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Action

Educator Preparation Committee

Initial Institutional Approval – Stage III: Consideration of Provisional Approval for Lake County Office of Education

Executive Summary: This agenda item presents, as part of the Initial Institutional Approval process, Lake County Office of Education’s responses to the Common Standards and Program Preconditions for consideration and possible Provisional Approval by the Commission.

Recommended Action: That the Commission grant Provisional Approval to Lake County Office of Education and set the Provisional Approval period to be three years.

Presenter: Hart Boyd, Consultant, Professional Services Division

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 III: Consideration of Provisional Approval for Lake County Office of Education

Introduction

This agenda item presents, as a part of Stage III of the Initial Institutional Approval (IIA) process, the Lake County Office of Education's (LCOE) responses to relevant Preconditions and the Common Standards for consideration of Provisional Approval by the Commission on Teacher Credentialing (Commission). LCOE seeks to offer Preliminary Multiple Subject Intern and Education Specialist: Mild/Moderate Intern programs. Preconditions have been reviewed by staff and have been determined to be met. Common Standards responses have been reviewed by members of the Board of Institutional Review (BIR) and have been determined to be aligned. If granted Provisional Approval, the next step in the process would be the review of LCOE's response to the Program Standards by a BIR team. When these reviewers determine that the Program Standards are aligned, the proposed program will be considered for approval by the Committee on Accreditation (COA). If approved, the institution may offer the program for the provisional period of time as specified by the Commission.

Background

California Education Code §44372(c), 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. The Commission has established the IIA process whereby an institution seeking to offer educator preparation program(s) in California must first satisfactorily complete five stages to be approved as a program sponsor.

At the December 2015 Commission meeting, the Commission approved a new IIA process as part of the Strengthening and Streamlining Accreditation project. Updates to the IIA process were subsequently approved during the February 2017 Commission meeting. The submission of Common Standards and Preconditions is Stage III of the five-stage process, as indicated in the highlighted column of the chart on the following page. Completion of this stage of the process results in a determination by the Commission of whether to grant the institution Provisional Approval. As a reminder, Provisional Approval permits the institution to offer an educator preparation program *once* the program standards are found to be aligned by a BIR team and the proposed program is subsequently approved by the COA in Stage IV.

Initial Institutional Approval: Five Stages Chart

Lake County Office of Education (LCOE) is seeking approval of Stage III as highlighted in the chart below.

IIA Process	Stage I	Stage II	Stage III	Stage IV	Stage V
Action	Prerequisites	Eligibility Requirements	Preconditions & Common Standards	Program Standards	Site Visit
Purpose	Ensures legal eligibility of institution in California Ensures institution understands requirements of Commission's accreditation system	Ensures that institution has capacity to sponsor effective programs	Ensures institution meets all relevant preconditions Ensures institution meets all Common Standards	Ensures all proposed programs meet all relevant program standards	Program operates for 2-3 years and hosts a focused accreditation site visit
Requirements	Institution must: 1. Have legal eligibility 2. Attend Accreditation 101 with institutional team	Submit responses to: • 12 Eligibility Criteria	Submit responses to: • Preconditions • Common Standards	Submit responses to: • Program Standards	Institution must: • Collect data • Host focused site visit
Reviewed By	Staff	Staff	Preconditions: Staff Common Standards: BIR	BIR	Site Visit Team
Authority	Staff	Commission	Commission	COA	Commission
Decision	Determine Eligibility for Stage II	Eligibility: 1. Grant 2. Deny	Provisional Approval: 1. Grant 2. Deny	Program(s): 1. Approve 2. Deny	1. Grant Full approval 2. Retain Provisional Approval with Additional Requirements 3. Deny Approval
IIA Status*	Not Approved	Not Approved	Provisional Approval**	Provisional Approval***	Full Approval

*At conclusion of stage

**Institutionally-approved but cannot offer programs

***May begin offering approved programs

Lake County Office of Education

LCOE has completed Stages I and II of the IIA process and was approved as an eligible institution by the Commission at its [August 2019](#) meeting. This action allowed LCOE to move forward to Stage III in which responses to Preconditions and Common Standards were submitted, as linked in this item below. Currently, LCOE seeks Provisional Approval from the Commission. The LCOE application states that the institution intends to offer a Preliminary Multiple Subject Intern program and a Preliminary Education Specialist: Mild/Moderate Intern program and will next seek COA approval in Stage IV.

Stage III: Review to Determine Alignment with Preconditions and Common Standards

In keeping with the Commission's process for IIA, LCOE submitted its responses to the Initial Program Preconditions, Preliminary Multiple Subject and Preliminary Education Specialist Program Preconditions, Intern Preconditions, and Common Standards. The Preconditions have been reviewed by Commission staff and have been found to be met. In addition, two BIR members reviewed the Common Standards and have found them to be aligned.

Information and excerpts from LCOE's responses to Initial Program Preconditions, the Preliminary Multiple Subject Preconditions, Preliminary Education Specialist Preconditions, Intern Preconditions, and the Common Standards are included in this agenda item. Complete submissions of LCOE's responses to the Preconditions and Common Standards are available on the [LCOE website](#).

It is an important reminder that although the Preconditions and Common Standards in this agenda item can provide some indication of the design of the program the institution proposes to offer, detailed program information will be provided in the institution's responses to the Program Standards in Stage IV of the IIA process. The responses to the Program Standards will be reviewed by a team of qualified individuals to determine alignment to the Commission-approved Program Standards. Once reviewers have determined that the responses are aligned to the Program Standards, an agenda item will be brought to the COA for approval or denial of the proposed program.

