

## **Division VIII of Title 5 of the California Code of Regulations**

### **Proposed Additions and Amendments to Title 5 of the California Code of Regulations Pertaining to Cost Recovery Fees for Extraordinary Accreditation Activities Initial Statement of Reasons**

#### **Rationale for Proposed Regulations**

Education Code (EC) section 44225 authorizes the Commission to adopt the proposed regulation amendments. The proposed regulations implement, interpret, and make specific EC section 44374.5 pertaining to fees related to extraordinary accreditation activities.

This rulemaking action proposes the following:

- Amend Title 5 California Code of Regulations (CCR) section 80691 in order to clarify, interpret, and make specific the cost recovery fee definitions for specified accreditation activities pursuant to EC section 44374.5. The proposed amendments align definitions with the Commission's recently revised Accreditation System.
- Amend Title 5 California Code of Regulations (CCR) section 80692 in order to clarify, interpret, and make specific the cost recovery fee structure for specified accreditation activities pursuant to EC section 44374.5. The proposed amendments align the fee structure with the Commission's recently revised Accreditation System.

The Budget Act of 2015 (AB 93 (Chapter 10, Statutes of 2015), 6360-001-0001) provided a one-time General Fund appropriation of \$3.467 million which was allocated to streamline the Commission's Accreditation System. Below is a summary of significant Commission action related to the revision of the Accreditation System. Links to specific agenda items are located in the "Documents Relied upon in Preparing Regulations" section of this Initial Statement of Reasons.

- June 2014 Commission meeting: Work plan adopted by the Commission with the purpose of Strengthen and Streamline the Commission's Accreditation System including regularly scheduled activities and the Initial Institutional Approval (IIA) process.
- June 2015 Commission meeting: Draft revised IIA process presented. Commission provided direction for further work on the draft IIA process and approved a moratorium on new institutional approvals until a final process could be adopted.
- August 2015 Commission meeting: Approved plan for the transition to the revised Accreditation System's regularly scheduled activities.
- October 2015 Commission meeting: Adoption of the IIA process.
- February 2016 Commission meeting: Removal of the moratorium on new IIA proposals.
- December 2016 Commission meeting: Approval of proposed changes to cost recovery fees. Directed staff to proceed with the rulemaking process.
- February 2017 Commission meeting: Final modifications to the IIA process approved.

Transition will be complete at the end of the 2016-2017 year, and the current regulatory definitions and fee structure requires amendments in order to align with the revised Accreditation System.

The purpose of the Accreditation System is to ensure the quality of California educators. The Commission's Accreditation System is the only quality control mechanism the state has over educator preparation programs and helps ensure the integrity of the credentials issued by the agency (reference EC sections 44370 and 44371). Failure by the Commission to perform its statutorily-mandated duties could result in the certification and placement of unqualified teachers in California's public schools.

### **Proposed Amendments to Regulations**

This proposed amendments include one addition and one deletion to the fee schedule, as well as changes to the fee structure and terminology order.

#### *Additional Fee:*

The initial institutional approval process now includes multiple stages for which documentation is submitted for review and action by the Commission. This format requires a significant amount of additional staff time to review eligibility requirements, a step that was not part of the previous Accreditation System. An additional fee of \$1,000 is proposed to recover a portion of the funds for staff time allocated to the review of the eligibility requirements.

The \$1,000 fee for the review of eligibility requirements is proposed to recover a portion of the expenses associated with the significant amount of staff time required for the following: delivering the Accreditation 101 training free of cost to participants; offering technical assistance to programs preparing eligibility requirements documentation for review; acceptance and review of documentation by Commission staff; and the staff time needed to prepare a summary for Commission review and action. The minimum staffing required for an Accreditation 101 session is two Consultants (Consultant in Teacher Preparation (Program Evaluation and Research)) and two Administrators (Teacher Preparation Administrator I (Program Evaluation and Research)) for a minimum of eight hours each. The number of staff required is dependent on the number of interested participants. Using the low end of pay scales, the daily rate for a beginning Consultant is approximately \$272/day and a beginning Administrator is approximately \$311/day. (This calculation was made by taking the low end of the current civil service pay scales for one month of pay and dividing it by 22 which is the average number of work days in a month according to the state calendar. The beginning monthly salary for a Consultant is \$5,984 and an Administrator is \$6,850. ). Running the Accreditation 101 session costs approximately \$1,166 when using the low end of pay scales.

Accreditation 101 is offered free of charge so those who run prospective programs may fully understand the responsibility of running a teacher preparation program prior to making a financial investment into the process. The training has been operational for the past year, during which time several prospective institutions have chosen not to move forward after understanding the scope of the process and ongoing responsibilities.

Prospective institutions choosing to move forward with the process are required to submit documentation responding to the eligibility criteria. A Consultant will spend approximately sixteen hours providing technical assistance to a prospective institution compiling and submitting their documentation, as well as analyzing the submitted documentation for Commission action. Sixteen hours of Consultant pay is approximately \$544. The Administrator over accreditation will also spend four or

more hours working with the Consultant to finalize the information packet for Commission review at a minimum cost of approximately \$155.

Each submission requires several senior staff members to review the accompanying agenda item, including the Commission’s Executive Director. An individual Commission agenda item is prepared for each institution moving forward with eligibility requirements.

The proposed \$1,000 fee for the review of eligibility requirements provides a reasonable amount of cost recovery to ensure Accreditation 101 training remains free of charge, provide the necessary technical assistance to prospective institutions, and cover the time for review of eligibility requirements by staff.

*Deleted Fee:*

The program assessment process has been renamed to “program review” and streamlined to have only one review session. For this reason, fees associated with multiple late reviews are no longer necessary and are proposed to be deleted from the fee structure.

