained evidence of test preparation material in their records. Two candidates left the program. The program met the requirement for teacher candidates. Only one in ten (10%) of principal/PIL candidates contained evidence of test preparation material. The program did not meet the requirement as prescribed for principal/PIL candidates. [19 TAC §228.40(b)]
- NAU does not grant test approval for certification exams until candidates meet all requirements for admission and have been formally or contingently admitted. Information was found in the ACP and Initial Teacher Program Handbooks noting that 80% on all practice exams are required and 80% of all online coursework must be completed for test approval to be granted. The test approval information based on admission dates was not found in the Principal Program Handbook. The program met the requirement as prescribed for teacher candidates, but not principal/PIL candidates. [19 TAC §228.40(d)]
- NAU does not use information from a variety of sources to evaluate program design and delivery. The EPP provided course feedback for Spring 2020 and Fall 2019. The data was acceptable, but there was no evidence presented that NAU did anything with it to improve the EPP. NAU also provided individual current candidate cooperating teacher and field supervisor surveys from 11 candidates. The advisory committee meeting minutes showed evidence of discussing the evaluation of the design and delivery of the EPP. [19 TAC §228.40(e)]
- All candidate records for the review served as evidence that the EPP retains records as required for a period of five years from admission to completion or withdrawal from the



program for any reason. The program met the requirement as prescribed. [19 TAC §228.40(f)]

#### **Compliance Issues to be Addressed** (see Compliance Plan)

- 19 TAC §228.40(e) NAU did not continuously evaluate the design and delivery of the EPP components based on performance data, scientifically-based research practices, and the results of internal and external feedback and assessments.  
Action: Require an evaluation plan detailing the activity, timeline, person responsible, utilize data results from internal and external evaluation reports, and share that information with the advisory committee to make programmatic improvements.
- 19 TAC §228.40(b): §228.40(d) There was limited evidence that principal candidates are provided test preparation and that test readiness is determined by EPP.  
Action: Retain test readiness documentation for principal candidates.

#### **Recommendations**

- None.

Based on the evidence presented, North American University was not in compliance with 19 TAC §228.40 – Assessment and Evaluation of Candidates for Certification and Program Improvement.

### **COMPONENT VI: PROFESSIONAL CONDUCT - 19 TAC §228.50**

#### **Findings**

19 TAC §228.50 requires that during the period of preparation, the educator preparation program shall ensure that the individuals preparing candidates and the candidates themselves understand and adhere to Chapter 247 of this title (relating to Educators' Code of Ethics).

- Eight out of 11 teacher candidates (73%) signed attestations of understanding and abiding by the Texas Educator's Code of Ethics. Two of the 11 files reviewed contained no evidence that they signed the Code of Ethics and one file contained no documentation at all. Seven out of ten (70%) of principal/PIL candidates signed attestations of understanding and abiding by the Texas Educator's Code of Ethics. Three out of ten (30%) did not contain evidence that they signed the Code of Ethics. Signed Educator Code of Ethics documents was found in candidate portfolios submitted after the principal practicum was complete. In all, 15 out of 21 files reviewed (71%) met the requirement. NAU did not meet the requirement as prescribed. [19 TAC §228.50; 19 TAC §247.2]
- All associated staff and field supervisors did not sign a Texas Educator's Code of Ethics. In conversations with the EPP staff during the review, it was found that this is not a program requirement and the legal authority understands that this is a compliance item. The program did not meet the requirement as prescribed. [19 TAC §228.50; 19 TAC §247.2]



### **Compliance Issues to be Addressed** (see Compliance Plan)

- 19 TAC §228.50; 19 TAC §247.2 North American University did not consistently retain evidence that candidates understand and adhere to 19 TAC Chapter 247.  
Action: Retain evidence that all candidates understand and agree to adhere to the Texas Educator's Code of Ethics.
- 19 TAC §228.50; 19 TAC §247.2 North American University did not require EPP staff to understand and adhere to the Code of Ethics.  
Action: Require EPP staff and field supervisors to acknowledge receipt of and adherence to the Code of Ethics. Retain evidence in the EPP files and/or in each candidate file as evidence of compliance.

