



Technical Compliance Audit Report 2011-2012 American College of Education Principal 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.

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County/District Number: 057-715

SBEC Approval Date: 2009

Program Specialists, Vanessa Alba and Mixon Henry, conducted a Texas Education Agency Technical Compliance Audit of the American College of Education Principal Preparation Program on March 28-29, 2012. The focus of the technical assistance compliance audit was the post-baccalaureate principal preparation program, the principal certificate, and the areas that were out of compliance at the time of the post-approval visit conducted on March 10-11, 2011. The following are findings and recommendations for program improvement.

Data Analysis:

Information concerning compliance with Texas Administrative Code (TAC) governing educator preparation programs was collected by various qualitative means. Because this was a technical-assistance audit, a self-report was not required to be submitted to the Texas Education Agency. An on-site review of documents and candidate records provided evidence regarding compliance. Due to the fact that this was a technical assistance audit, the following were not reviewed: course material, online courses, and curriculum correlations charts. In addition, electronic questionnaires were sent to the American College of Education principal preparation program stakeholders by TEA staff. A total of one hundred sixty-eight (168) questionnaires were sent electronically and a total of forty-four (44) responses were received. They included the following: two (2) out of eight (8) advisory committee members; twenty-eight (28) out of fifty-three (53) principal candidates; two (2) out of three (3) field supervisors and twelve (12) out of one hundred four (104) campus principal mentors. 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 correlated to Texas Administrative Code.

Opening and Closing Session:

The opening session on March 29, 2012, was attended by ten (10) people. The following people representing the American College of Education were in attendance: Dr. Kenneth Craycraft, Board Chair; President Sandra Doran; Dr. Shawntel Landry, Associate Provost & Senior Vice-President of Institutional Effectiveness & Assessment; Dr. Mary Bold, Academic Dean; Sharyl Thompson, Vice-President of Regulatory Affairs & Compliance; Dr. Kenneth Jandes, Associate Dean & Director of Operations; Dr. Linetta Collins-Durand, Chair, Department of Educational Leadership; Sharon Spears, Associate Director, Internships; Traci Coomer, Associate Director, Internships and TEA contact; and Alana Sloan, Vice President of Curriculum and Development. The closing session held on March 29, 2012, was attended by eight (8) people. They included the following people representing the American College of Education: President Doran; Dr. Bold; Dr. Jandes; Traci Coomer; Dr. Collins-Durand; Sharon Spears; Sharyl Thompson; and Dr. Landry.

COMPONENT I: COMMITMENT AND COLLABORATION - Texas Administrative Code (TAC) §228.20 – GOVERNANCE OF EDUCATOR PREPARATION PROGRAMS

FINDINGS:

Program support was indicated by the governing body of American College of Education per TAC §228.20(c) as evidenced by the participation of President Doran, Dr. Ken Jandes, Dr. Landry, and Traci Coomer (TEA contact) in various aspects of the compliance audit.

Since Governance was not an area of focus for the technical assistance visit, it was only briefly discussed during the opening session presentation.

The advisory committee consists of eight (8) members. The respondents to the advisory committee questionnaire reported the following: they all represented public schools (100%); their length of service was between 1-3 years (100%); they were familiar with Texas Administrative Code (TAC) §227, 228, and 229 regarding educator preparation programs (100%); and that they were familiar with TAC §241 regarding principal preparation programs (100%). American College of Education Principal Preparation Program meets TAC §228.20(b) requirements for advisory committee composition.

The first meeting of the academic year was held on September 27, 2011. Eleven (11) members attended this meeting either in person or via telephone. The agenda and minutes reflect a review of the previous meeting minutes, a review of the educational leadership internship structure, field visits, the principal TExES exam module, program review, and assessment review. Additionally the minutes reflect changes in the program that had been made since the post-approval audit. The agenda, minutes, and attendee records were available to substantiate that the advisory committee meeting was held. The second meeting of the academic year is scheduled for April 17, 2012. An email invitation to attend that meeting either in person or virtually was provided as evidence that the meeting will occur within the academic year.

