

Discussion of the Development of a Cost Recovery Plan for Some Accreditation Activities June 2013

Overview

This report discusses requirement in the 2013-14 Budget Act that the Commission develop and adopt a cost recovery plan for some accreditation activities.

Staff Recommendation

This is an information item.

Background

The state budget for 2013-14 includes language that requires that the Commission develop and adopt a cost recovery plan for some accreditation activities. The COA discussed this topic at its February 2013 meeting and the Commission began its exploration of this topic at its April 2013 meeting. Now that an agreement has been reached on the State Budget for 2013-14, the Commission needs to revisit this topic and determine a course of action.

Staff brings this topic to the COA for guidance as it works to develop one or more options for the Commission to consider. An agenda item will be presented to the Commission at its August 2013 meeting. A copy of the April Commission meeting item is attached for discussion purposes.

The COA may wish to discuss the following issues to help guide staff in developing a plan for the Commission to consider:

- 1) Have the appropriate activities been identified for cost recovery??
- 2) Are the proposed fees reasonable and are they sufficient?
- 3) Would a plan to allow the provision of readers to substitute for actual costs payment feasible?
- 4) Do you have any additional suggestions for a cost recovery plan to be presented to the Commission?

Next Steps

Based on the COA discussion, a draft cost recovery plan will be developed and presented to the Commission at its August 2013 Commission meeting.

3D

Information/Action

Professional Services Committee

Proposed Cost Recovery Plan for Accreditation Activities

Executive Summary: This agenda item provides a discussion of a possible cost recovery plan for some accreditation activities consistent with the Governor's proposed 2013-14 state budget for the Commission.

Policy Question: Does the proposed cost recovery plan for accreditation in order to implement the language in the Governor's proposed 2013-14 budget and in related trailer bill language meet the Commission's expectations?

Recommended Action: That the Commission discuss the proposed accreditation cost recovery plan and provide direction to staff for future activities and/or actions relative to this topic.

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

Strategic Plan Goal

II. Program Quality and Accountability

- ◆ Establish and maintain educator preparation, development, and career pathways as a shared responsibility among institutions of higher education, local education agencies and state agencies.

April 2013

Proposed Cost Recovery Plan for Accreditation Activities

Introduction

The Governor's proposed budget released on January 10, 2013 included a provision that would authorize the Commission to develop and implement a cost recovery plan for selected accreditation activities. This agenda item presents for discussion a proposed plan to implement a cost recovery system should the cost recovery proposal be included in the final 2013-14 Budget Act.

Background

Historically, the Commission's accreditation activities have been supported through credential fees paid by candidates. For several years, however, the Commission has been challenged by reduced revenues that support the operations of the Commission and increased nondiscretionary expenses. This decrease in revenue can be attributed to a number of factors, including a decrease in the number of new teachers entering the workforce. In 2012-13, the Commission's budget was so severely hampered by both increasing costs and decreasing revenue that in March 2012, program assessment activities, initial institutional review, and initial program review were suspended for approximately six months. These activities are those components of the accreditation system that require the use of experts from the field to determine if the documentation provided by institutions regarding the quality of their program's operations, faculty, and services for candidates are aligned to the requirements of the Commission's adopted standards, and which incur expenses for the travel of volunteers who review documents and participate in on-site visits to educator preparation programs and institutions.

In June 2012, the Commission considered the impact of the budget situation on its accreditation system. The Commission adopted 14 recommendations (Appendix A) related to accreditation for the 2013-14 year (<http://www.ctc.ca.gov/commission/agendas/2012-06/2012-06-6B.pdf>). The purpose of these 14 recommendations was to determine priorities related to accreditation in light of significant budget constraints. In addition to the suspension of document review activities for new and continuing programs, the Commission voted to defer for one year all site visits that had been scheduled for 2013-14, with a few exceptions. The site visit is the accreditation system's culminating activity; the report from the site visit is what the Committee on Accreditation uses to make accreditation decisions.

Among the other recommendations that were adopted by the Commission in June 2012 was a recommendation to explore the possibility of developing a cost recovery system for some accreditation activities. The language of the adopted Recommendation 12 is as follows:

Develop a fee recovery system for accreditation revisits and other activities that exceed the regularly scheduled accreditation activities. Use the 2012-13 year to explore whether a fee recovery system is appropriate for any part of accreditation.