Initial Program Preconditions

(1) Demonstration of Need:

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

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE's submission notes that its proposed Preliminary Multiple Subject and Preliminary Education Specialist: Mild/Moderate intern programs will serve as a resource and support system for the six districts within Lake County as well as other districts in the region. LCOE's submission highlights a variety of factors which demonstrate the need for its proposed programs. LCOE's submission states that, despite efforts to recruit and retain fully-credentialed teachers, districts within LCOE begin each school year with classes led by teachers on emergency permits (e.g., Short-Term Staff Permits, Provisional Internship Permits, substitute permits). The submission claims that many of these teachers serving on emergency permits would like to pursue a preliminary credential but there are limited options available in the region. Due to there being no clear pipeline for these teachers to earn a Preliminary credential, LCOE experiences high turnover rates for emergency permit holders. The submission further states that due to the high poverty rate and the remoteness of the region, it would be extremely difficult for prospective candidates in Lake County – who would otherwise be interested in becoming a fully-credentialed teacher – to enroll in an approved intern program in a surrounding area. Additionally, communities served by the school districts in Lake County have been impacted by several natural disasters in the past several years, contributing to the difficulty in recruiting and retaining qualified teachers. Recent wildfires have devastated the rural community and destroyed over 2,000 homes which, in turn, has created a shortage of available housing. LCOE claims that by offering the proposed intern programs, it will create a clear pathway to a Preliminary credential for emergency permit holders and other prospective candidates.

LCOE has also provided a letter signed by district and county leadership verifying the need for the proposed intern programs.

(2) Practitioner's Participation in Program Design:

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

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE established a design and development team for the proposed intern programs which includes the following members:

- Associate Superintendent (Mendocino County Office of Education)
- Education Coordinator of Teacher Development (Lake County Office of Education)
- Senior Director of School and District Support (Lake County Office of Education)
- Deputy Superintendent (Lake County Office of Education)

LCOE's submission notes that all members of the team have participated actively in the design and development of the program's philosophical orientation, education goals, and content emphases. Additionally, through its partnership with Sonoma County Office of Education (North Coast School of Education), LCOE gathered feedback from intern candidates employed by LCOE and used it to inform the design of the proposed programs. LCOE has also established a leadership team that is comprised of members from each participating district, and this team will become a part of the advisory board for the proposed programs upon Provisional Approval.

Program Preconditions (Preliminary Multiple Subject)

(1) Limitation on Program Length

The professional preparation coursework that all candidates are required to complete shall be equivalent to no more than two years of full-time study at the institution. The limitation applies to postgraduate teacher preparation programs. *The limitation does not apply to blended/integrated programs of subject matter preparation and professional preparation teaching internship programs.*

Meets Precondition: N/A

How LCOE Meets the Precondition:

Not applicable due to the fact that this institution is seeking to offer intern programs.

(2) Limitation on Student Teaching Prerequisites

No college or university shall require candidates to complete more than the equivalent of nine semester units of professional preparation courses (as defined in Program Precondition 1) prior to allowing candidates to enroll in student teaching in elementary or secondary schools. This restriction may be increased to the equivalent of twelve semester units if the student teaching prerequisites include study of alternative methods of English language development as required by Program Precondition 7.

Meets Precondition: N/A

How LCOE Meets the Precondition:

Not applicable due to the fact that this institution is seeking to offer intern programs.

(3) English Language Skills

In each program of professional preparation, the college or university or school district requires candidates to demonstrate knowledge of alternative methods of developing English language skills, including reading, among all pupils, including those for whom English is a second language, in accordance with the Commission's standards.

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE's submission notes that studies of developing English language skills, including reading, among all pupils, including those for whom English is a second language will be embedded throughout the program's two-year curriculum. Candidates enrolled in the proposed Multiple Subject intern program will have opportunities to demonstrate knowledge of methods of developing English language skills, including Specially Designed Academic Instruction in English (SDAIE) strategies which support the learning of students for whom English is a second language, through the completion of assignments aligned with the coursework and through observations conducted by assigned mentors and supervisors.

(4) Undergraduate Student Enrollment

Undergraduate students of any campus of the California State University or the University of California shall be allowed to enroll in any professional preparation course.

Meets Precondition: N/A

How LCOE Meets the Precondition:

Not applicable due to the fact that this institution is seeking to offer intern programs at the local education agency.

(5) Program Admission

The sponsor of a multiple or single subject preliminary teacher preparation program assesses each candidate's standing in relation to required subject matter preparation during the admissions process. The program admits only those candidates who meet one of the following criteria:

- The candidate provides evidence of having passed the appropriate subject matter examination(s).
- The candidate provides evidence of having attempted the appropriate subject matter examinations(s).
- The candidate provides evidence of registration for the next scheduled examination.
- The candidate provides evidence of having completed an appropriate Commission-approved subject matter preparation program.
- The candidate provides evidence of continuous progress toward meeting the subject matter requirement.

- The candidate provides evidence of enrollment in an organized subject matter examination preparation program

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE’s submission notes that no one will be admitted to the proposed intern program without having provided all required subject matter preparation documentation when first applying to the proposed program. A requirement for admission listed in the provided admission requirements document specifies that each prospective candidate must provide evidence of having passed the appropriate subject matter examination(s) or having completed the appropriate Commission-approved subject matter program prior to admission into the program. A program assistant will review the subject matter preparation documentation, and the documentation will then move to the program director for a final review. After the coordinator reviews the documentation, it will then move to the credential analyst for a final determination on program admission.

(6) Subject Matter Proficiency

The approved preliminary teacher preparation program sponsor determines that each candidate meets the Subject Matter Requirement prior to being given daily whole class instructional responsibilities in a TK-12 school or before becoming the teacher of record as an intern in a TK-12 school. Reference: Education Code Sections 44259 (b) (5).

- For Multiple and Single Subject programs (traditional and intern), the candidate provides evidence of having passed the appropriate subject matter examination(s) or having completed the appropriate Commission-approved subject matter preparation program, or a course of study deemed equivalent by the program sponsor.
- For integrated undergraduate programs only, the candidate must be monitored by the program for subject matter competency both prior to beginning and during early field experiences. Each candidate in an integrated undergraduate program must have satisfied subject matter or at a minimum completed four-fifths of the Commission-approved subject matter preparation program prior to beginning solo (i.e., student) teaching.

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE’s submission states that each candidate must provide evidence prior to admission into the Multiple Subject intern program of having passed the appropriate subject matter examination(s) or having completed the appropriate Commission-approved subject matter program prior to becoming the teacher of record as a Multiple Subject teacher in a TK-12 school. LCOE has provided an admissions requirements document as evidence.

