

# Desk Audit Compliance Audit Report 2015-2016 Texas A&M University – Commerce Principal Certification Program

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. William Holt

**County/District Number:** 116-501

**SBEC Approval Date:** November 10, 1969

Texas Education Agency Education Preparation Program Specialist, Vanessa Alba, conducted a compliance desk audit of Texas A&M University – Commerce Educator Preparation Program (EPP), located at Young Education North, Rm. 106, P.O. Box 3011, Commerce, TX 75428 in November, 2015, as required by Texas Administrative Code (TAC) §228.10(c) and TAC §229.6(a) which states that educator preparation programs "shall be reviewed at least once every five years". The focus of the audit was the Post Baccalaureate Principal Program and the principal curriculum. The program's accreditation status is "Accredited".

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

The scope of this audit is restricted solely to verifying compliance with Texas Administrative Code (TAC) §227, §228, §229, §241 and §230.

### **Data Analysis:**

Information concerning compliance with TAC governing educator preparation programs was collected by various qualitative means. A self-report was submitted to TEA on November 3, 2015. A TEA review of documents, student records, course material, and curriculum correlations charts provided evidence regarding compliance. In addition, TEA sent electronic questionnaires to Texas A&M University - Commerce EPP stakeholders. A total of 183 out of 987 (19%) responded to the questionnaires as follows: 8 out of 16 (50%) advisory committee members; 68 out of 492 principal candidates (14%); 105 out of 465 (23%) site supervisors; and 2 out of 14 (14%) field supervisors. Qualitative methods of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. Evidence of compliance was measured using a rubric aligned to Texas Administrative Code.

## **Findings, Compliance Issues, and Recommendations:**

“Findings” indicate evidence that was collected during the compliance audit process. If the program is “NOT in compliance” with any identified component, the program should consult the Texas Administrative Code correct the issue IMMEDIATELY. An “action plan” may be drafted on at the close of the desk audit that identified compliance issues to be addressed. A timeline for completion will be agreed upon between TEA and the program. Program” recommendations” are suggestions for general program improvement and no follow up is required.

### **Ongoing Communication and Action Plan:**

A communication between TEA program specialist and the Texas A&M University - Commerce EPP Interim Department Head, Dr. William Holt, Dr. Linda Mott, Director, Center for Educator Certification and Academic Services, and Dr. Julia Ballenger occurred via phone conference on January 4, 2016 to discuss findings and request additional information. Additional documents were submitted by Dr. Mott and reviewed by TEA. The audit was closed on January 14, 2016.

The action plan was discussed in a phone conference with Dr. William Holt, Dr. Linda Holt and Dr. Melissa Arrambide, Principal Program Director, and agreed upon on January 14, 2016. The action plan was developed to guide implementation of compliance issues.

The following are the findings of the desk audit.

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

### **FINDINGS:**

1. Dr. William Holt, Interim Department Head, College of Education, Dr. Linda Mott, and Dr. Melissa Arrambide, Principal Program Director, provided support, participated in all aspects of the desk audit, are accountable for the quality of the educator preparation program and the candidates whom the program recommends for certification [TAC §228.20(c) and TAC §228.2(8)];
2. The principal advisory committee currently consists of 16 members representing four groups (4 members represent public/private schools, 9 members represents higher education, 2 members represent an ESC, and 1 member represents business/community). A list of advisory committee members with representation identified was provided as evidence. Texas A&M University - Commerce EPP meets TAC §228.20(b) minimum requirements for advisory committee composition;
3. The minutes, agendas and original sign-in sheets verify one advisory committee meeting was held. It was noted that no meetings were held prior to July 21, 2015. Meeting dates were verified as follows:
  - July 21, 2015 (10 members were present).

The principal program did not meet the two minimum requirement for advisory committee meetings per academic year (September 1-August 31) as prescribed [TAC §228.20(b)].

4. Agendas, minutes, and attendee records did not indicate that the members assisted in the design, delivery, evaluation, and major policy decisions of the EPP. The evidence was limited to minutes and agenda topics for one advisory committee meeting. The program did not meet the minimum requirements of TAC §228.20(b) and TAC §228.1(a); and
5. There was limited evidence that advisory committee members understand their roles and responsibilities. A letter of invitation was provided for review with roles and responsibilities outlined. However, it could not be determined if that letter was sent to principal advisory committee members. Texas A&M University - Commerce EPP did not meet minimum requirements of yearly advisory committee training per TAC §228.20(b).

**Compliance Issues to be addressed:**

- Reflect in detailed advisory committee minutes how the principal advisory committee members assisted in the design, delivery, evaluation, and major policy decisions of the principal program [TAC §228.20(b); TAC §228.1(a)];
- Provide training annually to the principal advisory committee members on their roles and responsibilities. Have committee members sign verification of the training. Retain for audit purposes [TAC §228.20(b)]; and
- Schedule and conduct principal advisory committee meetings twice during each academic year (September 1-August 31). Retain agendas, attendance records, and minutes for audit purposes [TAC §228.20(b); TAC §228.2(1)].

