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Action

Educator Preparation Committee

Initial Institutional Approval – Stage II: Eligibility Requirements for Alder Graduate School of Education

Executive Summary: This agenda item presents, as part of the Initial Institutional Approval process, Alder Graduate School of Education’s responses to the Eligibility Requirements for consideration and possible approval by the Commission.

Recommended Action: That the Commission review the responses to the Eligibility Requirements and determine if the institution may move forward in the Initial Institutional Approval process.

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Strategic Plan Goal

II. Program Quality and Accountability

- b) Effectively and efficiently monitor program implementation and outcomes and hold all approved educator preparation programs to high standards and continuous improvement through the accreditation process.

Initial Institutional Approval – Stage II: Eligibility Requirements for Alder Graduate School of Education

Introduction

As part of the Initial Institutional Approval process, a prospective program sponsor, Alder Graduate School of Education (Alder GSE), has submitted responses to the Eligibility Requirements for consideration and possible approval by the Commission on Teacher Credentialing (Commission). Approval of Stage II allows an institution to move forward to Stage III which is to submit Common Standards and preconditions for review. Approval of Stage II does not authorize the institution to offer an educator preparation program that leads to a credential or license.

Background

California law provides the Commission with the authority to accredit institutions to offer programs that lead to a credential to serve as an educator in California's public schools. Among other responsibilities, Education Code section 44372(c) sets forth the Commission's responsibility to rule on the eligibility of an applicant for initial accreditation for the purpose of offering a program of educator preparation.

The Commission requires that an institution seeking to offer new educator preparation program(s) must first be approved for initial accreditation as a new program sponsor and must do so by completing the Commission's Initial Institutional Approval (IIA) process. At the [December 2015](#) meeting, the Commission approved a new IIA process requiring the satisfactory completion of five approval stages as part of the Strengthening and Streamlining Accreditation project. Updates to the IIA process were subsequently approved during the [February 2016](#) meeting. A graphic detailing the five stages of the IIA process is provided on the following page.

This agenda item presents for consideration one institution of higher education seeking to become a program sponsor.

Alder Graduate School of Education

Alder GSE began as a pilot program to train teachers in Aspire Public Schools. In 2015, Alder GSE became a separate nonprofit from Aspire Public Schools named Aspire University which was later renamed Alder Graduate School of Education. In 2019, the Western Association of School and Colleges' Senior College and University Commission (WSCUC) granted Alder GSE Initial Accreditation for a period of six years. Alder GSE seeks IIA in order to offer the following educator preparation programs:

- Preliminary Multiple Subject
- Preliminary Single Subject: English, Mathematics, Foundational-Level General Science, Science: Biological Sciences, Science: Chemistry, Science: Geosciences, Science: Physics, World Languages: Spanish, and Social Science
- Preliminary Education Specialist: Mild/Moderate
- Bilingual Authorization: Spanish

A summary of Alder GSE's responses to the twelve [Eligibility Requirement Criteria](#) are provided in the table below. The full response from Alder GSE can be found in this [Attachment](#). Criteria 1 through 9 have been reviewed by staff and a recommendation has been provided. Criteria 10, 11, and 12 have been summarized for the Commission's review and consideration. [Appendix A](#) includes the eligibility requirement criteria, required information for each of the criteria and factors to consider for Criteria 10 through 12 as an institution prepares its response.

Initial Institutional Approval

I	II	III	IV	V
Prerequisites	Eligibility Criteria	Address Standards & Preconditions a) Common b) Program	Provisional Approval	Full Approval
<p>To ensure that the prospective sponsor is legally eligible to offer educator preparation programs in California.</p> <p>To ensure that the prospective sponsor understands the requirements of the Commission's accreditation system.</p> <p>Staff Determination If the institution is a legal entity and the team attends Accreditation 101, the institution may move to Stage II.</p>	<p>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.</p> <p>Commission Decision 1) Grant Eligibility 2) Deny Eligibility</p>	<p>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 the Commission.</p> <p>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.</p> <p>a) Commission Decision 1) Grant Provisional Approval 2) Deny Provisional Approval</p> <p>b) Committee on Accreditation Decision 1) Approve Program(s) 2) Deny Approval</p>	<p>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.</p> <p>Commission Decision 1) Grant Full Approval 2) Retain Provisional Approval with additional requirements 3) Deny Approval</p>	<p>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.</p> <p>Committee on Accreditation Decision Monitors through the accreditation system.</p>

Alder Graduate School of Education
Criterion 1 through 9

In accordance with the Commission adopted process determining eligibility for Initial Institutional Approval, Eligibility Criteria 1-9 as follows includes a staff review and recommendation.

