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Action

Professional Services Committee

Adoption of Precondition 1 Related to Non-Regionally Accredited Institutions and Other Program Sponsors

Executive Summary: This agenda item presents a rationale for the possible revision of Precondition 1 for the Commission's discussion and consideration.

Recommended Action: Staff recommends adoption of the proposed revision for Precondition 1 Related to Non-Regionally Accredited Institutions and Other Program Sponsors.

Presenter: Teri Clark, Director, and Cheryl Hickey, Administrator, Professional Services Division

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

Adoption of Precondition 1 Related to Non-Regionally Accredited Institutions and Other Program Sponsors

Introduction

The Commission has historically approved institutions of higher education and local education agencies to offer educator preparation programs. As part of the Commission's General Preconditions, institutions of higher education are required to be accredited by the Western Association of Schools and Colleges (WASC) or one of the other six regional accrediting bodies. For school districts or county offices of education (Local Education Agencies, or LEAs), the Precondition specifies that the LEA must submit evidence that the governing board approves the sponsorship of the preparation program.

At the January 2011 Committee on Accreditation (COA) meeting an agenda item was presented on the responsibilities of institutions approved by the Commission to offer educator preparation programs (http://www.ctc.ca.gov/educator-prep/coa-agendas/2011-01/2011-01-item-09.pdf). Based on discussion at that meeting, staff brought an additional information item to the COA at the March 2011 meeting. At the April 2011 meeting the COA took action to forward suggested revised language for Precondition 1 to the Commission for discussion and possible adoption. At the June 2011 Commission meeting, this item was presented to the Commission for information and discussion. The Commission asked for additional information about the "teach out" component of WASC. That information is provided in this item. At this time, the proposed revised language returns to the Commission for further discussion and possible adoption.

Background

The Commission's Preconditions and Common Standards outline what an approved entity must do to offer one or more educator preparation programs in California. Preconditions are compliance requirements that must be met in order for an accrediting association or licensing agency to consider accrediting an institution, its programs or its schools. Preconditions determine a program sponsor's eligibility for accreditation. Some preconditions are based on state laws, while other preconditions are established by Commission policy.

When the Commission's General Preconditions were first developed most sponsors of educator preparation programs were institutions of higher education (IHE). Now there are additional types of program sponsors, as shown in Table 1 below:

Table 1. Program Sponsors by Type

Program Sponsor Type	Number of Current Program Sponsors *
University of California	8
California State University	23
Private Colleges and Universities	56
Local Education Agencies	167

Program Sponsor Type	Number of Current Program Sponsors *
Other Sponsors	3
Alternative STEM Sponsors	0
Total Institutions	**257**

*June 2011

Discussion

There are three key issues that prompted the COA to forward the consideration of a revised Precondition 1 to the Commission. These are: (1) sponsorship of educator preparation programs by school districts and county offices of education (LEAs); (2) potential sponsorship of educator preparation programs by entities that are not regionally accredited; and (3) program sponsor responsibilities to candidates if and when an educator preparation program closes. Each of these key issues is addressed below.

Key Issue 1: Sponsorship of educator preparation programs by LEAs

Although LEAs are included within the current language of Precondition 1, the requirement for these entities is only that the Superintendent of the LEA verifies that the governing board has approved the sponsorship of the educator preparation program. However, the responsibilities for program sponsors are significant, and it was not clear that LEAs recognize and understand the depth and breadth of the commitment they are making when they approve sponsoring an educator preparation program. For example, program sponsors must commit to offering the program to candidates until the candidate completes the program, is dropped from the program, withdraws from the program, or transfers to another approved program. The COA believes that these requirements are not sufficiently addressed in the current language of Precondition 1.

Key Issue 2: Potential sponsorship of educator preparation programs by entities that are not regionally accredited

In June 2010 the Commission adopted a plan as required by SBX5 1 for organizations that are not regionally accredited but wish to offer educator preparation programs in California (http://www.ctc.ca.gov/commission/agendas/2010-06/2010-06-5B.pdf). As of the writing of this agenda item, no such entities have requested to begin the approval process. However, the current version of Precondition 1 only addresses regionally accredited IHEs and LEAs and does not address the requirements for non-regionally accredited prospective program sponsors. The precondition needs to be modified for the future to include this type of potential educator preparation program sponsor.

Key Issue 3: Program responsibilities to candidates if and when a program closes

For IHEs, regional accreditation addresses large institution-wide issues including catalog rights and procedures for the closing of programs. WASC stated that programs at WASC-accredited institutions are expected to teach-out all students who have been accepted into a program if the program is going to close. In addition, WASC mentioned that this is in keeping with the federal policy on candidate rights and closing a program at an institution of higher education.

The COA believes that the current General Preconditions do not clearly or adequately address the responsibilities for both LEAs and entities that are not regionally accredited with respect to

candidates who have been accepted into an approved program if the program is closed before the candidate has had time to complete the program.

Review of Precondition 1

Precondition 1 specifies that all IHEs must be regionally accredited while LEAs must submit verification that the governing board has approved sponsorship of the program. There is no language within the adopted Precondition 1 that addresses entities that are not regionally accredited colleges or universities, school districts and county offices of education.

