

December 15, 2023

Joe Stephenshaw, Director  
California Department of Finance 915 L Street  
Sacramento, CA 95814

Dear Mr. Stephenshaw:

In accordance with the State Leadership Accountability Act (SLAA), the Commission on Teacher Credentialing submits this report on the review of our internal control and monitoring systems for the biennial period ending December 31, 2023. Should you have any questions please contact Mary Vixie Sandy, Executive Director, at (916) 322-6253, [msandy@ctc.ca.gov](mailto:msandy@ctc.ca.gov).

## **BACKGROUND**

The mission of the Commission is to ensure integrity and high quality in the preparation, conduct and professional growth of the educators who serve California's public schools. Its work reflects both statutory mandates that govern the Commission and research on professional practices. Critical business functions, objectives, and activities for the Commission have been organized by division. Please see below:

**Certification Division:** The Certification Division is the licensing branch of the Commission, responsible for reviewing, evaluating, and granting applications for credentials, permits, certificates and waivers that authorize service in California's public schools. The Division is the primary point of contact for, and provides information to, credential applicants, credential holders, and credential personnel at the college, university, county office and school district levels regarding specific requirements for the credential documents issued. Beginning July 1, 2022, the Certification Division is also responsible for development of the Roadmap to Education Careers Initiative which includes educator career counseling and web support to individuals that are interested in exploring careers and pathways in the field of PK-12 education.

**Professional Services Division:** The Professional Services Division (PSD) is responsible for the development of licensure standards for all credential areas, aligned with the adopted K-12 academic content standards; the development and implementation of licensing examinations, including the performance assessments and accrediting educator preparation programs in the state. PSD has been given responsibilities to oversee state grant programs for prospective teacher candidates to support completion of a credential program and other teacher preparation efforts. The grant programs include:

- **Ongoing Administration**

- Teacher Residency Grant Program
- Classified School Employee Teacher Credential Program
- Computer Science Supplementary Authorization Incentive Grant Program
- Dyslexia Grants to Preparation Programs
- Local Solutions to the Shortage of Special Education Teachers Grant Program
- Integrated Undergraduate Teacher Preparation Grants Program

- **New Funds for 22-23**

- \$250 million added to Teacher Residency Grant Program, which was expanded to include School Counselor residencies.
- \$20 million for a Statewide Residency Technical Assistance Center Grant Program
- \$20 million in new funding for the Integrated Undergraduate Teacher preparation Grants Program
- \$15 million from the General Fund for the Reading and Literacy Supplementary Authorization Incentive Grant Program

The Division supports the Committee on Accreditation, a statutory body that is charged with implementing the Commission's accreditation system to monitor the quality of all educator preparation programs. Related activities include data collection, reporting, and policy research.

**Division of Professional Practices:** The Division of Professional Practices (DPP) is responsible for the discipline of credential applicants and holders and the enforcement activities of the Commission. The Division supports the Committee of Credentials, a statutory body that is responsible for conducting investigations of charges of misconduct against a credential holder or applicant upon initial application for a credential, when a credential is renewed, or when there are allegations against a credential holder relating to criminal activity, unprofessional conduct, or misconduct that would impact the status of a license.

**Administrative Services Division:** The Administrative Services Division (ASD) provides all administrative functions such as human resources, fiscal, technology, legislation, public relations and regulations and any other relevant administrative services to ensure the Commission is successful in meeting the goals and mission of the Agency.

### **ONGOING MONITORING**

As the Executive Director of Commission on Teacher Credentialing, Mary Vixie Sandy, Executive Director, is responsible for the overall establishment and maintenance of the internal control and monitoring systems.

#### **Executive Monitoring Sponsor(s)**

The executive monitoring sponsor responsibilities include facilitating and verifying that the Commission on Teacher Credentialing internal control monitoring practices are implemented and functioning as intended. Executive monitoring sponsor responsibilities have been given to:

Mary Vixie Sandy, Executive Director, and Sara Saelee, Fiscal and Business Services Branch.

#### **Monitoring Activities**

Monitoring is an ongoing process that involves reviewing, evaluating, and improving our systems of internal controls and oversight on a regular basis. As such, the Commission's monitoring process complies with California Government Code sections 13400-13407.

