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Information

Professional Services Committee

Updating the Commission's General Preconditions for All Educator Preparation Programs

Executive Summary: This item begins the discussion of updating the Commission's General Preconditions for all educator preparation programs.

Policy Question: In what ways should the General Preconditions for all educator preparation programs be revised in order to ensure high quality educators for California schools?

Recommended Action: For information only

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Strategic Plan Goal

II. Program Quality and Accountability

- 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 2012

Updating the General Preconditions for All Educator Preparation Programs

Introduction

This agenda item presents information about the Commission's ten adopted General Preconditions which are required to be addressed by all institutions offering educator preparation programs in California. In addition, it raises issues for discussion that the Commission may wish to consider in reviewing, updating, and adopting new preconditions that all educator preparation programs will be expected to meet.

Background

California currently has a set of adopted General Preconditions that all Commission-approved educator preparation programs must meet in order to offer programs leading to a California certificate or authorization (Appendix A). In addition, the Commission has also adopted specific preconditions for the various credential programs. Preconditions for a prospective program sponsor or approved program sponsor are reviewed 1) during the initial institutional approval process, 2) prior to approval of a new educator preparation program, and 3) prior to an accreditation site visit. Preconditions are based either in California state statute or in adopted Commission policy. Because preconditions are largely ministerial and not discretionary, staff is responsible for reviewing documentation submitted by an institution and determining whether an institution has satisfactorily addressed them.

The credential specific preconditions are routinely reviewed and updated at the same time that credential specific program standards are reviewed and updated, typically by the same expert standards development panel. The General Preconditions have not been reviewed and updated in a comprehensive manner since their inception in the 1990's. Minor revisions have been made over the years to address particular issues. The preconditions, along with the Common Standards, serve as a gatekeeper for institutions wishing to sponsor educator preparation programs and help ensure that only those institutions that have the capacity, resources, and infrastructure to support high quality preparation programs. Given this important function of the preconditions, and given that much has changed in the educational environment in the past two decades, the Commission provided direction at the June 2012 Commission meeting to begin the discussion to update and revise, as appropriate, the General Preconditions.

Focus on the Approved Institution and its Approved Educator Preparation Programs

The Commission accredits an institution and all its approved preparation programs. Education Code §44374(d) states that the Commission shall make a single decision to accredit, to accredit with stipulations, or to deny accreditation to all of an institution's credential programs. The most recent review of the accreditation system conducted in 2004-2006 reaffirmed the unit accreditation approach. The Common Standards and the General Preconditions, together, are used to demonstrate institutional compliance with Commission policies and unit level support for all of the educator preparation programs that the institution offers.

This agenda item raises issues that the Commission may wish to consider in developing updated General Preconditions. First, this agenda item discusses issues related to the current preconditions. Second it presents several recommendations for changes that the Committee on Accreditation (COA) has discussed and voted to move forward to the Commission for possible action. Finally, it raises new issues that perhaps should be considered for inclusion in the General Preconditions.

Questions to consider with respect to the current General Preconditions:

Precondition 1: Accreditation and Academic Credit

Precondition 1 distinguishes between institutions of higher education and other sponsors, such as local education agencies and contains distinct language for both types of sponsors. The first part of the precondition requires that to be granted initial institutional accreditation by the Commission 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 (WASC) or another of the six regional accrediting associations. This precondition is based on EC§44225(a)(1).

Regional accreditation provides the Commission with certain assurances that an institution has the capacity, institutional leadership, and resources to provide educational services. However, regional accreditation agencies have undergone tremendous changes in the past decade. The Commission has not done a thorough review of the differences between the regional accrediting agencies and the potential impact of those varying requirements. Some anecdotal evidence suggests that there may be significant differences between the requirements of the six regional accrediting bodies. Some of these possible differences may be of importance to the question of whether an institution should be approved to operate educator preparation in California.

- Does the Commission wish to revisit whether regional accreditation from the six regional accrediting bodies provide adequate assurance of institutional infrastructure?

When the Preconditions were initially developed, almost all educator preparation programs were sponsored by colleges and universities. Over the past twenty years, other entities have begun to offer different types of educator preparation programs. The preconditions, as currently written, are silent as to what type of educator preparation program each entity is eligible to sponsor. Appendix B presents the list showing which types of institutions are eligible to offer which types of credential programs based on current law and Commission policies. This issue may need to be reviewed to determine whether Commission policy should be changed in any way with respect to types of institutions that may offer educator preparation programs.

- Staff recommends that the preconditions be revised to clarify that not all types of institutions are eligible to offer all types of educator preparation programs.