Criterion	Staff Recommendation	Alder Graduate School of Education Response
Criterion 1: Responsibility and Authority	Aligned	<ul style="list-style-type: none"> • The president of Alder GSE, Heather Kirkpatrick, will be responsible for ongoing oversight of all educator preparation programs. The president will report directly to the board of directors as this body has the ultimate authority and responsibility for the graduate school. • The dean at Alder GSE, Nate Monely, will coordinate the institution’s educator preparation programs and report directly to the president. • Alder GSE has submitted a complete organizational chart that indicates that all educator preparation programs will be housed in the graduate school where the dean and associate dean have oversight of all course instructors. • Alder GSE assures that the duties related to credential recommendations will be performed only by employees of Alder GSE and that these individuals will take part in the Commission training related to the recommendation process.
Criterion 2: Lawful Practices	Aligned	<ul style="list-style-type: none"> • A non-discrimination policy has been provided for employees and candidates. The non-discrimination policy will be provided in Alder GSE’s Employee, Faculty, and Student Handbooks as well as be linked on the institution’s website.
Criterion 3: Commission Assurances and Compliance	Aligned	<ul style="list-style-type: none"> • Alder GSE provided assurances and stated that it: <ol style="list-style-type: none"> a) Will comply will all preconditions; b) Will submit all data reports and accreditation documents; c) Will cooperate in an evaluation of the program by an external team or monitoring of the program by Commission staff; d) Will participate fully in the Commission’s accreditation system and submission timelines; and e) In the event the program closes, will offer the program and meet all adopted standards until the

Criterion	Staff Recommendation	Alder Graduate School of Education Response
		candidate completes, withdraws, is dropped, or is admitted to another program.
Criterion 4: Requests for Data	Aligned	<ul style="list-style-type: none"> The dean at Alder GSE, Nate Monely, is identified as the qualified officer responsible for reporting and responding to all requests for data within timeframes specified by the Commission. The dean will be supported by the registrar and credential analyst, Mariah Klein, and other Alder GSE staff as appropriate. Furthermore, Alder GSE is seeking two individuals for its institutional research office who will also play a key role in gathering data and preparing reports - a Director of Data Strategy and Systems and a Director of Impact Measurement.
Criterion 5: Grievance Process	Aligned	<ul style="list-style-type: none"> Alder GSE has provided its Grievance Policy which will be accessible to all candidates and applicants on the academic policies and resources page of the institutional website, and will also be available in the student, faculty, and employee handbooks. During the enrollment process, Alder candidates will be provided with the student handbook (including the Grievance Policy) and will be asked to fill out an online acknowledgement receipt through Alder’s enrollment platform.
Criterion 6: Communication and Information	Aligned	<ul style="list-style-type: none"> Alder GSE’s webpage is currently accessible to the public without the requirement of log in information. Alder GSE’s mission, governance and administration, admission procedures, and information about all Commission-approved programs will be made available through the institution’s website, various handbooks, admissions materials, social media, and institutional email newsletters.
Criterion 7: Student Records Management, Access and Security	Aligned	<ul style="list-style-type: none"> Candidates will access Alder GSE’s password-protected student information system for the purpose of obtaining enrollment certification, verifying academic units and progress toward program completion, and to access unofficial transcripts. Students will request official transcripts by emailing the registrar and credentials analyst. Alder GSE will maintain candidate records on a secure platform (digital) and at the institution’s home office in Redwood City, California (paper).

