



Compliance Audit Report 2014-2015 Wiley College

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: 102502

SBEC Approval Date: May 1989

Program Specialists, Lorrie Ayers, and Mixon Henry, conducted a Texas Education Agency Compliance Audit of Wiley College on February 10 – February 12, 2015. The focus of the compliance audit was the Generalist EC-6 certification program.

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. An on-site review of documents, student records, course material, online courses, and curriculum correlation charts provided evidence regarding compliance. In addition, electronic questionnaires developed by TEA staff were sent to Wiley College stakeholders. The questionnaire results follow: Twelve (12) out of thirteen (13) or 92% from advisory committee members; 0 out of forty-two (42) or 0% from teacher candidates; two (2) out of three (3) or 67% from field supervisors; nine (9) out of twenty-three (23) or 39% from principals; and eleven (11) out of forty-six (46) or 24% from cooperating teachers/mentors. Qualitative and quantitative methodologies of content analysis, cross-referencing, and triangulation of the data were used to evaluate the evidence. 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. An action plan detailing compliance issues to be addressed and a timeline for completion may be drafted during the visit. “General Recommendations” are suggestions for general program improvement and no follow up is required.

Opening and Closing Session:

The opening session on February 10, 2015, was attended by Haywood L. Strickland, Boyce C. Williams, Lisa Taylor, Sonya Burnett-Andrus, T. Bernard Clayton, Karen Helm, Glenda F. Carter, Ruth Washington, Jean D. Fitts, Juyeon Lee, Alice Ajanga, Cescilio Chavez, Abraham Campos, Thelma Woodard, and Lee A. Aggison, Jr.

The closing session on February 12, 2015, was attended by Sherlynn Byrd, Alexander Marriott, Ruth Washington, Khaled Al-Aglin, Juyeon Lee, Joseph L. Morale, Lee A. Aggison, Thelma Woodard, Jean D. Fitts, Glenda Carter, Karen Helm, Haywood L. Strickland, Sonya Burnett-Andrus, Lisa Taylor, and Boyce C. Williams.

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

FINDINGS:

- 1) The Wiley College campus facilities are in appropriate condition; however, wireless internet access is not reliable in the education building.
- 2) Attendance at opening and closing sessions and participation of staff in all phases of the audit indicate program stakeholders play an active role in the educator preparation program.
- 3) Sign in sheets and minutes indicate that the Advisory Committee has diverse membership consisting of nine (9) members representing Public / Private Schools, three (3) members representing higher education, one (1) member representing an education service center, and five (5) members from the community and/or community organizations.
- 4) Advisory Committee meeting minutes indicate the members are trained in their roles and responsibilities.
- 5) Advisory Committee meeting minutes document two (2) meetings per academic year in which program design, delivery, and evaluation are discussed.
- 6) Wiley staff overall lacks an understanding of the processes and Texas Administrative Code involved in the efficient operation of an educator preparation program. The lack of consistent central accountability contributes to the inefficient program function.

GENERAL RECOMMENDATIONS:

- 1) Increase the diversity of members attending Advisory Committee meetings by offering incentives such as CPE credits or by using technology to allow participation from a distance.
- 2) Consider utilizing TEA staff and resources to train Wiley College administration and staff to improve program function and efficiency.
- 3) The new Wiley College Conceptual Framework handbook contains numerous errors and some missing components. Review and update this handbook per TEA auditor suggestions.

Based on the evidence presented, Wiley College is **IN COMPLIANCE** with Texas Administrative Code §228.20 – Governance of Educator Preparation Programs.

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

FINDINGS:

- 1) A review of records for ten (10) candidates indicates Wiley College admits candidates with a GPA of 2.5 which is in compliance with TAC; however, the information on the Wiley College, Division of Education web page states an admission GPA requirement of 2.75.
- 2) Candidate records reference the use of THEA, ACT, SAT, and TSI exemptions used to measure basic skills. However, in some cases, coursework is used to measure basic skills. In these candidates' records, no coursework documentation exists to support this.
- 3) Historic candidate records do not contain interviews as an admission screening device; however, current candidate records contain documentation that candidates are interviewed prior to admission.
- 4) Candidates' records are missing documents which indicates Wiley College does not have a consistent, reliable record-keeping process in place.

COMPLIANCE ISSUES TO BE ADDRESSED (see Action Plan):

- 1) Documentation of coursework used to measure basic skills of incoming candidates is not retained.
- 2) Candidates' records are incomplete.

COMPLIANCE RECOMMENDATIONS (see Action Plan):

- 1) Modify the admission application to allow for documentation of coursework or scores on exams used to establish basic skills. Retain relevant coursework and official exam scores in candidates' records.
- 2) Implement a process for collecting and retaining complete candidate records of admission, progress through program, and completion of program requirements. Retain all records for 5 years.