*Fee Structure Amendments:*

Amendments to the regulations are being proposed due to the changes in the Accreditation System and efforts to update and revise program standards. Currently, the cost recovery fee structure is based on the number of standards required for the submission of a new program and any change in the number of standards a program requires may directly affect the calculation of fees. However, since program standards have been streamlined and strengthened, the number of standards in a program is no longer indicative of the complexity of efforts needed to review the program. As standards were streamlined, they were also strengthened and each standard now addresses multiple competencies. Proposed amendments include categorizing standards based on the type of authorization that results from them (preliminary credential, clear credential, or added authorization) which provides the flexibility needed to continually improve standards without having to amend the fee structure or regulations.

The table below describes the current regulation, the proposed amendment, and the rationale for each amendment.

Current Regulation	Proposed Amendment	Rationale
<b>§80691</b>		
§80691(a)	<i>Update:</i> Revision date for incorporated document from 2012 to 2016.	Significant revisions to handbook chapter. See Summary of Updates to the Articles Incorporated by Reference table.

Current Regulation	Proposed Amendment	Rationale
§80691(b)	Definition for “Focused site visit” relocated to §80691(f).	Relocated to maintain alphabetical order of definitions.
	<i>Addition:</i> Definition for “Category I: Preliminary/Initial Preparation”	<p>The current fee structure is based on the number of standards required for the submission of a new program. Changes in the number of standards a program requires may directly affect the calculation of fees. As programs standards are streamlined and strengthened the number of standards in a program is no longer indicative of the complexity of the effort needed to review the program. As standards are streamlined, they are also strengthened and each standard addresses multiple competencies. Therefore, language defining the fee to be assessed for initial program review of Category I programs is needed.</p> <p>Preliminary preparation programs are those that lead to an entry-level credential with a limited validity period (typically 5 years), which must eventually be “cleared” through a second tier program to receive the full credential.</p> <p>Initial preparation programs are those that only have one level for the full credential (i.e. Speech-Language Pathology, School Nurse).</p> <p>Preliminary and Initial preparation programs have the most rigorous and complex standards and require the most amount of time for review.</p> <p>A table listing each category with the respective programs is provided on page 16.</p>
§80691(c)	Definition for “Initial institutional approval” relocated to §80691(g).	Relocated to maintain alphabetical order of definitions.
	<i>Addition:</i> Definition for	Current fee structure is based on the number of standards required for the submission of a new program. Changes in the

<b>Current Regulation</b>	<b>Proposed Amendment</b>	<b>Rationale</b>
	<p>“Category II: Second Tier Preparation”</p>	<p>number of standards a program requires may directly affect the calculation of fees. As programs standards are streamlined and strengthened the number of standards in a program is no longer indicative of the complexity of the effort needed to review the program. As standards are streamlined, they are also strengthened and each standard addresses multiple competencies. Therefore, language defining the fee to be assessed for section tier program review of Category II programs is needed.</p> <p>Second tier preparation programs lead to a secondary credential. These programs are typically the “journey-level” or “professional-level) and are attended by those who already hold a preliminary credential.</p> <p>Second tier preparation program standards are slightly less complex and require slightly less time to review than Category I programs.</p> <p>A table listing each category with the respective programs is provided on page 16.</p>
<p>§80691(d)</p>	<p>Definition for “Initial program review” relocated to §80691(h).</p>	<p>Relocated to maintain alphabetical order of definitions.</p>

Current Regulation	Proposed Amendment	Rationale
	<p><i>Addition:</i> Definition for “Category III: Added Authorizations”</p>	<p>Current fee structure is based on the number of standards required for the submission of a new program. Changes in the number of standards a program requires may directly affect the calculation of fees. As programs standards are streamlined and strengthened the number of standards in a program is no longer indicative of the complexity of the effort needed to review the program. As standards are streamlined, they are also strengthened and each standard addresses multiple competencies. Therefore, language defining the fee to be assessed for section tier program review of Category III programs is needed.</p> <p>Added authorization preparation programs lead to an authorization that is added to a pre-existing credential.</p> <p>Added authorization preparation program standards are less complex and require less time to review than Category I and II programs.</p> <p>A table listing each category with the respective programs is provided on page 16.</p>
§80691(e)	<p>Definition for “Institution” relocated to §80691(i).</p>	<p>Relocated to maintain alphabetical order of definitions.</p>
	<p><i>Addition:</i> Definition for “Eligibility Requirements”</p>	<p>The Commission adopted a strengthened Initial Institutional Approval process which requires submission and review of Eligibility Requirements as the first step in a multi-step approval process. Significant staff and commissioner time is required to review the Eligibility Requirements and a \$1,000 fee is proposed to cover that cost as it is outside of normally scheduled accreditation activities.</p>
§80691(f)	<p><i>Update:</i> Revision date updated</p>	<p>Significant revisions to handbook chapter. See Summary of Updates to the Articles Incorporated by Reference table.</p>

Current Regulation	Proposed Amendment	Rationale
	<i>Relocation</i>	Definitions reordered to maintain alphabetical order. Reference to another section updated as a result of reordering of definitions.
	<i>Addition:</i> Language added so that the Commission may request a focused site visit.	Language updated to include the Commission as a possible requestor of a focused site visit. The revised Accreditation System provides for the Commission to request a focused site visit when a new institution is going through the phases of the initial institutional approval process.
§80691(g) and §80691(h)	<i>Update:</i> Revision date and chapter title updated	Significant revisions to handbook chapter, including the title. See Summary of Updates to the Articles Incorporated by Reference table. Both subsections contain the same updates as the same chapter is referenced.
	<i>Relocation</i>	Definitions reordered to maintain alphabetical order. Reference to another section updated as a result of reordering of definitions.
§80691(i)	<i>Update:</i> Update to subsection reference.	Definitions reordered to maintain alphabetical order. Reference to another section updated as a result of reordering of definitions.
§80691(j)	<i>Update:</i> Revision date updated	Significant revisions to handbook chapters, including the titles. See Summary of Updates to the Articles Incorporated by Reference table.
	<i>Relocation</i>	Definitions reordered to maintain alphabetical order. Reference to another section updated as a result of reordering of definitions.
	<i>Update:</i> Definition term updated	Changed from “Late review” to “Late Submission of Documentation.” Multiple reviews are no longer required. Therefore, language has been changed to a more accurate term that applies to late submission of any document required in the regular accreditation activity cycle.