The American College of Education Principal Preparation Program advisory committee has been meeting regularly since its approval. One hundred percent (100%) of the advisory committee members reported in their questionnaire that they did meet two times per academic

year. The program meets the requirements for conducting a minimum of two advisory committee meetings per academic year as required by TAC §228.20(b).

The advisory committee members reported that they do assist in designing/revising curriculum (100%), major policy decisions (50%), and evaluation (100%) of the educator preparation program.

The advisory committee cited that a strength of the American College of Education principal preparation program is availability and access to the online program.

An area cited for improvement by the advisory committee was the lack of face-to-face interaction with other educators throughout the program's coursework.

Based on the evidence presented, American College of Education Educator Preparation Program is in compliance with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.

COMPONENT II: ADMISSION CRITERIA - Texas Administrative Code (TAC) §227.10 and TAC §241 - ADMISSION AND CERTIFICATION CRITERIA

FINDINGS:

American College of Education principal preparation program's admission requirements include the following: an application [TAC §227.10(6)] which is signed electronically; a bachelor's degree from an accredited institution of higher education [TAC §241.5(a) and TAC §227.10(a)(2)] an overall GPA of 2.75, which is higher than the GPA of 2.5 as required for admission [TAC §241.5(b) and TAC §227.10(a)(3)(A)]; a valid classroom teaching certificate [TAC §241.5(b) and TAC §241.20(3)]; and two years creditable teaching experience as a classroom teacher [TAC §241.5(b) and TAC §241.20(4)]. At the time of the March 2011 post-approval audit, the following were not in place to ensure equity in admissions for all applicants: an interview process to determine the oral communication skills of the applicant or his/her appropriateness for the for the principal certificate being sought [TAC §227.10(6)] and a writing sample so that the program staff could evaluate the written communication skills of the principal applicant [TAC §227.10(7) and TAC §241.5(c)].

TEA program specialists reviewed current candidates' files specifically for the admissions criteria requirements that were found to be out-of-compliance at the time of the March 2011 post-approval audit. Evidence exists that the interview or other screening device has been developed and utilized. There is an oral and written aspect to the admission process that is rated by two evaluators using a rubric. The published criterion of the American College of Education principal preparation program has not been consistently applied. Specifically, the requirement that the candidate hold a valid classroom teaching certificate per TAC §241.5(b) and TAC §241.20(3) has not been enforced. It was found that two applicants were admitted without standard teaching certificates and six of thirteen candidates' files reviewed or forty-seven percent (47%) did not meet the published GPA requirement of 2.75, but were automatically admitted to the principal preparation program with a "provisional status".

Out-of-country applicants 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). 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(a)(5) and TAC §230.413(b)(5)(B)]. Although this requirement is one for applicants who are seeking initial certification, American College of Education's Admissions' Catalogue states on page 19, Section 3, #5 that all candidates are required to submit a Test of English as a Foreign Language (TOEFL) score. In the out-of-country applicant files reviewed, it was found that this requirement had not been met for applicants to the Texas principal preparation program. This was discovered during a conference call with the Director of Admissions in Indianapolis, Indiana.

Based on the evidence presented, American College of Education is not in compliance with TAC § 227.10 and TAC §241 - Admission and Certification Criteria.

COMPONENT III: CURRICULUM - Texas Administrative Code (TAC) §241.15 – Educator Preparation Curriculum

FINDINGS:

The American College of Education principal preparation program's online curriculum was not reviewed at the time of the technical assistance audit. For that reason, the findings in the March 2011 post-approval audit report will stand as written.

Based on evidence presented at the time of the post-approval audit, American College of Education is in compliance with Texas Administrative Code Section §241.15 – Educator Preparation Curriculum.