Precondition 2: Responsibility and Authority

Precondition 2 requires that the institution provide the Commission with a thorough description of the organizational structure of the institution and the prospective educator preparation program(s) as well as the reporting relationship of the individuals with responsibility for the institution and each program. The Commission staff identifies no immediate issue related to this precondition,

however, given that the preconditions have not been reviewed in a number of years, offer the following:

- Staff suggests that it is an appropriate time to review the language of this precondition.

Precondition 3: Personnel Decisions

Precondition 3 requires that the institution make all personnel decisions without considering differences due to gender or other constitutionally or legally prohibited considerations. These decisions include decisions regarding the admission, retention or graduation of students, and decisions regarding the employment, retention or promotion of employees. There have been a number of changes to both state and federal law that could impact this precondition.

- Staff suggests that it is an appropriate time to review the language of this precondition.

Precondition 4: Demonstration of Need

Precondition 4 requires that to be granted initial program accreditation by the Committee on Accreditation, the program proposal must include a demonstration of the need for the program in the region in which it will be operated. Such a demonstration must include, but need not be limited to, assurance by a sample of school administrators that one or more school districts will, during the foreseeable future, hire or assign additional personnel to serve in the credential category.

Commission staff has identified several issues that arise with respect to this precondition. First, this precondition is poorly constructed. By using the term “initial program accreditation” it suggests that this precondition should be addressed for the specific program that is being proposed. Given that, this particular precondition might better be placed within each set of credential specific preconditions.

The second issue the Commission might wish to discuss is whether evidence that one school district will during the foreseeable future hire or assign additional personnel to serve in the credential category is still sufficient to meet this precondition. Additionally, the Commission may wish to add additional language to the term “school district” to reflect the other types of educational service providers that now exist in California educational environment.

- Staff suggests that Precondition 4 be removed from the General Preconditions and be placed in each set of credential specific preconditions.
- Staff suggests that the language of Precondition 4 be broadened to allow evidence from entities besides school districts as demonstration of need.
- Staff suggests that the evidence required to meet this precondition be clarified.

Precondition 5: Practitioner Participation in Program Design

Precondition 5 requires that there be verification that practitioners in the credential area have participated actively in the design and development of the program’s philosophical orientation, educational goals, and content emphases. Typically, this is established through a list of individuals, with job titles and employing agencies identified, who attended meetings on the development of the proposed program; meeting minutes confirming their participation; and other relevant materials. Because Precondition 5 is pertinent only when a new program is being proposed, the same issues identified above for Precondition 4 are appropriate here.

- Staff suggests that Precondition 5 be removed from the General Preconditions and be placed each set of credential specific preconditions.
- Staff suggests that the evidence required to meet this precondition be clarified.

Precondition 6: Commission Assurances

Precondition 6 requires that the institution acknowledge that it will comply with the Commission standards and will participate in the accreditation system. Precondition 6 and 7 seem closely aligned with Precondition 2 and it would make sense to reorder the preconditions. Precondition 6 was developed prior to the adoption of the current accreditation system. The precondition language should be updated to more accurately reflect current expectations such as collecting, analyzing and using candidate assessment and program effectiveness data.

- Staff suggests that Precondition 6 be reordered and updated to reflect current expectations.

Precondition 7: Requests for Data

As previously mentioned, Precondition 7 is closely aligned with 6 and 2 and reordering preconditions may be advisable. In addition, numerous additional data requirements have been put in place in the years since the preconditions were adopted. For example, federal Title II reporting, biennial reports, and TPA data are all routine reporting requirements for approved educator preparation programs.

- Staff suggests Precondition 7 be reordered and revised to reflect the heightened importance of various data reports in recent years.

Precondition 8: Faculty Participation

Precondition 8 applies only to institutions of higher education. It requires that each faculty member who regularly teaches one or more courses relating to instructional methods in a college or university program of professional preparation for teaching credentials, including Specialist Credentials, or one or more courses in administrative methods in an Administrative Services Credential program, shall actively participate in public elementary or secondary schools and classrooms at least once every three academic years.

Three issues have been identified related to Precondition 8: Faculty Participation. First, based on Education Code Section 44227.5, this precondition applies to teaching credentials, including Specialist Credentials, and preliminary administrative services programs. Questions have been raised at times about whether and why certain “Specialist” credentials would be subject to this precondition.

- Staff suggests clarification of which credential programs are subject to the provisions of this precondition, that is, recent experiences in the public schools.

Second, this precondition references “instructional methods”. Staff has interpreted this to mean a methodology course. Clarity as to the meaning of the term “instructional methods” and to the types of preparation programs which have such courses would be helpful.