(7) Completion of Requirements

A college or university or school district that operates a program for the Preliminary Multiple or Single Subject Credential shall determine, prior to recommending a candidate for the credential, that the candidate meets all legal requirements for the credential, including but not limited to:

- Possession of a baccalaureate or higher degree for Preliminary Multiple Subject credential candidates, and for Preliminary Single Subject candidates, possession of a baccalaureate degree in a subject other than in professional education from a regionally accredited institution
- Completion of Basic Skills Requirement
- Completion of an accredited professional preparation program
- Completion of the subject matter requirement
- Demonstration of knowledge of the principles and provisions of the Constitution of the United States
- Passage of the Teaching Performance Assessment
- Passage of the Reading Instruction Competence Assessment (RICA) (for Multiple Subject candidates)

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE's submission details the process that will determine that all legal requirements for the issuance of the Preliminary Multiple Subject credential have been completed by a candidate prior to the credential recommendation. The program assistant will do a preliminary review of all program requirement documentation and will forward the documentation to the program coordinator. The program coordinator will then ensure that all program requirements have been met and that all documentation is ready for the final review. The credential analyst will then conduct the final review and make a credential recommendation to the Commission on Teacher Credentialing.

Program Preconditions (Preliminary Education Specialist)

(1) English Language Skills

In each program of professional preparation, the college or university or school district requires candidates to demonstrate knowledge of alternative methods of developing English language skills, including reading, among all pupils, including those for whom English is a second language, in accordance with the Commission's standards.

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE's submission notes that studies of developing English language skills, including reading, among all pupils, including those for whom English is a second language will be embedded

throughout the program's two-year curriculum. Candidates enrolled in the proposed Mild/Moderate intern program will have opportunities to demonstrate knowledge of methods of developing English language skills, including Specially Designed Academic Instruction in English (SDAIE) strategies which support the learning of students for whom English is a second language, through the completion of assignments aligned with the coursework and through observations conducted by assigned mentors and supervisors.

(2) Program Admission

The sponsor of an education specialist teacher preparation program assesses each candidate's standing in relation to required subject matter preparation during the admissions process. The program admits only those candidates who meet one of the following criteria:

- The candidate provides evidence of having passed the appropriate subject matter examination(s).
- The candidate provides evidence of having attempted the appropriate subject matter examinations(s).
- The candidate provides evidence of registration for the next scheduled examination.
- The candidate provides evidence of having completed an appropriate Commission approved subject matter preparation program.
- The candidate provides evidence of continuous progress toward meeting the subject matter requirement.
- The candidate provides evidence of enrollment in an organized subject matter examination preparation program.

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE's submission notes that no one will be admitted to the proposed intern program without having provided all required subject matter preparation documentation when first applying to the proposed program. A requirement for admission listed in the provided admission requirements document specifies that each prospective candidate must provide evidence of having passed the appropriate subject matter examination(s) or having completed the appropriate Commission-approved subject matter program prior to admission into the program. A program assistant will review the subject matter preparation documentation, and the documentation will then move to the program director for a final review. After the coordinator reviews the documentation, it will then move to the credential analyst for a final determination on program admission.

(3) Subject Matter Proficiency

The approved teacher preparation program sponsor determines that each candidate meets the subject matter requirement prior to solo teaching, or, for intern candidates, before being given daily whole class instructional responsibilities in a K-12 school or before becoming the teacher of record in a K-12 school.

To demonstrate subject matter competence, a candidate for an Education Specialist teaching credential, except for the Early Childhood Special Education credential, shall:

1. Pass the Commission-approved Multiple Subject matter examination; or pass a Commission-approved subject matter examination in Art, English, Mathematics, including foundational-level Mathematics, Music, Social Science or Science, including foundational-level General Science; or
2. Complete a Commission-approved subject matter program in Art, Elementary, English, Mathematics including foundational-level Mathematics, Music, Social Science or Science, including foundational-level General Science; or Preliminary Education Specialist 2 Preconditions For integrated undergraduate programs only, the candidate must be monitored for subject matter competency both prior to beginning and during early field experiences. Each candidate in an integrated undergraduate program must have satisfied subject matter or at a minimum completed four-fifths of the Commission-approved subject matter preparation program prior to beginning solo (i.e., student) teaching.
3. Hold a California general education teaching credential in any subject

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE's submission notes that each candidate must provide evidence prior to admission into the Mild/Moderate intern program of having passed the appropriate subject matter examination(s), having completed the appropriate Commission-approved subject matter program, or being in possession of a California general education teaching credential prior to becoming the teacher of record as a Mild/Moderate subject teacher in a TK-12 school. LCOE has provided an admissions requirements document as evidence.

(4) Completion of Requirements

A college or university or school district that operates a program for the Education Specialist teaching credential shall determine, prior to recommending a candidate for the credential, that the candidate meets all legal requirements for the credential, including but not limited to:

- Possession of a baccalaureate or higher degree from a regionally accredited institution
- Satisfaction of the Basic Skills Requirement
- Completion of an accredited professional preparation program
- Completion of the subject matter requirement
- Demonstration of knowledge of the principles and provisions of the Constitution of the United States
- Passage of the Reading Instruction Competence Assessment (RICA)

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE's submission details the process that will determine that all legal requirements for the issuance of the Preliminary Education Specialist: Mild/Moderate credential have been completed by a candidate prior to the credential recommendation. The program assistant will do a preliminary review of all program requirement documentation and will forward the documentation to the program coordinator. The program coordinator will then ensure that all program requirements have been met and that all documentation is ready for a final review. The credential analyst will then conduct the final review and make a credential recommendation to the Commission on Teacher Credentialing.

Intern Preconditions (Preliminary Multiple Subject and Preliminary Education Specialist)

(1) Bachelor's Degree Requirement

Candidates admitted to internship programs must hold baccalaureate degrees or higher from a regionally accredited institution of higher education.

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE notes that candidates must hold a baccalaureate degree or higher from a regionally accredited institution of higher education prior to admission to the Preliminary Multiple Subject or Preliminary Education Specialist internship program. LCOE states that the baccalaureate degree will be verified by LCOE's credential analyst as part of the admissions process, and a copy of the baccalaureate degree will be kept on file at the LCOE office.