**Recommendations:**

- Utilize an advisory committee meeting template to ensure that all required business is conducted at the required meetings yearly;
- Utilize the TEA Advisory Committee Training PPT to train members in their roles and responsibilities. This can be emailed to members with a delivery/read receipt to serve as documentation that members have been trained annually or document face-to-face training with attendance records and original signatures. Maintain email verification as evidence that training has occurred;
- Consider conducting the meetings via SKYPE or other electronic communication; and
- Provide an incentive to the members of the principal advisory committee for their involvement and assistance with the Texas A&M University - Commerce University Educator Preparation Program (EPP) by providing Continuing Professional Education (CPE) credit to members who need CPE hours for the renewal of their Texas certificates.

**Based on the evidence presented, Texas A&M University - Commerce Principal Preparation Program (EPP) is not in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.**

**COMPONENT II: Texas Education Code (TEC) §21.044(e) and ADMISSION CRITERIA - Texas Administrative Code (TAC) §227.10 and §241.5**

**FINDINGS:**

1. Consistent and accurate information is provided to all applicants and enrolled candidates on the effect of supply and demand forces on the educator workforce in this state. Texas A&M University - Commerce was advised about providing this information on the website. The program was advised of the requirements as prescribed [Texas Education Code (TEC) §21.044(e)];
2. Texas A&M University – Commerce’s principal program admission requirements as identified on the website and self-report require the applicant to:
  - A. Be enrolled in an principal educator preparation program from an institution of higher education that is accredited by a regional accrediting agency, as recognized by the Texas Higher Education Coordinating Board (THECB) [TAC §227.10(a)(2) and TAC §230.11)];
  - B. Hold a minimum of a Baccalaureate Degree from an accredited institution of higher education [TAC §241.5(a); TAC §227.10(a)(2)];
  - C. Have a minimum 2.5 GPA or at least a 2.5 in the last 60 semester credit hours [TAC §227.10(a)(3)(A)] or meet the exception to the minimum GPA [TAC §227.10(a)(3)(B)];
  - D. Submit an application [TAC §227.10(a)(6)];
  - E. Complete an interview [TAC §227.10(a)(6)] and TAC 241.5(c)];
  - F. Submit one letter of recommendation [TAC §241.5(c)];
  - G. Hold a valid teaching certificate [TAC §241.20(3)]; and
  - H. Provide a copy of the educator’s service record.
3. The program was advised on future implementation admission requirements as follows:
  - A. For an applicant to be formally admitted to an educator preparation program (EPP), the applicant must meet all of the admission requirements specified in 227.10 of this title (relating to Admission Criteria) [TAC §227.17(a)];
  - B. For an applicant to be formally admitted to an EPP, the EPP must notify the applicant of the offer of admission in writing by mail, personal delivery, facsimile, email, or an electronic notification. The offer of admission must include the effective date of admission [TAC 227.17(b)];
  - C. For an applicant to be considered admitted to the EPP, the applicant must accept the offer of admission in writing by mail, personal delivery, facsimile, email, or an electronic notification. The acceptance admission must include the effective date of admission [TAC 227.17(c)]; and

D. An EPP shall not provide examination approval, training, or coursework that leads to certification to applicants prior to formal admission into an EPP [TAC 227.17(d)];

E. Incoming Class Grade Point Average as follows [TAC 227.19(a)]:

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

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

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

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

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

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

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

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

4. Twenty (20) candidate records were provided to verify that admission requirements are followed:

5. Transcripts for 20 files were provided for review to verify that all were enrolled as post-baccalaureate students at Texas A&M University – Commerce in the College of Education. Of those 20 files selected for review, one applicant was for a superintendent and two were educational diagnosticians [TAC §227.10(a)(1), TAC §230.11; TAC §241.5; TAC §242.5; TAC §239.81];

6. Transcripts for 14/20 (70%) candidates were provided to verify a GPA range of 2.13-3.67 at the time of admission. Of the 20 files reviewed, there were four candidates admitted who had less than a 2.5 GPA and two files had no GPA documented [TAC §227.10(a)(3)(A) and TAC §227.10(a)(3)(B)];

7. The program was advised about the exception to the minimum GPA requirement will be granted by the program director only in extraordinary circumstances and may not be

used by a program to admit more than 10% of any cohort of candidates. There were four files reviewed that had a GPA of less than 2.5 and no documentation to equate work or career experience equal to the 2.5 GPA. The program did not meet the requirement as prescribed [TAC §227.10(a)(3)(B)];

8. Twenty files (100%) contained a completed signed and dated application. The program met the application requirement [TAC §227.10(a)(6)];
9. No evidence was presented that verified that any applicant (20 files reviewed) participated in an interview evaluated with a rubric with a cut score for admission. The program did not meet the interview requirement [TAC §227.10(a)(6)];
10. One letter of recommendation was found in each of the 20 files reviewed. The program met the requirement as prescribed [TAC §227.10(a)(6)]; TAC 241.15(b)];
11. Admissions requirements are published on the Texas A&M University – Commerce website [TAC §227.10(a)(7)]; and
12. The program could not verify that it maintained candidate records showing eligibility for admission to the program and evidence of completion of all program requirements for a period of five years. The program keeps paper files, but did not produce all records for files reviewed. The program did not meet the requirement as prescribed [TAC §228.40(d)].

