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Action

Educator Preparation Committee

Initial Institutional Approval: Process for Non-Governmental Organizations and Community-Based Organizations

Executive Summary: This agenda item presents information on the Initial Institutional Approval (IIA) Process for Non-Governmental Organizations (NGO) and Community-Based Organizations (CBO) to sponsor teacher preparation for STEM fields and proposes updates to the process.

Recommended Action: That the Commission approve the proposed updated IIA process for NGO/CBOs as described in this agenda item.

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Strategic Plan Goal

IV. Operational Effectiveness
   b) Align human and financial resources with Commission priorities and offer staff opportunities for development to maximize professional engagement and performance.

Initial Institutional Approval: Process for Non-Governmental Organizations and Community-Based Organizations

Introduction

This agenda item presents information on the Initial Institutional Approval (IIA) process for Science, Technology, Engineering and Math (STEM) teacher preparation by non-governmental organizations (NGOs) and community-based organizations (CBOs). NGOs and CBOs were initially authorized to offer teacher preparation in STEM fields by SBX 5 1, urgency legislation signed into law in 2010. The legislation authorized these entities to prepare teachers for credentials in Science, Math and Career Technical Education. At this time, no NGO/CBO has been granted IIA to offer STEM teacher preparation.

Since the process was adopted in 2010, there have been a number of significant changes to the accreditation process including updated Common Standards and a revised IIA process. Staff suggests that the IIA process for NGO/CBO entities be updated. The Commission has adopted revised Common Standards and has made significant changes to the IIA process for other entities, and the former two national accrediting bodies (known as the National Council for Accreditation of Teacher Education "NCATE" and the Teacher Education Accreditation Council "TEAC") have unified into a single accrediting body known as Council for the Accreditation of Educator Preparation (CAEP), a situation that has resulted in revised national accrediting standards. Revising the IIA process as it applies to NGO/CBO entities is timely and appropriate under these circumstances and will bring the IIA process for these types of entities in alignment with the Commission's current IIA policies and practices.

Background

In California, regionally accredited institutions of higher education (IHEs) and local education agencies (LEAs) approved by the Superintendent of Public Instruction (SPI) are eligible to sponsor educator preparation programs. Regional accreditation and approval by the SPI provides a level of assurance regarding the infrastructure of the institution to the Commission such that the entity is likely to be capable of offering effective educator preparation programs.

In 2010, the California legislature authorized NGO/CBOs to offer teacher preparation in STEM fields. Staff developed, and in June 2010 the Commission adopted, criteria for NGO/CBOs to be eligible to sponsor STEM teacher preparation in California. When staff developed this process, significant aspects were adapted from the Western Association of Senior College and University Commission (WASC) process, especially the steps for initial eligibility and candidacy that WASC uses. The NGO/CBO IIA process must provide a similar level of assurance for the prospective entity's infrastructure and likelihood of effectiveness as an educator preparation entity.

NGO/CBO IIA Process

The original NGO/CBO IIA process was adopted in June 2010. One option was for an entity to submit a narrative with supporting documentation to the Commission responding to a series of

organizational requirements. [A document listing the A-C requirements was developed and posted](#) on the Commission's [SBX5 1 web page](#). The requirements are organized under 3 overarching goals that are closely aligned with WASC's regional accreditation requirements:

A. Articulating Organization Goals and Addressing Educator Preparation Objectives

B. Commitment to Learning and Continuous Improvement to Achieve California Educator Preparation Objectives

C. Developing, Sustaining and Applying Resources and Organizational Structures to Ensure Quality Educator Preparation

An NGO/CBO is currently required to meet these requirements prior to being eligible for review of their Common Standards and program standards for the prospective educator preparation program. The Commission would take action on institutional eligibility once the Common Standards submission was found to meet the standards. The Committee on Accreditation would consider the approval of the educator preparation program once the institution has institutional approval. The steps, as adopted in 2010, for NGO/CBO IIA are summarized below:

Current NGO/CBO IIA Process
1. Declare interest in sponsoring STEM teacher preparation
2. Pay the $5,000 NGO/CBO IIA Fee
3. Address the A-C Requirements
4. Respond to the Commission's Preconditions
5. Submit a response to the Commission's Common Standards
6. Submission is reviewed by Board of Institutional Reviewers (BIR) members, feedback and resubmission until the submission is determined to meet the Commission's Common Standards
7. **Agenda item for Commission approval as a sponsor**
8. Submit a proposal for an educator preparation program addressing both Preconditions and program standards
9. Submission is reviewed by BIR members, feedback and resubmission until the submission is determined to meet the Commission's preconditions and program standards
10. **Agenda item for the Committee on Accreditation (COA) for approval to offer the educator preparation program**

An alternative was developed for an entity that held national accreditation through the NCATE. The Commission agreed that if the entity had earned NCATE accreditation, it would satisfy many of the A-C requirements that NGO/CBOs are required to meet. Today, NCATE is an organization that no longer exists but instead, national accreditation of educator preparation takes place through CAEP under an entirely different set of national educator preparation standards than existed in 2010.