On January 10, 2013, the Governor's 2013-14 proposed budget included a provision that would allow the Commission to charge for some accreditation activities in order to recover some costs for the accreditation system. The Commission's 2013-14 proposed budget assumes up to \$200,000 in funds from the implementation of a cost recovery system. The proposed policy will be addressed in a "trailer" bill that will be part of the Budget Act. The proposed budget trailer bill language is as follows:

Educator Preparation Program Reviews (Adds ECS 44375)

SEC. 12. 44375 (a) The Commission may charge a fee to recover the costs of reviewing initial or new educator preparation programs. Applicable local educational agencies and institutions of higher education shall submit the established fee to the Commission when submitting a proposal for an initial or new program. The Commission may review the established fee on a periodic basis and adjust the fee as necessary. The Commission shall notify the chairpersons of the committees and subcommittees in each house of the Legislature that consider the State Budget and the Department of Finance at least 30 days prior to implementing the fee and at least 30 days prior to making any subsequent fee adjustments.

(b) The Commission may charge Commission-approved entities a fee to recover the costs of accreditation activities in excess of the regularly scheduled data reports, program assessments, and accreditation site visits. This includes, but is not limited to, accreditation re-visits, addressing stipulations, or program assessment reviews beyond the standard. Institutions shall submit the established fee to the Commission in the year that the extraordinary activities are performed. The Commission may review the established fee on a periodic basis and adjust the fee as necessary. The Commission shall notify the chairpersons of the committees and subcommittees in each house of the Legislature that consider the State Budget and the Department of Finance at least 30 days prior to implementing the fee and at least 30 days prior to making any subsequent fee adjustments.

Current Commission Policy to Cover Cost of Accreditation

Currently, the Commission covers the cost of accreditation site visits. These costs include travel and meals for all site visit team members. Further, the Commission reimburses the institution for the cost of lodging for review team members, meeting room costs, and any ancillary costs (internet charges or copies, for example) within the state's allowable limits. The Commission does not provide an honorarium or stipend for reviewers. The Commission also covers the cost of substitutes for K-12 practitioners where necessary. Costs associated with preparing documents and evidence for review and preparing for site visits are the responsibility of the institution hosting the visit.

The Commission has also covered the cost for reviewers to review all types of documents within the accreditation system, i.e., those submitted for purposes of initial institutional approval, initial program approval, and program assessment. The most efficient manner to review documents includes bringing reviewers to the Commission offices for dedicated time in assigned pairs to

review documents in their expertise area, ideally for a period of two days. The Commission has paid for travel, lodging, and meal costs for the reviewers and no honorarium or stipend is provided. The face-to-face document review where the two readers are able to review the submission in a protected environment with Commission facilitation of the process provides the most reliable and calibrated review for all program sponsors. In lean budget years, the Commission has employed various strategies to reduce costs of these document reviews. These included holding “commuter” reviews that rely on reviewers who live within driving distance to the Commission (thus saving flight costs), reducing the number of dedicated review days to one day, and more recently, employing “remote” reviews where reviewers read the documents at their home or office and communicate via technology. While these efforts have allowed the Commission to make continued progress on reviewing documents, it has increased the length of time it takes for program documents to be reviewed and made the task of ensuring the calibration of reviewers more challenging. In addition, many reviewers have indicated to Commission staff that their participation in future reviews is dependent on being able to have dedicated time with another reviewer.

Revisits and a review of documentation after a site visit for an institution with stipulations have also been covered by the Commission’s operating budget and there has been no additional cost to an institution beyond the planning, organizing, and document preparation required to address the stipulations.

Each of the possible accreditation activities discussed in the trailer bill language is discussed below, along with proposed revenue options. Appendix B provides a summary of the various options presented in the item.

Initial Institutional Approval

The trailer bill would authorize the Commission to charge a fee to recover the costs of initial institutional approval. The table below provides historical data about the numbers of Initial Institutional Approvals for the past five years as well as the number of new educator preparation programs reviewed and approved.

