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Information

Professional Services Committee

Discussion on Accepting Program Coursework for Child Development Permits from Non-Regionally Accredited Entities

Executive Summary: This agenda item seeks direction from the Commission regarding whether to accept coursework from non-regionally accredited entities for the Child Development Permit. The item provides information regarding Child Development Permit requirements and approval process and current Commission practices related to alternative program providers for other types of credentials.

Recommended Action: For information only

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Strategic Plan Goal: 1

Promote educational excellence through the preparation and certification of professional educators

- ◆ Sustain high quality standards for the preparation and performance of professional educators and for the accreditation of credential programs

December 2010

Discussion on Accepting Program Coursework for Child Development Permits from Non-Regionally Accredited Entities

Introduction

Legislative staff recently contacted Commission staff regarding a legislative proposal from an accrediting organization for Montessori teacher training programs. The specific proposal under consideration would require the Commission to accept early childhood program coursework offered by non-regionally accredited programs that currently prepare prospective private school preschool teachers. As a result of this request, the Commission staff has reviewed current law and regulations regarding the Child Development Permits and at this time seeks direction from the Commission regarding accepting coursework from non-regionally accredited entities for Child Development Permits. The item provides information regarding Child Development Permit requirements and approval process and current Commission practices related to alternative program providers for other types of credentials.

Background

Child Development Permit Structure

The state of California has issued permits for service in *publicly funded* preschool programs for over fifty years. These permits were first issued by the California Department of Education (CDE) and then by the Commission on Teacher Credentialing (Commission) when it was established as an independent standards board in the 1970's. Education Code § 8363 authorizes the Commission to establish the requirements for the issuance and renewal of permits authorizing service in the care, development, and instruction of children in child care and development programs. Staff requirements for *private* preschool programs are determined and overseen by the Department of Social Services, Community Care Licensing.

The current Child Development Permit structure, implemented through the regulatory process in 1998, is based on a career ladder concept to align with requirements in Education Code §8360 stating that all *publicly* funded child development programs administered by the CDE “must include a career ladder program for classroom staff.” Based on a foundational core group of courses in child development and general education, the permit structure builds coursework and experience requirements aligned with the authorization of the permit level.¹ The six levels of the permit are:

- Child Development Assistant Teacher
- Child Development Associate Teacher
- Child Development Teacher

¹ Child Development Permit Leaflet: <http://www.ctc.ca.gov/credentials/leaflets/cl797.pdf>

- Child Development Master Teacher
- Child Development Site Supervisor
- Child Development Program Director

Child Development Permits Issued 2004-05 to 2008-09

Initial Issuance Only	2005	2006	2007	2008	2009
Child Development Assistant Permit	1,124	1,074	1,109	1,404	1,591
Child Development Associate Teacher Permit	3,213	2,656	2,789	2,840	3,090
Child Development Teacher Permit	1,841	1,716	1,847	1,889	1,881
Child Development Master Teacher Permit	664	574	632	666	684
Child Development Site Supervisor Permit	1,940	1,658	1,817	1,864	2,018
Child Development Program Director Permit	453	403	457	544	579
Initial Issuance Totals	9,235	8,081	8,651	9,207	9,843

Reissuance/Renewal Only	2005	2006	2007	2008	2009
Child Development Assistant Permit	21	22	26	82	69
Child Development Associate Teacher Permit	281	334	412	571	596
Child Development Teacher Permit	495	539	740	932	896
Child Development Master Teacher Permit	94	128	153	259	260
Child Development Site Supervisor Permit	672	705	803	1359	1278
Child Development Program Director Permit	169	218	280	395	455
Previously Issued Permit Types	693	603	456	354	352
Reissuance/Renewal Totals	2,425	2,549	2,870	3,952	3,906

Grand Total (Initial and Renewals)	11,660	10,630	11,521	13,159	13,749
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Regional Accreditation for Commission-issued Documents, including the Child Development Permit

In general, institutions offering coursework for the Child Development Permit must be regionally accredited. The only exception to this requirement is that candidates may complete a Home Economics and Related Occupations (HERO) program or Regional Occupation Program (ROP) in Child Development Related Occupations for the Assistant Teacher Permit, the lowest level permit. The evaluation of coursework for the permits is conducted by the Commission's certification staff based on a review of transcripts and verification of experience. Because the process for approving an application for a Child Development Permit is based on a course-by-course transcript evaluation, the institutions offering the programs are not required to meet Commission program standards and do not participate in the Commission's accreditation process.

