



Compliance Audit Report 2014-2015 Southwestern Assemblies of God 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.texas.gov for details.

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County/District Number: 070501

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Texas Education Agency Program Specialist, Lorrie Ayers, conducted a five-year Continuing Approval Compliance Desk Audit of Southwestern Assemblies of God University, 1200 Sycamore Street, Waxahachie, TX 75165, on July 1, 2015 – August 10, 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 §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 July 1, 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 Assemblies of God University stakeholders. The following responses were recorded: seventeen (17) out of forty-seven (47) or 36% from Advisory Committee members; nine (9) out of twenty-seven (27) or 33% from principals; twenty-four (24) out of ninety-nine (99) or 24% from educator candidates; fifty (50) out of one hundred thirty-eight (138) or 36% of mentor teachers; and seven (7) out of twenty-three (23) or 30% of field supervisors. Overall, one hundred seven (107) out of three hundred thirty-four (334) stakeholders or 32% 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 July 1, 2015 at the Texas Education Agency. After 1st review of documents was completed, preliminary results were discussed via phone conference attended by Lorrie Ayers, and Dr. Christine Wirth on August 4, 2015. Compliance issues and missing documents were discussed during the conference call. Additional documents were submitted by Dr. Wirth on August 7, 2015. A final phone conference was held on Thursday, 1/7/2016, to review audit findings. The final conference call was attended by Lorrie Ayer, Christine Wirth, and Janice Whitaker.

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

FINDINGS:

- 1) Staff participation in the audit process indicates that Southwestern Assemblies of God University (SAGU) personnel are actively engaged in the success of the educator preparation program.
- 2) The Advisory Committee currently consists of 23 non-university members and various representatives from the SAGU faculty. Sixteen (16) members of the Advisory Committee represent public or private K-12 schools, five (5) members represent business and community interests, and (two) 2 members are candidate representatives. There are various SAGU faculty members and no ESC representatives on the Advisory Committee. A review of historic records indicates participation of at least 2-8 members on the Advisory Committee. The lack of meeting sign-in sheets does not allow confirmation of the actual number of members participating. Southwestern Assemblies of God University meets TAC §228.20(b) minimum requirements for Advisory Committee composition.
- 3) According to minutes, the Southwestern Assemblies of God University Advisory Committee has met consistently two times per year since October 2011. [TAC §228.20(b)]
- 4) Meeting minutes and an Advisory Committee member handbook provide evidence that members have been trained in their roles and responsibilities. Meeting minutes provide

evidence that Advisory Committee business addressed the “design, delivery, evaluation, and major policy decisions” of the EPP. [TAC §228.20(b)].

- 5) Seventeen (17) out of seventeen (17), or 100%, of Advisory Committee members that responded to TEA’s questionnaires indicated they are asked to sign in at Advisory Committee meetings. Sign in sheets were not provided as documentation.

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

RECOMMENDATIONS:

- Consider giving CPE credits to Advisory Committee members for their participation where appropriate.
- Require Advisory Committee members to sign in at meetings to document participation. Retain sign-in sheets as documentation.

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

FINDINGS

- 1) Transcripts 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. [TAC §227.10(a)(3)(A)]
- 2) Review of transcripts indicates candidates are admitted with a minimum of 15 hours of coursework in Math/Science if seeking certification at grades 7 or above or 12 hours of coursework in other content areas. [TAC §227.10(a)(3)(C)]
- 3) Candidates’ records contain documentation that basic skills scores are collected as part of admission requirements. [TAC §227.10(a)(4)]
- 4) Southwestern Assemblies of God University has the following published admission requirements: application, a typed essay, a counselors recommendation based on a Taylor-Johnson Temperament Analysis, 2 letters of reference, and grades of C or higher in ENG 1113/ENG1123, COM1143, and MTH1123/MTH1143. Candidates’ records contain documentation that candidates have completed the advertised admission requirements. [TAC §227.10(b)]
- 5) An interview with a rubric and cut score is used to screen candidates for admission. Documentation is retained in candidates’ records. [TAC §227.10(a)(6)]
- 6) The SAGU applications in candidates’ records stated that candidates will be required to complete an official background check as part of the certification process; however

historically the EPP had not specified 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. The application was updated appropriately during the audit. [§227.101(c)]

Based on the evidence presented, Southwestern Assemblies of God University is **In Compliance** with Texas Administrative Code §227.10 - Admission Criteria.