**Compliance Issues to be addressed:**

- All principal applicants must meet all program admission requirements: A structured interview based on a rubric with cut score [TAC §227.10(a)(6); TAC §241.5(b); TAC §241.5(c); TAC §242.5(b); TAC §239.81; TAC 227.10(a)(8)]; and
- Maintain admission documents for each candidate to verify eligibility for admission to the program and evidence of completion of all program requirements for a period of five years [TAC §228.40(d)].

**Recommendations:**

- Strongly consider requiring more than one interviewer in each interview to ensure that bias is eliminated in the interview process. It is recommended that three people participate in the interview in case there is a question as to whether applicant meets admission requirements, the third person can serve as tie-breaker.

**Based on the evidence presented, Texas A&M University – Commerce EPP is not in compliance with TAC §227.10 and TAC §241.5 - Admission Criteria.**

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

## **FINDINGS:**

1. The program was advised about new requirements in Texas Education Code (TEC) §21.044(e) regarding the following:
  - Consistent and accurate information provided to all educator candidates on the high expectations in the state;
  - Consistent and accurate information provided to all enrolled educator candidates on the responsibilities that educators are required to accept;
  - Consistent and accurate information provided to all applicants and enrolled candidates on the skills that educators are required to possess;
  - Consistent and accurate information provided to all enrolled candidates concerning the framework in this state for teacher and principal evaluation, including the procedures followed in accordance with Subchapter H; and
  - Consistent and accurate information provided to all enrolled candidates on the importance of building strong classroom management skills.
2. The Principal Standards alignment chart, syllabi and course outlines were provided as evidence that the educator standards adopted by the State Board for Educator Certification (SBEC) are the curricular basis for the principal program [TAC §228.30(a); TAC §241.10; and TAC §241.15];
3. The degree plan noting coursework required and syllabi presented for review for the courses required for principal certification served as evidence that the curriculum for each educator preparation program shall rely on scientifically based research. Coursework and training was sustained, rigorous, interactive, student-focused, and performance-based. Specifically, the syllabi and course notes reflected that there was ongoing interaction with instructors, direct instruction, and multiple opportunities to practice the skills required to be an effective principal [TAC §228.30 (a)];

The following courses are required of all candidates seeking principal certification:

- EdAd 615 – Leading Effective Schools
  - EdAd 595 – Using Research for Best Practice
  - EdAd 626 – Using the Law in Educational Practice
  - EdAd 656 - Building Capacity for Effective Learning
  - EdAd 619 – Designing Curriculum for Effective Instruction
  - EdAd 607 – Using Evaluation and Data to Improve Learning
  - EdAd 508 – Facilitating Learning for Diverse Students
  - EdAd 561 – Multicultural Education
  - EdAd 554 Leading the Learning Community, and
  - EdAd 610 – Leading the Learning Community Practicum (semester long)
4. Syllabi detailing the assessments used in each course were provided for each course offered. Specific evidence, in the form of EdAd 615 Leading Effective Schools and EdAd 607 Using Evaluation and Data to Improve Instruction, the two selected for review by TEA, documented that each candidate had met the requirement of structured

assessments of each candidate's progress throughout the EPP as prescribed. The program met the requirement as prescribed [TAC §228.40(a)];

5. It was noted in the self report that the courses are offered in an online format with more than 51% of coursework online. The program developed their own courses and the standards used for the development and delivery of the online courses was the "Quality Matters Rubric Standards, 5th Edition 2014", with assigned point values.
6. Instructors use a variety of teaching and delivery strategies to promote on-going and frequent teacher-student interactions. The instructors use discussion boards to get students to interact with the teacher and with other students in the courses. Students enter their response to a prompt and respond to at least two other peers. Students are provided immediate feedback to assignments and exams. In addition, the instructors provide personalized interaction with students. This interaction is done through "Chat" and "Classlive".
7. Students are given the opportunity to read and critique each other's work. The program also provides group assignments. Students work together on problem-based projects. They create "onlive" presentations and YouTube videos in response to the projects. The program also has students work together in study groups to complete projects. These students are able to review, discuss, and collaborate with each other in the study group.
8. Curriculum alignment with principal standards and competencies has been completed in all of the program's Redevelopment Course Section. Course leads for each of the principal preparation courses are assigned this task to complete. After the program staff revised course syllabi, curriculum and content, it is shared with all adjuncts who teach these courses. Curriculum alignment and course revisions are an ongoing process.

