
3B

Action

Educator Preparation Committee

Proposed Modifications of the Commission's General Preconditions for Educator Preparation Programs

Executive Summary: This agenda item provides for Commission consideration and possible adoption of the proposed General Preconditions for educator preparation programs.

Policy Question: Are the proposed revisions to the General Preconditions appropriate and adequate?

Recommended Action: Staff recommends that the Commission adopt the proposed revised General Preconditions.

Presenters: Lynette Roby, Consultant, and Cheryl Hickey, Administrator, Professional Services Division

Strategic Plan Goal

II. Program Quality and Accountability

- a) Develop and maintain rigorous, meaningful, and relevant standards that drive program quality and effectiveness for the preparation of the education workforce and are responsive to the needs of California's diverse student population.

September 2016

Proposed Modifications of the Commission's General Preconditions for Educator Preparation Programs

Introduction

As part of the continuing effort to strengthen and streamline the accreditation system for educator preparation, this agenda item presents for Commission review and potential adoption, proposed revisions to the General Preconditions required of educator preparation programs. These proposed revisions would reorganize the preconditions into a clearer, more understandable structure, address issues that have arisen in recent years but are not previously addressed in current preconditions, and bring the General Preconditions for Commission approved institutions into alignment with expectations established in 2015 for Initial Institutional Approval.

Background

Preconditions are grounded in either California state statute, regulations, or adopted Commission policy and specify requirements of program compliance. Currently, there are the following three categories of preconditions:

- 1) General Preconditions – The 10 General Preconditions are applicable to all Commission approved program sponsors and educator preparation programs.
- 2) Program Specific Preconditions – These 4 preconditions apply to most types of credential programs.
- 3) Program Preconditions – These preconditions are associated with a specific credential type (Multiple/Single Subject, General Education Induction, for examples) and apply to only those programs.

Each institution (college, university, school district, county office of education, or other approved sponsor) must meet the Commission's preconditions in order to demonstrate institutional compliance with state statute, regulations, and Commission policies. In the revised accreditation system's seven year cycle, all institutions sponsoring an educator preparation program will submit evidence in years one and four related to the General Preconditions and all appropriate preconditions for the programs it offers. In addition, at any time when an institution submits a new program proposal, it is required to submit responses to all applicable program preconditions prior to approval by the Committee on Accreditation. Because preconditions are largely ministerial, staff is responsible for reviewing documentation submitted by an institution and determining whether an institution has satisfactorily addressed the preconditions.

Commission staff reviewed the current General Preconditions, as well as the four Program Specific Preconditions with several intended objectives. First, a review of the General Preconditions had not been done for a number of years, and the strengthening and streamlining accreditation project provides an ideal opportunity to examine and update any expectations that the

Commission would have for all institutions offering educator preparation in California. Another objective was to make the structure more understandable to current and prospective program sponsors, and to the public. Having three distinct categories of preconditions is confusing and in need of simplification. And finally, the policy work around Initial Institutional Approval for institutions seeking to be Commission approved program sponsors provided a solid foundation for consideration of revisions to General Preconditions for currently approved program sponsors.

In October 2015, the Commission took action to revise the Initial Institutional Approval process. As part of this effort, the Commission adopted new Eligibility Requirements for Institutions seeking to offer educator preparation in California. These Eligibility Requirements were largely comprised of the Commission’s General Preconditions as well as some additional requirements to address issues that have arisen in recent years. In considering proposed revisions to the General Preconditions, staff considered whether certain aspects that the Commission included in the eligibility requirements for new program sponsors should also be applicable in a similar manner for approved program sponsors.

Summary of Proposed Changes

The table below provides summaries of the proposed revisions and their rationale. The full text of the proposed Preconditions is provided in Appendix A.