The COA has the authority to determine the comparability of standards (Education Code §44373). With respect to the comparability of the Commission's standards to the NCATE standards, for the Commission's prior Common Standards, the COA determined there were only 4 sentences from

the Commission's Standards that had to be addressed when an institution had earned NCATE accreditation. The requirement was that the entity must meet the aspects of the Common Standards that had not been found to be addressed by the NCATE standards. NCATE no longer exists; it has unified with another national accreditor and is now CAEP.

Since the NGO/CBO IIA process was adopted in 2010, the Common Standards have been updated and the IIA process has been significantly revised. With the new five stage IIA process, the review of the Common Standards takes place now in Stage III. To allow that review to remain in Stage III, staff suggests that the NGO/CBO that is accredited by the national accreditor should be required to meet any of the A-C Eligibility Requirements that are not assessed during the CAEP accreditation process.

The NGO/CBO A-C Eligibility Requirements are provided in Appendix B. Staff has analyzed the NGO/CBO Requirements against the CAEP Preconditions and Standards. The second column in Appendix B shows where in the CAEP accreditation process the requirement for NGO/CBOs is addressed. Staff has identified that there are six requirements in the NGO/CBO A-C Requirements that are not addressed by the CAEP accreditation process. In addition, staff has identified two edits that are necessary in the A-C Requirements due to the changes in the Commission's accreditation system. They include the following:

A-7. The organization demonstrates knowledge of and the capacity to participate in the Commission's accreditation process including annual data submission ~~Biennial Reports,~~ Program Review, ~~Program Assessment~~, accreditation site visits, the Common Standards, Preconditions and Program Standards.

A-8. The organization is committed to honest and open communication with the California Commission on Teacher Credentialing, to undertake the accreditation review process with seriousness and candor, to inform the Commission promptly of any matter that could materially affect the accreditation status of the organization, and to abide by Commission policies and procedures.

C-5.
- A one to two page narrative describing revenue and expenditure projections for the next 4 years;
- If tuition based, the tuition refund policy should the educator preparation programs be discontinued.

C-7. The organization policies related to fees and other financial obligations of candidates, conflicts of interest, non-discrimination and sexual harassment are clearly stated.

C-8. The organization has an independent governing board or similar authority that, consistent with its legal and fiduciary authority, exercises appropriate oversight over organizational integrity, policies, staffing and ongoing operations.

Current Accreditation Fee Structure for NGO/CBOs
The Commission adopted a fee structure for NGO/CBOs at its August 2010 meeting, setting a fee of $5,000 for NGO/CBOs that want to sponsor educator preparation programs in California. This

is expressly allowed by [paragraph (e) of the Education Code §44227.2](#). This fee was put in place prior to the development of Annual Accreditation and Extraordinary Fees. There are now additional IIA fees of $2,000 for IIA and $2000 for the review of the initial teacher preparation program.

Proposed Updated NGO/CBO IIA Process

The Commission's IIA process is now a five stage process (see graphic that follows on page 6). The proposed NGO/CBO process ensures that all institutions seeking to prepare educators in California, including those seeking approval under SBX5 meet all five stages of initial approval, including establishing eligibility and completing a provisional period of approval.

Under the original SBX5 process, the NGO/CBOs were required to meet the NGO/CBO requirements or be NCATE-accredited in order to be eligible to be brought to the Commission for the IIA decision. To maintain a parallel NGO/CBO IIA process for both nationally accredited NGO/CBOs as well as NGO/CBOs that are not nationally accredited, staff suggests that NGO/CBOs should be required to meet the required NGO/CBO Requirements during Stage I of the IIA process, prior to the entity being eligible to submit to the Eligibility Requirements as part of Stage II. Completing the NGO/CBO Requirements would assure that the entity is an eligible entity. Staff suggests that the updated NGO/CBO Requirements be added to Stage I of the IIA process for all NGO/CBOs. Staff also recommends that the NGO/CBO fee ($5,000) be maintained.