#### **Frequency of Monitoring Activities**

Monitoring is a continuous process with weekly management team meetings as the forum to present, discuss and make decisions regarding identified areas of risk, concern or other items needing attention that include the senior management team as well as the executive director. Concerns of an urgent nature are raised as they occur or are discovered and are addressed in a timely manner. These matters are reported as needed to all staff, management team, or those affected.

The Commission is in the receipt of private information for individuals seeking credentials. In addition, the Commission is in possession on a daily basis of funding that is paid by an applicant when submitting his/her application. To ensure the utmost security regarding both elements the Commission has restricted the number of individuals with access to the area in which money is received. The Commission requires employees across the Agency to ensure on a nightly basis or when away from their workstations to clear their area of any documents that might contain private information. This information is stored in locked areas and/or file cabinets when not being utilized.

Lastly, the Commission keeps a secured building minimizing the number of individuals with access to our facilities.

All staff, contractors, and Commission members are required to carry an access badge. Staff are trained to be aware of and to check badges of individuals they are not familiar with. All visitors are required to check.

in at the front desk and be escorted if they require access to other areas of the building. These daily routines and activities help to ensure the monitoring and safety of not only staff but the private information that is contained within the Agency.

Each Commission employee is provided individualized login credentials for using computers, and these logins provide access to only the information necessary for the fulfillment of their duties, a process that is enabled by having role-based security. Items of high security or confidentiality are kept with minimal access only to those who have a need to know the information for the functions in their work. There is an annual review of privileges of employee data systems in relation to their duties. Firewalls are installed to detect and prevent breaches of Commission data and updates to the systems are kept current to avoid any lapse in protection.

Physical controls are in place to protect highly sensitive information and equipment, such as the server, which is kept locked and secured within a secondary room with a code-protected access. Personnel and legal documents are kept secured and with limited access, with confidential documents either secured or shredded. Fingerprinting is in place for employees due to the nature of employment at the Commission.

### **Addressing Vulnerabilities**

*Reporting and Documenting Monitoring Activities.* All staff are empowered to raise issues of concern to their immediate supervisor or managers. This may occur through an informal process or may be brought up at monthly unit meetings. Senior Managers bring potential action items to weekly management meetings for discussion and decision making. Upon Executive and management concurrence, staff resources are assigned to undertake and mitigate risks and report back on progress/completion. For long term projects, periodic updates are provided to management along with any problems that require management resolution to accomplish remediation and mitigation goals. Documents, procedures, and other outcomes are maintained by the entity for use and reference. Policies and Procedures are updated regularly and posted on the internal website for staff availability as needed. In any event of a risk or concern in relation to any of these internal controls, immediate steps are taken to resolve the problem as a top priority. When a problem is identified, the information will be shared with the necessary parties, likely involving senior management for discussion and then steps for problem resolution. Any deficiency reports would be submitted to the Executive Director. A corrective action plan will be made and enforced immediately.

### **Communication**

*Procedure for Addressing Identified Internal Control Deficiencies.* The Executive/Senior Managers Team holds weekly meetings to review any deficiencies as well as new risks and deficiencies that have been recently identified. Policy and procedure changes as part of the mitigation process will be broadcast to staff via internal memoranda or internal website. The SLAA Coordinator and Agency Monitor work with key staff to ensure that mitigation efforts have been implemented and then periodically review to ensure sustainability of these efforts. Corrective action plan reporting will be conducted by the Agency Monitor in collaboration with assigned key staff. The control environment of the Commission influences the control consciousness of its staff. The Commission has established a strong foundation for all other components of internal control, providing discipline and structure. Control environment factors established by the Commission include the integrity, ethical values, and competence of the Commission's people, management's philosophy, and operating style; the way management assigns authority and responsibility and organizes and develops its staff; and the attention and direction provided. The Commission management reviews current procedures of its divisions on a regular basis and reports to all management if deficiencies are identified.

### **Ongoing Monitoring Compliance**

The Commission on Teacher Credentialing is in the process of implementing and documenting the ongoing monitoring processes as outlined in the monitoring requirements of California Government Code sections 13400-13407. These processes include review, evaluation, and improvement as needed to the Commission on Teacher Credentialing systems of controls and monitoring.

