

CALIFORNIA COMMISSION ON TEACHER CREDENTIALING

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**All Individuals and Groups Interested in the Activities
of the Commission on Teacher Credentialing**

Subject: Additions to the Preconditions: Responsibility and Accountability for Credential Programs

Introduction: Background Information

In the past two years, the Commission has examined several policy issues that relate to the authority and responsibility of the organizations that sponsor teacher preparation programs. Analysis of the issues suggests that they each relate to a common underlying question: Who is responsible and accountable for credential preparation programs within the organizations that offer those programs to prospective educators? Discussions have dealt with three different types of organizations: Colleges and universities offering credential preparation programs, non-university professional development providers offering parts of credential programs, and school districts offering internship credential programs.

Although the issues were somewhat unique to each type of organization, the Commission discussion still related to concerns about the authority, responsibility and accountability of organizations that sponsor preparation programs and recommend candidates for credentials. Although the Commission is on record in support of multiple, flexible routes and alternative methods of delivering educator preparation, California statutes require that the Commission address issues of quality control and quality assurance thoroughly.

Introduction: Definition of a Key Term

In the past, the Commission has adopted *preconditions* for the review and approval of credential preparation programs that are sponsored by postsecondary institutions and local education agencies. A *precondition* is a policy requirement that must be fulfilled by the sponsors of a credential program in order for the program to be eligible for review and approval or accreditation on the basis of *standards* of program quality and effectiveness. Whereas *standards* focus on issues of quality and effectiveness that vary in intensity, *preconditions* are technical conditions that either are present or are not present when the program is reviewed. In

some cases, the Commission has adopted *preconditions* that re-state applicable legal mandates. In many other instances, the Commission has adopted *preconditions* that are reasonable interpretations of applicable laws, and that specify conditions that the Commission determined were essential for successful and effective administration of the law.

First Concern: Institutional Responsibility and Accountability in the Professional Accreditation System

In enacting the *Accreditation Framework* (1994), the Commission took significant steps toward developing new accountability mechanisms for the university-based system of educator preparation in the state. The enabling legislation (SB 655, Bergeson) included several innovations in professional responsibility and accountability, including establishment of the Committee on Accreditation, which is responsible for making accreditation decisions on the basis of its professional expertise. Another salient and powerful change was to move from a program-centered model of credential evaluation to an institutionally-based model of professional accreditation. To emphasize the responsibility of *entire institutions* for all credential preparation, the Commission decided that *one accreditation decision* would be made about *each* institution of postsecondary education *and* all of its credential programs.

In the Commission's prior model of program evaluation, distinct credential programs could (and often did) receive very different evaluations even though they were offered by the same institution, and sometimes in the same school or department. The shift to a single accreditation decision has placed significant pressure on entire institutions to support and monitor all of their credential programs, regardless of where the programs might be housed within the institution. At the same time, the decision to hold a whole institution accountable for all credential programs has raised complex issues about institutional responsibility for educator preparation.

It is common for several departments and academic units at an institution to be actively involved in offering programs for distinct credentials. Invariably, the school, college or department of education is among the units that offer credential preparation programs. Also involved are academic units that specialize in speech therapy, professional psychology, management, social work, nursing, and library/information science.

Some credential programs are sponsored and administered by Extended Learning Divisions at accredited institutions. Extended Learning Divisions are closely connected with the academic administrative structures at some institutions, but not at all institutions. Lines of responsibility, authority and accountability are sometimes clear, sometimes blurred. In some cases credential programs may be offered by Extended Learning Divisions at other institutions than their own.

When distinct units of an institution offer multiple credential programs, it may not be realistic to expect the institution to give full responsibility over every aspect of educator preparation to the academic leader of the education unit (school, college or department of education). In fact, officers in multiple units of an institution typically have *no reporting relationship* with the dean or director of education. Indeed, it would be presumptuous for the Commission to assume such organizational responsibilities and relationships within any institution that offers credential programs. The licensing agency's concern is that overall responsibility for credential programs has been assigned to an appropriate authority who can be held accountable for the quality and effectiveness of those programs.

When the responsibility for credential programs is dispersed or unclear within a college or university, the Commission's accreditation system for educator preparation suffers in significant ways. Initially, one year before an accreditation review, the Committee on

Accreditation needs to know which officer of an institution will be responsible for planning and arranging all phases of the review. If this responsibility is not clear, some units of large institutions are likely to be "left out of the loop" in making essential plans and arrangements for the forthcoming review. Later, when the professional review has been completed, the Committee needs to be assured that all stipulations of the review will be resolved under the leadership and direction of a responsible academic officer of the institution. Finally, once these stipulations have been established, the Committee needs to know which officer to hold accountable if, after a reasonable time has elapsed, the stipulations have not been resolved satisfactorily.

