



Compliance Audit Report 2014-2015 Texas Lutheran University Teacher Preparation 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.state.tx.us for details.

Contact Information: Anna Bergstrom

County/District Number: 094501

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Program Manager, Sandra Jo Nix, and Program Specialist, Mixon Henry, conducted this Texas Education Agency Compliance Audit of Texas Lutheran University (TLU) at Education Service Center Region 20 in San Antonio, Texas, on May 19-21, 2015. The focus of the compliance audit was the Pedagogy and Professional Responsibility curriculum required for initial certification. The following are findings and recommendations for program improvement.

Scope of the Compliance Audit:

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

Data Analysis:

Information concerning compliance with Texas Administrative Code (TAC) governing educator preparation programs was collected by various qualitative means. A self-report was submitted to the Texas Education Agency on April 23, 2015. A review of documents, student records, course material, online courses, and curriculum correlations charts provided evidence regarding compliance. In addition, electronic questionnaires developed by TEA were sent to Texas

Lutheran University stakeholders and responses are as follows: Five (5) out of eighteen (18) advisory committee member; twelve (12) out of seventy (70) clinical teachers/interns; two (2) out of four (4) principals; and four (4) out of seven (7) cooperating teachers/mentors responded. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. Evidence of compliance was measured using a rubric alignment to determine compliance of Texas Administrative Code.

Findings, Compliance Issues, and Recommendations:

“Findings” indicate evidence that was collected during the compliance audit process. If the program is “NOT in compliance” with any identified component, the program should consult the Texas Administrative Code and correct the issue IMMEDIATELY. An action plan may be drafted during the visit that identifies compliance issues to be addressed and a timeline for completion. Program “recommendations” are suggestions for general program improvement and no follow up is required.

Opening and Closing Session:

TEA created a training, interactive audit which required participation of TLU staff, Anna Bergstrom and Donna Kubena. They assisted Mr. Mixon Henry in the review. All documents, except for student folders, were submitted in advance. At the end of the review of the documents and student folders, the audit rubric was scored and results shared with the Texas Lutheran University representatives. An Action Plan was created to address the compliance issues noted in the audit.

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

FINDINGS:

- Program support was indicated by the governing body of Texas Lutheran University per TAC §228.20(c) as evidenced by the participation and cooperation of TLU’s Ms. Anna Bergstrom and Ms. Donna Kubena, in various stages and steps of the compliance audit.
- The advisory committee consists of thirty-three (33) members: fourteen (14) members are from local school districts, fifteen (15) members are from higher education (TLU), three (3) members represent community/business interests, and one (1) member from ESC #13. Texas Lutheran University meets TAC §228.20(b) requirements for advisory committee composition.
- TLU provided evidence of two advisory committee meetings for the past two academic years and have had one for the 14-15 academic year. The next advisory committee was scheduled for April 21, 2015, but was delayed due to weather. Another is scheduled upon advisory committee members return to campus. Agendas, minutes, and sign in sheets were available as evidence of compliance. There were discussions on ways to increase attendance at advisory committee meetings. Some recommendations included presenting meetings via webinars, phone conferences, or other uses of technology to increase participation. Additionally it was suggested to send out the minutes to all members and request feedback. The program meets the requirements for conducting a

minimum of two advisory committee meetings per academic year as required by TAC §288.20(b).

- TLU addressed the required items of design, delivery, program evaluation, and major policy decisions in the advisory committee agendas. Though the minutes verified items were presented, the interaction between program and advisory committee members to gain input or assistance is not noted. It was suggested that minutes taken at meetings should be specific and capture the conversations between members to demonstrate assistance in design, delivery, program evaluation, and major policy as required by TAC §228.20(b).

Compliance Issues to be addressed:

- Establish a manner of note taking to capture the interactive feedback from advisory committee members to demonstrate the assistance in design, delivery, program evaluation, and major policies.

Recommendations:

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

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

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

FINDINGS:

- The transcripts identified a 2.9 GPA or higher, but no documentation was found to denote 12 hours in the candidates' specific content field or 15 hours in Mathematics and Science (10 of 10 candidate folders). In reviewing the transcripts, the content hours could be found, but it could not be verified the program had determined the information. (TAC§227.10(a)(3)(C),
- Ten of ten candidate folders had an application (TAC§227.10(a)(6) ,
- Evidence of interviews were found in candidates' folders, but no rubric was used to evaluate if the interview met the program's criteria (10 of 10 candidate folders) (TAC§227.10(a)(6),

- Requirements for admission to the program are on the TLU website and in university catalogs. These requirements are applied consistently to all candidates (TAC§227.10(a)(7), and
- There have been no out-of-country applicants within the last three years of our review, but the requirements are established if the need arises. Candidates' whose first language is not English must demonstrate competence in the English language by submission of an official minimum score on the written or computer-based Test of English as a Foreign Language (TOEFL) with a speaking score of 26. In addition, the applicant must have his/her transcripts from an out-of-country non-English speaking university evaluated by an approved evaluation service [TAC §227.10(7)].