The proposed NGO/CBO process is summarized below with a comparison to the current process. The graphic that summarizes the IIA process is provided on page 6 of this agenda item. Note that NGO/CBO language has been added in Stage I.

Original SBX 5 IIA Process	Proposed SBX5 IIA Process
1. Declare interest in sponsoring STEM teacher preparation 2. Pay the $5,000 NGO/CBO IIA Fee 3. Address the A-C Requirements **or** hold NCATE Accreditation and respond to the identified Common Standards 4. Respond to the Preconditions 5. Submit a response to the Common Standards 6. Review the submission by BIR members, feedback and resubmission until the submission is determined to meet the Commission's Common Standards 7. **Agenda item for Commission approval as a sponsor**	Stage I 1. Attend Accreditation 101 2. Pay the $5,000 NGO/CBO Fee 3. Address the NGO/CBO A-C Requirements **or** hold CAEP Accreditation and respond to the identified NGO/CBO A-C Requirements Stage II 4. Pay IIA Fee 5. Respond to the 12 Eligibility Criteria 6. **Commission agenda item to consider approval to move to Stage III** Stage III 7. Submit a response to the Preconditions and Common Standards for review by members of the BIR. Once the submission is found to meet the Commission's requirements, prepare agenda item for the Commission. 8. **Commission agenda item to consider approval to move to Provisional Approval**

Original SBX 5 IIA Process	Proposed SBX5 IIA Process
8. Submit a proposal for an educator preparation program addressing both Preconditions and program standards 9. Review the submission by BIR members, feedback and resubmission until the submission is determined to meet the Commission's preconditions and program standards **10. Agenda item for the Committee on Accreditation approval to offer the educator preparation program**	Stage IV 9. Program proposal is submitted and reviewed by members of the BIR. When the submission is found to meet the requirements, an agenda item will be prepared for the Committee. 10. Committee agenda item to consider program approval 11. Operate program for 2-3 years 12. Host an accreditation site visit with the report going to the Commission with data submitted by the institution. Stage V 13. **Commission's final decision on approval and institution is placed in an accreditation cohort.**

Staff Recommendation

Staff recommends that the Commission adopt the revised NGO/CBO IIA process as presented in this agenda item and summarized below:

1. The Commission confirm that the NGO/CBO IIA Requirements must be met as part of Stage I of the Commission's revised IIA process.

2. The Commission approve the two edits to the A-C Requirements as presented on page 3 of the item.

3. That accreditation by CAEP satisfies many of the Commission's IIA Stage 1 prerequisites for NGO/CBOs as indicated in the Appendix B. Any CAEP-accredited entity must demonstrate that it meets the NGO/CBO A-C Requirements identified in Appendix B **in bold** because the requirements are not adequately addressed by the CAEP standards.

4. NGO/CBOs will be invoiced for $5,000 for the review of the NGO/CBO Requirements. This is in addition to the standard IIA fees.

Next Steps

If the Commission takes action to adopt the staff recommendations, staff will update the documentation addressing the NGO/CBO IIA process and disseminate the information.

Initial Institutional Approval

I	II	III	IV	V
Prerequisites	**Eligibility Criteria**	**Address Standards & Preconditions** a) **Common** b) **Program**	**Provisional Approval**	**Full Approval**
To ensure that the prospective sponsor is legally eligible to offer educator preparation programs in California. To ensure that the prospective sponsor understands the requirements of the Commission's accreditation system. **Staff Determination** If the institution is a legal entity and the team attends Accreditation 101, the institution may move to Stage II. *==For NGO/CBOs—meet A-C Requirements or hold CAEP accreditation and address the alignment matrix==*	To provide initial information to the Commission about the entity so that the Commission can make a decision if the prospective sponsor is one that has the potential to sponsor effective educator preparation programs. **Commission Decision** 1) Grant Eligibility 2) Grant Eligibility with specific topics to be addressed in Stage III 3) Resubmission with additional information 4) Deny Eligibility	a) To ensure that the institution meets all of the Commission's Common Standards (e.g., infrastructure, resources, faculty, recruitment and support, continuous improvement, and program impact). Standards are reviewed by the BIR prior to going to Commission. b) To ensure that the proposed program meets all of the Commission's adopted program standards. Standards are reviewed by the BIR prior to going to the Commission. **a) Commission Decision** 1) Grant Provisional Approval 2) Deny Provisional Approval **b) Committee on Accreditation Decision** 1) Approve Program(s) 2) Deny Approval	After the program operates for 2-3 years, sufficient time so that a minimum of one cohort has completed the program and the institution has had ample time to collect data on candidate outcomes and program effectiveness, the institution will host an accreditation site visit. The report from this site visit, including related data, will be presented to the Commission. **Commission Decision** 1) Grant Full Approval 2) Retain Provisional Approval with additional requirements 3) Deny Approval	Once an entity has earned Full Approval from the Commission, the institution will be placed in one of the accreditation cohorts and will participate in the Commission's regularly scheduled accreditation activities. **Committee on Accreditation Decision** Monitors through the accreditation system

