



Compliance Audit Report 2014-2015 Southwestern Adventist University

According to Texas Administrative Code (TAC) §228.10(c), "An entity approved by the SBEC under this chapter...shall be reviewed at least once every five years under procedures approved by the Texas Education Agency (TEA) staff; however, a review may be conducted at any time at the discretion of the TEA staff." Per TAC §228.1(c), "All educator preparation programs are subject to the same standards of accountability, as required under Chapter 229 of this title." The Texas Education Agency administers Texas Administrative Code required by the Texas legislature for the regulation of all educator preparation programs in the state. Please see the complete Texas Administrative Code at www.tea.state.tx.us for details.

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County/District Number: 126501

SBEC Approval Date: January 1972

Texas Education Agency Program Specialist, Lorrie Ayers, conducted a five-year Continuing Approval Compliance Desk Audit of Southwestern Adventist University, 100 Hillcrest Drive, Keene, TX 76059, on June 24, 2015 – July 30, 2015 as required by Texas Administrative Code (TAC) §229. The following are the findings of the audit.

Scope of the Compliance Audit:

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

Data Analysis:

Information concerning compliance with TAC governing educator preparation programs was collected by various qualitative means. A self-report and related audit documents were submitted to TEA on June 26, 2015. A review of documents, student records, EC-6 and PPR EC-12 course materials, and curriculum correlations charts provided evidence regarding compliance. In addition, TEA sent electronic questionnaires to Southwestern Adventist University stakeholders. The following responses were recorded: eleven (11) out of sixteen (16) or 69% from Advisory Committee members; one (1) out of nine (9) or 11% from principals; twenty (20) out of fifty-two (52) or 38% from educator candidates; sixteen (16) out of twenty-four (24) or 67% of mentor teachers; and two (2) out of three (3) or 67% of field supervisors. Overall, fifty (50) out of one hundred four (104) stakeholders or 48% responded to the questionnaires. 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 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 is required to correct the issue IMMEDIATELY. A “Compliance Plan” may be drafted that identifies compliance issues to be addressed and a timeline for completion. “General Recommendations” are suggestions for general program improvement and no follow up is required.

Audit Communications:

The audit opened upon receipt of audit documents June 26, 2015. Dr. Marcel Sargeant delivered documents, in hard copy and on flash drive, to Program Specialist, Lorrie Ayers, at the Texas Education Agency. After 1st review of documents was completed, preliminary results were discussed via phone conference attended by Lorrie Ayers, Marcel Sargeant, and Sonia Vergel. Compliance issues and missing documents were discussed during the phone conference. Additional documents were submitted by Dr. Marcel Sargeant on August 7, 2015. A final phone conference was held on August 27, 2015 to review audit findings. The final phone conference was attended by Lorrie Ayers, Marcel Sargeant, Donna Berkner, Michael England, Cheryl Tate, and Sonia Vergel. The audit closed on August 27, 2015.

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

FINDINGS:

- 1) Staff participation and assistance in the audit are evidence that Southwestern Adventist University personnel are actively engaged in the success of the educator preparation program.
- 2) The Advisory Committee currently consists of 15 members. Seven (7) members of the Advisory Committee represent public or private K-12 schools, six (6) members represent higher education, one (1) member represents an ESC, and one (1) member represents business and community interests. A review of historic records from the 2010-2011 reporting year indicates consistent representation from all 4 areas on the advisory committee. Southwestern Adventist University meets TAC §228.20(b) minimum requirements for Advisory Committee composition.
- 3) According to agendas and minutes, the Southwestern Adventist University Advisory Committee has met 2 times per year since October 2011 with the exception of one meeting during the 2014-2015 reporting year. The lack of meeting sign-in sheets does not allow for verification of the number of committee members present at each meeting. In questionnaires, Advisory Committee members responded that they are always asked to sign in at meetings. Southwestern Adventist University staff indicate that Advisory Committee sign in sheets were lost in a move

- 4) Meeting minutes provide evidence that members have been trained in their roles and responsibilities and that Advisory Committee business addressed the “design, delivery, evaluation, and major policy decisions” of the EPP. [TAC §228.20(b)].