General Precondition 1 as adopted is presented below:

> **(1) Accreditation and Academic Credit.** To be granted initial institutional accreditation by the Commission to become eligible to submit programs or to be granted initial program accreditation or continuing accreditation by the Committee on Accreditation, the program(s) must be proposed and operated by an institution that (a) is fully accredited by the Western Association of Schools and Colleges or another of the six regional accrediting associations, and (b) grants baccalaureate academic credit or post baccalaureate academic credit, or both. (This provision does not apply to professional preparation programs offered by school districts.)
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> For school districts wishing to offer a professional preparation program, the Superintendent of the district shall submit verification of the governing board's approval of sponsorship of the program.

Proposed Revised Language for Precondition 1

Provided below is a proposed revised Precondition 1 for the Commission's discussion that addresses the key issues discussed above:

> **(1) Accreditation and Academic Credit.** To be granted initial institutional accreditation by the Commission to become eligible to submit programs or to be granted initial program accreditation or continuing accreditation by the Committee on Accreditation, the program(s) must be proposed and operated by a college or university that (a) is fully accredited by the Western Association of Schools and Colleges or another of the six regional accrediting associations, and (b) grants baccalaureate academic credit or post baccalaureate academic credit, or both. (This provision does not apply to professional preparation programs offered by school districts.) For school districts or other non-regionally accredited entities wishing to offer an educator preparation program, 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:
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> Once a candidate is accepted and enrolls in an educator preparation program, the sponsor must offer the approved program, meeting the adopted standards, until the candidate:
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> 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, an individual transition plan would need to be developed with each candidate.

At the June 2011 Commission meeting, Commissioner Beverly Young referenced the "teach out" provision by WASC noting that WASC requires that the alternative program offered to the student or candidate affected by the closure must be reasonable. Commissioner Young requested that staff include information about the WASC teach out provision. This information is included in Appendix A. Although this provision seems to indicate that it applies to institutions for which action has been taken against the institution by WASC, staff confirmed that it applies to any institution that closes a program for any reason.

Staff Recommendation
Staff recommends that the Commission adopt the revised Precondition. In addition, the Commission can direct staff to present the WASC "teach out" language to the Committee on Accreditation to be reviewed and the appropriate portions incorporated in the Accreditation Handbook on withdrawing or closing a program.

Next Steps
If the Commission adopts the revised Precondition 1, staff will revise all related documents and materials to reflect the new language. In addition, a Program Sponsor Alert will be drafted and provided to all stakeholders and available on the Commission's website.

Appendix A

Western Association for Schools and Colleges (WASC) – Senior Commission
Teach Out Provision (Excerpt from WASC Procedures Manual)

Teach-Out Plans and Agreements [§602.24(c)]

An institution accredited by the Commission must submit to the Commission for its prior approval a teachout *plan* or *agreement* upon the occurrence of any of the following:

1) The Secretary of Education notifies WASC that the Secretary has initiated an emergency action against an institution in accordance with section 487(c)(1)(G) of the HEA or an action to limit, suspend, or terminate an institution participating in any Title IV, HEA program, in accordance with section 487(c)(1)(F) HEA, and that a teach-out plan is required.

2) WASC acts to withdraw, terminate, or suspend accreditation or candidacy of the institution.

3) The institution notifies WASC that it intends to cease operations entirely or close a location that provides one hundred percent of at least one program.

4) A state licensing or authorizing agency notifies WASC that an institution's license or legal authority to provide an educational program has been or will be revoked.

A teach-out *plan* means a written plan developed by that institution that provides for the equitable treatment of its own students if an institution, or an institutional location that provides one hundred percent of at least one program, ceases to operate before all students have completed their program of study, and may include if required by the institution's accrediting agency, a teach-out agreement between institutions. A teach-out *agreement* means a written agreement between two institutions that provides for equitable treatment of students under these circumstances. WASC may require an institution to enter into a teach-out agreement as part of its teach-out plan.

When an institution enters into a teach-out agreement with another institution, the initiating institution must submit the agreement to the Commission for approval prior to its implementation. The teach-out agreement may be approved only if the agreement is between institutions that are accredited by a nationally recognized accrediting agency; and

a) must be consistent with applicable standards of accreditation and Commission Policies;

b) must provide for the equitable treatment of students by ensuring that the teach-out institution has the necessary experience, resources, and support services to provide an educational program that is of acceptable quality and reasonably similar in content, structure, and scheduling to that provided by the institution that is closing or discontinuing its program(s), to remain stable, carry out its mission, and to meet all obligations to its existing students;

c) must ensure that the teach-out institution can provide students access to the program and services without requiring them to move or travel substantial distances;

d) must provide for notification of another accrediting agency if the teach-out institution holds accreditation from that agency; and

e) must specify additional charges, if any, levied by the teach-out institution and provide for notification to the students of any additional charges

If an institution the Commission accredits or has granted candidacy to closes without a teach-out plan, the Commission must work with the Department of Education and the appropriate State agency, to the extent feasible, to assist students in finding reasonable opportunities to complete their education without additional charges.

The Commission has adopted *Guidelines for Closing an Institution*, available from the Commission office.

Revised and approved by the Commission, 11/06/2009