In 1992, Assembly Member Polanco authored AB 2879 (Chap. 533, Stats. 1992), which directed the Commission to collaborate with the Superintendent of Public Instruction (SPI) on an examination of the permit structure. At that time, the permit structure was quite different from what is in place today. Approximately forty-three percent of first-time applicants for the permits were issued emergency type permits. AB 2879 required the Commission and the SPI to provide

recommendations in a report to the Legislature and the Governor no later than December 1, 1994. Commission and CDE staff collaborated with early childhood education professionals on the development of a report which was subsequently approved by the Commission and the SPI and which was forwarded to the Legislature and to the Governor. One recommendation in particular was that the Commission should establish an avenue for recognizing alternative training for the child development permit based on the development of program standards and participation of the preparation program in the Commission's accreditation process.

Subsequently, the Commission assembled a team of professionals in the area of early childhood education to develop program standards along with a site visit protocol, and also to design a pilot study that included two strands – one appropriate for alternative training programs and the other appropriate for regionally accredited institutions. The final pilot included seven alternative programs, seven regionally accredited community colleges, and four universities. While all participants proved successful in addressing the standards and site visit results were positive, the Commission faced a dilemma. With the probability of over one hundred programs participating in a “beyond the pilot” system, the cost to the Commission in budget allocations and in staff time would be problematic. And, while the pilot was voluntary, bringing Child Development Permit programs fully into a standards-based accreditation system would require all programs to meet the standards in order to receive Commission approval. It was determined at that time that the staff should try to identify a less onerous avenue.

In 2004, the Commission approved a new approach for regionally accredited community colleges and four-year universities called the “*Child Development Permit Verification of Completion Program*.” This voluntary program was initiated as an alternative to the Commission's course-by-course transcript review of each candidate's application. To develop the process, Commission staff met with representatives from community college and four-year college or university programs, from the CDE, and from the Child Development Training Consortium². Within this approach, programs at regionally accredited entities submit courses and course catalog descriptions for child development permits for program approval purposes and then verify that each candidate who submits an application through the program has completed all of the requirements. Participating colleges and universities are required to provide credential advising and assistance for all permit candidates. Through this new process the Commission assists candidates by providing early assurance that they will receive the permit, reduces the number of rejected applications, and streamlines permit processing at the Commission. There are nearly forty colleges and universities currently participating in this program. Applications submitted through the Verification of Completion Program receive priority processing. However, there is no option available for alternative programs (i.e., programs offered by entities that are not regionally accredited).

As time has progressed, the Commission continues to receive requests for a process that can incorporate coursework for the Child Development Permit provided by a non-regionally accredited entity. While alternative training is approved by the Department of Social Services, individuals completing such a program currently have no route for leaving *private* sector preschools to work in *public* child development programs without having to retake courses

² Child Development Training Consortium: <http://www.childdevelopment.org/cs/cdte/print/htdocs/home.htm>

through a regionally accredited college or university. In accordance with California Code of Regulations, Title 22, the Department of Social Services accepts coursework from “accredited or approved schools, colleges or universities.” Approved schools, colleges or universities are defined as “approved/authorized by the U.S. Department of Education, Office of Postsecondary Education, or by the California Department of Consumer Affairs, Bureau for Private Postsecondary and Vocational Education.” Accredited schools, colleges or universities are defined as “those accredited by any one of the following recognized accrediting agencies:

- Accrediting Commission, Distance Education and Training Council
- Western Association of Schools and Colleges
- Accrediting Bureau of Health Education Schools
- Association of Independent Colleges and Schools
- National Association of Trade and Technical Schools.