Based on the evidence presented, Southwestern Adventist University is **In Compliance** with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.

RECOMMENDATIONS:

- 1) To increase attendance at Advisory Committee meetings, consider giving CPE credits to Advisory Committee members for their participation where appropriate and/or consider holding meetings through webinars or other distance meeting methods.

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

FINDINGS

- 1) Documents in candidates’ records provide evidence that candidates are currently admitted with a GPA of higher than 2.5. The current published admission GPA is 2.75. According to program staff, in the future the GPA requirement will increase to 3.0. [§227.10(a)(3)(A)]
- 2) Published requirements for basic skills include THEA scores: 260 reading, 230 math, 220 writing; or 500 or better on math and Verbal of SAT; or 21 or better on composite ACT. Candidate records contain documentation of basic skills scores. [§227.10(a)(4)]
- 3) Southwestern Adventist University has the following published admission requirements: an application, an interview, a “statement of purpose” essay, a “foundational competencies evaluation” and “self-evaluation”, a background check, and 2 references. A review of candidates’ records revealed these documents are collected for all candidates. The interview is used as a screening device, scored with a rubric, and assigned a cut score of 3.5 out of 5 points. [§227.10(a)(6) & (7)]
- 4) Candidates’ records provided for audit indicate that records are retained for at least 5 years. [§228.40(d)]
- 5) A background check is required as part of admission process however the EPP does not post the notification that candidates may request a preliminary criminal history evaluation letter regarding the potential ineligibility for certification due to a previous conviction or deferred adjudication for a felony or misdemeanor offense. [§227.101(c)]
- 6) There are no candidates admitted into the EPP from outside the United States. [§227.10(e)]

COMPLIANCE ISSUES TO BE ADDRESSED (see Compliance Plan):

- 1) Potential candidates are not informed that they may request a preliminary criminal history evaluation letter regarding the potential ineligibility for certification due to a previous conviction or deferred adjudication for a felony or misdemeanor offense. [§227.101(c)]

Based on the evidence presented, Southwestern Adventist University is **Not in Compliance** with Texas Administrative Code §227.10 - Admission Criteria.

COMPLIANCE RECOMMENDATIONS (see Compliance Plan):

- 1) Notification should be posted on website and/or in admission materials so that all potential candidates will see it.

RECOMMENDATIONS:

- Consider raising THEA reading score requirement.
- Consider stream-lining candidate records to maintain appropriate documentation while eliminating excess paperwork.

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

FINDINGS:

- 1) Syllabi of Southwestern Adventist courses provide evidence that curriculum is standards-based. [§228.30(a)]
- 2) Based on the syllabi provided, there is evidence that curriculum is more rigorous, performance-based, and interactive in some courses than in others. [§228.30(b)]
- 3) Based on the syllabi provided, there is evidence that most courses have standards-based assessments appropriately aligned with the course content. [§228.40(a)]
- 4) Syllabi provide evidence that TEKS are appropriately addressed in relevant coursework. [§228.30(a)]
- 5) Required reading instruction is found in EDUC 382 for Generalist EC-6 candidates. Staff state that required reading instruction for secondary candidates is taught in EDUC 450 and in Cert 450. Syllabi do not provide evidence of reading instruction for secondary candidates. [§228.30(b)(1)]
- 6) The skills and competencies captured in the teacher standards, §149, including instructional planning and delivery; knowledge of students and student learning; content knowledge and expertise, learning environment; and professional practices and responsibilities are evident in the curriculum. Instruction in data-driven practice is limited in curriculum. Course syllabi indicate that data-driven practice is taught in EDUC 434. [§149.1001]