### **Recommendations**

- Update all Handbooks to include the current Educator Code of Ethics found in 19 TAC §247.2. The ACP handbook contained past versions of the Code of Ethics.
- Because the signed Educator Code of Ethics (ECOE) documents were found in candidate portfolios submitted after the practicum was complete, principal program staff should be encouraged to provide training in ethics and the Educator Code of Ethics. Have candidates sign those documents early in the training. Documentation should be retained in EPP files and not just in candidate portfolios. The EPP should enforce candidate compliance with the ECOE.

Based on the evidence presented, North American University was not in compliance with 19 TAC §228.50 - Professional Conduct.

## **COMPONENT VII: COMPLAINTS PROCESS – 19 TAC §228.70**

### **Findings**

- Per 19 TAC §228.70(b), the EPP complaints process is on file at TEA. The EPP complaint policy is also posted on the website. The program has the compliant policy posted on-site at the North American University campus on the 8<sup>th</sup> floor. It is posted on the bulletin adjacent to Room 834. The program provides the complaint policy in writing upon request. NAU meets the requirements as prescribed. [19 TAC §228.70(b)(1-4)]

### **Compliance Issues to be Addressed (Compliance Plan)**

- None.

### **Recommendations**

- Strongly consider posting the Complaint Procedure on the website where it is visible to all, rather than just having it contained within each handbook posted on the website.

Based on the evidence presented, North American University is in compliance with 19 TAC §228.70 – Complaints Process.





## **COMPONENT VIII: CERTIFICATION PROCEDURES - 19 Texas Administrative Code Chapters 228 and 230**

### **Findings**

- Teacher candidates have met degree requirements for certification. Seven out of ten teacher candidates who reached certification held a degree at the time of standard certification. Of the seven, one candidate had an effective date on the standard certificate prior to the conferral of the degree, but the remaining six (86%) met the requirement. The program met the requirement as prescribed. [19 TAC §230.13(a)(1)]
- All certified teachers had completed all EPP requirements per the documents, benchmarks, and transcripts presented for review. All met the application and issuance deadlines for the certificates awarded. The program met the requirement as prescribed. [19 TAC §230.13(a)(2); 19 TAC §230.13(b)(3)]
- Five out of ten principal/PIL candidates reached the point of standard certification. All five candidates had official transcripts and met degree requirements prior to standard certification. [19 TAC §241.60; 19 TAC §241.20]
- Principal candidates are required to hold a valid teaching certificate and service record with a minimum of two years of experience as a classroom teacher when recommended for standard certification. All five had valid certificates and a minimum of two years of teaching experience at the time of standard certification. Certificates and service records served as evidence of compliance. The program met the requirement as prescribed. [19 TAC §241.20; 19 TAC §241.20(4); 19 TAC §241.60; 19 TAC §241.60(4)]
- It was noted that five out of ten (50%) of the principal/PIL candidates completed the program prior to admission. TEA reviewed transcripts to make that determination. [19 TAC §241.20(5); 19 TAC §241.60(5)]

### **Compliance Issues to be Addressed (see Compliance Plan)**

- None.

### **Recommendations**

- NAU is advised that the certificate effective date cannot be before the last requirement is complete (last day of internship, date degree is conferred, etc.)
- NAU is advised to count only service that is as a classroom teacher.

Based on the evidence presented, North American University was in compliance with 19 TAC §228 and §230 – Certification Procedures.

## **COMPONENT IX: INTEGRITY OF DATA REPORTED - 19 Texas Administrative Code Chapter 229**

### **Findings**

- North American University has submitted ASEP reports within the timeline required by TEA. Corrections had to be made by the program and they were done within the timeline required by TEA for the 2019-2020 academic year. [19 TAC §229.3(f)(1) and Associated Graphic]