COMPONENT IV: PROGRAM DELIVERY AND ONGOING SUPPORT - Texas Administrative Code (TAC) §228.35 – PREPARATION PROGRAM COURSEWORK AND/OR TRAINING

FINDINGS:

American College of Education principal preparation program continues to be delivered in an online format. There are six core/foundational courses, six educational leadership courses, and one capstone course which includes the collection of seven artifacts from the internship experience. Since the focus of the technical assistance audit was those areas found to be out-of-compliance at the time of the March 2011 post-approval audit, TEA program specialists focused their review on the Educational Leadership (EL) 590 internship course and the requirements specified in TAC §228.35(f) for field supervision of candidates seeking professional certification.

American College of Education was to implement the appropriate schedule of observations per TAC §228.35(f) with the first contact being made by the field supervisor within the first three weeks of practicum placement. TEA program specialists verified that the initial contact was made within the first three weeks of assignment into the principal practicum. The evidence provided was a tracking system to indicate when candidates began their EL 590 internship (practicum) course. For the candidates' files reviewed, this was documented in the form of a telephone call and, therefore, meets the requirements specified in TAC §228.35(f).

American College of Education was to conduct a minimum of three on-site observations within the 160 clock-hours of the practicum with the first observation conducted within six weeks of practicum placement [TAC §228.35(f)]. TEA program specialists verified that the American College of Education has remedied this compliance item by implementing a spreadsheet to track the process for all principal candidates: 1st observation within the first six weeks, 2nd observation within the first semester, and 3rd observation during the second semester of assignment.

American College of Education was also to report observation findings to the candidates and campus administrators per TAC §228.35(f). TEA program specialists verified that the compliance item has been remedied by American College of Education. The campus principal mentor receives an electronic copy of the observation feedback provided by the field supervisor. The field supervisor sends the documentation via email and requests a “read receipt” or confirmation via email that the documentation has been received. This documentation is saved electronically to the candidate’s electronic file.

Five (5) of the candidate files reviewed were in the program last year prior to the post-approval audit. The correction process for TAC §228.35(f) was focused on new candidates into the American College of Education Principal Preparation Program. Five (5) candidate files reviewed demonstrated that candidates since the post-approval audit who have been enrolled in the EL 590 course precipitated the first contact via telephone as well as the first observation per TAC §228.35(f). Due to a rolling admission into the American College of Education Principal Preparation Program in Texas and into the EL590 practicum course, it appears that candidates are able to complete the practicum in a self-paced format. This makes it difficult for the field supervisors to track a year long process of supervision during the practicum and document each of the required 160 practicum clock hours. At the time of the audit, it could not be determined if any candidate had completed the required 160 clock hour practicum based on the method of documentation provided by the program. It was noted that completion of a course [i.e. EL 590 internship (practicum) course] does not verify the completion of the 160 clock-hour practicum. Due to the aforementioned process, it was difficult to identify benchmarks that establish the candidates’ progress through the program. This makes the issue of benchmarks difficult to monitor. [Component V (TAC §228.40(a) establishing benchmarks of the candidates’ progress through the EPP)]

Based on evidence presented, American College of Education 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 – ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT.

FINDINGS:

The American College of Education principal preparation program assessment and evaluation of candidates for certification and program improvement was not reviewed at the time of the technical assistance audit. For that reason, the findings in the March 2011 post-approval audit report will stand as written.

However, because it was noted and discussed at the time of the technical assistance visit that candidates complete the EL 590 internship (practicum) at their own pace, it appears that there is

not a benchmark for the EL590 course. Because this was not a focus of the visit and because there have not been any candidates who have completed the program, it was recommended that the program identify a process by which the coursework and practicum hours move simultaneously to ensure a more efficient tracking process. By exploring and implementing a more efficient tracking process, the program will have established benchmarks and structured assessments of the candidate's progress throughout the educator preparation program per TAC §228.40(a).

Based on evidence presented at the time of the post-approval audit, American College of Education 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

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). This was not a component that was discussed during the technical assistance audit.