<b>Current Regulation</b>	<b>Proposed Amendment</b>	<b>Rationale</b>
	<i>Update:</i> Terminology updated	The revised Accreditation System requires annual data submission, therefore the term “Biennial Report” is updated to “Annual Data Report”.
	<i>Update:</i> Terminology updated	The revised Accreditation System has changed the term “Program Assessment” to “Program Review.” The process has changed from a year 4 activity to a year 5 activity, has a different process for submission of program information, and no longer requires multiple reviews. The name change is also intended to communicate to the field that the old process is no longer in place.
§80691(k)	<i>Update:</i> Revision date updated	Significant revisions to handbook chapter. See Summary of Updates to the Articles Incorporated by Reference table.
	<i>Relocation</i>	Definitions reordered to maintain alphabetical order. Reference to another section updated as a result of reordering of definitions.
	<i>Update:</i> Terminology updated and accreditation activity year change.	The revised Accreditation System has changed the term “Program Assessment” to “Program Review.” The process has changed from a year 4 activity to a year 5 activity, has a different process for submission of program information, and no longer requires multiple reviews. The name change is also intended to communicate to the field that the old process is no longer in place.
§80691(m)	<i>Update:</i> Revision date updated	Significant revisions to handbook chapter. See Summary of Updates to the Articles Incorporated by Reference table.
	<i>Relocation</i>	Definitions reordered to maintain alphabetical order. Reference to another section updated as a result of reordering of definitions.
§80691(n)	<i>Update:</i> Revision date updated	Significant revisions to handbook chapter. See Summary of Updates to the Articles Incorporated by Reference table.



<b>Current Regulation</b>	<b>Proposed Amendment</b>	<b>Rationale</b>
§80691(o)	<i>Update:</i> Revision date updated	Significant revisions to handbook chapter. See Summary of Updates to the Articles Incorporated by Reference table.
§80691(p)	<i>Update:</i> Revision date updated	Significant revisions to handbook chapter. See Summary of Updates to the Articles Incorporated by Reference table.
<b>§80692</b>		
§80692(a)(1)	<i>Deletion:</i> Remove fee from location and move to (a)(1)(B)	New Initial Institutional Approval process requires addition of subsections (A) and (B). The Initial Institutional Approval process has been strengthened by creating a multi-step process requiring a multi-level pay schedule.
§80692(a)(1)(A)	<i>Addition:</i> \$1,000 flat fee for review of Eligibility Requirements	The Commission adopted a strengthened Initial Institutional Approval process which requires submission and review of Eligibility Requirements as the new first step in a multi-step approval process. Significant staff and commissioner time is required to review the Eligibility Requirements and a \$1,000 fee is proposed to cover that cost as it is outside of normally scheduled accreditation activities.
§80692(a)(1)(B)	<i>Relocation:</i> \$2,000 flat fee relocated.	Additional flat fee for Eligibility Requirements added, requiring relocation of this subsection.
§80692(a)(2)(A)	<i>Update:</i> Terminology updated	The current fee structure is based on the number of standards required for the submission of a new program. Changes in the number of standards a program requires may directly affect the calculation of fees. As programs standards are streamlined and strengthened the number of standards in a program is no longer indicative of the complexity of the effort needed to review the program. As standards are streamlined, they are also strengthened and each standard addresses multiple competencies. The fee amount is staying the same, however the language is being updated to read: Category I: Preliminary/Initial Preparation program review.

<b>Current Regulation</b>	<b>Proposed Amendment</b>	<b>Rationale</b>
§80692(a)(2)(B)	<i>Update:</i> Terminology updated	Current fee structure is based on the number of standards required for the submission of a new program. Changes in the number of standards a program requires may directly affect the calculation of fees. As programs standards are streamlined and strengthened the number of standards in a program is no longer indicative of the complexity of the effort needed to review the program. As standards are streamlined, they are also strengthened and each standard addresses multiple competencies. The fee amount is staying the same, however the language is being updated to read: Category II: Second Tier Preparation program review.
§80692(a)(2)(C)	<i>Update:</i> Terminology updated	Current fee structure is based on the number of standards required for the submission of a new program. Changes in the number of standards a program requires may directly affect the calculation of fees. As programs standards are streamlined and strengthened the number of standards in a program is no longer indicative of the complexity of the effort needed to review the program. As standards are streamlined, they are also strengthened and each standard addresses multiple competencies. The fee amount is staying the same, however the language is being updated to read: Category III: Added Authorization program review.
§80692(b)(3) and §80692(b)(3)(A)	<i>Deletion:</i> Delete obsolete language.	The Program Assessment process has changed to Program Review. Additionally, the process no longer requires a back and forth review process between readers and institutions. Therefore, this fee and language is obsolete, as multiple reviews have been eliminated.
§80692(b)(3)(B)	<i>Update:</i> Terminology updated and relocation	The deletion of language from subsections §80692(b)(3) and §80692(b)(3)(A) requires moving the language from this subsection to §80692(b)(3).  Deleting “program assessment” and replacing with “Program Review” to update terminology.
§80692(b)(4)(B)	<i>Update:</i> Revision date updated	Significant revisions to handbook chapter. See Summary of Updates to the Articles Incorporated by Reference table.

Current Regulation	Proposed Amendment	Rationale
§80692(b)(4)(C)	<i>Update:</i> Revision date updated	Significant revisions to handbook chapter. See Summary of Updates to the Articles Incorporated by Reference table.

