
4H

Information/Action

Professional Services Committee

Discussion of Policies Related to Initial Institutional Approval

Executive Summary: This agenda item describes the current process for initial institutional approval and provides an opportunity to discuss issues that have arisen over time.

Policy Question: Does the Commission wish to make changes to current policies and procedures related to initial institutional approval?

Recommended Actions: That the Commission provide direction as to whether any aspect of the initial institutional approval process should be changed.

Presenters: 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

August 2012

Discussion of Policies Related to Initial Institutional Approval

Introduction

This agenda item presents the current policies and procedures related to initial institutional approval and discusses issues that have arisen over time with the process.

Background

Under the Education Code, the Commission has the authority to determine the eligibility of institutions to offer approved educator preparation programs and to recommend issuance of credentials to candidates completing programs of preparation. This authority also applies to other program sponsors, such as school districts, who were made eligible to sponsor professional educator preparation programs through legislation. Appendices A and B provides pertinent citations from the Education Code and from the *Accreditation Framework* regarding the Commission's responsibilities and practices relative to institutional approval.

Once granted initial accreditation, the institution then comes under the continuing accreditation procedures of the Commission and will participate in the regular accreditation cycle for on-site reviews. All institutions approved for the first time to sponsor one or more Commission-approved educator preparation programs receive a technical assistance visit approximately two years after approval.

Currently, 261 institutions have been granted initial institutional approval. Recently, a situation arose in which an institution was offering a program to candidates prior to receiving initial institutional approval, and this situation raised significant questions about various aspects of the initial institutional approval process. Based on this situation as well as others of which the staff has become aware over time, the scope of this agenda item includes describing recent changes in the initial institutional approval process as well as raising additional issues for Commission discussion and consideration.

Recent Changes to Initial Institutional Approval Procedures

Past practice has been for agenda items relating to initial institutional approval have been included on the Consent Agenda and have only included a brief description of the institution and not the actual source documents such as the institution's full response to the Common Standards. In 2010, the Commission requested expanded information about institutional responses to the Preconditions within agenda items. In response to this request, staff has begun including a brief summary chart (Preconditions Worksheet) in relevant agenda items that describes how the institution has met the Commission's ten General Preconditions. This document has been provided to the Commission along with the initial institutional approval agenda item, along with a link to the institution's full Preconditions document.

In Fall 2011, the Commission requested and staff provided access to all documentation submitted by the prospective sponsor, not just the Preconditions worksheet. This includes the following:

- Links to the full Preconditions document
- Links to the entire Common Standards document
- Evidence provided by the institution, via links embedded within the Common Standards document
- Feedback sheets from reviewers documenting the reviewers' questions to the institution

Recently, all of the above information has been provided to the Commission for new institutions that request initial institutional approval.

Also beginning in Fall 2011, staff instituted several procedural changes:

- Website Changes - Commission staff has made several important changes to the website for initial institutional approval (<http://www.ctc.ca.gov/educator-prep/new-program-submission.html>) to present information more clearly and to clarify the steps to be taken, including indicating the time needed for the entire process to be completed. The fact that an institution must be approved for Initial Institutional Approval by the Commission prior to program approval by the Committee on Accreditation was made clearly explicit.
- Changes to the *Intent to Apply for Initial Institutional Approval* Form – Prior to submitting an institution's application consisting of the Preconditions and Common Standards documents, an institution has been required to submit an "*Intent to Apply for Initial Institutional Approval*" form. This form has been used by staff to better plan workload and ensure that reviewers were available for the anticipated review of the documentation.

Staff has revised this form in a significant manner. First, staff has added two statements that the institutional leadership must review and affirm. The statements are as follows:

I understand that we cannot offer educator preparation coursework in a program leading to a California credential until we receive both Initial Institutional Approval by the Commission and Initial Program Approval by the Committee on Accreditation.

On behalf of the institution identified on this form, I verify that we will not represent to students, candidates, prospective candidates, members of the public or others that any coursework or programs we currently offer leads to a California credential, certificate, or authorization until we have been granted both Initial Institutional Approval by the Commission on Teacher Credentialing and program approval by the Committee on Accreditation.