(2) Subject Matter Requirement

Each Multiple Subject intern admitted into the program has passed the Commission-approved subject matter examination(s) for the subject area(s) in which the Intern is authorized to teach, and each Single Subject intern admitted into the program has passed the Commission-approved subject matter examination(s) or completed the subject matter program for the subject areas(s) in which the Intern is authorized to teach.

Meets Precondition: Yes

How LCOE Meets the Precondition:

Before a candidate can be admitted to either of LCOE's proposed intern programs, all candidates must have passed the appropriate Commission-approved subject matter examination(s) or have completed a Commission-approved subject matter program for the subject area(s) in which the intern is authorized to teach. LCOE will provide test preparation and tutoring and will subsidize part or all the costs of taking the subject matter examination. LCOE's credential analyst will verify that the examination(s) have been passed and a copy of the documentation will be kept on file at the LCOE office.

(3) Pre-Service Requirement

- (a) Each Multiple and Single Subject Internship program must include a minimum of 120 clock hour (or the semester or quarter unit equivalent) pre-service component which includes foundational preparation in general pedagogy including classroom management and planning, reading/language arts, subject specific pedagogy, human development, and specific content regarding the teaching of English Learners pursuant to California Code of Regulations §80033.
- (b) Each Education Specialist Internship program includes a minimum of 120 clock hour (or the semester or quarter unit equivalent) pre-service component which includes foundational preparation in pedagogy including classroom management and planning, reading/language arts, specialty specific pedagogy, human development, and teaching English Learners.

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE provided an admissions checklist verifying that each Preliminary Multiple Subject intern and Preliminary Education Specialist: Mild/Moderate intern will complete a minimum of 120 clock hours pre-service component which includes foundational preparation in general pedagogy including classroom management and planning, reading/language arts, subject specific pedagogy, human development, and specific content regarding the teaching of English Learners.

(4) Professional Development Plan

The employing district has developed and implemented a Professional Development Plan for interns in consultation with a Commission-approved program of teacher preparation. The plan shall include all of the following:

- (a) Provisions for an annual evaluation of the intern.
- (b) A description of the courses to be completed by the intern, if any, and a plan for the completion of preservice or other clinical training, if any, including student teaching.
- (c) Additional instruction during the first semester of service, for interns teaching in kindergarten or grades 1 to 6 inclusive, in child development and teaching methods, and special education programs for pupils with mild and moderate disabilities.
- (d) Instruction, during the first year of service, for interns teaching children in bilingual classes in the culture and methods of teaching bilingual children, and instruction in the etiology and methods of teaching children with mild and moderate disabilities.

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE's submission states that each employing district will follow the professional development plan format developed by LCOE. LCOE further notes the components of the professional

development plan will be listed as part of the Memorandum of Understanding that will be signed by the employing district and a representative from LCOE.

(5) Supervision of Interns

- (a) In all internship programs, the participating institutions in partnership with employing districts shall provide 144 hours of support and supervision annually and 45 hours of support and supervision specific to teaching English learners pursuant to California Code of Regulations §80033.
- (b) University Intern Programs only: No intern's salary may be reduced by more than 1/8 of its total to pay for supervision, and the salary of the intern shall not be less than the minimum base salary paid to a regularly certificated person. If the intern salary is reduced, no more than eight interns may be advised by one district support person.

Meets Precondition: Yes

How LCOE Meets the Precondition:

- (a) LCOE states that each district employing an intern in either of the proposed intern programs will provide a trained district coach (possessing either a Multiple Subject or Mild/Moderate credential as appropriate) to provide immediate and ongoing support to the candidate each year they are enrolled in the program. In order to ensure that all intern candidates will receive appropriate and effective types of support, LCOE will:
 - Provide each district with the qualifications for the role,
 - Provide training for intern mentors, and
 - Collect evaluation data about the quality of support each candidate receives.

LCOE notes that the evaluation results will be used by the program to inform future training needs and to ensure that only the most effective district intern mentors are retained. LCOE will require a minimum of 144 hours of district coach support and supervision that will be documented annually on an activity log which will be verified by the candidate and submitted by the district coach. Additionally, LCOE states that each candidate will be provided with 45 hours of support and supervision specific to teaching English learners by a district employee with English learner expertise.

- (b) Not Applicable as this is a local education agency level program.

(6) Assignment and Authorization

To receive program approval, the participating institution authorizes the candidates in an internship program to assume the functions that are authorized by the regular standard credential. Reference: Education Code Section 44454. The institution stipulates that the interns' services meet the instructional or service needs of the participating district(s). Reference: Education Code Section 44458.

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE assures that all candidates enrolled in either the Multiple Subject and/or Mild/Moderate intern program will be employed by a participating school district as teachers in their respective credential areas in, at minimum, a 50 percent contract. LCOE notes that this will enable the candidates to assume the functions authorized by their credential. Additionally, LCOE's submission states that program leadership and LCOE's Human Resources Department will stipulate that the services of the interns must meet the instructional or service needs of the participating district. LCOE will require each participating district to complete a "proof of employment" document and will be kept on file as part of the candidate admission requirements.

(7) Participating Districts

Participating districts are public school districts or county offices of education. Submissions for approval must identify the specific districts involved and the specific credential(s) involved.

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE notes that a formal Memorandum of Understanding that details the responsibilities of the district will be signed by both LCOE and the participating district. LCOE provided a list of participating districts for both the proposed Multiple Subject and Mild/Moderate intern programs, which are listed below:

- Kellseyville Unified School District
- Konocti Unified School District
- Lakeport Unified School District
- Lucerne Elementary School District
- District Middletown Unified School District
- Upper Lake Unified School District

(8) Early Program Completion Option. (Does not apply to an Education Specialist intern program)

Each intern program must make available to candidates who qualify for the option the opportunity to choose an early program completion option, culminating in a five-year preliminary teaching credential. This option must be made available to interns who meet the following requirements:

- (a) Pass a written assessment adopted by the commission that assesses knowledge of teaching foundations as well as all of the following:
 - Human development as it relates to teaching and learning aligned with the state content and performance standards for K-12 students
 - Techniques to address learning differences, including working with students with special needs
 - Reading instruction in accordance with state standards

- Assessment of student progress based on the state content and performance standards
 - Classroom management techniques
 - Methods of teaching the subject fields
- (b) Pass the teaching performance assessment. This assessment may be taken only one time by an intern participating in the early completion option.
- (c) Pass the Reading Instruction Competence Assessment (RICA) (Multiple Subject Credential only).