**Summary of Updates and Justification for Updates to the Articles Incorporated by Reference**

The Commission adopted a new Accreditation Framework in February 2016, necessitating amendments to several accreditation handbook chapters which were subsequently adopted by the Committee on Accreditation pursuant to EC 44372. Updates have been made to the articles incorporated by reference in the current approved cost recovery fee regulations. Agenda items from Commission meetings and Committee on Accreditation meetings were relied upon in preparing the summary and justification of the updates to the articles incorporated by reference. All of the articles incorporated fall under the category of Accreditation Handbook Chapters and must be adopted by the Committee on Accreditation. Adoption dates are located in the footer of each chapter.

*Global Updates*

Throughout all chapters, the acronym for Commission on Teacher Credentialing (CTC) was used. To limit the number of acronyms used throughout the chapters, CTC has been changed to Commission. All chapters have been updated to reflect the month and year the Committee on Accreditation adopted the handbook revisions. Throughout the chapters, terms for Program Assessment and Biennial Reports have been changed to Program Review and Annual Data, respectively. Terminology has changed to align with the adopted Accreditation Framework, however specific justification for terminology changes can be found under each chapter’s summary of amendments. Finally, throughout the chapters language was added to reflect that preconditions and common standards review are part of the accreditation cycle. Review of preconditions and common standards documents has always been part of the cycle, however this was not clear in previous handbook chapters. In several locations updated terminology and the inclusion of preconditions and common standards is included. Several of the later chapters required edits to update terminology and clarify existing language. The information below details individual chapter changes and the justification behind the amendments.

*Accreditation Handbook Chapter Three, Institutional and Program Approval*

- Title change: extended title to included “and Change of Status” so program sponsors are aware that chapter three is the chapter that deals with the change of status (i.e. inactive, withdrawn, etc.).
- Introduction: Updated language for clarity.
- I. Initial Institutional Approval: Language added to reflect the new strengthened three part Initial Institutional Approval process which was approved by the Commission, and subsequently the Committee on Accreditation, after development by the Accreditation Advisory Panel.
- STAGE I – Prerequisites: Language added to reflect the new prerequisites required for prospective program sponsors. This process has been strengthened to require prospective programs to show proof of regional accreditation or district approval prior to attending the newly implemented Accreditation 101 training session. Accreditation 101 was added as a requirement so prospective institutions receive

a clear understanding of the approval process as well as the requirements of participating in the Accreditation System, including fiscal costs. Training is delivered by a staff Consultant and Administrator and is offered free of charge so those running programs can decide if they want to move forward with accreditation after obtaining detailed information about the Accreditation System and approval process.

- STAGE II – Eligibility Requirements: New language added describing the eligibility requirements that prospective institutions must respond to as part of the Initial Institutional Approval process. These requirements closely mirror the current preconditions that all approved institutions must respond to within the Accreditation System and provides the Commission with a clear picture of the prospective institution’s capacity to meet the rigorous California teacher preparation standards. Responses are reviewed by staff and presented to the Commission. A decision is made by the Commission on whether or not the prospective institution may move forward with the Initial Institutional Approval process.
- STAGE III – Alignment with all Applicable Standards and Preconditions: Language added to reflect the third stage which comes after the Commission grants permission to move forward with the process. This language details the submission information for Common Standards and General Preconditions which are reviewed by volunteers from the Board of Institutional Reviewers. Deleted language pertains to the obsolete process and is being eliminated for clarity.
- Commission Approval: New language added detailing the levels of approval. Provisional approval for two –to three years (as determined by the Commission) has been added to provide a “probationary” period for new institutions so data may be collected to determine the institution’s effectiveness in educator preparation. Language on obtaining full approval also added.
- Obsolete language from the outdated Initial Institutional Approval process deleted.

#### *Accreditation Handbook Chapter Four, the Accreditation Cycle*

- Introduction: Minor edits for clarity purposes.
- I Purpose: Added the word preconditions to ensure program sponsors are aligned with all standards and requirements.
- II Overview: Updated language to provide a broad, yet more detailed, overview of the activities within the new Accreditation Cycle. Updated terminology justifications can be found in the associated chapters below. Removed table with generic cohort chart and replaced with information directing to the Commission website. Other minor language changes. Replaced figure showing accreditation cycle activities with updated chart of accreditation cycle including updated terminology. (The figure appears to be under the “Biennial Reports” header, however that is a formatting error.)
- Biennial Reports: Heading changed from Biennial Reports to Annual Data Analysis. The Biennial data reports were previously due every other year, however the new system has been strengthened to require annual reports to determine possible needed programmatic changes in a timelier manner to ensure program effectiveness. Terminology renamed to reflect the new annual due dates of the reports.
- Precondition Review: Language added to establish the new review cycle requirements for program preconditions.
- Program Assessment: Title changed to Common Standards and Program Review for consistency with new accreditation cycle (see chapter six for justifications). Edits to first paragraph moving program review from year four to year five of the accreditation cycle. Deleted outdated language and replaced

with language clarifying the Annual Data process. (Note: this is just a broad overview of the process, see chapter six).

- Site Visit: Updated language to provide a broad, yet more detailed, overview of the activities within the new Accreditation Cycle. Updated terminology justifications can be found in the associated chapters below. Language added to clarify that electronic copies of documentation must be submitted, as the process is now paperless.
- Follow Up: New header added to clarify that the follow up process is not happening during the site visit.
- III. Cohort Activities: Removed the language related to table I which has been removed and now directs program sponsors to the Commission’s website for their cohort assignment.
- Table 1: Deleted, as program sponsors are now directed to the Commission’s website for their cohort assignment.