GENERAL RECOMMENDATIONS:

- 1) Advisory committee minutes and discussions with staff indicate a concern that some incoming candidates may have some skill deficiencies. Consider additional screening tools at admission such as reading passages, comprehension questions, and specific rubrics to evaluate reading efficiency. Use a rubric to evaluate writing samples already requested at admissions.
- 2) Candidates' records contain extraneous paperwork. Consider streamlining the documentation process to eliminate duplicate and unnecessary paperwork.
- 3) Consider requiring Post-Bac candidates to pass the Pre-Admission Content Test (PACT) as an admission requirement.
- 4) Modify the application for admission by removing inappropriate or extraneous questions such as those about marital status.
- 5) Create a process to insure all necessary program documentation is completed on time and retained appropriately for 5 years;

Based on the evidence presented, Wiley College is **NOT IN COMPLIANCE** with TAC §227 - Admission Criteria.

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

FINDINGS:

- 1) Based on the limited curriculum provided for review, there is no evidence that educator standards are the basis for the Wiley EC-6 or PPR curriculum.
- 2) Based on the limited curriculum provided for review, there is no evidence that TEKS are taught as appropriate in the content related curriculum.
- 3) Course syllabi indicate that assessments are used to evaluate candidate knowledge. In addition, midterm and final exams support the use of standards-based assessments in at least one education course.
- 4) There is little evidence that coursework is rigorous, interactive, student-focused, and performance-based.

- 5) Wiley College is implementing AVID strategies in coursework as well as AVID training for educator candidates.
- 6) The curriculum review indicates the curriculum addresses the following mandatory standards: a) reading; b) instructional planning and delivery; c) knowledge of students and student learning; d) content knowledge and expertise; e) learning environment. However instruction in data-driven practice is lacking.
- 7) Published degree plans provide evidence that candidates receive training in dyslexia.
- 8) According to TEC §21.044(c-1) and (c-2), candidates must receive instruction in the detection of students with mental or emotional disorders, including characteristics and identification of common disorders and strategies for teaching students with mental or emotional disorders. Evidence of this instruction is not found in the curriculum review.

COMPLIANCE ISSUES TO BE ADDRESSED (see Action Plan):

- 1) Educator standards are not evident in the coursework.
- 2) TEKS instruction cannot be verified in the coursework.
- 3) There is limited evidence that coursework is rigorous and project-based.
- 4) Instruction in data-driven practice is not evident in curriculum.
- 5) There is no documentation to support that candidates receive the required mental health training.

COMPLIANCE RECOMMENDATIONS (See Action Plan):

- 1) Conduct a curriculum and assessment alignment of educator preparation courses to insure all appropriate educator standards are being taught and assessed.
- 2) Consider creating a standard syllabus format that effectively reflects the standards-based course content.
- 3) Identify appropriate courses in which candidates should be taught to use TEKS to inform standards-based instruction, including TEKS framework, language of the TEKS, designing lessons using appropriate content area TEKS, assessing student mastery of TEKS, and evaluating vertical alignment of TEKS.
- 4) Evaluate course content and add projects and activities where appropriate to increase rigor and student focus.
- 5) Add activities into appropriate courses to give candidates practice interpreting and using student performance data to design remediation and create lesson plans based on that student data.
- 6) Review course content in all certificate areas to insure all educator candidates receive required mental health training, or invite local mental health authority to conduct training at no charge to EPP or candidates.

Based on evidence presented, Wiley College is **NOT IN COMPLIANCE** with Texas Administrative Code Section §228.30 – Curriculum.

**COMPONENT IV: PREPARATION PROGRAM COURSEWORK AND/OR TRAINING
– Texas Administrative Code (TAC) §228.35**

FINDINGS:

- 1) Degree plans for traditional undergraduate program document that EC-6 Generalist candidates are engaged in 315 + hours of coursework; however, candidates in the Post-Bac program do not receive the required 300 clock hours of coursework. In addition, the current policy allows candidates in the Post-Bac program to substitute teaching hours for coursework.
- 2) Documentation in candidates' records indicates candidates complete 30 hours of field-based observations prior to student teaching; however, there is no evidence that the hours are completed in a variety of settings or that they are interactive with students in the classroom. In addition, documentation of observation hours is incomplete in candidates' records.
- 3) According to §228.35(a)(4) "All coursework and training shall be completed prior to educator preparation program completion and standard certification". A candidate record revealed a candidate was issued a standard certification without completing an internship.
- 4) Documentation in candidates' records indicates all other candidates are completing the 12 week student teaching requirement in TEA approved school settings.
- 5) Candidates in student teaching assignments are assigned mentors; however, there is no evidence that mentors are trained in their responsibilities.
- 6) Wiley College employs three (3) Field Supervisors who have valid teaching certificates and relevant experience. The program has Field Supervisor training materials but there is no evidence that these Field Supervisors have received training on their responsibilities.
- 7) Inconsistent and incomplete documentation in candidates' records provides little evidence that candidates are being contacted and observed according to TAC while in their internships.
- 8) According to TAC §228.35(f) "The field supervisor shall document instructional practices observed, provide written feedback through an interactive conference with the candidate....." There is limited evidence in candidates' records that field supervisors document instructional practices during observations and follow-up with interactive conferences with candidates. Limited descriptors of candidate's instructional practices are documented on the observation forms used by Field Supervisors.
- 9) Wiley College does not have any candidates in out-of-state or out-of-country placements.