Principal candidates and field supervisors reported the following regarding instruction, observing and providing written feedback in their respective questionnaires:

Instruction Provided in the Following Areas:	Candidates Yes/No/Don't Know	Faculty/Field Supervisors Yes/No/Don't Know
<b>Learner-Centered Values and Ethics of Leadership</b>		
modeling and promoting the highest standard of conduct, ethical principles, and integrity in decision making, actions and behaviors	96% / 3% / 1%	100% / 0% / 0%
implementing policies and procedures that encourage all campus	93% / 0% / 7%	0% / 0% / 0%



personnel to comply with Chapter 247 of this title (relating to Educators' Code of Ethics)		
modeling and promoting the continuous and appropriate development of all learners in the campus community	96% / 3% / 1%	100% / 0% / 0%
promoting awareness of learning differences, multicultural awareness, gender sensitivity, and ethnic appreciation in the campus community	99% / 1% / 0%	0% / 0% / 0%
articulating the importance of education in a free democratic society	94% / 4% / 1%	0% / 0% / 0%
<b>Learner-Centered Leadership and Campus Culture</b>		
creating a campus culture that sets high expectations, promotes learning, and provides intellectual stimulation for self, students, and staff	96% / 3% / 1%	100% / 0% / 0%
ensuring that parents and other members of the community are an integral part of the campus culture	100% / 0% / 0%	0% / 0% / 0%
using strategies to ensure the development of collegial relationships and effective collaboration of campus	96% / 3% / 1%	0% / 0% / 0%

staff		
responding appropriately to the diverse needs of individuals within the community in shaping the campus culture	99% / 1% / 0%	0% / 0% / 0%
using emerging issues, trends, demographic data, knowledge of systems, campus climate inventories, student learning data, and other information to develop a campus vision and plan to implement the vision	99% / 1% / 0%	0% / 0% / 0%
facilitating the collaborative development of a shared campus vision that focuses on teaching and learning	100% / 0% / 0%	0% / 0% / 0%
facilitating the collaborative development of a plan in which objectives and strategies to implement the campus vision are clearly articulated	100% / 0% / 0%	0% / 0% / 0%
aligning financial, human, and material resources to support the implementation of the campus vision	97% / 0% / 3%	0% / 0% / 0%
establishing processes to assess and modify the plan of implementation to ensure achievement of the campus vision	100% / 0% / 0%	0% / 0% / 0%
supporting innovative thinking and risk-taking efforts of everyone	97% / 1% / 1%	0% / 0% / 0%

within the school community and view unsuccessful experiences as learning opportunities		
acknowledging, recognizing, and celebrating the contributions of students, staff, parents, and community members toward the realization of the campus vision	100% / 0% / 0%	0% / 0% / 0%
<b>Learner-Centered Human Resources Leadership and Management</b>		
collaboratively developing, implementing, and revising a comprehensive and on-going plan for professional development of campus staff that addresses staff needs and aligns professional development with identified goals	96% / 3% / 1%	0% / 0% / 0%
facilitating the application of adult learning and motivation theory to all campus professional development, including the use of appropriate content, processes, and contexts	96% / 3% / 1%	0% / 0% / 0%
ensuring the effective implementation of the professional development plan by allocation of appropriate time,	93% / 6% / 1%	0% / 0% / 0%

funding, and other needed resources		
implementing effective, legal, and appropriate strategies for the recruitment, selection, assignment, and induction of campus staff	97% / 1% / 1%	0% / 0% / 0%
using formative and summative evaluation processes appropriate to the position held to further develop the knowledge and skills of campus staff	97% / 3% / 0%	100% / 0% / 0%
diagnosing and improving campus organizational health and morale through the implementation of strategies designed to provide on-going support to campus staff members	94% / 4% / 1%	0% / 0% / 0%
engaging in on-going, meaningful, and professional growth activities to further develop necessary knowledge and skills and to model lifelong learning	96% / 4% / 0%	0% / 0% / 0%
<b>Learner-Centered Communications and Community Relations</b>		
demonstrating effective communication through oral, written, auditory, and nonverbal expression	93% / 4% / 3%	0% / 0% / 0%
using effective conflict management and group consensus	91% / 7% / 1%	0% / 0% / 0%

building skills		
implementing effective strategies to systematically gather input from all campus stakeholders	99% / 0% / 1%	100% / 0% / 0%
developing and implementing strategies for effective internal and external communications	93% / 3% / 4%	0% / 0% / 0%
developing and implementing a comprehensive program of community relations which uses strategies that will involve and inform multiple constituencies, including the media	96% / 3% / 1%	0% / 0% / 0%
providing varied and meaningful opportunities for parents to be engaged in the education of their children	97% / 1% / 1%	0% / 0% / 0%
establishing partnerships with parents, business, and other groups in the community to strengthen programs and support campus goals	96% / 3% / 1%	0% / 0% / 0%
responding to pertinent political, social, and economic issues that exist in the internal and external environment	97% / 3% / 0%	0% / 0% / 0%
<b>Learner-Centered Organizational Leadership and Management</b>		

implementing appropriate management techniques and group processes to define roles, assign functions, delegate authority, and determine accountability for campus goal attainment	93% / 4% / 3%	0% / 0% / 0%
gathering and organizing information from a variety of sources for use in creative and effective campus decision making	99% / 1% / 0%	0% / 0% / 0%
framing, analyzing, and creatively resolving campus problems using effective problem-solving techniques to make timely, high-quality decisions	99% / 1% / 0%	100% / 0% / 0%
developing, implementing, and evaluating change processes for organizational effectiveness	99% / 1% / 0%	0% / 0% / 0%
implementing strategies that enable the physical plant, equipment, and support systems to operate safely, efficiently, and effectively to maintain a conducive learning environment	98% / 3% / 0%	0% / 0% / 0%
applying local, state, and federal laws and policies to support sound decisions while considering implications related to	99% / 1% / 0%	0% / 0% / 0%