#### *Accreditation Handbook Chapter Five, Biennial Reports*

- Title Change: Title changed to Annual Data Submission. The Biennial data reports were previously due every other year, however the new system has been strengthened to require annual reports to determine possible needed programmatic changes in a timelier manner to ensure program effectiveness. Terminology renamed to reflect the new annual due dates of the reports.
- Introduction: Amended to reflect purposed of the annual data submission.
- The majority of the chapter has been rewritten to clarify the annual process including the use of the newly implemented data warehouse. Information added to explain how the Commission will collect information electronically and how it will be analyzed within the accreditation process and used by all stakeholders.

#### *Accreditation Handbook Chapter Six, Program Assessment*

- Title Change: Title changed to Program Review. The new streamlined process significantly reduced the lengthy narrative that was required in the Program Assessment process, which occurred in year four, which required several revisions and resubmissions. The name was change to differentiate to the field that the process has changed significantly. This accreditation activity now takes place in year five and it only requires one submission.
- Introduction: Language amended to give a broad overview of the new process.
- Purpose of Program Assessment: Name change from program assessment to program review. Delete language that described the outdated “assessment process.” New paragraph added describing the new process and how review of the documents will be utilized prior to and during the site visit.
- II. Program Assessment Documentation *and* III. Review of Program Assessment Documents: Both sections combined and retitled to Program Review Submission. All of the section II language deleted, as it is obsolete under the new process. New language outlining the new process added to clarify the type of documentation that needs to be submitted for review. The new process outlined aligns with the adopted Accreditation Framework and creates a less onerous process for programs while still providing the necessary program specifics to reviewers.
- III. Review of Program Review Submission: This sections includes language that was previously in the section titled Preview of Program Assessment Documents. This section describes how the submitted program documents will be reviewed and includes amendments and new language to align with the

updated process. Language added to reflect the cost recovery fees, should additional members be needed on the site visit team due to incomplete document submission. Language added to clarify that the site visit team makes recommendations to the Committee on Accreditation (COA) which then makes the accreditation decision. Sample version of Preliminary Report of Findings updated with minor edits for clarity.

- Additional Information: Amendments clarify how program sponsors can obtain technical assistance.
- IV. Program that are Transitioning to New Program Standards: Minor language changes to clarify the process when programs are transitioning to newly adopted standards.

*Accreditation Handbook Chapter Eight, Accreditation Decisions: Options and Implications*

- GLOBAL NOTE: The repeating underlined headings for “Operational Implications” and “Removal of Stipulations” are not new language. They were stylistically underlined in the original chapter for ease while browsing through the chapter for information. They are underlined in the revised chapter as well.
- I. Accreditation Decision Options: Language related to the operation implications of each accreditation decision relocated to page three for better flow of information in the chapter. Table 1 has been relocated to page two and has been restructured to align with the new accreditation system and adopted framework.
- Accreditation: Accreditation with Stipulations: Additional language added to clarify what stipulations may include. Language added clarifying that stipulations requiring the closure of an individual program may not be removed because a closed program requires a minimum waiting period of two years before the institution may reapply to operate the program again.
- Accreditation with Major Stipulations: Language added to explain that the COA will determine whether programs with major stipulations will be required to notify students of the accreditation status. Relocation of language for better flow of information from page 9 to page 8. Language added clarifying that major stipulations requiring the closure of an individual program may not be removed because a closed program requires a minimum waiting period of two years before the institution may reapply to operate the program again.
- Accreditation with Probationary Stipulations: Language added requiring programs with probationary stipulations to notify students of the accreditation status and provide periodic updates to the COA. Language added regarding what an institution with probationary stipulations may do while on probationary status to include the institution’s right to close the program and the prohibition of accepting new candidates into the program. Language added clarifying that probationary stipulations requiring the closure of an individual program may not be removed because a closed program requires a minimum waiting period of two years before the institution may reapply to operate the program again.
- Stipulations Requiring Closure of an Individual Program: Section added to clarify the process that must take place when the COA requires the closing of an individual program.
- Denial of Accreditation: General language edits for clarity and flow of information.
  - NOTE: The underlining of the following sentences are stylistic underlining for ease of locating information and does not indicate new information:

- Page 13: “Part 1: General Definitions, Parameters, Operational Implications for Denial of Accreditation” is a stylistic underlining and does not indicate new information, however the strike through for the word “and” is an indication of a deletion.
  - Page 15: “Operational Implications (for either Initial Visits or Revisits)” is not new language. Stylistic underlining only and appears in both chapter versions (new and old). “Part II: Procedures to Be Used by COA Regarding Denial of Accreditation” is not new language, but has been newly underlined for stylistic purposes.
  - Page 16: “Process of Re-applying for Initial Institutional Accreditation” is not new language. Stylistic underlining only and appears in both chapter versions (new and old).
- II. Guidance for the Team Recommendation: General language edits for clarity and flow of information.
  - Table 2: Numbers have changed to lower numbers due to the change in the number of Common standards being reduced from nine to five as a result of strengthening and streamlining efforts.

*Accreditation Handbook Chapter Nine: Activities during the Seventh Year of the Accreditation Cycle:*

- All of the edits in this chapter are general language edits for clarity with the exception of the removal of table 1. Table 1 was removed because it was not as helpful to the field as the narrative explanations that followed it.

*Accreditation Handbook Chapter Eleven, Accreditation Decisions: Board of Institutional Review Member Skills and Competencies:*

- The majority of the edits in this chapter are general languages for clarity so that the chapter aligns with the adopted Accreditation Framework.
- Reading and Analyzing Documents: Paragraphs with the headings “Identify How and Institution Responds to each Standard,” “Note Generalization and Other Vague Language,” “Note Key Forms,” and “Look for Formulas” have been removed. Institutions are no longer required to write a lengthy narrative and include forms and formulas, rather a matrix is utilized, leaving these paragraphs obsolete.
- Identify Whether All Required Documentation is Present: Section added to ensure that key pieces of evidence are included in submissions. This is a reinforced reminder to programs. It has been noted in the past that large institutions with several programs have had difficulty in making sure this happens.
- Determine Relationships: Relocated from previous location as the fourth paragraph in this section. Moved for better flow of information.
- NOTE: The underlined headings above paragraphs are not new language, rather stylistic changes made by the handbook authors for ease while browsing through the chapter for information. These stylistic changes begin with the underlined heading on page 2 for Initial Program Review (IPR) and continue throughout the chapter.