RECOMMENDATIONS:

- Review the Principal program application process to ensure all applicants complete the application.
- Review the Principal program records retention process to ensure records are retained for five years for all candidates.
- Review admission practices for all professional class programs to ensure interview / other screening tool is applied equitably to all applicants per program policy.

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

FINDINGS:

- 1) Syllabi and coursework representing Southwestern Assemblies of God University curriculum provide evidence that curriculum is standards-based. [TAC §228.30(a)]
- 2) Based on the syllabi and coursework provided, most of the curriculum is rigorous, performance-based, and interactive. [TAC §228.30(b)]
- 3) Based on the syllabi provided, there is evidence that most courses have standards-based assessments, including multiple choice exams and performance-based assessments such as unit plans and portfolios, appropriately aligned with the course content. [TAC §228.40(a)]
- 4) Syllabi provide evidence that TEKS are appropriately addressed in relevant coursework. [TAC §228.30(a)]
- 5) EC-6 candidates receive mandatory reading instruction in Literacy Instruction I – IV courses. Secondary candidates receive reading instruction in ENG3283, Teaching English as a Second Language and Diversity, and in RDG4133, Adolescent Literacy II. [TAC §228.30(b)(1)]
- 6) The skills and competencies captured in the Commissioner's Rules, §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 but present in curriculum. According to syllabi, data-driven practice is taught in EDU4183, Curriculum Development & Assessment II, and in EDU4273, Advanced Strategies.

- 7) Mandatory training in identification and education of students with mental and emotional health disorders is not evident in curriculum. [TAC §228.35(a)(5)]
- 8) Per syllabi and a student handbook, instruction in the educator code of ethics is embedded in curriculum. [TAC §228.30(b)(2)]
- 9) Instruction in characteristics and identification of dyslexia and strategies for teaching students with dyslexia are embedded in the RDG4123 curriculum for elementary candidates however it is not clear that secondary candidates receive the required dyslexia instruction. [TAC §228.35(a)(4)]. Seven (7) out of twenty-three (23) candidates that returned completed surveys responded that they did not receive training in “the identification and characteristics of dyslexia”. When surveyed about preparedness, thirty-nine percent (39%) of respondents did not feel prepared in characteristics and identification of students with dyslexia.
- 10) Survey results from candidate questionnaires indicated that candidates felt well-prepared in most areas except less than 80% felt well prepared in the following areas: characteristics and instruction of students with dyslexia, teacher’s responsibilities for administering state testing (STAAR and EOC), and conducting parent conferences.

COMPLIANCE ISSUES TO BE ADDRESSED (see Compliance Plan):

- 1) Required training in mental and emotional health is not provided to all candidates.
- 2) Required dyslexia training is not provided to secondary candidates.

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

COMPLIANCE RECOMMENDATIONS (see Compliance Plan):

- 1) Identify a course, or courses, in which the required components of mental and emotional health training can be taught to all candidates.
- 2) Identify a course, or courses, in which required components of dyslexia training can be taught to all secondary candidates.

GENERAL RECOMMENDATIONS:

- Add more opportunities for candidates to practice skills.
- Include additional instruction in data-driven practice.