In addition, a signature requirement has been added to the *Intent to Apply for Initial Institutional Approval* Form. This ensures that the institutional leadership is made aware of the application for Initial Institutional Approval. Situations have arisen in the past for program approval where documents have been submitted by institutional personnel without the knowledge or consent of the larger institutional leadership. Addressing this situation at the beginning of the approval process ensures that institutional leadership is aware and supportive of the application.

- Changes to the *Intent to Apply for Program Approval* Form – Because an institution must undergo a two-step process of initial institutional approval and initial program review, similar changes have been made for the initial program review intent form. Website information has been clarified, including that Initial Institutional Approval by the Commission is required before program approval can be considered by the COA. In addition, verification language similar to that above has been added to the *Initial Program Review Verification* form for a program proposal.

The steps taken above meet two purposes: 1) to clarify expectations for institutions that have not previously sponsored educator preparation programs in California; and 2) to serve as a vehicle for alerting Commission staff to potential issues in a more timely manner.

- Changes to processes for notifying institutions offering programs not approved by the Commission – Commission staff has also implemented new procedures for contacting institutions when it becomes aware of institutions that may be advertising or communicating with candidates that their program is approved if it is, in fact, not yet approved. Presently, all incidents of this kind would be handled by issuing a formal cease and desist letter to the institution that was reviewed by legal staff and signed by the Commission’s Executive Director indicating that the Commission had become aware of the statements and/or representations about the program along with evidence of the statements and/or representations, if available. The institution will be directed to remove such claims from all institutional materials, both print and electronic, and staff will be tasked to follow up to ensure the institution has complied with the directive. The letter will also include a statement that failure to comply with the directive could result in denial of initial institutional approval by the Commission.

Staff will maintain documentation within the institution’s file regarding any incident of this type that resulted in Commission direction to the institution. To date, however, Commission staff has not had to implement this procedure.

Initial Institutional Approval Policy Issues

The identified topics are presented below as policy issues for the Commission to review and discuss. For each topic, one or more summary questions are provided to help focus the Commission’s discussion.

A. Preconditions: *Precondition regarding the veracity of all claims and documentation submitted*

The initial institutional approval process relies solely on the information provided by the applicant institution in written documentation, whereas in ongoing accreditation, a great deal of additional evidence (e.g., student work samples, interviews with stakeholders, surveys, and other data sources) is available to corroborate or dispute the information provided in the document. To date, there has been an assumption that the information provided in Initial Institutional Approval documentation is true and accurate. Recently, however, a proposal submitted appeared on paper to meet the Commission’s standards, and the recommendation to the Commission for approval was based on those facts alone. But in actuality, other aspects of the institution and the program relevant to the approval process were not provided in the written documentation, and thus there

was a lack of full disclosure by the institution of the circumstances of the program and its implementation. The General Preconditions do not explicitly require a prospective sponsor to affirm that the information provided is complete and true. Staff suggests that it would be appropriate for the Commission to review and possibly revise its General Preconditions to address this issue and add any additional criteria deemed necessary for the Commission to make an informed decision about a prospective sponsor.

The *Accreditation Framework and Handbook* do not provide guidance regarding accreditation decisions in a situation such as this, as the current language limits the Commission's choices to only approve or deny the application based solely on the quality of the responses to the Commission's Standards and ten General Preconditions. Requiring an affirmation by the institution of full disclosure of pertinent information in a Precondition would provide the Commission with justification for not granting an institution initial institutional approval even in cases where the Common Standards and Preconditions, as they appeared on paper, have been deemed to be met. Without such a process, if staff and the Commission were not to follow the procedure as outlined, an institution could charge that the Commission was not properly following its stated procedures and have grounds to dispute an adverse decision by the Commission.