Appendix A

SEC. 5. Section 44227.2 is added to the Education Code, to read:

44227.2. (a) The Legislature hereby establishes the Science, Technology, Engineering, Math, and Career Technical Education Educator Credentialing Program for purposes of providing alternative routes to credentialing, in accordance with the guidelines for the federal Race to the Top Fund, authorized under the federal American Recovery and Reinvestment Act of 2009 (Public Law 111-5), that do not compromise state standards.

(b) No later than June 1, 2010, the commission, in consultation with the Committee on Accreditation established pursuant to Section 44373, shall develop a process to authorize additional high-quality alternative route educator preparation programs provided by school districts, county offices of education, community-based organizations, and nongovernmental organizations. Organizations participating in this project may offer educator preparation programs for any science, mathematics, and career technical education credential type issued by the commission if the organization meets the requirements for being authorized pursuant to criteria established by the commission.

(c) The commission shall authorize community-based or nongovernmental organizations accredited by an accrediting organization that is recognized by the Council for Higher Education Accreditation and the United States Department of Education. The commission may also establish alternative criteria, if necessary, for project participants that are not eligible for accreditation by one of the accredited organizations.

(d) Participating organizations shall electronically submit credential applications to the commission.

(e) The commission may assess a fee on a community-based or nongovernmental organization that is seeking approval to participate in the program. For purposes of this section, an independent college or university in California is not a community-based or nongovernmental organization.

Appendix B

Alignment Matrix
NGO/CBO A-C Requirements and What is Assessed by the CAEP Process

Requirements for Organizations (NGO/CBOs) that are Not Regionally Accredited or accredited by CHEA or the USDOE to Offer Educator Preparation Programs in California (Adopted June 2010)	CAEP Preconditions and Standards
A: A: Articulating Organizational Goals and Addressing Educator Preparation Objectives The organization defines its educator preparation purposes and establishes objectives. The organization functions with integrity and autonomy.	Phase II: Table 1
1. The organization's formally approved statements of purpose and operational practices are appropriate for an educator preparation organization in California. The organization's objectives are clearly recognized and consistent with stated purposes.	Phase II: Table 1
2. The organization demonstrates an appropriate response to the increasing diversity in society through its policies, practices and programs.	CAEP Standards
3. The organization has educator preparation as a primary purpose regardless of political, corporate, or religious affiliations.	Phase II: Table 1
4. The organization exhibits integrity in its operations, as demonstrated by the implementation of appropriate, equitable, open and honest communication with candidates and the public, timely and fair responses to complaints and grievances, and regular evaluation of its performance in these areas.	CAEP Standards
5. **The organization demonstrates knowledge of and the capacity to participate in the Commission's accreditation process including annual data submission ~~Biennial Reports,~~ Program Review, ~~Program Assessment~~, accreditation site visits, the Common Standards, Preconditions and Program Standards.**	**NGO/CBO Must Address**
6. **The organization is committed to honest and open communication with the California Commission on Teacher Credentialing, to undertaking the accreditation review process with seriousness and candor, to informing the Commission promptly of any matter that could materially affect the accreditation status of the organization, and to abiding by Commission policies and procedures.**	**NGO/CBO Must Address**
B: Commitment to Learning and Continuous Improvement to Achieve California Educator Preparation Objectives The organization achieves its educator preparation objectives. The organization maintains a sustained, evidence-based, evaluation	Phase II: Table 1