For the licensing agency and its accrediting committee, this responsibility must be clear with respect to accreditation plans, findings and consequences. A reporting relationship between a credential program and the responsible academic officer may be indirect (through other offices or positions on the campus), but an official relationship must be defined. For example, an institution might designate the Associate Vice-President for Academic Affairs as the responsible position for all credential programs, and could provide an organizational chart showing the reporting relationships between the Associate Vice-President and each credential program coordinator. In many cases the reporting relationship will be indirect, but the line of authority should be clear. When the accreditation reviewers visit the campus, they will know how institutional responsibility for all credential programs is assigned, and will be able to communicate their accreditation findings and recommendations effectively to the responsible officer.

Precondition – Institutional Responsibility and Accountability

The following precondition was adopted on February 5, 1998. Institutions will be required to begin using this precondition for all accreditation visits after June 30, 1998. Its use is optional during the 1998-99 accreditation visit cycle.

- (1) To be granted initial accreditation or continuing accreditation by the Committee on Accreditation, the institution shall provide the following information.
 - (a) Identify the academic position within the institution's organizational structure that is responsible for ongoing oversight of all credential preparation programs offered by the institution (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 managers who coordinate each credential program offered by the institution. If a reporting relationship is indirect, describe the levels of authority and responsibility for each credential program.

Second Concern: Responsibility for Non-University-Based Professional Development Programs for the Professional Administrative Services Credential

When the Commission changed the structure of administrator preparation in California, the Commission also adopted new *Standards of Program Quality and Effectiveness for Administrative Services Credential Programs* (March, 1995). In the case of Preliminary Level I Preparation Programs, the Commission's standards and preconditions clearly expect accredited colleges and universities to be responsible for program quality and effectiveness. For the Professional Level II Preparation Programs, however, the assignment of responsibility is not sufficiently clear for at least one important component of the program.

In the administrator preparation system, the Commission decided to allow candidates to fulfill *some* of the Level II requirements by pursuing high-quality professional development activities that are *not* sponsored by accredited colleges or universities. Under the revised structure, entities other than universities have the option of submitting specific professional development activities for approval and inclusion in professional credential induction plans for new administrators. The non-university-based activities can consist of up to 120 hours (the equivalent of eight semester units), which is one third of the Professional Level II Program.

To govern the quality and effectiveness of the non-university-based activities, the Commission in 1995 adopted a specific standard for these activities. Entities other than colleges and universities may submit their training programs to the Committee on Accreditation, which reviews them in relation to the Commission's standard. Once the non-university activities are approved on the basis of the standards, colleges and universities are required to include the activities in the induction plans of individual candidates who determine that the approved non-university-based activities would contribute to their professional induction and development as new administrators. Institutions are not authorized to assess or scrutinize these activities, or to deny a candidate's request to participate in them.

During the past two years, the Administrative Services Credential Program Review Panel has used the Commission's *Standards of Program Quality and Effectiveness* to review administrator preparation programs on behalf of the Committee on Accreditation. Using these standards, the Review Panel has also reviewed non-university-based professional development programs for new school administrators. In the course of considering these non-university entities for approval, the Review Panel and the Committee on Accreditation identified the following issues pertaining to organizational responsibility and accountability.

- Once a non-university-based program is approved, who has responsibility for oversight of the program, and for assuring proper quality control?
- Who is responsible for administering the non-university-based program?
- Who controls the resources of a non-university-based program, and who is responsible for providing essential support to it?
- If candidates or institutions have concerns or questions about an approved non-university-based program, to whom should they be addressed?
- If there are complaints about a non-university-based program, who should be contacted by an investigator for the Commission and the Committee?
- How can the Commission and the Committee on Accreditation be assured of ongoing quality and effectiveness of non-university-based programs?

These questions cannot be answered based on the Commission's existing standard for non-university-based activities. The Commission decided that it would be valuable to adopt preconditions related to program authority and accountability that could be applied to the non-university-based programs. Such preconditions would resolve the issues about responsibility and accountability for non-university programs.

Preconditions – Non-University-based Entities Responsibility and Accountability

The following preconditions were adopted on February 5, 1998 and March 5, 1998. Non-university-based entities are now required to use these precondition.

- (1) To be approved as an entity offering non-university-based professional development activities for a credential, the sponsoring organization shall provide the following information.