1. *Does the Commission wish to add a Precondition requiring full disclosure and verification that information and documentation submitted in the request for initial institutional approval are true and complete?*
2. *Are the ten General Preconditions appropriate for today's variety of institutions and programs?*

B. Institutional Application Documents: *Documentation presented for all institutions seeking initial institutional approval*

As stated above, the Commission is now provided with copies of:

- Links to the full Preconditions document
- Links to the entire Common Standards document
- Evidence provided by the institution, via links embedded within the Common Standards document
- Feedback sheets from reviewers documenting the reviewers' questions to the institution

The review process, as it is now defined, does not have a component for the Commission to complete an independent review of the Preconditions or Common Standards. The Framework defines that the BIR members review the Common Standards. The process currently followed for review of the responses is that the experts who are BIR members and/or experts in the field of educator preparation serve as trained peer reviewers. The over 500 reviewers receive extensive initial training (four days) and subsequent follow-up training and recalibration for their responsibilities. Pairs of reviewers discuss the narrative and evidence provided and either 1) determine by consensus that information submitted by the prospective sponsor is aligned with the Common Standards, or 2) determine by consensus that more information is needed. If the pair of reviewers determines that additional information or evidence is needed, they work together to develop language that would identify what questions they have or what additional

information is still needed to adequately respond to the standards. If the two reviewers cannot reach consensus, a third reviewer may be added to the review team.

Because of the level of complexity and detail required to demonstrate that an institution meets the Common Standards, it is usually the case that institutions new to the process are requested to submit additional information a minimum of one time, but usually two or three times. The process is repeated until sufficient information is provided to determine that all Common Standards have been met. If and when all responses have been deemed to be aligned to the Common Standards, and the Preconditions have been found to be met through the staff review, the recommendation for initial institutional accreditation is brought to the Commission for review and approval.

3. *Does the Commission wish to continue the practice of being provided the full program application, including all submitted documents?*

4. *Does the Commission wish to have a more active role in the review process itself?*

C. Institutional Review Sequence: *Strict Sequential Approach to the Review Process*

It has been the Commission's practice to begin the review of all documents received as soon as feasible. In other words, the process for reviewing the submission addressing the program standards has not been delayed until after the review of the General Preconditions and Common Standards has been completed, since these processes are done by different groups of individuals. The Commission might wish to institute a strict sequential approach to the review process in which the responses to the Program Standards would be held for initial review until such time the institution received Initial Institutional Approval.

While a strict sequential approach would eliminate the possibility of any program's review being completed before the institution itself is approved as an approved program sponsor, this change would likely significantly increase the time needed for approval and thus the startup time for the institution to offer the educator preparation program. This delay could have an adverse impact on a school community that may have a need for the proposed program in a more timely manner and could unnecessarily expose the Commission to allegations that it is overly bureaucratic and not responsive to external needs. The current system is in place to ensure that the already lengthy process does not become unnecessarily lengthy.

5. *Does the Commission wish to maintain the current practice or to institute a strict sequential approach to the review process?*

D. Approval Processes and Decisions: *Approval Options: Approve, Deny, or Provisional Approval*

Currently, the Commission's processes for initial institutional approval provide only two options: approval or denial of initial institutional approval. Given that the criteria for approval include a review of the Preconditions and Common Standards, institutions that have not been deemed to meet these criteria are not forwarded to the Commission for approval.

In order to assure that institutions new to educator preparation in California understand and comply with applicable standards and policies, the Commission could consider establishing a provisional period for some or all new program sponsors. During this period of time, the new institution would become part of the ongoing accreditation system and could begin to offer its approved programs. There would be an expectation that some demonstration to the Commission of adequate performance or operation would be required for a specified amount of time in order for the institution to continue to operate approved educator preparation programs in California. If the Commission were to establish a provisional period, however, it would need to define clear criteria of expected performance for new institutions, and there would be an additional workload for staff and/or the COA to review institutional performance and approve the movement of the institution from provisional to full approval. Further, if this policy were adopted as an option for the Commission to apply selectively rather than as a requirement for all new institutions, then discussion would be necessary to determine under what scenarios provisional approval would be awarded as opposed to full approval.

6. Does the Commission wish to consider the option of a provisional approval period for some or all new educator preparation institutions?