Requirements for Organizations (NGO/CBOs) that are Not Regionally Accredited or accredited by CHEA or the USDOE to Offer Educator Preparation Programs in California (Adopted June 2010)	CAEP Preconditions and Standards
system to ensure that high quality educator preparation objectives are met.	
1. The organization's learning outcomes and expectations for candidate attainment are clearly stated and widely shared among stakeholders and at the course, program and organizational levels. The organization's staff takes collective responsibility for establishing, reviewing, fostering, and demonstrating the attainment of these expectations.	CAEP Standards
2. The organization's educator preparation programs actively involve prospective educators in learning, ensure they meet high expectations, and provide them with appropriate and ongoing feedback about their performance and how it can be improved.	CAEP Standards
3. The organization regularly identifies the characteristics of its candidates and assesses their preparation, needs, and experiences. The organization collects and analyzes prospective educator data, disaggregated by demographic categories and type of credential program. The organization takes security measures to ensure the security and integrity of candidate records.	CAEP Standards
4. The organization's planning processes identify and align program, personnel, fiscal, physical, and technological needs with the strategic objectives and priorities of the educator preparation program. Planning processes are informed by appropriately defined and analyzed quantitative and qualitative data from multiple sources including those identified in B3.	Phase II: Table 5
C: Developing, Sustaining and Applying Resources and Organizational Structures to Ensure Quality Educator Preparation The organization sustains its operations and supports the achievement of its educator preparation objectives through its investment in human, physical, fiscal, and information resources. These key resources promote the achievement of quality educator preparation.	Phase II: Table 6
1. The organization demonstrates that it employs an adequate number of instructional staff with commitment to educator preparation of high quality. The staff is sufficient in number, professional qualifications, and diversity to achieve the organization's educator preparation objectives.	Phase II: Table 4
2. Staff recruitment and evaluation practices are aligned with educator preparation objectives. For instructional staff, evaluation involves	CAEP Standards

Requirements for Organizations (NGO/CBOs) that are Not Regionally Accredited or accredited by CHEA or the USDOE to Offer Educator Preparation Programs in California (Adopted June 2010)	CAEP Preconditions and Standards
consideration of evidence of teaching effectiveness, including candidate's evaluations of instruction.	
3. The organization maintains appropriate and sufficiently supported staff development activities designed to improve teaching and learning, consistent with its educator preparation objectives.	CAEP Standards
4. Initially, the organization provides clean independent audits of a full set of financial statements of the legal entity planning to offer educator preparation programs for the three years prior to submission of the "Intent to Seek Institutional Approval Form." The audits should meet the standards of the American Institute of Certified Public Accountants or other appropriate accounting standards generally accepted in the U.S. After initial approval by the Commission, the organization submits the legal entity's 990 Form (for non-profits) or corporate income tax returns (for for-profits) for the past two years on a biennial basis. Resources are aligned with educator preparation objectives.	Phase II: Table 6
5. A business plan that focuses on the unit being accredited. The business plan should include:	Phase II: Table 6
• A business model that briefly describes the services to be delivered, the area to be served, the current and projected number of candidates, recruitment activities, a description of faculty, tuition costs, a budget narrative, etc.;	Phase II: Tables 1, 3, and 5
• The most current approved budget;	Phase II: Table 6
• Revenue and expense projections for the next two years, including funding streams, the length and percentage of funding from foundation grants, appropriated governmental funds, tuition, funds from elsewhere in the legal entity or its affiliates; costs of facility, payroll, maintenance, etc.;	Phase II: Table 6
• **A one to two page narrative describing revenue and expenditure projections for the next 4 years;**	**NGO/CBO Must Address**
• A one to two page narrative describing the relationship between the unit and the legal entity offering the educator preparation programs; and	Phase II: Table 6
• **If tuition based, the tuition refund policy should the educator preparation programs be discontinued.**	**NGO/CBO Must Address**
6. The organization's facilities are safe, secure and healthy. The organization's information technology resources are sufficiently	Phase II: Table 5

Requirements for Organizations (NGO/CBOs) that are Not Regionally Accredited or accredited by CHEA or the USDOE to Offer Educator Preparation Programs in California (Adopted June 2010)	CAEP Preconditions and Standards
coordinated and supported to fulfill its educator preparation purposes.	
7. **The organization policies related to fees and other financial obligations of candidates, conflicts of interest, non-discrimination and sexual harassment are clearly stated.**	**NGO/CBO Must Address**
8. **The organization has an independent governing board or similar authority that, consistent with its legal and fiduciary authority, exercises appropriate oversight over organizational integrity, policies, staffing and ongoing operations.**	**NGO/CBO Must Address**
9. The primary administrator responsible for the educator preparation program shall possess a post baccalaureate degree or credential and experience in education. In addition, the institution has a sufficient number of other qualified administrators, including a chief financial officer, to provide effective educational leadership and management.	CAEP Standards

Language **in Bold** is not assessed in the CAEP Accreditation process and must be satisfied by any NGO/CBO that elects to seek Commission approval to offer STEM teacher preparation in California.