Criterion	Staff Recommendation	Alder Graduate School of Education Response
		<ul style="list-style-type: none"> • Paper copies will be securely stored at Alder GSE’s home office in Redwood City, California, in a private, locked, and alarmed room with no public access. • Digital copies will be stored on a secure, password-protected, platform that offers internal tools such as profiles, roles, and permission sets to control record access.
Criterion 8: Disclosure	Aligned	<ul style="list-style-type: none"> • Alder GSE has provided information about its proposed programs that will focus on the residency model. Candidates will be in K-12 classrooms with a mentor doing co-teaching and will participate in coursework and seminar classes. • Alder GSE plans to offer in-person courses at their partner schools including UOP, Aspire Public Schools home office, Aspire Los Angeles regional office, and the Monterey Peninsula Unified School District office. In addition to in-person courses and seminars, during the school year Alder residents will participate in graduate level online courses via Canvas - Alder’s online learning platform. • While Alder GSE will be responsible for the academic coursework and training related to the proposed educator preparation programs, it will also partner with the following which will provide educational services: <ol style="list-style-type: none"> 1) Partner Directors are clinical faculty who support their cohort of residents through weekly, day-long seminars, regular observations, and support of both residents and mentors. Partner Directors will serve as leaders of Alder’s program in a given region. 2) Mentor teachers (district-employed supervisors) employed by and chosen by the partner organizations, with partner directors leading the selection and supervision of their program’s mentors based on criteria provided by Alder. 3) Teachers Test Prep will provide test preparation services for the CBEST and CSET to Alder residents.
Criterion 9: Veracity in all Claims and	Aligned	<ul style="list-style-type: none"> • An assurance signed by the president of Alder GSE, Heather Kirkpatrick, has been submitted attesting to the veracity of all statements and documentation

Criterion	Staff Recommendation	Alder Graduate School of Education Response
Documentation Submitted		submitted to the Commission. The letter also attests to an understanding that a lack of veracity is a cause for denial of Initial Institutional Approval.

Criterion 10, 11 and 12

In accordance with the Commission approved process for determining eligibility for Initial Institutional Approval, Eligibility Criteria 10-12 include a staff summary of the institution's submission, but do not include a staff recommendation.

Criterion	Summary of Alder GSE's Responses
Criterion 10: Mission and Vision	<p>Alder GSE's Mission is: <i>....to create opportunity and cultivate success for every student by recruiting and educating excellent teachers and leaders who reflect our schools' communities.</i></p> <p>Alder GSE's vision is.. <i>....that outstanding teachers and leaders change students' lives and make the world better and more just.</i></p> <p>Alder GSE aims to prepare highly effective, diverse teachers to teach in any California public school through yearlong, intensive clinical preparation focused on educational equity. Theory and practice will be interwoven in teaching and learning at Alder GSE, in order to equip the institution's teacher candidates with the skills and habits of mind for success in California's adopted state standards and frameworks. Alder's program and student learning outcomes will align with the organizational and programmatic mission; included among these are the ability "to plan and design learning experiences for all students influenced by considerations of state-adopted standards (Common Core State Standards), student learning needs, curriculum, data, and learning theory."</p> <p>Alder GSE has published its mission and vision in the footer of every page of its website. Additionally, Alder GSE includes its mission and vision in student, faculty, and employee handbooks.</p> <p>Alder GSE will pair theory and practice through master's level coursework and classroom practicum. This will be done with the goal of immersing residents in theory while providing meaningful opportunities to apply it in practice through an apprenticeship with a highly effective teacher. Alder GSE's theory of action is that, through engaging in deliberate practice around teaching skills and deeply examining core theory and beliefs and considering the impact of learning and</p>