- 7) Mandatory training in identification and education of students with mental health disorders is not evident in curriculum. Southwestern Adventist University staff indicate this training will be included in PSYC 210 for the 2015-2016 school year. [§228.30(b)(5)]
- 8) According to course syllabi, instruction in the educator code of ethics is embedded in the curriculum of the EDUC 416 course taken by all educator candidates. [§228.30(b)(2)]
- 9) Instruction in characteristics and identification of dyslexia and strategies for teaching students with dyslexia is embedded in the EDUC 382 curriculum for elementary candidates and in EDUC 450 for secondary candidates. [§228.30(b)(4)]
- 10) Questionnaires completed by eighteen (18) current and former candidates revealed that they felt most prepared by the EPP in the following areas: reading strategies, theories of how people learn, how to use a variety of classroom assessments with students, laws and standards regarding students with special education needs, and varied instructional strategies.
- 11) Questionnaires completed by eighteen (18) current and former candidates revealed that candidates felt least prepared in the following areas: conducting parent conferences, teachers' responsibilities for administering state tests such as STAAR tests, and characteristics and identification of students with dyslexia.

COMPLIANCE ISSUES TO BE ADDRESSED (see Compliance Plan):

- 1) Mandatory reading instruction is not evident for secondary candidates
- 2) There is no evidence that required mental health training is provided to EPP candidates.

Based on evidence presented, Southwestern Adventist University is **Not in Compliance** with Texas Administrative Code Section §228.30-Curriculum.

COMPLIANCE RECOMMENDATIONS (see Compliance Plan):

- 1) Identify a course that is common to all secondary candidates and update course content to teach
 - phonemic awareness
 - phonics
 - fluency
 - vocabulary
 - comprehension
- 2) Identify a course, or courses, in which the required components of mental health training can be taught to candidates. Instruction must include:
 - characteristics of common mental and emotional disorders ;
 - identification of common disorders; and

- effective, strategies for teaching students with mental and emotional disorders

GENERAL RECOMMENDATIONS:

- Numerous standards identified on the alignment charts did not correlate with the course work in the class in which they were identified. Consider realigning curriculum with standards.
- Many rubrics do not measure mastery of standards. Consider evaluating rubrics so they more accurately reflect candidate knowledge and mastery of standards

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

FINDINGS:

- 1) Review of syllabi and degree plans indicates there are more than 300 clock hours of coursework required in the Generalist EC-6 program. [§228.35(a)(3)]
- 2) Syllabi and observation forms provide evidence that more than 30 hours of Field-Based Experience are required and are embedded in coursework. Documentation in candidates' records is incomplete with inconsistent documentation of observation times and teacher signatures so that 30 hours could not be verified. [§228.35(a)(3)(A)]
- 3) The Field-Based Experience takes place in classroom settings with certified teachers. Candidates complete FBE in the grade levels within the certification being sought. Candidates do not complete FBE hours in grade levels outside of their certification fields. [§228.35(d)]
- 4) According to TAC [§228.35(d)(1)(E)], candidates must complete a follow up activity or reflection as part of the Field-Based Experience. A survey of nineteen (19) current and former candidates revealed that all were required to complete some form of follow up activity, including reflection journals, guided observations with focused questions/answers, class discussions and/or written assignments.
- 5) TAC requires all candidates to complete 30 hours or more of Field-Based experiences. Several candidates were not required to complete Field-Based Experience because they had prior classroom teaching experience. [§228.35(a)(3)(A)]
- 6) Candidates enter clinical teaching during the last year of school. Most coursework is completed prior to clinical teaching. [§228.35(a)(3)(A) & (B)]
- 7) Candidates complete a 14-week, full day student teaching practicum in 2-7-week increments. [§228.35(d)(2)(A)]
- 8) According to the Self-report, one candidate was placed in an out-of-state practicum without TEA approval, however follow-up with staff revealed the candidate was in

completing a psychology practicum that was not part of educator preparation. All other placements were in TEA approved schools. [§228.35(d)(4)(C)]