- Ten out of 11 teacher observations were correctly reported in ASEP. One out of 11 teacher observations were not reported in ASEP (1%) [19 TAC §229.3(f)(1)]
- Six out of ten (60%) of the teacher candidate enrollment was accurately reported in ASEP. Four out of ten (40%) of teacher candidate enrollment was not reported accurately in ASEP. [19 TAC §229.3(f)(1)]
- Three out of five (60%) of undergraduate candidates were correctly reported as undergraduate candidates. Two out of five undergraduate teacher candidates (40%) were incorrectly reported as ACP candidates. [19 TAC §229.3(f)(1)]
- Seven out of ten (70%) non-teacher principal files contained an admission date in the records that corresponded to the admission date reported. Three out of ten (30%) non-teacher principal files contained an admission date in records that did not correspond to the admission dates reported. [19 TAC §229.3(f)(1)]
- Half (50%) of the non-teacher principal candidates contained an enrollment status that was correctly reported. Five out of ten (50%) non-teacher principal candidates contained an enrollment status that was not accurately reported. [19 TAC §229.3(f)(1)]

#### **Compliance Issues to be Addressed (see Compliance Plan)**

- 19 TAC §229.3; 19 TAC §229.3(f)(1) and [Graphic](#) NAU did not report all data accurately in ASEP.  
Action: Require NAU to report all data accurately.

#### **Recommendations**

- Report all data as it is received rather than wait until the end of the year to ensure that it is being reported accurately.

Based on the evidence presented, the North American University was not in compliance with 19 Texas Administrative Code Chapter 229 – Integrity of Data Reported.

#### **RECOMMENDATIONS AND ADVISEMENT**

- For Teacher preparation programs, the Pre-Admission Content Test (PACT) changed effective January 27, 2020. Ensure curriculum in all teacher certificate areas has been updated to meet requirements for content pedagogy instruction and test preparation. Passing scores on TExES exams cannot be used to meet EPP admission requirements after 1/27/2020 but may be used for certification purposes until the expiration date of the related certificate. The new PACT, or “TX PACT”, is a content-pure assessment that cannot be used for certification purposes.
- Develop a plan to update EPP benchmarks and test readiness requirements for Teacher programs to address changes in PACT, if necessary.
- Application A has changed – plan to review requirements to prepare for adding new certificate areas.
- Develop and implement more performance assessments in all programs. Evidence of performance assessments is a requirement for adding new certificates using the new Application A.



- Review all certificate areas that the EPP no longer plans to support and request, in writing, for TEA to remove them from inventory.
- The addition of the Science of Teaching Reading exam (STR) will impact the issuance of the Core Subjects EC-6, Core Subjects 4-8, ELAR 4-8, and ELAR/Social Studies 4-8 certificates effective January 1, 2021. Teacher program staff are advised to plan by updating curriculum and processes to meet the January 1, 2021 certificate issuance requirement. The EPP website advisement reflects candidates must apply and “be recommended” for a certificate before December 31, 2020, to qualify for a certificate without STR. The website should be updated to reflect “the certificate must issue” by December 31, 2020, to achieve certification without the STR.
- Intern and Probationary certificate deactivation timelines and requirements changes are in effect. Changes include new timelines for requesting deactivations and information that must be provided to stakeholders in advance of internship start dates. Field supervisors will need to verify candidate placement information at the beginning of the assignment. Reference [19 TAC §228.35\(e\)\(2\)\(B\)\(vii\)\(I-II\)](#) for specific information.

#### **PROGRAM RECOMMENDATIONS All EPPS**

- To ensure continuity in record keeping and other related processes, consider creating a procedure manual documenting EPP processes.
- Align the verbiage of the program to the verbiage of Texas Administrative Code (TAC) (ex. Field supervisor, cooperating teacher, mentor, 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 training and webinars provided by the Division of Educator Preparation to ensure that the program staff is knowledgeable about current requirements and changes in the Texas Administrative Code;
- Continue to maintain communication with the program specialist assigned to the program.
- Ensure that the TEA staff has the most current contact information by sending updates to the assigned program specialist.



**SUMMARY**

A Compliance Plan was created collaboratively with the North American University staff.

**“I have reviewed the EPP Report and agree that all required corrections will be made on or before February 26, 2021.”**

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**Signature of Legal Authority**

**Date**

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**Printed Name of Legal Authority**

**Date**