An intern who chooses the early completion option but is not successful in passing the assessment may complete his or her full internship program.

Meets Precondition: Yes

How LCOE Meets the Precondition:

A review of evidence shows that an Early Completion Option (ECO) will be made available by LCOE to any Multiple Subject candidate who qualifies for the option based on the specific criteria listed in the precondition. *Please note that there is no ECO available for the Preliminary Education Specialist intern programs.*

(9) Length and Validity of Intern Certificate

Each intern certificate will be valid for a period of two years. However, a certificate may be valid for three years if the intern is participating in a program leading to the attainment of a specialist credential to teach students, or for four years if the intern is participating in a district intern program leading to the attainment of both a multiple subject or a single subject teaching credential and a specialist credential to teach students with mild/moderate disabilities.

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE's submission notes that the proposed program sponsor understands the following:

- Intern certificates will be valid for a period of two years.
- Intern credentials may be valid for three years if the intern is participating in a program leading to the attainment of an Education Specialist credential to teach students.
- Intern credentials may be valid for four years if the intern is participating in a district intern program leading to the attainment of both a Multiple Subject and an Education Specialist credential to teach students with Mild/Moderate disabilities.

(10) Non-Displacement of Certificated Employees

The institution and participating districts must certify that interns do not displace certificated employees in participating districts.

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE's submission includes a letter signed by leadership from each participating district and LCOE that verifies that interns will not displace certificated employees.

(11) Justification of Internship Program

When an institution submits a program for initial or continuing accreditation, the institution must explain why the internship is being implemented. Programs that are developed to meet employment shortages must include a statement from the participating district(s) about the availability of qualified certificated persons holding the credential. The exclusive representative of certificated employees in the credential area (when applicable) is encouraged to submit a written statement to the Committee on Accreditation agreeing or disagreeing with the justification that is submitted.

Meets Precondition: Yes

How LCOE Meets the Precondition:

LCOE's submission notes that there are a variety of factors contributing to its justification for its proposed programs. The communities served by the school districts in Lake County have been impacted by several natural disasters in the past several years, contributing to the difficulty in recruiting and retaining qualified teachers. Recent wildfires have devastated the rural community and destroyed over 2,000 homes which, in turn, has created a shortage of available housing. LCOE's submission states that, despite efforts to recruit and retain fully-credentialed teachers, districts within LCOE begin each school year with classes lead by teachers on emergency permits (e.g., Short-Term Staff Permits, Provisional Internship Permits, substitute permits). The submission claims that many of these teachers serving on the emergency permits would like to pursue a preliminary credential but there are limited options available in the region; however, due to there being no clear pipeline for these teachers to earn a preliminary credential, LCOE experiences high turnover rates for emergency permit holders. The submission further states that due to the high poverty rate and the remoteness of the region, it would be extremely difficult for prospective candidates in Lake County – who would otherwise be interested in becoming a fully-credentialed teacher – to enroll in an approved intern program in a surrounding area.

LCOE has also provided a letter signed by district and county leadership verifying the need for the proposed intern programs.

(12) Bilingual Language Proficiency

Each intern who is authorized to teach in bilingual classrooms has passed the language proficiency subtest of the Commission-approved assessment program leading to the Bilingual Crosscultural Language and Academic Development Certificate.

Meets Precondition: Yes

How LCOE Meets the Precondition:

Not applicable as LCOE's submission notes that the proposed program sponsor does not plan to offer the Bilingual Cross-cultural Language and Academic Development Certificate.

Common Standards Responses

All responses to the Common Standards have been deemed, by a team of BIR-trained reviewers, to be aligned. Beneath each Common Standard is information and excerpts from LCOE Common Standards submission. The [2015 Common Standards](#) are provided here as a reference.

Common Standard 1 – Institutional Infrastructure to Support Educator Preparation

The vision for LCOE’s proposed intern programs is to develop an appropriate, well-articulated, sequence of educational experiences that will meet a wide range of teachers’ needs. Leaders in LCOE and its partner districts are striving to recruit, prepare, and retain the most effective, innovative educators to provide exceptional learning experiences for all students. The proposed intern programs will fit into this sequence by providing appropriate professional development experiences to prepare educators to:

- Create effective learning environments that meet the needs of the full range of California TK-12 students;
- Effectively teach California’s adopted state standards and frameworks;
- Meet the diverse emotional and instructional needs of students in California;
- Understand and meet the unique educational and emotional needs of students who have adverse traumatic experiences;
- Engage in a goal of continuous, lifelong learning; and
- Earn the preliminary level teaching credential as an important part of the California Learning to Teach System.

Additionally, LCOE notes that a theoretical framework informs the mission statement of the proposed programs; the mission will be to prepare effective, innovative, and reflective teachers who are able to meet the diverse educational needs of the TK-12 students of California as well as being prepared to address the unique challenges faced by students in the districts of Lake County.

LCOE notes that it includes program stakeholders in the organization, coordination, and decision making for the proposed intern programs. LCOE’s submission includes a Stakeholders Activities Table that lists each program stakeholder and their contributing role, including:

- Lake County Office of Education Representatives
 - County Superintendent, Deputy Superintendent of Educational Services, Senior Director of School and District Support, Program Coordinator
- District Representatives within LCOE
 - Superintendent (Kelseyville USD), Superintendent (Lakeport USD), Superintendent (Middletown USD), Superintendent (Upper Lake USD), Principal/Superintendent (Lucerne Elementary SD), Associate Superintendent (Mendocino COE), Director (Konocti USD)

LCOE’s Stakeholders Activities Table denotes individuals who will contribute to the planning and development of the proposed intern programs and those who will provide input through the advisory board. Additionally, LCOE has two advisory board positions available for an intern

candidate and an intern coach upon approval. LCOE's advisory board will oversee the review of program data and determine the impact of future program modifications and planning.