Senate Bill 174/Texas Administrative Code §229

Current Accreditation Status

American College of Education is currently Accredited-with an Action Plan based on an overall pass rate below the 75% pass rate standard required and a pass rate below the 75% pass rate required for three demographic groups as listed below in the Table - Standard I: Results of Certification Exams. At the time of the March 2011 post-approval audit, American College of Education principal preparation program status was Accredited-not rated because it was a new program and there was no data to report. The 2010-2011 academic year, which began September 1, 2010, and ended August 31, 2011, is the first year that American College of Education had data to report. Those data are listed in the table below:

Standard I: Results of Certification Exams

| Pass Rate Performance: | 2010-2011 75% Pass Rate |
|-------------------------------|------------------------------------|
| Overall: | 67% |
| Demographics: | |
| Female | 67% |
| Male | 67% |
| African American | 60% |
| Test Area: | |
| Principal EC-12 | 50% |

Information regarding the percentage of candidates in the program passing the principal content exam was also provided at the opening session presentation and that information is provided in the table below:

Principal Exams passed on the first attempt for Completion Year 2011

| Completion Year 2011 | # tests taken | # tests passed | % passed |
|----------------------|---------------|----------------|----------|
| Principal Exam (068) | 9 | 3 | 33% |

Program Recommendations:

The following are recommendations based on the findings of the technical compliance audit. If the program is NOT in compliance with any identified component, please consult the TAC rules and correct the issue IMMEDIATELY. A Compliance Status Report will be required every sixty days until the compliance issues are totally corrected.

Program recommendations are suggestions for general program improvement and no follow-up is required.

PROGRAM COMPLIANCE RECOMMENDATIONS:

TAC §227.10 and TAC §241.5 - Admission Criteria

- Require that all applicants to the Texas program meet the published admission criterion of American College of Education per TAC §227.10(7) of a GPA of 3.0;
- Require that all applicants to the Texas program meet the published admission criterion of American College of Education per TAC §227.10(7) of holding a valid teaching certificate at the time of admission; and
- Require a TOEFL for out-of-country applicants per TAC §227.10(5) and TAC §230.413.

TAC §228.35- Program Delivery and Ongoing Support

- Develop and implement a tracking system that will verify the completion of the 160 clock-hour practicum.

GENERAL PROGRAM RECOMMENDATIONS:

- Participate in State Board of Education (SBOE) and State Board of Educator Certification (SBEC) meetings and review the minutes to stay abreast of current and changes to Texas Administrative Code;
- Participate in future stakeholder meetings regarding Texas Administrative Code rule revisions;
- Participate in the Division of Educator Certification and Standards webinars for the purpose of understanding current and changes to the Texas Administrative Code;
- Maintain communication with the program specialist assigned to the American College of Education for the purpose of asking questions about current requirements in TAC §227-229 and TAC §241 for Governance; Admissions; Curriculum; Program Delivery & On-going Support; and Program Evaluation;
- Participate in annual Deans/Directors meetings to ensure that the program is knowledgeable about current and future changes to Texas Administrative Code; and
- Align the verbiage of the American College of Education Educator Preparation Program to that of current Texas Administrative Code; and
- Ensure that one person involved in the Texas American College of Education Principal Preparation Program in based in Texas who understands and is able to implement the Texas Administrative Code accurately.

Component 1 General Recommendations:

- Continue to seek options for ways to increase the depth of the advisory committee by adding principal candidates, principal mentors, human resource directors, and superintendents as a means to include a more representative advisory committee not directly associated with the American College of Education;
- Continue to be mindful that an academic year is from September 1 to August 31 of any given year to ensure that a minimum of two advisory committee meetings are held during the academic year;
- Convene a statewide advisory committee to represent the various geographic areas within the State of Texas; and
- Consider the fluidity of the American College of Education principal preparation program staff and its advisory committee, by utilizing rolling terms for advisory committee members to ensure a balance between experience and new perspectives.

Component 2 General Recommendations

- Continue to adhere to the American College of Education published admission criteria; and
- Continue to ensure that all applicants to the American College of Education Principal Preparation Program in Texas are required to meet the oral and written requirements that are rated on a rubric by two evaluators during the admission process.

Component 4 General Recommendations

- Consider reducing the ratio of candidates to field supervisor; and
- Explore a process by which the coursework and practicum hours move simultaneously to ensure a more efficient tracking process.