### **RISK ASSESSMENT PROCESS**

The following personnel were involved in the Commission on Teacher Credentialing risk assessment process: Executive Management, and Middle Management.

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### **Risk Identification**

The Commission uses a variety of methods to identify ongoing and current risks within the agency. In addition, to regular meetings of senior managers and directors, the Agency holds regular Safety meetings that cover a variety of topics from physical to electronic. Additionally, the Commission has spent time throughout the past two years working on identifying risk throughout the Agency.

As it relates to electronics or privacy risks, the Commission completed a two-year funded project that helped strengthen our electronic systems to better ensure privacy particularly as it relates to educator information and back up and technical security within the Agency to protect sensitive information. Throughout the process, the Commission worked closely with educational partners, other state agencies and staff to ensure proposed risk remedies were stronger and more streamlined. This engagement included regular meetings, surveys, and follow-up to ensure the objectives were met.

In addition, and related to safety risks identified, a team was created and possible physical risks for individuals working at the Commission were identified as well as solutions. The risks were identified by surveying all staff as well as engaging in dialogue with senior managers and directors. The improvements and solutions identified through the committee and Commission leadership are currently being implemented.

### **Risk Ranking**

The Commission uses a variety of methods to determine risk level. These include the following:

- Staff and Educator feedback/concerns/questions.
- Risks identified through regular audits (both internally and externally); and
- Identified through common workday processes or events.

Any risks identified through these common routes and/or other routes are then discussed at a management level first to determine the best next steps. Long-term solutions to risks that are being implemented may be re-prioritized for risks that come up that are identified as more of an emergency risk. This determination of rank is often first determined by management and leadership with input from stakeholders and other staff as appropriate.

## **RISKS AND CONTROLS**

### **Risk: Operations - Internal-Staff - Key Person Dependence, Workforce Planning**

The Commission is a small agency of only 180 employees on average. Recent and pending retirements have increased dependence on a few key staff, underscoring the need to provide for transfer of critical historical knowledge to ensure continuity and support for the overall work of the agency. The loss of high-level knowledge and expertise in the agency creates a risk for the agency. The risk has occurred due to the following:

- A small agency size overall makes it more challenging to provide upward mobility opportunities.
- Long-term staff with critical historical knowledge who are nearing retirement with limited succession opportunities; and
- Limitations for the Agency on training and succession planning for lower-level staff to move them efficiently into management positions when they become available.

The Commission runs the risk of the ability to retain critical, knowledgeable staff. Given the unique and technical nature of the issues the Commission deals with, having a background in education is critical for many positions. This coupled with ongoing shortages within the education sector makes recruitment outside the agency challenging and underscores the criticality of internal training and succession planning to minimize gaps in work during staff transitions. Not having available staff ready to move into some of these positions could result in a slowdown in addressing critical policy issues and implementation while staff is trained and brought up to the needed knowledge and background level. Additionally, due to the size of our Agency, we are limited in our upward mobility opportunities for staff to promote.

**Control A**

The Commission staff continue to have conversations and meetings around the need for a workforce plan that includes succession planning, staff training needs and support for workplace morale and retention. This identified need coupled with the state's requirement for a workforce plan has prompted the Commission to move this risk to the top of our list and address it in a thorough and strategic manner.

The Commission believes the development and implementation of such a plan will result in multiple positive impacts throughout the Agency including:

- A decrease in staff turnover due to improved and increased training, more opportunities for upward mobility and higher morale.
- Improved documentation and transfer of historical policy knowledge due to succession planning that includes mentoring and crossing training; and
- A stronger statewide impact due to a greater number of knowledgeable staff ready to contribute on critical policy issues.

**CONCLUSION**

The Commission on Teacher Credentialing strives to reduce the risks inherent in our work and accepts the responsibility to continuously improve by addressing newly recognized risks and revising controls to prevent those risks from happening. I certify our internal control and monitoring systems are adequate to identify and address current and potential risks facing the organization.

*Brigid Hanson* for

Mary Vixie Sandy, Ed.D.  
Executive Director

cc: California Legislature Senate & Assembly  
California State Auditor  
State Controller  
Secretary of California Government Operations Agency  
Megan Sabbah, Finance Budget Analyst  
Brigid Hanson, CTC SLAA Coordinator