	Initial Institutional Approvals	New Programs Approved
2009-10	10	30
2010-11	7	101
2011-12	3	74

Commission staff proposes that institutions that submit an application for *initial institutional approval* be charged a total of \$1,600 per application. This would recover costs for the following operational activities:

- Individualized technical assistance beyond the norm to institutions as needed on the document submission and review process throughout the duration of the process
- Dedicated time for qualified reviewers (including travel, per diem, and substitutes if needed) to conduct face-to-face reviews for the Initial Institutional submission document

Review and Approval of New Programs

The trailer bill would also authorize the Commission to charge a fee to recover the costs of review and approval of new programs. The amount of time and effort required to approve new programs varies depending on a variety of factors, including the number of standards responses that need to be reviewed, whether the document is clearly and appropriately linked to the required evidence, the clarity and length of the responses to the standards, and whether the response directly addresses the standard requirements. While most of these factors are beyond the control of the Commission, it seems reasonable for the Commission to consider a fee recovery structure for the review of new program proposals that is graduated according to the number of standards that need to be addressed, since the number of standards can serve as a proxy for the length and complexity of the responses that would need to be reviewed.

For discussion purposes, Commission staff proposes the following possible structure.

Number of Standards	Type of Credential Programs	Proposed Fee
Preliminary Programs (programs with 12 or more standards)	Multiple Subject, Single Subject, Education Specialist, Administrative Services, School Counseling, School Psychology, School Social Work, Adult Education, Career Technical Education	\$1,600
Second Tier Programs and programs with 6-11 Standards	General Education Induction and Clear Education Specialist Induction, Administrative Induction, Adapted Physical Education AA, Bilingual, Agriculture Specialist, California Teachers of English Learners (CTEL), School Nurse, Teacher Librarian	\$1,000
Added Authorization Programs and programs with 5 or fewer standards	Added Authorization in Special Education (ASD, OI, TBI OHI, ED, DB), RSP AA and ECSE AA, Math AA, Special Class Authorization, Reading AA, Reading Specialist, Math AA, Math Specialist, Child Welfare and Attendance	\$800

Commission staff proposes that institutions that submit an application for a new educator preparation program be charged a fee as defined above per application. This would recover costs for the following operational activities:

- Individualized technical assistance beyond the norm to institutions as needed on the document submission and review process throughout the duration of the process
- Dedicated time for qualified reviewers (including travel, per diem, and substitutes if needed) to conduct face-to-face reviews for the program submission

Accreditation Activities in Excess of Regularly Scheduled Activities

The second part of the trailer bill language refers to the development of a cost recovery plan for those activities that are beyond the routine accreditation activities. The language specifies that these include, but are not limited to: accreditation revisits, addressing stipulations, or program assessment reviews beyond the usual protocol.

The following chart includes information from the past three years for these types of activities.

	Total Number of Site Visits	Number of Institutions Addressing Stipulations (that do not require a revisit)	Number of Revisits
2009-10	13	3	4
2010-11	31	3	6
2011-12	38	2	5

Revisits

Revisits generally require a two-day focused visit of a smaller team to determine whether the institution has sufficiently addressed all stipulations. The revisit team always includes a team lead, which in most cases is the same team lead as the original visit, and a Commission consultant. The inclusion of additional reviewers is dependent on the nature and number of stipulations to be addressed and number of programs that are involved in the revisit. The Administrator of Accreditation works with the team lead to determine whether additional reviewers are necessary on revisit teams, and, to the extent possible, keeps the revisit team as small as possible to accomplish the necessary task. In most cases, the revisit team includes only one additional reviewer. Staff time to prepare and work with the institution can be considerable and is generally proportional to the level of stipulations assigned.

Commission staff proposes that the Commission consider a fee of \$1,000 per reviewer who attends the revisit. This fee would be used to cover the following operational costs:

- Costs related to the travel of reviewers and staff to attend the revisit
- Individualized technical assistance beyond the norm in the year between the original visit and the revisit

Institutions with Revisits and Required Quarterly Reports (includes Addressing Stipulations)

If the stipulations are significant and the Committee on Accreditation (COA) has concerns that the institution may not make adequate progress throughout the year, the COA may stipulate that quarterly reports are due from the institution. This happens most often with institutions that receive Major or Probationary stipulations. These reports are reviewed by the Commission consultant and summarized at the next regularly scheduled COA meeting. These reports have proved critical to ensure that institutions with significant issues do not wait an entire year to address the stipulations and they allow the COA the ability to take additional action, if they deem it necessary, more expeditiously if they determine that progress is not being made.