**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 in Generalist/Core Subjects EC-6 preparation. [TAC §228.35(a)(3)]
- 2) Syllabi and Field-Based Experience (FBE) observation forms provide evidence that more than 30 hours of FBE are required and are embedded in coursework. FBE logs with classroom teacher signatures verify the hours are completed. [TAC §228.35(a)(3)]
- 3) The Field-Based Experiences take place in classroom settings with certified teachers. Candidates inconsistently observe classes in a variety of grade levels and content areas. [TAC §228.35(d)]
- 4) There is no evidence that at least 15 hours of FBE are interactive with students. [TAC §228.35(d)(1)]
- 5) Candidates must complete 30 hours or more of Field-Based Experiences prior to beginning Clinical Teaching or Internship. According to FBE logs and placement dates in candidates' records, candidates complete FBE hours prior to Clinical Teaching. [TAC §228.35(d)(1)]
- 6) Candidates enter Clinical Teaching during the last year of school. According to degree plans, more than 80 hours of coursework are completed prior to Clinical Teaching. [TAC §228.35(a)(3)(B)]
- 7) Candidates complete 12 consecutive weeks of full day Clinical Teaching. [TAC §228.35(d)(1)]
- 8) Documentation in candidates' records and candidate responses on surveys indicate Clinical Teaching placements matched the grade level and certification field in which the candidate was seeking certification.
- 9) Multiple candidates were placed in out-of-state or out-of-country Clinical Teaching or Internship assignments without TEA approval. All other placements were in TEA approved schools. [TAC §228.2(4)] [TAC §228.35(d)(4)]
- 10) There are currently no candidates teaching on probationary certificates.
- 11) According to candidates' records, each candidate was assigned to a campus cooperating teacher during Clinical Teaching. Eighty-five percent (85%) of candidates responded that the assigned cooperating teacher taught the same grade level and content area as the certificate being sought by the candidate. Handbooks contain information relevant to Clinical Teaching for candidates, cooperating teachers, and Field Supervisors. Field Supervisor logs indicate that cooperating teachers are trained by the Field Supervisor at the first meeting. [TAC §228.35(e)]
- 12) Candidates are assigned to currently certified Field Supervisors who are experienced with five (5) or more years of relevant experience. Per logs in candidates' records, Field Supervisors are trained and make first contact with candidates within the first three (3)

weeks of the Clinical Teaching assignment and conduct the first observation within the first 6 weeks of the teaching assignment. [TAC §228.35(f)]

- 13) Observation forms in candidates' records provide documentation that Field Supervisors inconsistently observe candidates a minimum of three (3) times during Clinical Teaching. Additionally, Field Supervisors inconsistently capture instructional strategies observed, and inconsistently record observation times as evidence that observations are 45 minutes or more in duration. Candidates and Field Supervisors sign completed observation forms but there is no evidence that an interactive conference takes place after an observation. [TAC §228.35(f)]
- 14) There is inconsistent evidence that campus administrators receive a copy of observation results and no evidence that candidates receive ongoing, informal coaching from Field Supervisors. However, ninety-four percent (94%) of candidates surveyed indicated they receive informal observations and coaching. [TAC §228.35(f)]

COMPLIANCE ISSUES TO BE ADDRESSED (See Compliance Plan):

- 1) There is no evidence that at least 15 FBE hours are interactive.
- 2) There is inconsistent documentation that Field Supervisors conduct observations that are at least 45 minutes in duration.
- 3) Field Supervisors inconsistently capture instructional strategies observed.
- 4) Field Supervisors inconsistently document the interactive conference is held with each candidate following each observation.
- 5) There is inconsistent evidence that a campus administrator receives a copy of a candidates' observation results.
- 6) There is no evidence that Field Supervisors provide informal observations and/or additional coaching to candidates.
- 7) Multiple candidates completed Clinical Teaching in unapproved out-of-state or out-of-country placements.
- 8) Some candidates were missing documentation of formal observations and/or observations were completed by the Cooperating Teacher instead of the Field Supervisor.