Criterion	Summary of Alder GSE's Responses
	<p>students on identity and beliefs, resident teachers are prepared to be successful on their first day in the classroom through their thirtieth year in the classroom. Alder GSE conceptualizes rigor in practice-based teacher education through the framework of the learning cycle and is informed by the works of Pam Grossman, Karen Hammerness, Morva McDonald, Magdalene Lampert, Linda Darling-Hammond, Nikole Richardson, Elham Kazemi, and Sarah Schneider Kavanaugh.</p>
<p>Criterion 11: History of Prior Experience and Effectiveness in Educator Preparation</p>	<p>Alder GSE's experience in the preparation, training, and support of teachers began in 2010 as a pilot program to train teachers for Aspire Public Schools. Alder has operated in partnership with the University of the Pacific as a program in the Gladys Bernerd School of Education. The program matched residents with mentors who would work together throughout an immersive one-year residency in the classroom. Alder GSE currently operates a similar program with Relay Graduate School of Education in Tennessee.</p> <p>Additionally, Alder GSE became a separate nonprofit from Aspire Public Schools in 2015 named Aspire University and was later renamed as Alder Graduate School of Education in 2017. In 2019, the WSCUC granted Alder GSE Initial Accreditation for a period of six years.</p> <p>During that time Alder GSE prepared more than 270 residents for teaching in partnership with nearly 60 school sites reaching 30,000 students. Alder GSE has provided eight years of data showing that its teachers were successful in the classroom, come from underrepresented groups; furthermore, Alder GSE reports that these teachers are remaining in teaching longer than national averages on teacher retention.</p> <p>Alder indicates that faculty continually gather qualitative and quantitative data on the success of its residents, mentors, and alumnae in order to refine its residency model.</p> <p>Alder GSE has posted the third party invitation for comments on the institutional website where the public and all stakeholders can access it. No comments have been received at this time.</p> <p>As required by this criterion, staff researched the possibility of any additional available information relevant to Alder GSE's application for initial institutional approval and found none.</p>
<p>Criterion 12: Capacity and Resources</p>	<p>As evidence of capacity and resources, Alder GSE has provided a copy of its most recently audited budgets for the 2016-17 and 2017-18 fiscal years as well as a copy of a proposed operations budget for its education unit.</p>

Criterion	Summary of Alder GSE's Responses
	<p>Alder GSE has also detailed within its submission the facility resources that will be available for its candidates. These include the Canvas learning management system for its online classes. Alder GSE notes that because it will have staff members distributed across California, it requires limited facilities compared to more traditional institutions of higher education, but notes that there will be a venue for weekly seminars provided by each of its TK-12 partners.</p> <p>Additionally, within the submission document, Alder GSE has identified the job responsibilities and minimum qualifications for the program personnel and instructional support, including partner directors, course instructors, mentor teachers, and program supervisors. Alder GSE also plans to hold regional in-person sessions at the UOP campus, Aspire Public Schools home office, Aspire Los Angeles regional office, and at the Monterey Peninsula USD office.</p> <p>Through its partnership with UOP, Alder GSE has nine signed partnership agreements for the purposes of fieldwork with the following institutions: Aspire Public Schools, KIPP Bay Area, Summit Public Schools, Caliber Schools, Monterey Peninsula USD, KIPP LA Public Schools, Envision Education, Lighthouse Community Public Schools, and San Lorenzo USD. Alder GSE has noted that it will not be continuing its partnership with Summit Public Schools in 2019-20. Alder GSE will work to contextualize the residency program for the needs of the partner organizations, and will embed residents within those organizations' schools and classrooms, gradually giving them more teaching responsibility as they progress throughout the year.</p> <p>In the event the Alder Graduate School of Education needs to initiate a teach-out plan, the Dean shall inform and involve affected faculty and staff at the earliest possible stage of consideration. Once the decision to pursue closure of an educational program has been made, the Dean shall forward a proposal to the Alder GSE Board of Directors. The Teach-Out Plan progression will operate as follows:</p> <ol style="list-style-type: none"> 1. Faculty will be involved in and informed of plans to terminate a program at the earliest possible stage of consideration, along with notification of any associated lay-offs. 2. Written notification of program closure will be immediately provided to all affected staff, faculty and student groups once Alder Board of Directors grants approval. 3. Student advisement meetings will be scheduled to inform residents of options for completing their course of study with partner institutions and transition plans will be developed for each student. 4. Currently enrolled students affected by the program termination will be provided an opportunity to complete their programs during the teach-out period. The strategy may include completion at a partner institution.

Criterion	Summary of Alder GSE's Responses
	<p>5. The admissions office will immediately suspend the admission process and notify any newly admitted or previously admitted students who are not yet enrolled.</p> <p>6. The Dean's Office will identify Commission-approved partner institutions in the regions where residents work as options for students to transfer and complete their course of study. Agreements will be made between Alder and partnering institution so as to do the very best to honor the work students have already completed and to make the transition as seamless as possible.</p>

Staff Recommendation

Staff recommends that the Commission consider the response to Eligibility Requirements submitted by Alder Graduate School of Education and take one of the following possible actions for the institution:

- 1) Grant Eligibility; or
- 2) Deny Eligibility.