Proposed General Precondition	Summary of Revision General Precondition	Rationale for Proposed Revision
1: Accreditation and Academic Credit	Separated the language related to enrollment and completion, making it a new stand-alone precondition.	Minor revisions to some language for clarity and elimination of unnecessary language and eliminated the sentence which introduced the aspect that is proposed as being separated as its own precondition.
2: Enrollment and Completion	Requirement is not new, but separated from Precondition 1 and made to stand alone as General Precondition #2. Clarified language around what is expected should the institution and/or program close.	Precondition states that a program sponsor must be prepared to provide candidates the ability to complete a program, withdraw or drop from a program based on established criteria or provide a path for completion if a program closes. It clarifies the need for a teach-out plan for remaining candidates in the event of program closure.
3: Responsibility and Authority	Additional Language Proposed in 3b and 3c requiring that the program sponsor provide an organizational chart for the institution and any division, parent organization, outside organization or partner who	This allows for greater transparency about organizations or individuals that play key roles in program operations or delivery of a program. It addresses more explicitly that recommendations to the Commission for

	is involved in the oversight of the unit or program delivery and that the duties regarding credential recommendations are made only by employees of the Commission approved program.	individuals to receive a California credential or authorization cannot be delegated.
4: Discrimination	Title Change	Title changed to <i>Lawful Practices</i> upon the recommendation of the Commission's General Counsel.
5: Commission Assurances	Minor edits to wording for clarification. Added expectation for timely submission of documents.	Language addressing the timely submission of documents is currently lacking from preconditions.
5: Prior to Program Approval	Delete	This precondition was an assurance that an institution submitting a program for initial program approval was aware that it had to submit the program specific preconditions and the program preconditions. The information provided by this precondition is redundant since a new program cannot be considered for approval without the submission and alignment of all appropriate preconditions.
6: Requests for Data	Specifies two additional types of data programs sponsors need to agree to provide the Commission.	This precondition would be revised to include data related to performance assessments, where appropriate, and indicates the institution's responsibility to keep current institutional leadership and program contact information.
7: Veracity in all Claims and Documentation Submitted	Removed language that is applicable to all preconditions and not this precondition alone	Proposed revision would remove the language stating lack of compliance with this precondition could be cause for denial or for stipulations because lack of compliance of any of the preconditions may be cause for denial or for stipulations.
8: Grievance Process	Minor edits to wording for clarification	Minor edits to wording for clarification
9: Faculty and Instructional Personnel Participation	No Change	

<p>10: Program and Candidate Specific Preconditions</p>	<p>Delete from General Preconditions. Move to program preconditions</p>	<p>This precondition has two different requirements. The first, which relates to the Basic Skills Requirement, does not apply to <i>all</i> educator preparation programs and therefore does not belong in the General Preconditions. It would be added to the program preconditions for programs for which it does apply.</p> <p>The second part of the precondition addresses the Certificate of Clearance. This applies primarily to initial credentials as second tier credential candidates would presumably already have obtained a Certificate of Clearance as part of their initial program and in their base credential.</p>
<p>10: Communication and Information</p>	<p>Additional General Precondition</p>	<p>This precondition would enhance transparency by requiring that program sponsors provide that easily accessible information be available about requirements for admission and successful completion for all its educator preparation programs. This precondition also aligns with the newly revised Initial Institutional Approval Eligibility Requirements, Criterion 10.</p>
<p>11: Student Records Management, Access, and Security</p>	<p>Additional General Precondition</p> <p>Language related to program sponsor responsibility regarding student records management, access, and security in educator preparation programs was lacking.</p>	<p>This language would provide an important lever in which to ensure minimum levels of security, management and access for records related to applicants and candidates enrolled in educator preparation programs. It aligns with the newly revised Initial Institutional Approval Eligibility Requirements, Criterion 11.</p>
<p>12: Disclosure</p>	<p>Additional General Precondition</p> <p>This precondition would enhance transparency and aid in greater understanding of a program sponsor's organizational structure by</p>	<p>This precondition aligns with the newly revised Initial Institutional Approval Eligibility Requirements, Criterion 12.</p>

	requiring that institutions disclose any outside organizations that will provide direct educational services for its approved programs.	
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Reorganization of Program Specific Preconditions

As previously stated, there are 4 Program Specific Preconditions. They are:

- 1) Demonstration of Need (for Initial Program Proposals only)
- 2) Practitioners Participation in Program Design (for Initial Program Proposals only)
- 3) Basic Skills Requirement
- 4) Certificate of Clearance

The [complete text of these four Program Specific Preconditions](#) is available in the Preconditions document on the Commission’s website.