all school operations and programs		
acquiring, allocating, and managing human, material, and financial resources according to school district policies and campus priorities	94% / 6% / 0%	0% / 0% / 0%
collaboratively planning and effectively managing the campus budget	97% / 3% / 0%	0% / 0% / 0%
using technology to enhance school management	91% / 6% / 3%	0% / 0% / 0%
using effective planning, time management, and organization of work to maximize attainment of school district and campus goals	100% / 0% / 0%	0% / 0% / 0%
<b>Learner-Centered Curriculum Planning and Development</b>		
using emerging issues, occupational and economic trends, demographic data, student learning data, motivation theory, learning theory, legal requirements, and other information as a basis for campus curriculum planning	94% / 3% / 3%	100% / 0%
facilitating the use of sound research-based practice in the development and implementation of campus curricular, co-curricular, and extra-curricular programs	98% / 0% / 2%	0% / 0% / 0%

facilitating campus participation in collaborative school district planning, implementation, monitoring, and curriculum revision to ensure appropriate scope, sequence, content, and alignment	95% / 3% / 2%	0% / 0% / 0%
facilitating the use and integration of technology, telecommunications, and information systems to enrich the campus curriculum	95% / 5% / 0%	0% / 0% / 0%
facilitating the effective coordination of campus curricular, co-curricular, and extracurricular programs in relation to other school district programs	97% / 3% / 0%	0% / 0% / 0%
<b>Learner-Centered Instructional Leadership and Management</b>		
facilitating the development of a campus learning organization that supports instructional improvement and change through an on-going study of relevant research and best practice	97% / 2% / 2%	100% / 0% / 0%
facilitating the implementation of sound, research-based instructional strategies, decisions, and	97% / 2% / 2%	0% / 0% / 0%



programs in which multiple opportunities to learn and be successful are available to all students		
implementing special campus programs to ensure that all students are provided quality, flexible instructional programs and services to meet individual student needs (i.e., guidance and counseling programs and services);	94% / 6% / 0%	0% / 0% / 0%
using interpretation of formative and summative data from a comprehensive student assessment program to develop, support, and improve campus instructional strategies and goals	100% / 0% / 0%	0% / 0% / 0%
facilitating the use and integration of technology, telecommunications, and information systems to enhance learning	94% / 6% / 0%	0% / 0% / 0%
facilitating the implementation of sound, research-based theories and techniques of classroom management, student discipline, and school safety to ensure an environment conducive to teaching and learning	95% / 3% / 2%	0% / 0% / 0%
facilitating the development,	100% / 0% / 0%	0% / 0% / 0%

implementation, evaluation, and refinement of student activity programs to fulfill academic, developmental, social, and cultural needs		
acquiring and allocating sufficient instructional resources on the campus in the most equitable manner to support and enhance student learning	97% / 3% / 0%	0% / 0% / 0%

**Compliance Issues to be addressed:**

- None

**Recommendations:**

- None

**Based on evidence presented, Texas A&M University - Commerce Principal Preparation Program (EPP) is in compliance with Texas Administrative Code Section §228.30.**

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

**FINDINGS:**

1. Texas A&M University - Commerce coursework and training ensure the educator is effective in the professional assignment. The program curriculum review, degree plan for each candidate file reviewed and the course/module schedule revealed that the program has a total of 450 clock-hours in the Post-Bac program [TAC §228.35(b) and TAC §228.2(5)]. The program requires that candidates complete a 160 clock hour practicum [TAC §228.35(d)(3)]. The total program hours, program hours prior to principal practicum and principal practicum hours provided in the document review were verified in the degree plan and program hours chart;
2. All coursework and training shall be completed prior to educator preparation program completion and issuance of standard certification. Candidate files contained program benchmarks, degree plans, transcripts and a program schedule of coursework.

However, based on conversations with the principal program staff during the review of audit materials, it was determined that the program did not understand the professional class certification requirements. While it appeared that each candidate met the requirements, they did not actually meet the requirements because standard principal certificates were issued prior to completion of the internship requirements. The program did not meet the requirement as prescribed [TAC §241.20(5); TAC §228.2(18)];