7. If the Commission wishes to consider the option of a provisional approval period for some or all new educator preparation institutions, what would be the criteria for imposing provisional approval?

The issue of sanctions also arose in discussion as a possible option for the Commission in the event that an institution did not comply appropriately with Commission policy and/or requirements. The idea of sanctions must be carefully considered due to potential legal issues, and may be difficult to enforce depending on the nature of the sanctions. The Commission has no authority to levy penalties or fines on institutions, and the Commission has no authority over institutions that are not in its accreditation system. Delay of approval could be an option; however, it is unclear what impact that type of sanction would have on the affected institution.

8. Does the Commission wish to continue the discussion relating to identifying and potentially imposing sanctions?

Additional changes to discourage institutions from beginning or operating a program prior to Commission approval

Over the past year, the Commission became aware of an institution that was operating a credential preparation program prior to being approved by the Commission. As a result of this and other recent occurrences, the Commission staff concluded that more could be done to help institutions better understand the process and expectations involved in initial institutional and program approval. To that end, changes have been made on the Initial Institutional Approval webpage (<http://www.ctc.ca.gov/educator-prep/new-program-submission.html>).

It is the case, however, that a college or university may offer courses, and a school district, county office of education or other entity may offer professional development without Commission approval. In general, the Commission does not appear to have the statutory authority to regulate whether and when an institution may begin offering coursework. Statute is

clear, however, that only those credentials recommended by Commission-approved programs will be granted. The Commission frequently receives requests from all sectors of the educator preparation community about the ability to begin a credential program prior to approval.

Without the authority to prevent institutions from offering coursework, the Commission is significantly limited in terms of responses and actions with respect to an institution that offers coursework that will be part of an educator preparation program prior to receiving Commission approval for the program. The very clear statement is that under the *Accreditation Framework*, the institution would not be able to recommend an individual for a California credential until such time as the program is approved by the Commission, which is, some would argue, a significant lever.

With the recent changes to improve the clarity of information provided to institutions regarding initial institutional approval policies and processes, Commission staff believes that it has now taken sufficient appropriate actions to assist institutions seeking to be approved to operate as an educator preparation program provider.

9. Does the Commission have additional ideas that could be implemented to ensure that all prospective program sponsors are aware of and follow established policies and protocols relating to initial institutional approval?

E. Another Policy Issue: Charging for Initial Institutional Approval

Over the past several years, the issue of charging for accreditation activities has been raised. One of the possible areas in which a fee structure could be developed and implemented is in the document review process within Initial Institutional Approval procedures. Currently, the Commission assumes the cost of conducting the reviews within its regular budget allocation. This budget allocation for this purpose does not change with the increase or decrease in workload related to the number of Initial Institutional Approvals.

The time it takes to review Preconditions and Common Standards documents is significant. As the interest in offering educator preparation grows among traditional and nontraditional providers, such as those envisioned to provide educator preparation in the STEM (science, technology, engineering, and mathematics) fields, the charter school community, and others, the Commission may wish to develop a reliable revenue source to support the workload involved in these reviews.

The Commission could explore a variety of fee structures to recoup the cost of staff time and the cost of the review of the documents by Board of Institutional Reviewers. This not only will help the Commission defray the cost of a critically important accreditation function, but may also provide a more timely review of documents submitted by prospective program sponsors since some of the revenue could cover the cost to bring reviewers together for dedicated review sessions.

Two individuals are needed to review a prospective sponsor's Common Standards. A more calibrated and reliable review is completed when the reviewers meet together with a Commission staff member available to respond to questions and provide guidance. Currently travel costs

average about \$400 a person for a one-day reading session. Charging a prospective sponsor \$800 would fund the travel costs for the pair of reviewers. Another possibility would be for the prospective sponsor to support one or two staff members to travel to the Commission and serve as reviewers on other proposals in lieu of paying a specified fee.

10. Does the Commission wish to pursue options for charging for Initial Institutional Approval?

Summary

This item is for information. Staff welcomes direction from the Commission on any aspect of initial institutional approval that the Commission deems appropriate. A summary of the issues and questions is provided here.