The existence of the four Program Specific Preconditions in addition to General Preconditions and those related to programs is understandably confusing to the field and in need of simplification. To that end, staff proposes to move Program Specific Precondition 1 and 2 within each of the preconditions for all credential areas and to continue to require that institutions address these only when proposing new programs. Staff further proposes that Program Specific Preconditions 3 and 4 above be moved to be included in all applicable credential program preconditions.

Staff Recommendation

Staff recommends that the Commission consider, and if appropriate, adopt the proposed revisions to the General Preconditions (Appendix A) and approve the reorganization of the four Program Specific Preconditions.

Next Steps

If the Commission adopts the revised General Preconditions, staff will disseminate a Program Sponsor Alert that outlines the revisions. In addition, staff would update the appropriate documents and the Commission website with the updated preconditions.

Appendix A

Proposed Revised General Preconditions

General Statement Applicable to all Preconditions for all Educator Preparation Programs

Pursuant to Education Code Section 44227 (and 44265 where applicable for Education Specialist Program) each program of professional preparation that leads to a teaching or services credential shall adhere continually to the following requirements of California State Law or Commission Policy. Each institution must respond to the general preconditions as well as all other applicable program specific preconditions.

(1) Accreditation and Academic Credit. The program(s) must be ~~proposed and~~ operated by

(a) **Institutions of higher education:** A college or university that (i) is fully accredited by the Western Association of Schools and Colleges or another of the six regional accrediting associations, and (ii) grants baccalaureate academic credit or post baccalaureate academic credit, or both, ~~and (iii) a~~ An institution approved to offer educator preparation in California must notify the Commission within 30 days if its regional accreditation status changes. ~~(This provision does not apply to professional preparation programs offered by school districts or other sponsors.)~~

(b) **School districts or other non-regionally accredited entities:** The Superintendent or CEO of the district or entity shall submit verification of the governing board's approval of sponsorship of the program. ~~The agreement to sponsor a program must include verification of the following:~~

(2) Enrollment and Completion. Once a candidate is accepted and enrolls in an educator preparation program, the approved program sponsor must offer the approved program, meeting the adopted standards, until the candidate:

- i. completes the program;
- ii. withdraws from the program;
- iii. is dropped from the program based on established criteria; **or**
- iv. is admitted to another approved program to complete the requirements, with minimal disruption, for the authorization.

In the event the program closes, ~~In this event,~~ a teach out plan, which includes an individual transition plans for each candidate as well as a plan for candidates and graduates to access their student records would need to be developed ~~with each candidate.~~

(32) Responsibility and Authority. To be granted continuing accreditation by the Committee on Accreditation, the entity shall provide the following information:

- (a) Identify the position within the organizational structure that is responsible for ongoing oversight of all educator preparation programs offered by the entity (including educator preparation programs offered by an extension division, if any).
- (b) Provide a description of the reporting relationship between the position described in (a) and the individual(s) who coordinate each educator preparation program offered by the entity. If a reporting relationship is indirect, describe the levels of authority and responsibility for each educator preparation program. Include an organizational chart for the institution as well as the division(s) within the institution responsible for the oversight of educator preparation programs; include any parent organization, outside organization(s), or partner(s) who will be involved in the oversight of the educator preparation unit and/or responsible for any aspect of program delivery.
- (c) Provide policies to ensure that duties regarding credential recommendations are provided solely by persons who are current employees of the Commission approved institution.