Compliance Issues to be addressed:

- Document with candidate transcripts the required hours in the content field the candidate seeks to gain a standard certificate.
- Create a rubric and cut score for the admission's interview and keep the results in the candidate folders for future audits.

Recommendations:

- Consider an oral reading assessment to determine the articulation, fluency, and comprehension of the candidates evaluated with a rubric.
- Consider a writing sample, with an evaluative rubric, to determine the writing skills of the candidates prior to entering the program.
- Consider requiring a second set of transcripts per candidate, so the candidate folders contain an official transcripts and the university maintains the other transcript.
- Consider posting the admission criterion on the website where navigating to the information is simple and streamline.

Based on the evidence presented, Texas Lutheran University is not in compliance with TAC §227 - Admission and Certification Criteria.

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

FINDINGS:

- Texas Lutheran University is approved to offer teacher certification in thirty-one (31) fields.
- In reviewing the content and Pedagogy and Professional Responsibilities curriculum, it was noted that the educator standards were not identified in the syllabi, but rather domain and competencies. This does not meet the requirement of TAC §228.30(a);

- The content and Pedagogy and Professional curriculum addressed the relevant Texas Essential Knowledge and Skills (TEKS), but is not reflected in the syllabi. It is reflected in the activities and identified in candidates' lesson plans created in the courses. It would better serve the candidate, if the syllabi reflected the TEKS, TAC §228.30(a);
- Instruction on the teacher standards were included in the coursework as prescribed TAC §228.30(b);
- Sufficient evidence was presented to verify that all candidates received instruction in: dyslexia and mental and emotional health TAC §228.30(a)(4)
- Instruction in reading (five elements: phonetics, phonemic awareness, vocabulary, reading comprehension, and fluency) can be identified in the Generalist EC-6 and 4-8 curriculum, but is missing from some content areas; i.e. 7-12 and EC-12 content areas TAC §228.30(b).

Compliance Issues to be addressed:

- Require all syllabi to identify the educator standards taught in the coursework, and
- Require all candidates receive instruction in reading (five elements).

Recommendations:

- Increase the number of lesson plans required to be created, critiqued, or expanded by the candidates in every course toward certification in order to mirror the expectations for practicing classroom teachers to plan, instruct, and assess instruction. Provide an instructional scenario and have the candidate plan the lesson to adapt to several variables (learning style, differentiation, etc.) Provide a completed lesson plan and have the candidates modify it according to several variables. Also, have candidates complete a series of interrelated lessons into a unit of instruction to develop the skill of building on knowledge.
 - Provide more differentiating instruction strategies in special populations' coursework (Gifted and Talented and Limited English Proficiency identified in mentor questionnaires).
 - Ensure assessments reflect mastery of the performance standards (what the teacher can do) of the educator standards.
 - Develop additional coursework which deals with data management and interpretation to determine address the learning needs of students.
 - Utilize the TEA developed training for meeting "Teachers' Responsibilities for the STAAR test administration at <http://texas.testsecuritytraining.com/TestAdministratorTraining.aspx>. It may be used for a whole group or individually. A certificate can be printed upon completion and counted toward the required 300 clock hours. This is the same training that teachers must complete prior to STAAR testing.

- Utilize the dyslexia information found on the TEA website at <http://www.tea.state.tx.us/index2.aspx?id=4434> or at <http://www.region10.org/dyslexia/>.
- Utilize the mental and emotional health training approved by the Department of Human Resources and TEA. You may use any resources from other mental health organizations that you feel addresses the requirements of the law.
- Utilize the ethics training and the assessment of the training found at <https://www.youtube.com/playlist?list=PLYCCyVaf2q1vuF3qlz1NjEWFEMtxaBMvC> or use the information below.

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

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

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

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

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

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

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

Based on evidence presented, Texas Lutheran University is not in compliance with Texas Administrative Code Section §228.30 – Educator Preparation Curriculum.