Commission staff proposes that the Commission consider a fee of \$1,000 for institutions that are required by the COA to provide quarterly reports. This fee would be in addition to the fee for a revisit. This additional fee would cover the following:

- Technical assistance beyond the norm to the institution, which in these cases tend to be significant
- Travel by staff to the institution to ensure that the institution is addressing the stipulations and/or to provide on-site technical assistance

Addressing Stipulations without a Revisit

Some stipulations are of a limited nature and do not require a revisit. Instead, these tend to be issues related to documentation and can be resolved through a review of evidence that demonstrates that the institution and its programs have made the necessary improvements. They typically involve numerous conversations with institutional representatives – either through phone calls, conference calls, emails or video conferencing. Staff works with the institution over the course of the year following the initial visit to address the stipulations. Staff then reviews the documentation and consults with the team lead about whether the documentation and evidence sufficiently addresses the stipulations and can then be moved forward for consideration by the Committee on Accreditation.

Commission staff proposes that the Commission consider a fee of \$500 per institution to cover the following costs:

- Staff travel to the institution to provide on-site technical assistance
- Dedicated time with the team lead to review the documentation and determine whether the stipulations have been sufficiently addressed

Focused Site Visit

The Commission's accreditation system allows the COA to call for a focused accreditation site visit when the institution is not complying with the accreditation system activities (e.g., not submitting biennial reports or program assessment documents) or if there are concerns expressed about a program or institution. To date this has not been necessary; however, if this option is ever executed, staff recommends that it be included in a cost recovery system. Staff proposes that Commission consider a fee of \$1,000 per individual who attends the focused visit to cover travel costs and expenses.

Program Assessment Reviews Beyond the Norm

In most cases, program assessment reviews result in multiple resubmissions by the institution in order to verify that the program has fully addressed all standards. Occasionally, a program document requires a significant number of reviews or some extra technical assistance by staff in order to determine alignment of the program with the standards. Typically, feedback from reviewers early on in the review process provides staff with information about the fact that the document is not ready for an expert review panel, either because it is not clearly presented, or no appropriate evidence is presented to support the alignment with the standards, or the document is simply so poorly written that it is not reviewable as is.

While it makes some sense that an additional fee could be levied on institutions that submit documents that take an extraordinary number of reviews to approve or that require additional technical assistance, this might be challenging to implement. However, the Commission could consider assessing a fee for any program review that takes more than 3 submissions—the original submission and 2 resubmissions.

Recommended Action

Staff recommends that the Commission discuss the options presented in the proposed accreditation cost recovery plan and provide direction to staff. Depending on Commission discussion and direction, staff could provide additional information and an updated cost recovery

plan for consideration and possible adoption at the June 2013 meeting, so that the plan would be in place should the Governor's proposal be included in the Budget Act that becomes effective July 1, 2013.

Next Steps

After Commission discussion, the Commission staff could further develop a plan for cost recovery for accreditation activities for consideration by the Commission at the June 2013 meeting, should the Governor's budget proposal become law.

Appendix A
Recommendations Adopted by the Commission
Related to Implementing the Commission's Accreditation System in 2012-13

1. Continue with the Biennial Report submission, review and feedback for all approved institutions as currently scheduled for 2012-13. Submission dates have been selected by the institutions, with the first round of submissions currently arriving at CTC.

2. Develop and implement a pilot where program directors/leaders come to the CTC (or another central location) to review Biennial Reports, with an initial focus on one type of educator preparation program to facilitate the pilot activities. The purpose of the pilot would be to develop a process for building capacity within the preparation program to think deeply about candidate assessment data, the analysis of the data, and using data to drive program improvement.

3. Increase the consistency and comprehensiveness of the data collected, analyzed, and reported on for each type of educator preparation program. An efficient process would be to work with program sponsors to help them work with and incorporate data in future reports, possibly through a webinar. The initial focus for technical assistance efforts would be on the development, analysis, and use of teaching performance assessment data within the biennial reports, and the subsequent focus would be on the use of performance assessment data within the site visit process to help focus the visit on candidate outcomes and program quality issues.

4. Continue with the Program Assessment process for all institutions in the Violet and Indigo cohorts. This will allow the programs sponsored by the institutions in the Violet and Indigo cohorts to complete the review, and redesign if necessary, of each approved program. In addition, program assessment for Education Specialist programs that have transitioned will also be important.

5. Postpone the beginning of Program Assessment for institutions in the other five cohorts by one year. The Blue cohort would submit in Fall 2013 rather than Fall 2012 and each of the other cohorts would be deferred by one year as well.