3. While the Texas A&M University-Commerce Self Report reflected that a 160 clock-hour practicum is required, the program did not provide sufficient evidence to document that practicum was actually 160 clock-hours. The practicum is completed in the last semester of coursework during EdAd 610. The candidate files reviewed [6 out of 20 (30%)] documented hours ranging from 62-171 clock hours. It was also noted that one of those files included eight hours of lunch/volleyball game duty. A talking point with the program staff included whether or not the EPP knew if the candidate in a practicum or internship was actually practicing the standards required for certification. The program submitted inconsistent evidence or no evidence at all for the files reviewed. Only four out of the 20 files (20%) reviewed contained evidence that a field supervisor was actually assigned to each professional candidate during the practicum experience. The program did not meet the requirement as prescribed [TAC §228.35(d)(2)(B); TAC §228.2(17)];
4. There was inconsistent documentation provided that each candidate in a probationary assignment actually held a probationary certificate and was classified as an "administrator" as reported on the campus Public Education Information Management System (PEIMS) data. There were two out of 20 (10%) candidates that held a probationary certificate and another two out of 20 (10%) that should have been on a probationary, but were not. It appeared that the program did not understand the requirements of professional candidates on probationary certificates. The program did not meet the requirement as prescribed [TAC 228.35(d)(2)(B)];
5. The program did not provide sufficient documentation that each candidate had an appropriate site supervisor. It was documented that 11 out of 20 (55%) of candidates had a site supervisor assigned. The program did not meet the requirements of site supervision as prescribed [TAC §228.2(19)];
6. Insufficient evidence was available that Texas A&M University – Commerce principal preparation program provided site supervisor training. A site supervisor observation document was provided, but there was no specific training to know if that document was used for training purposes. The program did not meet the requirement as prescribed [TAC §228.35(e)];
7. The program verified that there are four field-supervisors at Texas A&M University - Commerce. All hold an appropriate in-state principal and teacher certification. Each of the field supervisors has 5+ years of teaching experience.
8. There was no list of field supervisor matched to principal candidate provided so it could not be verified that a field supervisor was assigned to each candidate. It was noted that four out of 20 (20%) of candidates appeared to have been assigned an appropriate field supervisor [TAC §228.35(g); TAC §228.2(10); TAC 230.37(c)(2)];
9. The Texas A&M University – Commerce principal program field supervisors did not receive yearly training. It was noted in the Self Report that field supervisors had Advancing Educational Leadership Certificate and SAS Council on Accreditation and

School Improvement Training, but it could not be determined when that training occurred or who participated in that training. The program did not meet the field-supervisor training requirement as prescribed [TAC §228.35(g)];

10. Texas A&M University - Commerce principal program did not provide evidence that field supervisors made initial contact with each candidate within the first three weeks of assignment. Of the 20 files reviewed, a first contact could not be determined for any candidate. The program did not meet the requirements of initial contact by the field-supervisor as prescribed [TAC §228.35(f)];
11. Texas A&M University – Commerce principal program did not provide consistent evidence that field supervisors conducted observations for a total of 135 minutes. Where documents were available for review, it appeared that the site supervisor, and not the field supervisor, conducted the observations. The program did not meet the requirements of field-supervision as prescribed [TAC §228.35(g)(1)];
12. The first observation which must occur within the first 6 weeks of the practicum assignment could not be verified. The program provided inconsistent or no evidence for the candidates reviewed, but it appeared that the site supervisor, and not the field supervisor, conducted those observations [TAC §228.35(g)(2)];
13. It could not be verified that a minimum of three observations by the field supervisor were completed during the term of the practicum. The program did not meet the requirements as prescribed [TAC §228.35(g)(3)];
14. Because of the lack of appropriate observations, it could not be verified that the field supervisor documented professional practices observed, provided written feedback through an interactive conference with the candidate. The program did not meet the requirement as prescribed [TAC §228.35(g)];
15. It could not be verified that the field supervisor provided a copy of the written feedback to the candidate's site supervisor as required. The program provided inconsistent or no documentation for the candidates reviewed. It was noted in the Self Report that artifacts demonstrating the five principal evaluation standards, nine competencies, and seven curriculum standards were submitted along with a multi-copy observation instrument with site supervisor distribution noted. However, the document was inconsistently utilized. The program did not meet the requirement as prescribed [TAC §228.35(g)]; and
16. There was inconsistent or no documentation provided to verify that additional observations and coaching were provided. The program did not meet the requirements of informal observations and coaching as prescribed [TAC §228.35(g)].

**Compliance Issues to be addressed:**

- Require each principal candidate to maintain a practicum log that reflects completion of activities in each principal standard during the minimum of 160 clock-hour practicum. Retain in candidate records for audit purposes [TAC §228.35(d)(3) and TAC §228.2(17)];
- Document by dated attendance records with original signatures that the program provided yearly site supervisor training. Retain attendance records for audit purposes [TAC §228.35(e)];