*Accreditation Handbook Chapter Fifteen, The Accreditation Revisit:*

- Introduction: Paragraph one moved to paragraph two for better flow of information.

- What is the Relationship Between Stipulations and Standards Decisions in Revisits?: Language added to clarify that institutions may choose to address standards that are less than fully met, even if they are not related to stipulations. Previous language explaining this has been struck out and expanded clarifying language added.
- What Further Action can be Taken Beyond Removal of Stipulations?: Language added providing the ability for the COA to implement a shortened accreditation cycle for institutions with stipulations, and that this may necessitate a change in cohort. This addition has been made to ensure that institutions with demonstrated inability to meet standards is not able to wait the full seven years before an additional site visit is conducted to ensure that candidates are receiving the proper training to become credentialed teachers.
- Sample template removed on page 5, as it is obsolete.

**Program Category Listing**

<b>Category I Preliminary/Initial Preparation</b>	<b>Category II Second Tier Preparation</b>	<b>Category III Added Authorizations</b>
<ul style="list-style-type: none"> <li>• Multiple Subject</li> <li>• Single Subject</li> <li>• Education Specialist-Mild/Moderate</li> <li>• Education Specialist-Moderate/Severe</li> <li>• Education Specialist-Early Childhood</li> <li>• Education Specialist-Deaf and Hard of Hearing</li> <li>• Education Specialist-Visual Impairments</li> <li>• Education Specialist-Physical and Health Impairments</li> <li>• Education Specialist-Language and Academic Development</li> <li>• Administrative Services</li> <li>• School Psychology</li> <li>• School Counseling</li> <li>• School Social Work</li> <li>• Designated Subjects: Career Technical Education</li> <li>• Designated Subjects: Adult Education</li> <li>• Clinical or Other Rehabilitative-Orientation and Mobility</li> </ul>	<ul style="list-style-type: none"> <li>• General Education Induction</li> <li>• Clear Education Specialist Induction</li> <li>• Administrative Services Induction</li> <li>• California Teachers of English Learners</li> <li>• Bilingual Authorization</li> <li>• Agriculture Specialist</li> <li>• Adapted Physical Education</li> <li>• Early Childhood Specialist</li> <li>• Designated Subjects: Supervision and Coordination</li> <li>• Designated Subjects: Special Subjects</li> <li>• Pupil Personnel Services-Child Welfare and Attendance</li> <li>• Teacher Librarian</li> <li>• School Nurse</li> <li>• Audiology</li> </ul>	<ul style="list-style-type: none"> <li>• Education Specialist Added Authorization-Autism Spectrum Disorder</li> <li>• Education Specialist Added Authorization-Deaf-Blind</li> <li>• Education Specialist Added Authorization-Early Childhood Special Education</li> <li>• Education Specialist Added Authorization-Emotional Disturbance</li> <li>• Education Specialist Added Authorization-Orthopedic Impairments</li> <li>• Education Specialist Added Authorization-Other Health Impairments</li> <li>• Education Specialist Added Authorization-Resource</li> <li>• Education Specialist Added Authorization-Traumatic Brain Injury</li> <li>• Reading and Literacy Added Authorization</li> <li>• Reading and Literacy Leadership Specialist</li> <li>• Mathematics Instructional Added Authorization</li> <li>• Mathematics Instructional Leadership Specialist</li> <li>• Teacher Librarian Special Teaching Authorization</li> <li>• School Nurse Special Teaching Authorization</li> <li>• Speech-Language Pathology Special Teaching Authorization</li> </ul>



**Proposed changes to fee structure:**

Below is a table of the relevant current activities and fees as well as the proposed changes.

Extraordinary Accreditation Activities Education Code §44374.5	Cost Recovery Fee
<b>Current:</b> None <b>Proposed:</b> Review of Eligibility Requirements	<b>Current:</b> None <b>Proposed:</b> \$1,000
<b>Current:</b> Initial Program Review: Programs 12 or more standards. <b>Proposed:</b> Initial Program Review: Category I Preliminary/Initial Preparation programs	<b>Current:</b> \$2,000 <b>Proposed:</b> No changes
<b>Current:</b> Initial Program Review: Programs 6-11 standards. <b>Proposed:</b> Initial Program Review: Category II Second Tier Preparation programs	<b>Current:</b> \$1,500 <b>Proposed:</b> No changes
<b>Current:</b> Initial Program Review: Programs fewer than 6 standards. <b>Proposed:</b> Initial Program Review: Category III Added Authorization programs.	<b>Current:</b> \$1,000 <b>Proposed:</b> No changes
<b>Current:</b> Late Document Reviews <b>Proposed:</b> Late Submission of Documentation	<b>Current:</b> \$500 per program <b>Proposed:</b> No changes
<b>Current:</b> Program Assessment Requiring More than 3 Reviews <b>Proposed:</b> Eliminate	<b>Current:</b> \$1,000 <b>Proposed:</b> Eliminate Fee
<b>Current:</b> Full Program Review during Site Visit as a result of not completing program assessment process. <b>Proposed:</b> Full Program Review during a Site Visit as a result of not completing the program review process.	<b>Current:</b> \$3,000 per program <b>Proposed:</b> No changes

One addition and one deletion to the fee schedule is being proposed as well as amendments to the fee structure and terminology as a result of significant improvements made to the Accreditation System.

The initial institutional approval process has been strengthened to include various stages in which documentation is submitted for review and approval by the Commission and a significant amount of additional staff time is required for review of the eligibility requirements, a step that was not part of the previous Accreditation System. An additional fee of \$1,000 is proposed to cover the staff and commissioner time allocated to the review of the eligibility requirements.