~~(43) Discrimination-Lawful Practices.~~ To be granted continuing accreditation by the Committee on Accreditation, a program of professional preparation must be proposed and operated by an entity that makes all personnel decisions without unlawful discrimination. These decisions include decisions regarding the admission, retention or graduation of students, and decisions regarding the employment, retention or promotion of employees.

(54) Commission Assurances. To be granted continuing accreditation by the Committee on Accreditation, the ~~program proposal~~ program sponsor must: (a) ~~demonstrate~~ assure that the ~~program sponsor~~ will fulfill all of the applicable standards of program quality and effectiveness that have been adopted by the Commission, (b) assure that the approved program sponsor will cooperate in an evaluation of the program by an external team or a monitoring of the program by a Commission staff member, and (c) assure that the approved program sponsor will participate fully in the Commission's accreditation system, including the timely submission of documents required for accreditation.

~~(5) Prior to Program Approval.~~ ~~To be granted continuing accreditation by the Committee on Accreditation, the entity must confirm that there are program specific Preconditions that must be met including preconditions for initial program approval.~~

(6) Requests for Data. To be granted continuing accreditation by the Committee on Accreditation, the entity must identify a qualified officer responsible for reporting and responding to all requests from the Commission for data including, but not limited to, program enrollments, program completers, examination results, including performance assessments, and state and federal reporting within the time limits specified by the Commission. Institutional contact information must be updated annually.

(7) Veracity in all Claims and Documentation Submitted. To be granted continuing accreditation by the Committee on Accreditation, the entity must positively affirm the veracity of all

statements and documentation submitted to the Commission. ~~Evidence of a lack of veracity is cause for denial of initial institutional accreditation or for stipulations from the Committee on Accreditation.~~

(8) Grievance Process. To be granted continuing accreditation by the Committee on Accreditation, the approved program sponsor must have a clearly delineated grievance process for candidates and applicants. The grievance process information must be accessible to all candidates and applicants and the institution must be prepared to provide documentation that ~~the candidates~~ haves been informed of the grievance process and that the process has been followed.

(9) Faculty and Instructional Personnel Participation. All faculty and instructional personnel employed by colleges and universities who regularly teach one or more courses in an educator preparation program leading to a credential, shall actively participate in the public school system at least once every three academic years, appropriate to their credential area. Faculty who are not in the Department, School or College of Education are exempt from this requirement. *Reference: Education Code Section 44227.5 (a) and (b).*

~~**(10) Program and Candidate Specific Preconditions.** An institution which operates an approved preparation program shall meet all program specific preconditions, including:~~

~~(a) Require applicants for program admission to take the California Basic Educational Skills Test (CBEST) or have satisfied the Basic Skills Requirement (BSR).~~

~~(b) Not allow a candidate to participate in public school based field activities until the candidate obtains a Certificate of Clearance from the Commission.~~

(10) Communication and Information. To be granted continuing accreditation by the Committee on Accreditation, the approved program sponsor must provide easily accessible and accurate information to the public, prospective educators, and enrolled candidates about the requirements for admission and successful completion for all its educator preparation programs.

(11) Student Records Management, Access, and Security. To be granted continuing accreditation by the Committee on Accreditation, the sponsor must demonstrate that it will maintain and retain student records in accordance with the institution's record retention policy. Institutions will provide verification that:

(a) Candidates and graduates will have access to and be provided with transcripts and/or other documents for the purpose of verifying academic units and program completion.

(b) All candidate records will be maintained at the main institutional site or central location (paper or digital copies).

(c) Records will be kept securely in locked cabinets or on a secure server located in a room not accessible by the public.

(102) Disclosure. Institutions must disclose information regarding any outside organizations that will be providing any direct educational services as all or part of the educator preparation programs sponsored by the institution and identify the type of services the outside organization will provide.