If the Commission grants Eligibility, it may identify aspects of the application for which it may need additional information in Stage III.

If the Commission denies Eligibility, it may identify what it sees as missing in the current submission in the event the institution decides to continue to work toward institutional approval.

If approved by the Commission, Alder Graduate School of Education will be allowed to move forward to Stage III - submission of Common Standards and Preconditions for review. Approval of Stage II will not authorize Alder Graduate School of Education to offer an educator preparation program that leads to a credential.

Next Steps

Based on the Commission's action, staff will take appropriate next steps related to the option chosen.

Appendix A
Criterion 10, 11 and 12
Eligibility Requirement, Required Information, and Factors to Consider

Criterion 10: Mission and Vision

Eligibility Requirement	Required Information	Factors to Consider
<p>An institution’s mission and vision for educator preparation is consistent with California’s approach to educator preparation.</p> <p>* A complete program design with significant detail included is not what is intended here as that will be submitted to ensure alignment with the Commission’s adopted program standards in Stage III. Rather, the intent is to provide the Commission with sufficient information to ensure that the institution’s philosophy and approach about educator preparation is consistent with California’s.</p>	<p>a) Statement of the institution’s mission and vision for Educator Preparation.</p> <p>b) A statement confirming that the mission and vision will be published on the website and in institutional documents provided to candidates.</p> <p>c) Information about how the mission and vision for educator preparation reflects the institution’s commitment to California’s adopted state standards and frameworks for TK-12 students.</p> <p>d) Information that demonstrates the institution’s commitment to preparing candidates to work effectively with the full range of California TK-12 students.</p> <p>e) Statement that includes which educator preparation program(s) the institution will seek to offer.</p> <p>f) Information about the institution’s philosophical and/or theoretical framework or approach underlying the design of educator preparation.*</p> <p>g) If applicable, provide a description of the ways in which the proposed program for California would be similar or different from programs operated in another state.</p>	<p>a) To what extent did the institution provide a clear mission and vision for educator preparation programs that the institution seeks to offer to prospective California candidates?</p> <p>b) To what extent did the institution confirm that the mission and vision will be published on the website and in institutional documents provided to candidates?</p> <p>c) To what extent does the information about the institution’s mission and vision demonstrate the institution’s commitment to California’s adopted state standards and frameworks for TK-12 students?</p> <p>d) To what extent does the information about the institution’s mission and vision demonstrate the institution’s commitment to the health and success of all students?</p> <p>f) To what extent does the information provided about the proposed program design indicate that sufficient attention will be paid to both the theoretical foundations of teaching and learning and effective professional practice?</p>

Eligibility Requirement	Required Information	Factors to Consider
	h) Any other relevant information the institution believes will allow the Commission to better understand the institution and its programs.	

Criterion 11: History of Prior Experience and Effectiveness in Educator Preparation

Eligibility Requirement	Required Information	Factors to Consider
<p>Institutions seeking IIA must have sponsored an educator preparation program leading to licensure, or participated as a partner in any educator preparation programs and/or programs focused on K-12 public education and provide history related to that experience.</p> <p>CTC staff will research available information about the institution relevant to the application for initial institutional approval.</p> <p>Institutions must submit:</p> <p>Proof of third party notification enlisting</p>	<p>a) History related to its prior experience preparing, training and supporting educators within California or in other states.</p> <p>b) A list of all states and/or countries in which the institution is currently operating an educator preparation program and the status of the institution’s approval in each of those locations.</p> <p>c) If applicable, a copy of the most recent approval document (state approval/accreditation and, if applicable, letter or report from regional accrediting body, if applicable, indicating accreditation status.</p> <p>d) For institutions currently operating educator preparation programs in another state, data from the most recent 5 years indicating number of candidates enrolled in the institution’s programs and number who have completed program (taking into account the length of time of the program design).</p>	<p>a) Is there information that the institution has prior experience successfully preparing, training, and/or supporting educators or partnering with institutions that prepare educators?</p> <p>b) To what extent did the institution provide a complete and accurate list of all the states and/or counties in which it is operating an educator preparation program?</p> <p>c) Is there sufficient information that the entity is operating in good standing in other jurisdictions where it is/has sponsored educator preparation or other related work?</p> <p>d) To what extent does the data provided regarding completion indicate that most candidates are able to successfully complete the program in a timely manner?</p> <p>e) To what extent does the data provided indicate that candidates that complete the institution’s programs are likely to be employed as educators?</p>