- 9) According to the Self-report, there are currently no candidates teaching on probationary certificates.
- 10) During Clinical Teaching, each candidate is assigned to a campus cooperating teacher. Cooperating teachers are trained using three (3) different Power Point training modules. Cooperating teachers play an active role in the candidate's development including formal observations and communication with Field Supervisors. [§228.35(e)]
- 11) Candidates are assigned to currently certified and experienced Field Supervisors. In a survey of nineteen (19) current and former candidates, 95% responded that the assigned Field Supervisor met with the candidate within the first 3 weeks of the teaching assignment; however there is no documentation that Field Supervisors make first contact with candidates within first three (3) weeks of the Clinical Teaching assignment. [§228.35(g)]
- 12) Observation forms in candidates' records provide documentation that Field Supervisors observe candidates at least three (3) times during Clinical Teaching. Field Supervisors capture instructional strategies observed; however, they inconsistently record observation times as evidence that observations are 45 minutes or more in duration. [§228.35(f)]
- 13) Out of fifteen (15) respondents in the candidate survey, 93% said the Field Supervisor held an interactive conference with them following the observation. 87% responded that they received informal observations and/or coaching from the Field Supervisor. There is no evidence in candidates' records that an interactive conference takes place after the observation and no evidence that candidates receive ongoing, informal coaching. [§228.35(f)]
- 14) There is no evidence that campus administrators receive a copy of the observation results. [§228.35(f)]
- 15) Conversation with staff indicates all Field Supervisors have been trained but there is no documentation of that training. [§228.35(f)]

COMPLIANCE ISSUES TO BE ADDRESSED (See Compliance Plan):

- 1) Documentation that all candidates complete 30 hours of Field-Based Experience is inconsistent.
- 2) There is inconsistent documentation the Field-Based Experiences are completed in a variety of settings.
- 3) During Field-Based Experiences candidates must be actively engaged in instructional or educational activities that include:
 - a. authentic school settings in a public school accredited by the TEA or other school approved by the TEA for this purpose;
 - i. (B) instruction by content certified teachers;

- ii. (C) actual students in classrooms/instructional settings with identity-proof provisions;
 - iii. (D) content or grade-level specific classrooms/instructional settings; and
 - iv. (E) reflection of the observation.
- 4) Candidate experiences in these aspects of FBE are inconsistently documented.
 - 5) Candidates with prior teaching experience are not required to complete FBE hours.
 - 6) There is no documentation that Field Supervisors receive training.
 - 7) There is no documentation the Field Supervisors make initial contact with candidates within the first three (3) weeks of the clinical teaching assignment.
 - 8) The length of observations conducted by Field Supervisors is inconsistently documented.
 - 9) Interactive conferences between Field Supervisors and candidates are not documented.
 - 10) There is no evidence that campus administrators receive copies of candidate observation forms.
 - 11) There is no documentation that candidates receive informal observations and coaching from Field Supervisors

Based on evidence presented, Southwestern Adventist University is **Not in Compliance** with Texas Administrative Code Section §228.35 – Program Delivery and On-Going Support.

COMPLIANCE RECOMMENDATIONS (see Compliance Plan):

- 1) Require candidates to submit logs signed by candidate and host teacher to document Field-Based Experiences. Logs should include grade level and subject area in which FBE occurred, the activities in which the candidate was engaged in that classroom, and the time spent in each classroom. Candidates should be required to complete FBE hours in a variety of settings including grade levels in elementary, middle and high school settings.
- 2) Ensure the FBE is designed so that candidates fulfill the following requirements: a) authentic, approved school settings; b) instruction by content certified teachers; c) actual students in classrooms; d) content or grade level specific; and e) reflections or some type of related activity following the reflection.
- 3) Require all candidates to complete 30 FBE hours prior to entering clinical teaching or internship. There are no substitutes for FBE hours and FBE hours may not be waived.
- 4) FBE logs and relevant evidence should be retained in candidates' records for 5 years.

- 5) Create process to train Field Supervisors annually. Retain documentation that the training occurred, including training materials and dated sign in sheets.
- 6) Ensure that Field Supervisors contact candidates either by phone or face-to-face within the first three (3) weeks of the candidates' clinical teaching or internship assignments. Retain dated documentation such as sign in sheets or copies of email exchanges in candidates' records for 5 years.
- 7) Observation forms used by Field Supervisors should reflect 'time in' and 'time out' of observations to capture that each observation is a minimum of 45 minutes. Forms should also reflect that an interactive conference between the candidate and the Field Supervisor follows each observation. Documentation should be retained in candidates' records for 5 years.
- 8) Ensure that the campus administrator for each candidate receives a copy of each completed observation. Document receipt by either requiring a signature on the observation form or requesting a read receipt for an emailed copy.
- 9) Encourage Field Supervisors to create opportunities for informal coaching such as additional observations or email/phone conversations. Retain evidence in candidates' records for 5 years.