- (a) Identify the position within the organizational structure that is responsible for oversight of all non-university-based professional development activities that the organization offers to credential candidates.
 - (b) Provide a description of the reporting relationship between the position described in (a) and each non-university-based professional development activity that is offered by the organization to credential candidates.
- (2) For a non-university-based professional development program or activity to be accredited so participation by credential candidates will partially fulfill the requirements for professional credentials, the organization that sponsors the program/activity shall agree to cooperate in an evaluation of the program/activity by an external team, or in a monitoring of the program by a Commission staff member, within four years of the initial enrollment of candidates. Further evaluations shall thereafter be conducted on a regular basis according to procedures set by the Committee on Accreditation. The sponsor shall also respond to all requests by the Commission for data regarding program enrollments and completions within the specified time limits.

Third Concern: Legal Authority and Responsibility for District Intern Programs

When the original district intern legislation was enacted, lawmakers wanted to give local school districts and their governing boards opportunities to assume responsibility for the preparation of their own teachers. Since its inception in 1983, the district intern statute has required that school districts prepare Professional Development Plans for the training, support and assessment of the participating interns. This requirement is stated in the following language of the law.

44830.3 (b) The governing board of each school district employing district interns shall develop and implement a professional development plan for district interns in consultation with an accredited institution offering an approved program of pedagogical preparation. The professional development plan shall include all of the following: *(nine elements are specified in law)*.

Although districts are required to confer with accredited colleges and universities regarding professional development plans for interns, the statute clearly expects the governing boards of participating school districts to assume full responsibility for the preparation of their interns.

Historically, the great majority of school districts have not viewed teacher preparation as one of their primary responsibilities. The original intent of the 1983 District Intern legislation was to allow districts to develop programs that specifically met their needs for teachers. The sponsor of the original statute, the Los Angeles Unified School District, urged its passage because of their extensive need for teachers, and because the district wanted to develop a teacher preparation program to meet the specific needs of its students.

Until 1997, all reviews of District Intern Programs were of individual school districts that had developed Professional Development Plans for their interns, as required by law. That year, the first consortium of several districts who had made an agreement with an agency to develop and implement a district intern program was reviewed. The Consortium developed a Professional Development Plan, which it offers to school districts in northern and central California. The Consortium is exploring the prospect of expanding into other regions of the state, including southern California. It is clear, however, that participating school districts do not develop plans for the preparation or development of the interns whom they hire. Staff was concerned whether or not this organizational practice was consistent with the requirements of Education

Code Section 44830.3 (b). The following questions were identified concerning the governance of district intern programs:

- Generally, who is responsible and accountable for District Intern Programs?
- Specifically, who makes decisions about these programs, who carries out these decisions, and who is accountable for resources, personnel, and evaluation in District Intern Programs?

These questions about organizational responsibility and accountability for District Intern Programs are not unique to these programs; the questions are, in fact, identical to ones that were raised about responsibility and accountability for institutional programs and non-university entities. Further, it is reasonable to assume that lawmakers considered the importance of the accountability issue when they required "the governing board of each school district employing district interns" to be responsible for all aspects of each intern's preparation.

Given the clear language of Education Code Section 44830.3 (b), the Commission decided to adopt a new precondition for the award of District Intern Certificates. Pertaining to the development, adoption and implementation of Professional Development Plans for District Interns, the purposes of this precondition are to clarify the responsibility of the governing board and administrative staff of each local education agency that employs district interns, to ensure that locally-elected boards of education are cognizant of their legal responsibilities for the preparation of district interns, and to ensure that these boards have assigned administrative responsibility and accountability for the success of their interns.

Precondition – District Internship Responsibility and Accountability

The following precondition was adopted on February 5, 1998. District Internship programs will be required to begin using this precondition for all program review visits after June 30, 1998. Its use is optional during the 1998-99 review cycle.

- (1) For a District Intern Certificate to be issued to any candidate recommended by a local education agency, the agency shall satisfy the following preconditions.
 - (a) The governing board of the local education agency that wishes to hire a district intern affirms its responsibility for the preparation, support and assessment of each district intern employed by the agency. This affirmation shall be included in the Governing Board Statement that accompanies each request for a District Intern Certificate.
 - (b) The local education agency that employs a district intern shall provide the name of the agency administrator who is responsible for the ongoing administration of the agency's Professional Development Plan for District Interns, and shall describe the administrative structure for implementing the Professional Development Plan.

If there are questions about the preconditions for institutions, non-university entities and district internship programs described in this Coded Correspondence, they may be directed to Dr. Larry Birch, Administrator of Accreditation, Professional Services Division at the Commission (916) 327-2967.

Sincerely,

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Executive Director