LCOE's submission highlights its collaboration with institutions of higher education and the broader education community through a Classified Grant program. LCOE awards grants to classified employees who are attempting to earn a bachelor's degree through the California State University, Sacramento Early Childhood Education program at Woodland Community College. Additionally, LCOE has with Yuba Community College District (YCCD) on the California Community College (CCC) Teacher Credentialing Partnership Program Grant which will enable direct collaboration with YCCD and other consortium members, including California State University, Chico. LCOE also participates in a personal learning network with intern directors from a variety of institutions, including:

- Yolo-Solano Center for Teacher Credentialing
- North Coast School of Education
- Kings County Office of Education
- Pepperdine University
- Sacramento County Office of Education
- Tulare County Office of Education

LCOE notes that the majority of faculty and instructional personnel in the proposed programs will consist of educators and specialists from the districts within LCOE; additionally, the submission states that part of the faculty and instructional personnel application process will require applicants to provide information demonstrating their collaboration with P-12 colleagues. LCOE's submission states that the instructional staff of the proposed programs will remain current with emerging research and best practices in the field through daily work in schools and districts, connection to state and regional education agencies, and professional development.

LCOE's submission details how the proposed programs will be provided with sufficient resources by the institution. The proposed programs will have a full-time program coordinator who oversees the day-to-day programmatic operations. The program coordinator will be supported by a full-time staff person who will help coordinate program activities, collect and file admissions documentation, and monitor candidate progress. LCOE will also hire a credentials analyst who will provide credential support to the proposed programs. Additionally, LCOE's proposed programs will be provided with resources that will support coursework and facilities for program activities and will also support training for mentors and instructors.

LCOE's full-time program coordinator and support person will maintain the quality of the intern programs and will effectively monitor the progress of all program candidates, and resources – materials, personnel, and facilities – will be available to maintain the quality of the proposed programs.

LCOE's submission states that it will purposefully recruit staff from diverse backgrounds, with specific emphasis being placed on Native American and Latino communities. LCOE will use broad, internet-based job boards to recruit on a national, state, and regional level but will also recruit heavily throughout Lake and Mendocino counties to hire faculty that possess the knowledge and shared experiences of the local student populations as well as those representing the diversity of California. LCOE instructors will receive specific training in supporting the learning of a diverse student population, including targeted instructional strategies that support the learning of English learners. In addition to recruiting faculty who are experienced with and trained in English learner strategies, LCOE also intends to develop partnerships with local tribal councils to share opportunities to join the program faculty and/or guest speak at intern classes. LCOE's submission notes that ongoing support and professional development will be provided by leadership in the proposed programs to promote the retention of program instructors who support diversity and excellence.

LCOE's proposed programs will employ and assign instructors who demonstrate professionalism, expertise, and knowledge in the areas they will be providing professional development. Instructors will be evaluated by candidates and program participants throughout the year and results will be analyzed by program leadership. Program leadership will then use the results of these evaluations to provide feedback and identify any areas of growth for the instructors. Additionally, LOCE's candidates will receive one-on-one support, feedback, and guidance from qualified and knowledgeable instructional coaches, and candidates will be provided with opportunities to provide feedback to the program based on their experiences with the instructional coach; this feedback will be used by the program to address areas for growth for the instructional coach.

LCOE's credential recommendation process will ensure that candidates for a credential have met all requirements. The program coordinator, with assistance from the credential analyst, will track the progress of each candidate enrolled in the proposed programs. The program coordinator will determine if a candidate has successfully met all performance and competency requirements for the program. LCOE will use a digital checklist that includes supporting artifacts for each program requirement to ensure all requirements have been met. The program coordinator will then send the credential recommendation to the credential analyst when all requirements have been met and are supported by evidence, and the credential analyst will consult the digital checklist to verify the completion of these requirements. Once confirmed, the credential analyst will make a formal recommendation to the Commission on Teacher Credentialing.

Common Standard 2 – Candidate Recruitment and Support Preparation

LCOE will recruit candidates using a variety of platforms, including news, print, and social media and other online resources. Prospective candidates who respond to recruitment notices on these platforms will be invited to meetings regarding the proposed intern programs where specific admissions and resource information will be shared. Additionally, individual advisement sessions may be scheduled with the program coordinator or program assistant.

LCOE notes that an important source for candidate recruitment will come from educators already serving in local classrooms on emergency permits (e.g., PIP, STSP, substitute permits). LCOE highlights that for the previous three years, over ten percent of educators serving in district classrooms have been serving on a PIP or STSP. LCOE's submission details the steps LCOE will take to provide these individuals with information regarding the proposed programs and the admission requirements:

1. LCOE's Human Resources department will identify individuals who will serve on a PIP or STSP in the following year, and these individuals will be provided an opportunity to attend a LCOE-sponsored training in the summer designed to assist the prospective candidates in successful school start-up activities (e.g., classroom management, classroom procedures, lesson design) and provide information about the proposed intern programs. Additionally, LCOE will provide CSET preparation classes at no cost.
2. The prospective candidates serving on a PIP or STSP will be assigned a mentor who will meet with and observe them in a classroom setting. The prospective candidates will be provided support when needed and further program information will be shared.
3. The prospective candidates serving on a PIP or STSP will attend four workshops throughout the year where they will be provided with professional development. Program instructors will check on the progress of prospective candidates and will provide program and/or admissions information as needed.

LCOE's submission includes a document detailing the multiple measures that will be used by LCOE to determine eligibility and admission of prospective intern candidates. These multiple measures will include the following:

- Attend an advisement meeting to learn about the program, determine eligibility, and create an action plan
- Hold a bachelor's degree
- Satisfy the basic skills requirement
- Complete the intern pre-service coursework to be considered for a district intern credential (consisting of a minimum of 120 hours)
- Complete subject matter competence
- Complete the U.S. Constitution Requirement
- Possession of a Certificate of Clearance
- Provide verification of an offer of employment as "Teacher of Record" from a participating school district (employment must be at least .5 FTE in the established credential area and not as an aide or substitute)

Additionally, prospective candidates will be required to provide a purpose statement, three references, and must complete a one-on-one advisement session with program staff.