Eligibility Requirement	Required Information	Factors to Consider
comments to be sent to: Input@ctc.ca.gov	e) If offering educator preparation program in other state, any information available on placement rates for candidates in the schools. f) Evidence that the entity has fostered positive working relationships with educational partners in establishing its programs in California to meet local educational needs. g) Evidence that candidates have been satisfied with the educator preparation programs offered by the entity and the services they received by the institution.	f) To what extent does the institution have either a positive history of working collaboratively with local educational partners and/or information that it will work collaboratively with local educational partners (for instance, TK-12 institutions working with feeder IHE programs or IHE programs working collaboratively with TK-12 employers) g) To what extent does the information provided indicate that candidates are satisfied with the institution and with the services they receive?

Criterion 12: Capacity and Resources

Eligibility Requirement	Required Information	Factors to Consider
An institution must submit a Capacity and Resources plan providing information about how it will sustain the educator preparation program(s) through a 2 – 3 year provisional approval (if granted) at a minimum. A plan to teach out candidates if, for some reason, the institution is unable to continue providing educator preparation program(s).	a) Copy of the most recent audited budget for the institution. b) A proposed operational budget for the educational unit. c) Information about instructional and support personnel for the educational unit. This information shall include, but not be limited to: 1) The number and type of faculty (full time faculty, pt. time adjunct, etc.) and/or instructional personnel, including support providers and coaches if induction, who will be employed or used	a) To what extent did the institution provide information from a recent audit that indicates that the institution is economically stable? b) Does the information provided indicate that that the institution will provide adequate resources to operate effective educator preparation programs in the first 2-3 years of the program? c) Does the information provided indicate that the leadership, instructional personnel and support staff are capable of maintaining and delivering an effective educator preparation program.

Eligibility Requirement	Required Information	Factors to Consider
	<p>to provide services to candidates in the first 2-3 years of the program's operation.</p> <p>2) The criteria or minimum qualifications for each of the positions listed above.</p> <p>3) If the institution applying is an out of state institution, provide all relevant information about how the instructional services will be delivered to candidates. For instance, will faculty and instructional personnel remain located in the home state and provide services via technology to candidates in California?</p> <p>d) If the institution applying is an out of state institution, the institution must provide all relevant information as to which of the educational services would be located outside of California. For instance, if candidates must go through the out of state offices in order to get financial aid services, the institution should provide that information to the Commission.</p> <p>e) Evidence of TK-12 partnerships for the purposes of providing fieldwork.</p> <p>f) Information demonstrating sufficient facilities and/or digital learning platforms for candidates.</p> <p>g) A plan to teach out candidates if, for some reason, the institution is unable to</p>	<p>d) To what extent did the institution provide clear information about which educational services would be located outside of California? And does the plan indicate that prospective California candidates would be well served by the plan?</p> <p>To what extent did the institution provide sufficient information to indicate that if any of the instructional services will be delivered from outside of California, that these services will meet the needs of prospective California candidates?</p> <p>e) To what extent did the institution provide information that demonstrates that it is working collaboratively with TK-12 schools to ensure appropriate fieldwork experiences for candidates?</p> <p>f) To what extent did the institution provide information that there will be sufficient facilities and/or effective digital learning platforms for candidates?</p> <p>g) To what extent did the institution provide a Teach Out plan that identifies, at least broadly what actions would be taken to ensure that the interest of</p>

Eligibility Requirement	Required Information	Factors to Consider
	continue providing educator preparation program(s).	enrolled candidates will be sufficiently addressed in the event of program and/or institution closure?