Issue	Question(s) posed in the item
A. Preconditions	
Precondition regarding the veracity of all claims and documentation submitted Review and update the Preconditions	1. Does the Commission wish to add a Precondition requiring full disclosure and verification that information and documentation submitted in the request for initial institutional approval are true and complete? 2. Are the ten General Preconditions appropriate for today’s variety of institutions and programs?
B. Institutional Application Documents	
Documentation presented for all institutions seeking initial institutional approval	3. Does the Commission wish to continue the practice of being provided the full program application, including all submitted documents? 4. Does the Commission wish to have a more active role in the review process itself?
C. Institutional Review Sequence	
Strict Sequential Approach to the Review Process	5. Does the Commission wish to maintain the current practice or to institute a strict sequential approach to the review process?
D. Approval Processes and Decisions	
Approval Options: Approve, Deny, or Provisional Approval Criteria for Provisional Approval	6. Does the Commission wish to consider the option of a provisional period for some or all new educator preparation institutions? 7. If the Commission wishes to consider the option of a provisional approval period for some or all new educator preparation program institutions, what would be the criteria for imposing provisional approval?
Potential Option for Sanctions Additional changes to discourage institutions from	8. Does the Commission wish to continue the discussion relating to identifying and imposing sanctions? 9. Does the Commission have additional ideas that could be implemented to ensure that all prospective program sponsors are aware of and follow established policies and

Issue	Question(s) posed in the item
beginning or operating a program prior to Commission approval	protocols relating to initial institutional approval?
E. Other Policy Issues	
Charging for Initial Institutional Approval	10. Does the Commission wish to pursue options for charging for Initial Institutional Approval?

Next Steps

Depending on the discussion, future agenda items could be prepared to address the Initial Institutional policies and procedures that the Commission identifies.

Appendix A – Education Code

Education Code §44227(a) – The Commission may approve any institution of higher education whose teacher education program meets the standards prescribed by the Commission, to recommend to the Commission the issuance of credentials to persons who have successfully completed those programs.

Education Code §44372 – The powers and duties of the Commission on Teacher Credentialing regarding the accreditation system shall include the following: (c) Rule on the eligibility of an applicant for accreditation when the applying institution has not previously prepared educators for state certification in California, pursuant to subdivision (a) of section 44227.

Education Code §44373(c) – The committee [Committee on Accreditation] shall do, but not be limited to doing all of the following: (2) Make decisions about the initial accreditation of new programs of educator preparation in accordance with procedures adopted by the committee.

Appendix B – Accreditation Framework (Adopted by the Commission, December 2007)

Section 4 **Initial Accreditation Policies**

This section governs the initial recognition of institutions and approval of programs.

A. Responsibility for Two Phases of Initial Accreditation

- 1. Initial Institution/Program Sponsor Approval.** A postsecondary education institution or local education agency (LEA) or other entity that is not currently preparing educators for California's public schools must submit an application to the Commission for initial eligibility to submit programs. The application must indicate evidence of accreditation by either the Western Association of Schools and Colleges (WASC) or another of the regional accrediting bodies. In the case of an application from a Local Education Agency (LEA) or other entity, the governance board's approval or sponsorship of the program must be noted. The Commission may establish additional procedures and criteria for the initial approval of institutions/program sponsors to prepare and recommend candidates for state credentials in education.
- 2. Initial Approval of Programs.** The Committee on Accreditation decides the initial approval of new credential or certificate programs at an eligible institution/program sponsor. New credential or certificate program proposals by institutions/program sponsors that have been determined to be eligible by the Commission must fulfill preconditions established by state law and the Commission, the Common Standards, and the appropriate set of Program Standards. Descriptions of new programs include evidence of involvement in program design and planning by elementary and secondary school practitioners and members of diverse local communities.