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

COMPLIANCE RECOMMENDATIONS (see Compliance Plan):

- 1) Alter FBE log to capture “interactive” activities.
- 2) Train Field Supervisors to complete the “Start time” and “End time” on observation forms to capture duration of observations.
- 3) Train Field Supervisors to capture specific instructional strategies observed for the components on the observation form and/or train Field Supervisors to keep a running record during observations. Retain observation documents in candidates’ records.
- 4) Alter the observation form used by Field Supervisors to capture the interactive conference. Some suggested options are record comments generated during the interactive conference or identify “time in” and “time out” of interactive conference. Provide a place for the candidate to sign verifying the conference documentation.
- 5) Alter the observation form used by Field Supervisors to allow for the principal or designee to sign verifying receipt of a copy of the observation form or send a copy of the observation form as an electronic attachment with a delivery/read receipt from the principal or designee to verify receipt.
- 6) Encourage Field Supervisors to identify opportunities for informal coaching and to use additional observations, email / phone conversations, or text messaging as methods of coaching. Consider asking Field Supervisors to keep a log of informal contacts signed by the candidate for verification.
- 7) Submit an approval request / crosswalk to TEA prior to all out-of-state and out-of-country placements. Retain approval as documentation for 5 years.
- 8) Ensure that all candidates in all programs receive required field supervision. Implement a process to retain the field supervision records for 5 years.

GENERAL RECOMMENDATIONS:

- To better support candidates in preparing for certification exams, and to better serve students in K-12 classrooms, consider requiring candidates to pass certification content 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.
- Review Texas Administrative code requirements for field supervision of professional classes to note that observations total 135 minutes in a minimum of 3 observations.

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

FINDINGS:

- 1) Southwestern Assemblies of God University has established benchmarks that define candidates' progress from entry into program through standard certification. [TAC §228.40(a)]
- 2) Candidate readiness to test is determined by completion of a representative practice exam. Candidates who are unsuccessful on practice exams are given targeted remediation prior to approval for the certification exams. [TAC §228.40(b)]
- 3) To guide program improvements, the SAGU educator preparation program gathers internal data from course survey questionnaires and from candidates' exit surveys. In the fall of 2015 an Instructional Technology course, EDP3413, was added based on research conducted by the university. [TAC §228.40(c)]
- 4) Candidates who responded to surveys generally commented that Southwestern Assemblies of God University "is very thorough and all staff are attentive."
- 5) In terms of program improvements, candidates responded that they would like more training in classroom management skills. Additionally, some candidates involved in the distance learning program felt disengaged during the field experiences and during the Clinical Teaching experiences.
- 6) Overall, the Cooperating Teachers surveyed identified program strengths as "students are prepared", "expectations are clearly defined" and there is "great communication from the university". A cooperating teacher hosting a distance-learning candidate felt the candidate was not well connected with the program and did not receive adequate support.

Based on evidence presented, Southwestern Assemblies of God 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 surveys of former candidates (1-3 years into teaching career), mentor teachers, and principals to determine overall, long-term program effectiveness.

FINDINGS:

TAC §228.50(a) states “during the period of preparation, the educator preparation program shall ensure that the individuals preparing candidates and the candidates themselves adhere to Chapter 247 of this title (relating to Educators’ Code of Ethics)”.

- 1) Candidates are provided instruction in the Texas Educator Code of Ethics through their coursework and in a printed student handbook. Each candidate signs an agreement to adhere to the Code of Ethics. Signed documents are retained in candidates’ records.
- 2) Each Southwestern Assemblies of God University educator preparation staff member has signed an oath that s/he has “read and agree to abide by” the Educators’ Code of Ethics.

Based on evidence presented, Southwestern Assemblies of God University is **In Compliance** with Texas Administrative Code §228.50(a) regarding Professional Conduct.

GENERAL PROGRAM RECOMMENDATIONS:

- To ensure continuity in record keeping and other related processes, create a procedures manual for the education program. Seek guidance from advisory committee.

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.