LCOE will strive to recruit and admit candidates that represent the diversity of California and meet the needs of the participating districts. LCOE submission notes that it will collaborate with every district in Lake and Mendocino Counties and will accept all applicants that meet the established admission requirements. Furthermore, LCOE will actively work to recruit diverse

candidates who are interested in becoming teachers, including specific recruitment through Tribal councils and community groups.

LCOE's proposed programs will provide support, advice, and assistance to candidates once admitted. Candidates will be supported by trained mentors who will provide one-on-one classroom support and guidance through the program requirements. Additional advice and assistance will be provided by program staff, leaders, supervisors, and instructors to promote the candidate's success while moving through the program.

LCOE's submission notes that information and a program handbook detailing program requirements, progress, and policies will be provided to candidates at the beginning of each semester. LCOE will use both Aeries and Canvas as platforms that function as student information and learning management systems. Candidates will use Aeries to generate unofficial transcripts, enroll in coursework, check enrollment status, and update their information while Canvas will serve as the candidate's learning platform where all elements of coursework will be housed, including assignments, grades, resources, and course materials.

LCOE's credential analyst will meet with candidates one-on-one at the beginning of each school year to review progress towards program completion and will meet with candidates again at the end of Year 2 to ensure program completion prior to recommending candidates for a preliminary credential. Candidates will also be provided with ongoing guidance from their intern mentor, and for specific program questions, the candidate may contact the program coordinator, program assistant, the curriculum and instruction director, or the credential analyst. LCOE notes that if a candidate requires additional support, the program director will make arrangements to provide the candidate with the necessary support.

LCOE's field supervisors will visit candidate classrooms regularly to observe and collect evidence of candidate progress in meeting competency and performance expectations, and the evidence will be used to guide advisement and support efforts provided by the field supervisors, mentors, and program leaders. Additionally, LCOE's field supervisors will meet regularly with mentors, instructors, and program leaders to discuss candidate progress towards meeting competency and performance expectations. If an intern needs additional support, the program coordinator will arrange for appropriate assistance.

LCOE's submission includes a program extension policy that was created to support candidates who need additional time to complete the program. Candidates are given information regarding this policy at the orientation and it is included in the program handbook. Candidates will complete an extension application, and this will be reviewed and a meeting will be scheduled with the candidate, program coordinator, and curriculum and instruction director to develop a detailed plan of activities that need to be completed, support that will be needed, the timeline for completion of these activities, and the potential costs.

LCOE notes that if a candidate needs additional time to complete competency requirements there is a process in place. Field supervisors will meet with the program coordinator to discuss

the identified competencies that have not been fully demonstrated, and a plan will be developed to address the additional support that is needed, the personnel that will be required, the timeline for completion, and the potential costs. LCOE notes that a candidate who does not complete the required coursework and/or examinations in four semesters will be required to take a fifth or sixth semester of supervision and/or coursework while they work towards completing program requirements.

Common Standard 3 – Course of Study, Fieldwork and Clinical Practice

LCOE's submission includes a planned scope and sequence for both the proposed Multiple Subject and Mild/Moderate intern programs. Additionally, LCOE submitted curriculum requirement documentation for both intern programs and notes that all coursework and clinical experiences will support the Teaching Performance Expectations (TPEs) and will incorporate current research. Coursework and field experiences will be focused on the candidate's classroom to ensure relevancy and to allow candidates to develop and demonstrate the knowledge and skills to educate and support their students in meeting state-adopted content standards.

LCOE candidates will be supported and supervised by trained clinical personnel who will collaborate and communicate with course instructors to ensure relevancy of the support and supervision provided to the candidate. Intern mentors and field supervisors will be familiar with program requirements and will support candidates as they move towards program completion. Instructors and field supervisors will participate in a collaborative meeting each semester to share course content and candidate progress through the program's scope and sequence, and this collaboration will prepare the field supervisors to connect feedback and support to the intern's coursework. LCOE's submission notes that it will hold a collaborative meeting at the beginning of each semester where coursework will be reviewed so all faculty, support, and supervisory personnel will be aware of the concepts and TPEs candidates will be working with through the year. LCOE will also hold an End-of-the-Year Staff Collaborative at the end of the spring semester where staff will reflect on program integration in the previous school year and plan for ongoing improvements for the following year.

LCOE will collaborate with district partners through face-to-face communication as well as through the advisory board, which will consist of representatives from each partnering district and county. Additionally, program staff will meet monthly with superintendents in partnering districts and quarterly with site principals to discuss program updates and needs. LCOE's partners will sign an MOU which will include language regarding the use of established criteria when selecting intern mentors who will support the candidates. LCOE submission includes the criteria and selection process for identifying and hiring mentors, field supervisors, and instructors. Although intern mentors will be hired by a partnering district, the mentors will be trained by LCOE's program leaders to ensure consistency of support for candidates across partnering districts. Partner districts will be provided with mentor evaluation data that is collected by LCOE so the data may be used by the district to inform rehiring decisions. LCOE

notes that instructors and field supervisors will be hired, trained, and evaluated by program leaders using established criteria.

LCOE notes that the classroom of each candidate will provide opportunities to experience issues of diversity and to demonstrate instructional strategies that will allow all learners to access a high-quality curriculum. Coursework and clinical experiences will be integrated and will reflect the foundational values of equity, complex instruction, collaboration, and trauma-informed instruction. LCOE's submission states that if a candidate's classroom does not provide ample opportunity to demonstrate these strategies, the program will provide the candidate with an alternative experience.

LCOE will require a Clear credential in the specified content or Education Specialist area in order to become an intern mentor or field supervisor. LCOE will use this information when assigning the mentors and field supervisors to ensure that each candidate has a support system of appropriately credentialed and experienced individuals.

LCOE highlights that it has already developed a pool of qualified site-based supervisors and mentors to serve candidates due to its previous role a satellite of the North Coast School of Education. LCOE states that it will recruit new supervisors and mentors continually through community outreach and communication with partnering districts. LCOE specifies that it will connect with SELPA and the Retired Teachers Association to recruit additional experienced, qualified supervisors.