B. Policies for Initial Approval of Programs

- 1. Review of New Programs.** Prior to being presented to the Committee on Accreditation for action, new programs proposed by eligible program sponsors are reviewed in relation to the Common Standards in Appendix 2 and the selected Program Standards as specified in Section 3 of this *Framework*. The Committee on Accreditation considers recommendations by the staff and/or the external reviewers regarding the approval of each proposed program.

C. Integration of Institutions/Program Sponsors into Accreditation Cycle. After initial approval of programs, the institution/program sponsor will be notified of its assignment to a specific cohort schedule. The institution/program sponsor will then participate in accreditation activities at the scheduled times.

1. **Accreditation Activities.** Institutions/program sponsors will complete Biennial Reports according to their cohort schedule. They will complete a Program Assessment eighteen months after initial program approval.
2. **Technical Assistance Site Visit.** Two years prior to the scheduled Site Visit, a Technical Assistance Site Visit will be made to the institution/program sponsor. The purpose of the Technical Assistance Site Visit is to prepare new institutions or program sponsors for the Committee on Accreditation Site Visit that will follow (to provide an opportunity for a limited review of all approved programs by a small team of experts in the field) and to provide feedback to the institution/program sponsor based upon that limited review.

Appendix C – Accreditation Handbook

Adopted by the Committee on Accreditation

Chapter Three Institutional and Program Approval

Introduction

This chapter describes the processes by which an institution gains initial institutional approval from the CTC that allows the institution to propose specific credential preparation programs for approval by the COA. This chapter also provides information about the different status options that a program might have, such as being approved, inactive, discontinued, or withdrawn.

I. Initial Institutional Approval

According to the *Accreditation Framework* (Section 1-B-1), the CTC is responsible for determining the eligibility of an institution that applies for initial accreditation and that has not previously prepared educators for state certification in California. The following procedures apply to those institutions:

- A. The institution prepares a complete program proposal, responding to all preconditions, Common Standards and appropriate program standards. The proposal will be considered the application for accreditation as well as the application for credential preparation program approval.
- B. Initial Accreditation will be considered a two-stage process:
 - 1. The proposal will be reviewed for compliance with the appropriate institutional preconditions. If the proposal meets the CTC's eligibility requirements as judged by trained reviewers, the institution will be recommended for initial institutional approval to the CTC which will consider the recommendation and take action.
 - 2. If the CTC acts favorably on the proposal, the proposal will be forwarded to the COA for program accreditation action according to adopted procedures.
- C. Once granted initial accreditation, the institution will then come under the continuing accreditation procedures adopted by the COA.

II. Initial Accreditation of Programs

According to the *Accreditation Framework* (Section 2-A-2), the COA is responsible for granting initial accreditation to new programs of educator preparation. If the COA determines that a program meets all applicable standards, the COA grants initial accreditation to the program. New credential program proposals by eligible institutions must fulfill preconditions established by state law and the CTC. They must also fulfill the Common Standards and one of the program standards options listed in Section 3 of the *Framework*: Option 1, California Program Standards;

Option 2, National or Professional Program Standards; or Option 3, Experimental Program Standards.

Section 4-B of the *Framework* contains the Policies for Initial Accreditation of Programs. Prior to being presented to the COA for action, new programs proposed by eligible institutions must go through Initial Program Review (IPR). During IPR, new program proposals are reviewed by panels of external experts, and occasionally by CTC staff with expertise in the credential area. During IPR, new programs are reviewed in relation to the preconditions, Common Standards and the selected program standards. The COA considers recommendations by the external review panels and CTC staff when deciding on the accreditation of each proposed program.

An institution that selects National or Professional Program Standards (Option 2) should consult the chapter on National or Professional Standards for appropriate procedures. The acceptability of the standards should be assured before the institution prepares a program proposal. An institution may choose to submit a program that meets the Experimental Program Standards (Option 3) adopted by the CTC when the program is designed to investigate professional preparation issues or policy questions related to the preparation of credential candidates.

Program Submission and Implementation: Basic Steps in the Accreditation of New Programs

There are several steps that must be followed by the CTC, its staff, and the COA during the process of reviewing proposals from institutions and agencies wishing to sponsor educator preparation programs.