- Staff suggests the term “instructional methods” be clarified such that it is clear which faculty and instructional personnel should be included for the purposes of this precondition.

Finally, the language in the preconditions refers only to programs sponsored by colleges and universities. Broadening this requirement to apply to all types of program sponsors will ensure that all appropriate faculty and instructional personnel will have actively participated in public schools regardless of the type of institution the program sponsor or prospective program sponsor.

- Staff suggests that the language of the precondition be broadened to apply to all types of program sponsors.

Precondition 9: CBEST

This precondition requires that in each program of professional preparation, applicants for program admission shall be required to take the California Basic Educational Skills Test (CBEST) and that the institution shall use the test results to ensure that, upon admission, each candidate receives appropriate academic assistance necessary to pass the examination. It also requires that in each intern program of professional preparation, candidates who are admitted shall be required to pass the California Basic Educational Skills Test prior to assuming intern teaching responsibilities.

At least two issues have been identified. First, the language is outdated. CBEST is no longer the only means of demonstrating basic skills. In recent years, numerous other options have been added to allow for greater flexibility for and reduced costs to candidates. The requirement is now referred to as the “Basic Skills Requirement” rather than the CBEST requirement. Commission staff suggests that the language of the precondition be updated to reflect changes in policy and statute.

The second issue is whether this precondition belongs in the General Preconditions at all. This precondition is applicable to the preliminary teaching and services credentials. It is not applicable to all programs seeking approval. Requiring an institution seeking approval for a new Clear Administrative Services credential proposal to submit to this precondition, when their candidates would have demonstrated basic skills competency with their initial credential, is not necessary.

The Commission could move this precondition from the General Preconditions to each of the applicable credential specific preconditions.

- Staff suggests that the language of Precondition 9 be updated to reflect current policies regarding the demonstration of basic skills.
- Staff asks whether Precondition 9 should be moved to each of the credential specific preconditions to which it applies.

In the case of the three General Preconditions that are proposed to be moved into the credential program specific preconditions, staff suggests that the concepts should be referenced in the General Preconditions as part of the responsibilities each entity must meet in order to sponsor a Commission-approved educator preparation program. This would include the current preconditions focusing on the demonstration of need for the preparation program, practitioner participation in the development of the program, and candidates meeting the Basic Skills Requirement.

Recommendations for Revisions Discussed by the Committee on Accreditation

At the April 2012 Committee on Accreditation meeting, the COA discussed revisions to two General Preconditions. At the Committee's direction, draft language was proposed and approved to move forward to the Commission for its consideration. Below is the proposed language and the rationale for the proposed revision.

Precondition 1: Regional Accreditation

Precondition 1, as it is currently written, requires that an institution be regional accredited, but does not indicate that if changes to that status were to occur that the Commission be notified. Because this is a foundational precondition without which an institution of higher education would not be eligible to offer educator preparation program in California, the COA suggests that revisions be considered to ensure notification. In addition, the regional accrediting bodies do not routinely provide the Commission with updates on the status of accreditation for California institutions. Commission staff tries to stay apprised of changes to institutions that are Commission approved program sponsors. For example, Commission staff researching recent actions by WASC realized that two related Commission approved institutions in California had relinquished their WASC accreditation, mandating a change in the Commission's relationship with those two campuses and the out-of-state campus accredited by another federally approved regional accrediting body. While fortuitous that staff learned of this situation and was able to rectify it, staff suggests that notification be required. The Commission staff and the COA suggest that the institutions be required to report, in a timely manner, any changes to their accreditation status that could possibly impact their ability to offer educator preparation in California. The proposed revised language is in italics below.

(1) Accreditation and Academic Credit.

- (a) *Institutions of higher education:*** 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. *(c) 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.)*

At the March COA meeting, the COA had discussed the wisdom of adding language to the above that would require an institution to notify the Commission when it was *contemplating* terminating or adding regional accreditation. In staff discussions, it was determined that this could be provided in guidance to institutions and that it was not necessary to include this in the preconditions.

Precondition 1: Clear Grievance Process

Also at the April 2012 COA meeting, the COA discussed the issue of candidate complaints and formal grievance procedures at Commission approved institutions. The Commission's Common Standards and Preconditions do not explicitly require an institution to have developed or

implemented a grievance process. All institutions of higher education that are regionally accredited by the Western Association of Schools and Colleges are required to have a grievance process as part of the regional accreditation. But over half the entities approved by the Commission are not institutions of higher education and are not regionally accredited. Therefore school districts, county offices of education or other entities that are approved to offer education preparation by the Commission may or may not have clearly detailed grievance processes.