GENERAL RECOMMENDATIONS:

- To better support candidates in preparing for certification exams, consider requiring candidates to pass certification exams prior to Clinical teaching.
- Consider giving CPE credit to mentor teachers. Mentor teachers may receive up to 45 clock hours in 5 years as CPE credit.
- When conducting Field Supervisor training, consider a process to norm, or calibrate, the observation process across all Field Supervisors.

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

FINDINGS:

- 1) According to documents and information submitted by Southwestern Adventist University the following benchmarks are defined for evaluating EC-6 candidate progress: 1) maintain a specified GPA; 2) complete coursework per degree plan; 3) pass EDUC495-Generalist and EDUC 495-PPR to be recommended for certification exams. [§228.40(a)]
- 2) Candidate readiness to test is determined by completion of EDUC 495-a test prep course and two (2) practice tests, one (1) given in the Junior year and one (1) in the senior year. [§228.40(b)]
- 3) Southwestern Adventist University educator preparation program gathers internal data from the SAU Student Evaluation of Program survey, the Student Satisfaction Inventory, and SIRs, or faculty evaluations, and uses Taskstream software to track former candidates after graduation. There is limited external feedback regarding program successes and improvements. [§228.40(c)]

Based on evidence presented, Southwestern Adventist University is **In Compliance** with Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates of Candidates for Certification and Program Improvement.

GENERAL RECOMMENDATIONS:

- Consider conducting course surveys to get feedback on individual course effectiveness.
- Consider conducting surveys of former candidates (1-3 years into teaching career), mentor teachers, and principals to determine overall long-term effectiveness of program.

COMPONENT VI: Professional Conduct (TAC) §228.50

FINDINGS:

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).

- 1) The Educator Code of Ethics is printed in the student handbook and candidates sign a document of receipt of the handbook. The signature forms do not require candidates to agree to demonstrate "adherence to" the Code of Ethics. There is no evidence that the EPP has collected or retained the signature forms. [§228.30(b)(2)]
- 2) Southwestern Adventist University staff signed "acknowledgement of reading and understanding the Texas Educator's Code of Ethics". The signature forms do not require staff to demonstrate "adherence to" the Code of Ethics. Signature documents were submitted for all staff.

COMPLIANCE ISSUES TO BE ADDRESSED (See Compliance Plan):

- 1) There is no evidence that candidates are required to sign an agreement to adhere to the Texas Educator's code of Ethics.

Based on evidence presented, Southwestern Adventist University is **Not In Compliance** with Texas Administrative Code §228.50(a) regarding Professional Conduct.

COMPLIANCE RECOMMENDATIONS (see Compliance Plan):

- 1) Require all candidates to sign an agreement to adhere to the Educator's Code of Ethics. Retain signed document in candidates' records for 5 years.

GENERAL RECOMMENDATIONS:

- Consider requiring faculty and staff working with educator candidates to sign an agreement to abide by the Texas Educator's Code of Ethics.

GENERAL FINDINGS

GENERAL PROGRAM RECOMMENDATIONS:

- To ensure continuity in record keeping and other related processes, create a procedures manual for the education program staff. Seek guidance from advisory committee.
- Implement quality control procedures to ensure ASEP reporting and GPA spreadsheets are submitted accurately during state reporting each year.

GENERAL RECOMMENDATIONS FOR ALL EDUCATOR PREPARATION PROGRAMS:

- Continue to follow the State Board for Educator Certification (SBEC) and the State Board of Education (SBOE) meetings and/or review the minutes to ensure that the program staff is knowledgeable about current Texas Administrative Code;
- Continue to participate in webinars provided by the Division of Educator Preparation to ensure that the program staff is knowledgeable about current requirements and changes in Texas Administrative Code;
- Continue to maintain communication with the program specialist assigned to the program.
- Ensure that TEA staff has the most current contact information by sending updates to the assigned program specialist.