COMPLIANCE ISSUES TO BE ADDRESSED (see Action Plan):

- 1) The Post-Bac curriculum, as defined in the degree plan, does not contain the required 300 clock hours of coursework.

- 2) Compliance with field experience requirements is inconsistent.
- 3) Certificates, standard and probationary, are issued inappropriately to candidates.
- 4) There is no evidence that Mentors and Field Supervisors are trained in their responsibilities.
- 5) There is inconsistent documentation of candidate observations by Field Supervisors.
- 6) There is inconsistent evidence of the following required components of field supervision: 45 minute observations, timing of first contact between candidates and field supervisors and subsequent observations, documentation of instructional practices observed and interactive conferences following the observation. There is no evidence that copies of observation results are given to campus administrators.
- 7) Annual program data such as finishers of the teacher preparation program is not reported to the state agency in a timely manner.

COMPLIANCE RECOMMENDATIONS (see Action Plan):

- 1) Discontinue the practice of allowing previous classroom experience to replace coursework hours. Conduct a curriculum alignment of the Post-Bac courses to insure all appropriate educator standards are addressed. Add content where necessary and appropriate.
- 2) Insure that 30 hours of field-based observations take place in a variety of grade levels and settings and that a minimum of 15 of the hours are interactive with students in the classroom. Design a means of tracking observation hours and experiences and retain documentation in candidates' folders.
- 3) Identify criteria and a process for recommending candidates for standard and probationary certificates. Assign a staff member to oversee all certification recommendations and to communicate deficiencies with candidates and relevant faculty and staff when necessary. Consult with TEA Program Specialist when unique situations influence certification.
- 4) Implement training for Mentors and Field supervisors and require attendees to sign in at training as verification of attendance. Create a handbook for mentors and field supervisors that provides information on their roles and responsibilities. Have the handbook sent via email with a delivery receipt or have them sign an acknowledgment of receipt. Retain documentation of training for 5 years.
- 5) Modify observation forms to capture necessary documentation. Create a clear timeline of contact and formal observations and review timeline with Field Supervisors during training. Obtain signature of receipt of completed observation by campus administrator or designee. Retain completed forms in candidates' records for 5 years.
- 6) Identify a staff member to attend TEA training on data reporting and take responsibility for accurate and timely state and federal data reporting. Establish a process and timeline for reporting.

GENERAL RECOMMENDATIONS:

- 1) Consider offering CPE credit to reward Mentors for assisting the program with educator preparation.

Based on evidence presented, Wiley College is **NOT IN COMPLIANCE** with Texas Administrative Code Section §228.35 – Preparation Program Coursework and/or Training.

COMPONENT V: ASSESSMENT AND EVALUATION OF CANDIDATES FOR CERTIFICATION AND PROGRAM IMPROVEMENT – Texas Administrative Code (TAC) §228.40

FINDINGS:

- 1) “The Road to Certification” document within the “Teacher as Reflective Practitioner” conceptual framework identifies benchmarks which track candidate progress through the program.
- 2) Candidates’ records contain a tracking document that tracks grades in each course as evidence of course completion.
- 3) Wiley provides a course to prepare candidates to take the TExES exams.
- 4) Wiley College has demonstrated a commitment to program improvement with the implementation of the “Teacher as Reflective Practitioner” conceptual framework. In addition, Wiley is implementing AVID strategies in educator training.

Based on evidence presented, Wiley College is **IN COMPLIANCE** with Texas Administrative Code §228.40 – Assessment and Evaluation of Candidates for Certification and Program Improvement

COMPONENT VI: PROFESSIONAL CONDUCT – Texas Administrative Code (TAC) §228.50

FINDINGS:

- 1) Educators and staff working with teacher candidates have signed agreements of adherence to the Educator Code of Ethics.
- 2) An Educator Code of Ethics is in the candidate handbook and is also taught in curriculum. Candidates sign an agreement to adhere to Educator Code of Ethics.

Based on evidence presented, Wiley College is **IN COMPLIANCE** with Texas Administrative Code §228.50 – Professional Conduct.

GENERAL RECOMMENDATIONS:

- 1) Align EPP terminology with TEA terminology found in Texas Administrative Code;
- 2) 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;
- 3) 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;
- 4) Continue to maintain communication with the program specialist assigned to the program;
- 5) Ensure that TEA staff has the most current contact information by sending update emails to the assigned program specialist.