Preliminary Staff Review

Before submitting program proposals for formal review and initial accreditation, institutions are encouraged to request preliminary reviews of *draft* proposals by the CTC's professional staff. The purpose of these reviews is to assist institutions in developing programs that are consistent with the intent and scope of the standards, and that will be logical and clear to the external reviewers. Program proposals may be submitted for preliminary staff review at any time. Institutions are encouraged to discuss the potential timeframe for such a review with CTC staff. Preliminary review is voluntary.

Review of Preconditions

Preconditions are requirements necessary to operate a program leading to an educator preparation license in California. They are based on state laws and regulations and do not involve issues of program quality. An institution's response to the preconditions is reviewed by the CTC's professional staff. At the institution's discretion, preconditions may be reviewed either during the preliminary review stage, or after the institution's formal submission of a proposal. If staff determines that the program complies with the requirements of state laws and administrative regulations, the program is eligible for a further review of the standards by staff or a review panel. If the program does not comply with the preconditions, the proposal is returned to the institution with specific information about the lack of compliance. Such a program may be resubmitted once the compliance issues have been resolved.

Initial Program Review (IPR) Unlike the preconditions, the standards address issues of program quality and effectiveness. Consequently, each institution's formal response to the standards is

reviewed by a review panel of experts in the field of preparation or by CTC staff. During the Initial Program Review process, there is opportunity for institutional representatives to confer with staff consultants to answer questions or clarify issues that may arise.

If staff or the review panel determines that a proposed program fulfills the standards, the program is recommended for initial accreditation by the COA at one of its regular meetings. Action by the COA is communicated to the institution in writing.

If staff or the review panel determines that the program does not meet the standards, the proposal is returned to the institution with an explanation of the findings. Specific reasons for the decision are communicated to the institution. Representatives of the institution can obtain information and assistance from the CTC's staff. After changes have been made in the program, the proposal may be submitted for re-consideration.

Appeal of an Adverse Decision

There are two levels of appeal of an adverse decision. The first is an appeal of a decision by CTC staff, or its review panel, that the preconditions or relevant program standards were not satisfied and that the proposal should not be forwarded to the COA for action. This appeal is directed to the COA.

The second is an appeal of an adverse decision by the COA. This appeal is directed to the Executive Director of the CTC.

If a program is not recommended to the COA for approval by staff or the review panel, the institution may submit a formal request to place that program on the agenda of the COA for consideration. In so doing, the institution must provide the following information:

- The original program proposal and the rationale for the adverse decision provided by the CTC's staff or review panel.
- Copies of any responses by the institution to requests for additional information from CTC's staff or review panel, including a copy of any resubmitted proposal (if it was resubmitted).
- A rationale for the institution's request.

The COA will review the information and do one of the following:

- Grant initial accreditation to the program.
- Request a new review of the institution's program proposal by a different CTC staff member or a different review panel.
- Deny initial accreditation to the program.

Within twenty business days of the COA's decision to deny initial accreditation, the institution may submit evidence to the Executive Director of the CTC that the decision made by the COA was arbitrary, capricious, unfair, or contrary to the policies of the *Accreditation Framework* or the procedural guidelines of the COA. (Information related to the quality of the program that was

not previously presented to the CTC's staff or the review panel may not be considered by the CTC.) The Executive Director will determine whether the evidence submitted by the institution responds to the criteria for appeal. If it does, the Executive Director will forward the appeal to the CTC. If it does not, the institution will be notified of the decision and provided with information describing how the information does not respond to the criteria. The institution will be given ten business days to re-submit the appeal to the Executive Director.

The appeal, if forwarded to the CTC by the Executive Director, will be heard before the Professional Services Committee of the CTC. The Professional Services Committee will consider the written evidence provided by the institution and a written response from the COA. In resolving the appeal, the CTC will take one of the following actions:

- Sustain the decision of the COA to deny initial accreditation to the program.
- Overturn the decision of the COA and grant initial accreditation to the program.

The Executive Director communicates the CTC's decision to the COA and the institution.