6. Discuss with the Commission which standards provide the most leverage in terms of program analysis and quality improvements based on data. A list of key essential standards would serve to focus programs on a smaller number of higher impact, essential standards than is presently the case.

7. Provide technical assistance for program-specific groups to discuss and build understanding of the Commission's Common and program standards and clarify the essential attributes in the adopted standards. Webinars could be a part of these activities and the webinar would be archived for later reference.

8. Postpone all initial site visits scheduled for 2012-13 until 2013-14, and postpone visits by one year. Use the 2012-13 year to provide technical assistance for institutions in preparation for the site visit (i.e., developing Preconditions reports, support for developing Common Standards

narratives and electronic exhibits that are streamlined but allow an institution the ability to demonstrate ways it addresses the Commission's standards. Work to 48 help all institutions scheduled for visits in 13-14 to be efficiently prepared for the site visit programs.

9. Conduct the scheduled accreditation revisits and special site visit scheduled for 2012-13.

When prudent, decrease the size of the team and/or the length of the visit to complete the visits in an economical yet rigorous manner.

10. Develop and pilot a program completer survey to collect data that can be used in the accreditation process. The survey would provide information relative to both the Common and program standards and could focus the site visit beginning with the visits in 2013-14.

11. Work with stakeholders and the Committee on Accreditation to develop a more streamlined and targeted site visit model that is cost effective, rigorous, and focuses on the essential attributes of high quality educator preparation. Discussions could take place with the COA over the course of 2012-13 and if it is determined that a revision to the site visit model, a pilot could occur in 2013-14.

12. Develop a fee recovery system for accreditation revisits and other activities that exceed the regularly scheduled accreditation activities. Use the 2012-13 year to explore whether a fee recovery system is appropriate for any part of accreditation.

13. Continue to review program proposals in 12-13 through a distance reading process. CTC staff would monitor and mediate the work between readers and between readers and the program.

14. Develop a fee recovery system whereby new programs and new institutions would be assessed a fee to cover the cost for reviewing the new program or institutional proposal. Use the 2012-13 year to explore whether a fee recovery system is appropriate for any part of accreditation.

Appendix B Possible Cost Recovery Plan

Document Review

Review of Initial Submission and up to two resubmissions, including individualized technical assistance from staff

Type of Program	Examples	Cost Recovery
Initial Institutional Approval—includes the initial review of one program	For institutions not in the Commission’s accreditation system	\$1,600
Preliminary Programs or programs with 12 or more standards	Multiple Subject, Single Subject, Education Specialist, Administrative Services, School Counseling, School Psychology, School Social Work, Adult Education, Career Technical Education	\$1,600
Second Tier Programs or programs with 6-11 Standards	General Education Induction and Clear Education Specialist Induction, Administrative Induction, Adapted Physical Education AA, Bilingual, Agriculture Specialist, California Teachers of English Learners (CTEL), School Nurse, Teacher Librarian	\$1,000
Added Authorization Programs and programs with 5 or fewer standards	Added Authorization in Special Education (ASD, OI, TBI OHI, ED, DB), RSP AA and ECSE AA, Math AA, Special Class Authorization, Reading AA, Reading Specialist, Math AA, Math Specialist, Child Welfare and Attendance	\$800

Extraordinary Accreditation Activities

- *Address Stipulations* – may necessitate a staff visit to the institution to provide technical assistance, includes time for the original Team Lead to review documentation that has been submitted. **Estimate \$500 per institution**
- *Quarterly Reports (includes Addressing Stipulations)* – if the stipulations are significant and the Committee on Accreditation (COA) has concerns that the institution may not make adequate progress throughout the year, the COA may stipulate that quarterly reports are due from the institution. May necessitate a staff visit to the institution to provide technical assistance, and time for the team lead to review the documentation submitted. **Estimate \$1,000 per institution**
- *Accreditation Revisit – (includes Addressing Stipulations, if quarterly reports are required the additional fee would be necessary)* – when a revisit is scheduled, typically

the staff consultant and team lead return to the institution for a two-day revisit. At times additional team members are required because of the specific nature of the standards that were not fully met at the time of the initial site visit. ***Estimate \$1,000 per individual who attends the visit.***

- ***Focused Site Visit*** – when an institution is not complying with the accreditation system activities or if there are concerns expressed about a program or institution, the COA may send a small team for a Focused Site visit. ***Estimate \$1,000 per individual who attends the visit.***