As a result, the Committee on Accreditation discussed and approved the proposed language below in italics for Commission consideration and adoption. The COA suggests that language similar to that below be added to Precondition 1.

- (c) ***Grievance Process:** All entities approved to offer educator preparation programs in California must have a clearly delineated grievance process for candidates and applicants. The grievance process information must be available to all candidates and applicants and the institution must be prepared to provide documentation that the grievance process has been followed.*

If agreed to by the Commission, a precondition ensuring a fair, impartial, and accessible grievance procedure can be added into the General Preconditions.

Other Issues to be Addressed

Add a Precondition Related to Veracity

At the June 2012 Commission meeting, the Commission discussed the policies and procedures related to initial institutional approval. Among the recommendations presented at that meeting was that a new precondition could be added that would require an institution seeking initial institutional approval to provide a statement that all documentation provided to the Commission for initial institutional approval and program approval are true and accurate. At the June 2012 meeting, the Commission agreed and directed staff to develop such a precondition related to the veracity of an institution.

Ensure that Preconditions Sufficiently Address Charter Schools as Educator Preparation Program Sponsors

According to the California Department of Education, there are approximately 800 public school charters operating or pending approval to operate in California. Charter schools are eligible to provide educator preparation programs and several have sought and have been granted Commission approval. Although the statute authorizing charter schools in California dates back to 1992, the sizeable expansion of this sector of the educational community has occurred more recently. Charter schools are generally exempt from California State laws governing school districts, except where specifically imposed by California Education Code §47610. The preconditions have never been reviewed specifically with the charter school as a preparer of educators in mind. The Commission could direct staff to ensure that this analysis is conducted to determine if specific language is necessary to address the uniqueness of charter schools as program sponsors.

Other Possible Issues

The Commission staff seeks suggestions from the Commission as to other areas that should be included in revised General Preconditions that all educator preparation programs must meet. Given the length of time since the preconditions have been reviewed and the fact that significant changes have occurred in the past two decades in education in California, there may be other preconditions that the Commission believes important to require for 2012 and beyond. In addition, the Commission staff could seek input from members of the education community as well as the members of the Committee on Accreditation on whether there are critical omissions in the current set of General Preconditions.

Next Steps

Based on Commission discussion at this meeting, staff plans to discuss these topics with the Committee on Accreditation at its October 2012 meeting. Staff could bring draft revised General Preconditions to a future Commission meeting for consideration and possible adoption.

Appendix A

General Preconditions for All Professional Preparation Programs

Pursuant to Education Code Section 44227 (and 44265) each institution must respond to the ten general preconditions as well as all other applicable program specific preconditions.

The following Preconditions apply to all professional preparation programs. All institutions applying for initial institutional approval or continuing accreditation of their educator preparation programs must respond to the following 10 Preconditions.

General Preconditions Established by the Commission

(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:

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:

- 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.

(2) Responsibility and Authority. To be granted initial institutional/district accreditation by the Commission or initial program accreditation or continuing accreditation by the Committee on Accreditation, the institution/district shall provide the following information.

(a) Identify the position within the organizational structure that is responsible for ongoing oversight of all credential preparation programs offered by the institution/district (including credential programs offered by the extension division, if any).

(b) Provide a description of the reporting relationship between the position described in (a) and the individuals who coordinate each credential program offered by the institution/district. If a reporting relationship is indirect, describe the levels of authority and responsibility for each credential program.

(3) Personnel Decisions. To be granted initial program accreditation or continuing accreditation by the Committee on Accreditation, a program of professional preparation must be proposed and operated by an institution/district that makes all personnel decisions without considering differences due to gender or other constitutionally or legally prohibited considerations. These decisions include decisions regarding the admission, retention or graduation of students, and decisions regarding the employment, retention or promotion of employees.

(4) Demonstration of Need. To be granted initial program accreditation by the Committee on Accreditation, the program proposal must include a demonstration of the need for the program in the region in which it will be operated. Such a demonstration must include, but need not be limited to, assurance by a sample of school administrators that one or more school districts will, during the foreseeable future, hire or assign additional personnel to serve in the credential category.

(5) Practitioners' Participation in Program Design. To be granted initial program accreditation by the Committee on Accreditation, the program proposal must include verification that practitioners in the credential category have participated actively in the design and development of the program's philosophical orientation, educational goals, and content emphases.

(6) Commission Assurances. To be granted initial program accreditation by the Committee on Accreditation, the program proposal must (a) demonstrate that the program will fulfill all of the applicable standards of program quality and effectiveness that have been adopted by the Commission; (b) assure that the institution/district will cooperate in an evaluation of the program by an external team or a monitoring of the program by a Commission staff member within four years of the initial enrollment of candidates in the program; and (c) assure that the institution/district will participate in focused reviews of one or more aspects of the program when designated by the Commission.