- Document by dated attendance records with original signatures that the program provided yearly field supervisor training. Retain attendance records for audit purposes. [TAC §228.35(g)];
- If any principal candidates wish to complete an internship of 180 days under contract to a school district, recommend the candidates for a probationary certificate [TAC §228.35(d)(3) and TAC §228.2(17)];
- Require each field supervisor to maintain a field supervisor log that reflects by date, and method of first contact with each candidate reflecting contact within the first 3 weeks of assignment in the principal practicum. This can be done by telephone, email, or other electronic communication. Retain documentation of first contact for audit purposes [TAC §228.35(g)];
- Revise the observation form to reflect the start date of the practicum, whether the contact is the first contact, first, second, or third observatoin, time the observation starts, time it ends, principal standard being observed, comments about practices observed, start and stop time of interactive conference and signatures of principal candidate, field supervisor, and site supervisor [TAC §228.35(g)(1); TAC §228.35(g)(2); TAC §228.35(g)(3); and
- Require each field supervisor to conduct a minimum of three observations totaling at least 135 minutes in duration by using an observation form reflecting the start and stop time of the observations. The first observation must be conducted within the first 6 weeks of practicum assignment. Retain observation forms in the candidate's records for audit purposes [TAC §228.35(g)(1); TAC §228.35(g)(2); TAC §228.35(g)(3); and
- Require each field supervisor to document on the observation form professional practices observed during the observation. The field supervisor should document by a conference start and stop time on the observation form an interactive conference. The field supervisor and the candidate must sign to acknowledge the observation and the interactive conference. The field supervisor must provide a copy of the written feedback to the candidate's site supervisor. The delivery can be the signed observation form by the site supervisor or the designee of the site supervisor. The signed observation form should be retained in the candidate's folder for audit purposes [TAC §228.35(g)]; and
- Require the field supervisor to record in the field supervisor log any informal observations and coaching as appropriate [TAC §228.35(g)].

**Recommendations:**

- Consider providing Site Supervisor Training materials via email with read receipt to ensure that each site supervisor has received, read and understands the requirements;
- Consider providing Field Supervisor Training materials via email with read receipt to ensure that each field supervisor has received, read and understands the requirements; and
- Consider offering CPE credit to site supervisors and field supervisors who may need hours for standard certification renewal.

**Based on evidence presented, Texas A&M University - Commerce Principal Preparation Program (EPP) is not in compliance with Texas Administrative Code Section §228.35 – Program Delivery and On-Going Support.**

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

### **FINDINGS:**

1. Texas A&M University - Commerce EPP has established benchmarks to ensure that candidates are prepared to receive standard certification. Documentation included the candidate record showing progression through the program by verifying benchmarks. It was also noted that practice exams are administered through the Texas A&M University – Commerce Testing Office. Critical Assignments in each course per sub-term, mid-term and final exams in courses, and a Principal Program Boot Camp is provided twice each semester, and Comprehensive Exam results were provided as evidence of compliance. Additionally benchmarks for each candidate reviewed were provided. The program met the requirement as prescribed [TAC §228.40(a)];
2. The program provided evidence to determine the readiness of each candidate to take the appropriate certification assessment. It was noted that the requirement was explained in the Principal Candidate Handbook detailing the criteria for testing. Paperwork with the date of principal exam test approval was provided as evidence of compliance for each candidate reviewed. The program met the requirement as prescribed [TAC §228.40(b)]; and
3. The program did not provide sufficient evidence that it continuously evaluates the design and delivery of the principal preparation curriculum based on performance data, scientifically-based research practices, and the results of internal and external assessments. The only document provided was the Principal Program Institutional Effectiveness Results Report and Program Plan. There was no evidence that the advisory committee reviewed any evaluative information [TAC §228.40(c)].

### **Compliance issues to be addressed:**

- Annually create an evaluative report presented to the advisory committee on the design and delivery of the educator preparation curriculum based on internal (surveys from site supervisors, course surveys from candidates) and external data including performance data such as test results, ASEP reports, and scientifically-based research practices. [TAC §228.40(c)].

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

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

### Findings:

1. TAC §228.50(a) states that during the period of preparation, the educator preparation entity shall ensure that the individuals preparing candidates and the candidates themselves demonstrate adherence to Chapter 247 of this title (relating to Educators' Code of Ethics);
2. Texas A&M University - Commerce EPP provided documentation indicating that 23 faculty members submitted a signed document noting that they had read and understood and will abide by the Code of Ethics; and
3. Texas A&M University - Commerce EPP did not provide documentation that candidates reviewed or acknowledged reading and understanding the Code of Ethics. Specifically, 16 out of 20 (80%) files reviewed did not contain evidence of compliance. The program did not meet the requirement as prescribed [TAC §228.50(a); TAC §247.2].

### Compliance issues to be addressed:

- Require all candidates to demonstrate adherence to Chapter 247 of this title relating to the Educators' Code of Ethics by signing an acknowledgement that the candidate has read, understood, and will abide by the Code of Ethics. Retain in the candidates folder for audit purposes [TAC §228.50; TAC §247.2].

### Recommendations:

- Consider utilizing the TEA Ethics videos for staff/candidates.

**Based on evidence presented, Texas A&M University - Commerce Educator Preparation Program (EPP) is not in compliance with Texas Administrative Code §228.50(a) regarding Professional Conduct.**

## COMPONENT VII: Complaints and Investigations Procedures (TAC) §228.70

1. The EPP shall adopt and send to TEA staff, for inclusion in the EPP's records, a complaint procedure that requires the EPP to timely attempt to resolve complaints at the EPP level before a complaint is filed with TEA staff. Texas A&M University - Commerce has a complaint policy on file with TEA. The policy is posted on the program's website. The program meets the requirements as prescribed [TAC 228.70(b)(1)];
2. The EPP shall post 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. The program was advised of the requirement. Because the program is 100% online, candidates are referred to the EPP website for complaints [TAC 228.70(b)(2) and TAC 228.70(b)(3)]; and

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. The program was advised of the requirement [TAC §228.70(b)(4)].