LCOE's proposed programs will provide appropriate training to all intern mentors and field supervisors, including how to supervise and support intern candidates. Training will include an orientation to the role, how to provide targeted, effective feedback that leads to improved practice, programmatic information such as ways to document their work, and how to integrate and support coursework expectations.

LCOE notes that mentors will receive specific professional development in the following areas:

- Effective coaching
- Relationship building
- Identifying the needs of intern candidates

LCOE's field supervisors will receive specific professional development so they will be prepared to observe, document, and coach in the following areas:

- Targeted feedback
- Teaching Performance Expectations
- English learner strategies
- Reading strategies

LCOE notes that intern mentors and field supervisors will be evaluated based on the criteria established in the job descriptions for their specific roles. Additionally, intern candidates and

program partners will provide LCOE with feedback on the mentors and field supervisors. LCOE states that evaluation data will be shared with mentors and supervisors to support their ongoing development and to recognize their service.

LCOE's proposed programs will effectively implement fieldwork and clinical practice that is integrated with the program coursework. Field supervisors will conduct targeted classroom observations to ensure that candidates can demonstrate the required skills and knowledge. LCOE's submission includes a classroom observation log, SDAIE observation form, and reading strategy observation form that will provide structure for the work of field supervisors. Field supervisors will observe each candidate 30 times over two years, both formally and informally, with each observation being TPE-based. Formal observations will include a lesson plan submitted in advance of the observation where the field supervisor contributes feedback and interns incorporate that feedback into the observed lesson. During all observations, field supervisors will document the intern's demonstration of TPEs. In a candidate's first year in the program, field supervisors will document evidence of SDAIE strategies, and in the second year, field supervisors will document evidence of reading strategies. Each observation will conclude with a debrief conversation where the candidate and field supervisor reflect on the lesson and the TPEs and strategies observed. These observations will be included in the candidate's file and will play a significant role in determining if a candidate has completed all program requirements.

LCOE's submission notes that Lake and Mendocino County schools reflect the diversity of California's students and emphasizes a growing population of English learners. Each candidate will be responsible for a class that includes English learners, students with disabilities, and general education students. In the event a candidate does not have the necessary diversity represented in his/her classroom to demonstrate program competencies, an individualized plan will be developed. If necessary, program leadership will collaborate with the candidate's district administrators to evaluate the diversity represented in the candidate's classroom and facilitate a classroom population that is reflective of the community the intern serves.

Common Standard 4 – Continuous Improvement

Candidates, mentors, and field supervisors will be surveyed by LCOE biannually to gather feedback on program effectiveness, and this data will be used to make program modifications to meet the needs of candidates. Additionally, candidates will complete surveys regarding program quality (e.g., admissions process, advising, coursework, fieldwork, and support and supervision). Candidates will also complete a confidential survey regarding the quality of support, service, and knowledge of the mentors and field supervisors. LCOE will use this data, in addition to mentor activity logs, to inform future training and support; the data will also be used to inform decisions regarding the retention of mentors, field supervisors, and instructors. LCOE also notes that site administrators will be interviewed and surveyed about potential areas of growth for candidates and the program.

LCOE will review TPA scores, coursework evaluations, and confidential candidate surveys to determine areas for potential growth, and the data from these will be used to make program

modifications. Additionally, LCOE will review and use completer data which will determine post-program effectiveness and will provide critical feedback about the quality of preparation and the extent to which candidates are prepared to enter the professional practice. LCOE's submission also includes both a Multiple Subject Intern Assessment Plan and Mild/Moderate Education Specialist Intern Program Assessment Plan.

LCOE's program coordinator will meet one-on-one with every candidate each semester to review program progress, grades, and gather feedback on program supports and cohesion. Additionally, LCOE's program coordinator will meet with mentors and field supervisors for feedback on candidate competency.

LCOE's submission states that at the end-of -the-year collaborative meeting with instructors, mentors, field supervisors, and program leadership, learning plans will be examined holistically to inform areas for program improvement.

LCOE's submission notes that program stakeholders and district employers will be surveyed to determine strengths and areas for program growth. This data will be compiled into a semester report that will be shared with the advisory board to guide continuous improvement. LCOE's submission also includes a unit assessment plan that will analyze program data to identify specific areas for growth for both of the proposed programs while also looking for trends across programs to inform continuous improvement across programs at the unit level.

Common Standard 5 – Program Impact

LCOE's submission notes that candidates will be observed and supported by trained mentors and field supervisor throughout the program. Candidates will be assessed on the quality of classroom instruction, management, and other indicators that the candidate meets the competency requirements specified in the program standards. Observation forms based on the TPEs will be used to gather evidence of candidate competence in the classroom. LCOE's submission includes a Learning Plan template that each candidate will complete collaboratively with their mentor and field supervisor, and the supervisor will collect evidence supporting the plan through their observations of the candidate in the classroom. Program leadership will review and assess each Learning Plan, will provide candidates with feedback regarding program progress, and will collect aggregate data to inform program improvement. Additionally, LCOE will assess assigned course activities to determine that candidates are knowledgeable and able to demonstrate the course content which is aligned to state adopted standards and teaching competencies.

LCOE program leadership will analyze both quantitative and qualitative survey data to determine the effectiveness of the program on both the candidates and the students they serve.

Staff Recommendation

The Board of Institutional Review has found the Common Standard responses to be aligned and staff has found the Preconditions to be met. Therefore, staff recommends that the Commission grant Provisional Approval to Lake County Office of Education.

Granting Provisional Approval would allow Lake County Office of Education's proposed Preliminary Multiple Subject intern program and Preliminary Education Specialist: Mild/Moderate intern program to be reviewed by the Committee on Accreditation for potential program approval in Stage IV.

In addition, because district intern programs are designed to be two years in length, staff recommends that if Provisional Approval is granted to Lake County Office of Education by the Commission, the period of Provisional Approval be three years. After three years, an institution will have had an opportunity to have a cohort complete the program and to collect three years' worth of data that includes completers of the program. The report from the focused site visit will be brought to the Commission for consideration of Full Approval for Lake County Office of Education in Stage V.

Next Steps

Staff will take appropriate next steps based on the Commission's action.