(7) Requests for Data. To be granted initial or continuing accreditation by the Committee on Accreditation, the institution/district must identify a qualified officer responsible for reporting and respond to all requests from the Commission for data including, but not limited to, program enrollments, program completers, examination results, and state and federal reporting within the time limits specified by the Commission.

General Preconditions Established by State Law

(8) Faculty Participation. Each postsecondary faculty member who regularly teaches one or more courses relating to instructional methods in a college or university program of professional preparation for teaching credentials, including Specialist Credentials, or one or more courses in administrative methods in an Administrative Services Credential program, shall actively participate in public elementary or secondary schools and classrooms at least once every three academic years. *Reference: Education Code Section 44227.5 (a) and (b).*

(9) California Basic Educational Skills Test. In each program of professional preparation, applicants for program admission shall be required to take the California Basic Educational Skills Test (CBEST). The institution shall use the test results to ensure that, upon admission, each candidate receives appropriate academic assistance necessary to pass the examination. *Reference: Education Code Sections 44252 (f) and 44225 (n).*

For Internship Programs: In each internship program of professional preparation, candidates who are admitted shall be required to pass the California Basic Educational Skills Test prior to assuming intern teaching responsibilities. *Reference: Education Code Section 44252 (b).*

Clarification of General Precondition 9

Legislative Intent. General Precondition 9 does not require passage of the CBEST for admission, only that the examination be taken. It is the intent of the Legislature that admission to a program not be denied solely on the basis of having failed to pass the CBEST. Further, it is expected that institutions will make provisions for assisting candidates in passing the exam.

Applicants Residing Out of State When They Apply for Admission. Persons residing outside of California when they apply for admission must take the CBEST no later than the second available administration of the test after enrolling in the program.

Candidate Qualifications. The standard requires that Multiple and Single Subject Credential (Program Standard 17) candidates must pass the CBEST prior to daily student teaching.

(10) Certificate of Clearance. A college or university that operates a program of professional preparation shall not allow a candidate to assume daily student teaching responsibilities until the candidate obtains a Certificate of Clearance from the Commission that verifies the candidate's personal identification, unless the individual has already completed the fingerprint and character identification process and has been issued a valid document by the Commission. *Reference: Education Code Section 44320 (d).*

For Internship Programs: A Certificate of Clearance must be obtained prior to assuming intern teaching responsibilities, intern counseling or psychologist responsibilities.

Appendix B

Entities Eligible to Offer a California Educator Preparation Program

Each entity must have earned Initial Institutional Approval (IIA- <http://www.ctc.ca.gov/educator-prep/new-program-submission.html>) from the Commission and approval for the specific educator preparation program(s) from the Committee on Accreditation to offer a program. All institutions and the programs offered must participate in the Commission’s accreditation system.

	Educator Preparation Program	IHE	LEA	Other Entity	CBO or NGO¹
Teaching Credentials	Preliminary MS/SS/Ed Sp—Student Teaching Model	Yes			Yes ²
	Preliminary MS/SS/Ed Sp—Intern Model	Yes	Yes		
	Added Authorizations (Special Education, APE, Math and Reading)	Yes	Yes		
	General Education (MS/SS) Induction	Yes	Yes		
	General (MS/SS) Clear	Yes			
	Clear Education Specialist Induction	Yes	Yes		
	Designated Subjects-Career Technical Education	Yes	Yes		Yes ²
	Designated Subjects-Adult Education, Special Subjects, and Supervision/Coordination	Yes	Yes		
	Specialist Teaching—Agriculture, Bilingual, CTEL, Health, Reading, Math	Yes	Yes		
Services Credentials	Preliminary Administrative Services	Yes	Yes		
	Preliminary Administrative Services—Intern Model	Yes			
	Tier II Administrative Services—Standards-based	Yes			
	Tier II Administrative Services—Guidelines-based	Yes	Yes	Yes	Yes
	Pupil Personnel Services—Counseling, School Psychology, Social Work, CWA	Yes			
	Pupil Personnel Services—Intern Model	Yes			
	Other Related Services—SLP, Audiology, O & M	Yes			
	Special Class Authorization—SLP	Yes			
	Specialist Services—School Nurse, Teacher Librarian, Special Class Authorization	Yes			

¹ Community-based Organization or a Non-governmental Organization: After completing the alternative Initial Institutional Approval process

² Only in STEM Subjects (Science, Mathematics, Business, Industrial and Technology Education, and Career Technical Education) (SBX5 1)