**Compliance issues to be addressed:**

- None

**Recommendations:**

- None

**Based on evidence presented, Texas A&M University - Commerce Educator Preparation Program (EPP) is in compliance with Texas Administrative Code § regarding Complaints and Investigations Procedures.**

## **COMPONENT VIII: Rules for Probationary Certificates (TAC) §230.37**

1. A candidate seeking certification as an educator must hold a probationary certificate while participating in an internship through an approved educator preparation program. Texas A&M University – Commerce EPP currently has 12 candidates on principal probationary certificates. A copy of the probationary certificate was provided for those candidates noting probationary, probationary extension or probationary 2<sup>nd</sup> extension. However, the program only provided documentation for one of the four candidates whose files were reviewed. TEA located the evidence for the other three files in the Educator Certification Online System (ECOS). The program did not meet the requirement as prescribed [TAC §230.37(a)(2)];
2. The candidate must be in an assignment consistent with the professional class certification sought. There was no/inconsistent observation records provided for all candidates and from the documentation provided, four candidates were on probationary certificates. It was also noted that field supervisor observation records were inconsistent. The program did not meet the requirement as prescribed [TAC §230.37(b)(3)(B)];
3. Each candidate on a probationary certificate must hold at least a bachelor's degree from an accredited institution of higher education. While the program did not provide the documentation, it was located in ECOS for each of the 20 files reviewed and met the requirement as prescribed [TAC §230.37(b)(1)];
4. Each candidate on a probationary certificate must be enrolled in a Texas EPP. All candidates were enrolled at TAMU Commerce, but not appropriately placed on a probationary certificate as determined by the date of issuance of the probationary certificate. The evidence reviewed was an application with admission date noted for 4 out of 20 files (20%) reviewed. However, 2 of the 4 (20%) were issued standard



before completion of internship year and one of the 4 is currently on probationary. The program did not meet the requirement as prescribed [TAC §230.37(f)(2)(A)];

5. Each candidate must meet the general certification requirements prescribed in §230.11 of this title (relating to General Requirements) including:
  - o 18 years of age or older; and
  - o Demonstrate English proficiencyThe birthdate on the application for all 20 files, regardless of whether they were on a probationary or not, served as evidence of compliance [TAC §230.37(b)(2)];
6. Each candidate must successfully complete the appropriate examinations required under Chapter 230, Subchapter B, of this title (relating to Assessment of Educators). The candidate history in ECOS served as evidence of compliance for 19 out of 20 (95%) of files reviewed. One candidate reviewed is still in the program and has not yet tested [TAC §241.20];
7. Each candidate must hold, at a minimum, a master's degree from an accredited institution of higher education that at the time was accredited or otherwise approved by an accrediting organization recognized by the Texas Higher Education Coordinating Board prior to issuance of the standard certificate. Nineteen out of 20 files reviewed (95%) met the requirement. One candidate file reviewed has not yet completed the program [TAC §241.20];
8. Each candidate seeking superintendent certification must hold, at a minimum, a principal certificate or the equivalent issued under this title or by another state or country. One superintendent file was reviewed and met the requirement as prescribed [TAC §242.20];
9. Each candidate must have two years of creditable teaching experience prior to issuance of the standard professional certificate. Teaching certificates and service records showing two+ years of experience served as evidence of compliance. All twenty files reviewed met the requirement at the time of admission [TAC §241.20; TAC §242.20];
10. Because there was no observation documentation in candidate files, it could not be determined if all files reviewed successfully complete the related educator preparation program that meets requirements designated in TAC [TAC §241.20; TAC §242.20]; and
11. The program did not retain documents that evidence a candidate's eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after program completion. The program did not produce records for the audit, therefore it could not be determined if files are retained as prescribed [TAC §228.40(d)].

**Based on evidence presented, Texas A&M University – Commerce Educator Preparation Program (EPP) is not in compliance with Texas Administrative Code §230.37 regarding Rules for Probationary Certificates.**

**Compliance issues to be addressed:**

- Require each candidate in a professional certification class to remain on the probationary certificate for the entire term of the probationary certificate (1 academic year) and do not issue the Standard Principal Certificate until all requirements of the program are met and the academic year has ended.

**Recommendations:**

- If any candidates in the future complete their practicum as an internship, require that they be placed on an appropriate probationary certificate.

  
**Standard Recommendations for Texas A&M University - Commerce EPP:**

- Align the verbiage of Texas A&M University - Commerce EPP to the verbiage of Texas Administrative Code (TAC) (ex. Field supervisor, Site supervisor, practicum, internship, candidate, etc.);
- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about current Texas Administrative Code;
- Continue to participate in webinars provided by the Division of Educator Preparation to ensure that the program staff is knowledgeable about current requirements and changes in Texas Administrative Code;
- Continue to maintain communication with the program specialist assigned to the program; and
- Ensure that TEA staff has the most current contact information by sending update emails to the assigned program specialist.