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

FINDINGS:

- The Texas Lutheran University curriculum is delivered in a face-to-face manner.
- The total program consists of 675 - 900 clock hours for primary and secondary candidates depending on entry into the program TAC §228.35(a)(3).
- Thirty clock hours of field-based experience with 15 being interactive with students were verified prior to internship as per TAC §228.35(d).
- Eighty hours of coursework prior to clinical teaching or internship was provided as per TAC §228.35(a)(3)(B).
- Clinical teaching is 12 weeks in length TAC §228.35(d)(2)(A).
- Per TAC §228.35(d)(2)(C), in the post-baccalaureate program an internship of 180 school days or an academic year is required for teaching candidates. In review of the candidate records, all candidate assignments matched the certification field for which the individual was accepted into the program and trained. In addition, according to TAC §228.35(d)(2)(C), the intern was issued the appropriate probationary certificate and is classified as “teacher” of record on the campus PEIMS data. This was also verified by the candidate records.
- According to TAC §228.35(e), TLU provided mentors training material with a handbook and conference. The handbook was available for review. This handbook is delivered by the field supervisor and a conference is held with the cooperating teacher, candidate, and field supervisor.
- Supervision of each candidate is conducted with the structured guidance and regular ongoing support of experienced educators who were trained as field supervisors TAC §228.35(f).
- Initial contact by the field supervisor was verified within the first three weeks of the assignment as required by TAC §228.35(f). The initial contact is made face-to-face on the candidate’s campus and is held with the candidate, cooperating teacher, and field supervisor to discuss expectations of the clinical teaching experience.
- Four observation conducted by TLU meets standards outlined in TAC §228.35(f)(3), during internship. Evidence of four observations was found in the candidate’s records.
- The four observations [TAC §228.35(f)(4)] were at least 45 minutes in duration [TAC §228.35(f)]. TAC §228.35(f) was documented with a start and stop time on the each observation form.
- The first observation was conducted within the first six weeks of clinical teaching or internship as documented in the candidate’s records TAC §228.35(f)(2).
- The field supervisor provided and documented instructional practices observed. The documentation of the interactive conference with the candidates was not documented on the observation form or in candidate folders TAC §228.35(f).

- The program did not provide a copy of the written feedback to the candidate's campus administrator which is required by TAC §228.35(f).

Compliance Issues to be addressed:

- Document interactive conferences following each observation and have all parties sign and keep in candidate folders.
- Provide a copy of each observation to the campus administrator and verify the receipt of the observation by a signature on the form or a read/delivery receipt email.

Recommendations:

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

Based on evidence presented, Texas Lutheran University is not in compliance with Texas Administrative Code Section §228.35 – PROGRAM DELIVERY AND ON-GOING SUPPORT.

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

FINDINGS:

- Texas Lutheran University has benchmarks as candidate process through the program as prescribed by TAC §228.40(a). Documentation was found in the candidates' records.
- Criteria to determine the candidate's readiness to test [TAC §228.40(b)] is in policies and procedures for candidates. There are several steps in place to gain a testing recommendation. A candidate must take a practice test, then a review of the test results is completed with certification staff, and finally an additional test preparation session is completed by T-CERT or Learning Express. When all three steps are completed and documentation is submitted, test approval is provided.
- TLU purchases the CREATE program evaluation system for Texas Lutheran University's yearly evaluation. Additionally, there is external data gathered from principal surveys and internal feedback from candidates, such as end of course reviews, exit surveys about field supervision, and student evaluations of the overall program. This meets TAC §228.40(c) for program evaluation.
- According to TAC §228.40(d), the program retains documents that evidence a candidates' eligibility for admission to the program and evidence of completion of all program requirements for a period of five years after program completion in a secure environment.

Recommendations:

- Use more external data in your overall program evaluations such as surveys from principals, mentors, former candidates, etc.

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

COMPONENT VI: Professional Conduct (TAC) §228.50

Findings:

- Texas Lutheran could not locate evidence that instructors and staff had signed the Educator Code of Ethics. Candidates were provided information about the Educator Code of Ethics in coursework and with the TEA ethics training. It was suggested that each candidate sign a copy of the Educator Code of Ethics and keep the document in each candidate's folders. This will indicate by the candidate's signature that they have read, understand, and will abide Chapter 247 of this title (relating to Educators' Code of Ethics).

Based on evidence presented, Texas Lutheran University is not in compliance with Texas Administrative Code §228.50 – Professional Conduct.

Standard Recommendations:

- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about current Texas Administrative Code;
- Continue to participate in webinars provided by the Division of Educator Certification & Standards 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 for information on current requirements in TAC for Governance; Admissions; Curriculum; Program Delivery & On-Going Support; and Program Evaluation (TAC § 227-229);
- Ensure that TEA staff is notified in changes in staff and provide contact information by sending an email to the program specialist assigned.