Rationale for Requiring Regional Accreditation for Commission-Issued Documents and Exceptions to the Rule

The California Education Code specifies that regionally accredited colleges and universities are eligible to sponsor educator preparation programs. Regional accreditation provides a level of assurance that the institution proposing to offer the educator preparation program has the institutional capacity to provide the promised services. It allows the Commission’s accreditation system to focus on issues related to implementing effective and high quality educator preparation programs. The precursor review for regional accreditation allows the Commission to have a reasonable assurance that students will receive the educational services promised by the institution.

For some credential programs, the Education Code specifies that other non-regionally accredited entities such as local education agencies (school districts and county offices of education) are eligible to sponsor the educator preparation program. The table below provides examples of these credential program and the statutory language.

Credential Program	Statutory Language Relating to Eligible Program Sponsor
Induction Program	Local education agencies in addition to institutions of higher education. EC §44259 (c)(2)(A)
Preliminary Administrative Services Program	Completion of an entry-level program of specialized and professional preparation in administrative services approved by the Commission §44270 (a) (3)
Clear Administrative Services Program	Local Education Agencies. Completion of a commission approved program of advanced preparation (with specialization in administrative services) §44270.1 (a) (3)
Designated Subjects Career Technical Education Program	Local Education Agencies. Completion of a program of personalized preparation as approved by the Commission §44260. 1 (c)

Eligible program sponsors are indicated for specific credential programs in the education code and are carried out in Title 5 regulations. All of the identified educator preparation programs are

governed by standards approved by the Commission. The program sponsors participate in the Commission's accreditation system.

Discussion

As stated in the Introduction, Commission staff was recently invited by legislative staff members to discuss a legislative proposal made by the Montessori Accreditation Council for Teacher Education (MACTE). The MACTE proposal was that the Commission should be required to accept coursework for the Child Development Permit from Montessori teacher training programs accredited by MACTE. This agenda item was developed following that discussion.

MACTE is recognized by the United States Department of Education (USDE), by the Council of Higher Education Accreditation (CHEA), and by the Association of Specialized and Professional Accreditors (ASPA). MACTE is also recognized as a professional accrediting organization by the National Council for Accreditation of Teacher Education (NCATE). California's Department of Social Services accepts courses from MACTE-accredited teacher training programs as meeting its requirements for staff in private preschool programs. The MACTE accreditation process is standards-based, requires specified hours of academic coursework and practicum experiences, requires demonstration of specified candidate competencies and includes site visits by an accreditation team every seven years. MACTE is an international organization with thirteen accredited programs in California. Two of the thirteen programs are offered by regionally accredited institutions of higher education.

As Commission staff continued to research the MACTE legislative proposal, staff noted a section of California Code of Regulations, Title 5, originally applied to address the standards-based pilot described above, that could potentially be reexamined with respect to this issue. Section 80105 (f) defines "Commission approved alternative education programs" as "training which occurs outside a regionally accredited institution of higher education that has been approved by the Commission to meet all or part of the requirements for obtaining a Child Development Permit. Commission approved alternative education programs must meet criteria established by the Commission in consultation with the Superintendent of Public Instruction in order to be applied toward the Permit." While the original application of this regulatory section was intended to address the standards-based pilot described above, staff believes that there may be other appropriate applications for this regulatory section that could potentially address the issue of non-regionally accredited program sponsors of early childhood development coursework.

Next Steps

Staff seeks direction from the Commission whether the issue of accepting coursework for the Child Development Permit from non-regionally accredited entities that has been raised by MACTE's legislative proposal should be pursued administratively within the context of the above referenced Title 5 regulations.

If the Commission wishes to pursue the issue, staff could convene a workgroup, including representatives of the SPI and other interested stakeholders, to develop a parallel route for approving coursework for the Child Development Permit provided by non-regionally accredited entities such as MACTE as is now available to regionally-accredited program sponsors. The

workgroup would identify criteria for approving alternative education programs offering high quality programs for child development professionals that could be presented to the Commission for adoption.