The program assessment process has been renamed to “document review” and streamlined to have only one review session. For this reason, fees associated with multiple late reviews are no longer necessary and have been deleted from the fee structure.

Amendments to regulations are being proposed due to the changes in the Accreditation System and efforts to update and revise program standards. Currently, the cost recovery fee structure is based on the number of standards required for the submission of a new program and any change in the number of standards a program requires may directly affect the calculation of fees. However, as programs standards are streamlined and strengthened the number of standards in a program is no longer indicative of the complexity of the effort needed to review the program. As standards are streamlined,

they are also strengthened and each standard addresses multiple competencies. Proposed amendments include categorizing standards based on the type of authorization that results from them (preliminary credential, clear credential, or added authorization) which will provide the flexibility needed to continually improve standards without having to amend the fee structure or regulations.

The time and expense of initial program review is largely dependent upon the type of program being reviewed. Previously, the three categories that programs fell under were based on the number of standards because, the most complex and lengthy were preliminary programs with 12 or more standards, second was the second tier or “clear” programs having 6-11 standards; and finally added authorization programs with 5 or fewer standards to review.

The Commission has adopted policy to strengthen and streamlined Accreditation System which has resulted in changes to the number of standards a program has. Changes in the number of standards may directly affect the calculation of fees with the current categories. As programs standards are streamlined and strengthened the number of standards in a program is no longer indicative of the complexity of the effort needed to review the program. As standards are streamlined, they are also strengthened and each standard addresses multiple competencies. The complexity of the standards and length of time to review will not change.

Initial program reviews are initiated in two ways: 1) an approved institution intends to offer a new program and submits a program proposal for review; 2) the Commission revises standards to such a significant degree that institutions are required to rewrite the program and submit it for initial program review. Staff includes a discussion of costs when presenting proposed program standards revisions to the Commission for approval at a regularly scheduled public meeting. The Commission will determine, after considering all comments, objections, and recommendations, whether programs will be required to submit the new program for initial program review and bear the associated costs or if submission of a no-fee transition plan will suffice.

Teams of two Board of Institutional Review members review program documents in a protected environment with Commission staff facilitation to determine if a program is aligned with the standards or if more information is needed. The program documents are resubmitted until all standards are aligned. This process often requires multiple submissions and reviews. The most efficient manner to review documents includes bringing reviewers to the Commission offices for dedicated time in assigned pairs to review documents in their expertise area.

### **Objectives and Anticipated Benefits of the Proposed Regulations**

The objective is to amend the regulations that permit the Commission to recover costs incurred for extraordinary accreditation activities, including initial institutional approval and new program reviews. Amending the regulations will benefit pupils in California public schools by ensuring high quality educators. Additionally, the proposed amendments will align the fee structure with the strengthened and streamlined Accreditation System and create regulations that will last through the strengthening and streamlining of program standards in the future.

The Commission anticipates that the proposed amendments will benefit the welfare of students

attending public schools in the State of California by providing the monetary means to perform its statutorily-mandated accreditation duties, thereby ensuring high quality educator preparation for the instruction of California public school pupils.

The proposed regulations will promote fairness and prevent discrimination by specifying that the cost recovery fees apply to all institutions offering Commission-approved programs, regardless of agency type. The proposed regulations will also increase openness and transparency in government by clarifying the cost recovery fees associated with initial institutional and new program review and accreditation activities in excess of the regularly scheduled data reports, program assessments, and accreditation site visits. The Commission does not anticipate that the proposed regulations will result in the protection of public health and safety, worker safety, or the environment, the prevention of social inequity or an increase in openness and transparency in business.

### **Documents Incorporated by Reference:**

*Accreditation Handbook* Chapter Three, Institutional and Program Approval (rev. March 2017):

<http://www.ctc.ca.gov/educator-prep/accred-handbook/2016/AH-Chapter-03.pdf>

*Accreditation Handbook* Chapter Four, The Accreditation Cycle (rev. March 2016):

<http://www.ctc.ca.gov/educator-prep/accred-handbook/2016/AH-Chapter-04.pdf>

*Accreditation Handbook* Chapter Five, Annual Data Submission (rev. February 2017):

<http://www.ctc.ca.gov/educator-prep/accred-handbook/2016/AH-Chapter-05.pdf>

*Accreditation Handbook* Chapter Six, Program Review (rev. April 2016):

<http://www.ctc.ca.gov/educator-prep/accred-handbook/2016/AH-Chapter-06.pdf>

*Accreditation Handbook* Chapter Eight, Accreditation Decisions: Options and Implications (rev. March 2016):

<http://www.ctc.ca.gov/educator-prep/accred-handbook/2016/AH-Chapter-08.pdf>

*Accreditation Handbook* Chapter Nine, Activities during the Seventh Year of the Accreditation Cycle (rev. March 2016):

<http://www.ctc.ca.gov/educator-prep/accred-handbook/2016/AH-Chapter-09.pdf>

*Accreditation Handbook* Chapter Eleven, Board of Institutional Review Member Skills and Competencies (rev. April 2016):

<http://www.ctc.ca.gov/educator-prep/accred-handbook/2016/AH-Chapter-11.pdf>

*Accreditation Handbook* Chapter Fifteen, The Accreditation Revisit (rev. March 2016):

<http://www.ctc.ca.gov/educator-prep/accred-handbook/2016/AH-Chapter-15.pdf>

### **Documents Relied Upon in Preparing Regulations:**

*Commission Agenda Items*

June 2014 Commission Agenda Item 2E:

<http://www.ctc.ca.gov/commission/agendas/2014-06/2014-06-2E.pdf>

October 2014 Commission Agenda Item 3A:

<http://www.ctc.ca.gov/commission/agendas/2014-10/2014-10-3A.pdf>

February 2015 Commission Agenda Item 4D:

<http://www.ctc.ca.gov/commission/agendas/2015-02/2015-02-4D.pdf>

April 2015 Commission Agenda Item 4B:

<http://www.ctc.ca.gov/commission/agendas/2015-04/2015-04-4B.pdf>

June 2015 Commission Agenda Item 5B:

<http://www.ctc.ca.gov/commission/agendas/2015-06/2015-06-5B.pdf>

August 2015 Commission Agenda Item 3C:

<http://www.ctc.ca.gov/commission/agendas/2015-08/2015-08-3C.pdf>

August 2015 Commission Agenda Item 3D:

<http://www.ctc.ca.gov/commission/agendas/2015-08/2015-08-3D.pdf>

October 2015 Commission Agenda Item 2D:

<http://www.ctc.ca.gov/commission/agendas/2015-10/2015-10-2D.pdf>

February 2016 Commission Agenda Item 3B:

<http://www.ctc.ca.gov/commission/agendas/2016-02/2016-02-3B.pdf>

February 2016 Commission Agenda Item 3C:

<http://www.ctc.ca.gov/commission/agendas/2016-02/2016-02-3C.pdf>

December 2016 Commission Agenda Item 3C:

<http://www.ctc.ca.gov/commission/agendas/2016-12/2016-12-3C.pdf>

February 2017 Commission Agenda Item 2C:

<http://www.ctc.ca.gov/commission/agendas/2017-02/2017-02-2C.pdf>

#### *Committee on Accreditation (COA) Agenda Items*

January 2016 COA Agenda Item 15:

<http://www.ctc.ca.gov/educator-prep/coa-agendas/2016-01/2016-01-item-15.pdf>

January 2016 COA Agenda Item 17:

<http://www.ctc.ca.gov/educator-prep/coa-agendas/2016-01/2016-01-item-17.pdf>

January 2016 COA Agenda Item 18:

<http://www.ctc.ca.gov/educator-prep/coa-agendas/2016-01/2016-01-item-18.pdf>

January 2016 COA Agenda Item 19:

<http://www.ctc.ca.gov/educator-prep/coa-agendas/2016-01/2016-01-item-19.pdf>

March 2016 COA Agenda Item 9:

<http://www.ctc.ca.gov/educator-prep/coa-agendas/2016-03/2016-03-item-09.pdf>

March 2016 COA Agenda Item 12:

<http://www.ctc.ca.gov/educator-prep/coa-agendas/2016-03/2016-03-item-12.pdf>

March 2016 COA Agenda Item 16:

<http://www.ctc.ca.gov/educator-prep/coa-agendas/2016-03/2016-03-item-12.pdf>

April 2016 COA Agenda Item 17:

<http://www.ctc.ca.gov/educator-prep/coa-agendas/2016-04/2016-04-item-17.pdf>

April 2016 COA Agenda Item 18:

<http://www.ctc.ca.gov/educator-prep/coa-agendas/2016-04/2016-04-item-18.pdf>

April 2016 COA Agenda Item 19:

<http://www.ctc.ca.gov/educator-prep/coa-agendas/2016-04/2016-04-item-19.pdf>

April 2016 COA Agenda Item 21:

<http://www.ctc.ca.gov/educator-prep/coa-agendas/2016-04/2016-04-item-21.pdf>

February 2017 COA Agenda Item 14:

<http://www.ctc.ca.gov/educator-prep/coa-agendas/2017-02/2017-02-item-14.pdf>

March 2017 COA Agenda Item 9:

<http://www.ctc.ca.gov/educator-prep/coa-agendas/2017-03/2017-03-item-09.pdf>

### **Economic Impact Assessment/Analysis**

EC section 44225 authorizes the Commission to adopt these proposed regulations. The proposed regulations implement, interpret, and make specific EC section 44374.5 that authorizes the Commission to implement a cost recovery plan for specified accreditation activities

AB 86 added EC section 44374.5 and authorizes the Commission to develop and implement a cost recovery plan for specified accreditation activities. The purpose of the proposed cost recovery fees are to implement a cost sharing plan for the specified accreditation activities.

In accordance with Government Code section 11346.3(b), the Commission has made the following assessments regarding the proposed regulation amendments:

#### Creation or Elimination of Jobs Within the State of California

The proposed amendments pertain to cost recovery fees for extraordinary accreditation activities. The proposed amendments to cost recovery fees will not create or eliminate jobs in California. Fees are only assessed to institutions choosing to participate in the Accreditation System, and the majority of fees can be avoided by ensuring timely submission of documents and adherence to standards. Institutions pursuing Initial Institutional Approval or Initial Program Approval may choose to create jobs to operate programs, however the cost recovery fees would not be a significant factor in making that decision.

#### Creation of New or Elimination of Existing Businesses Within the State of California

The proposed amendments pertain to cost recovery fees for extraordinary accreditation activities. The proposed cost recovery fees will not create or eliminate existing businesses in California. Cost recovery fees are only applicable to existing program sponsor or existing regionally accredited institutions or other Local Education Agencies within California.

#### Expansion of Businesses or Elimination of Existing Businesses Within the State of California

The proposed amendments pertain to cost recovery fees for extraordinary accreditation activities. The proposed cost recovery fees will not cause the expansion or elimination of existing businesses in California. It is unlikely that the fees would prohibit institutions from choosing to expand their offerings to candidates to include additional teacher preparation programs.

#### Benefits of the Regulations

The Commission anticipates that the proposed amendments and additions will benefit the welfare of students attending public schools in the State of California by providing the monetary means to perform its statutorily-mandated accreditation duties, thereby ensuring high quality educator preparation for the instruction of California public school pupils.

The proposed amendments and additions regulations will promote fairness and prevent discrimination by specifying that the cost recovery fees apply to all institutions offering Commission-approved

programs, regardless of agency type. The proposed regulations will also increase openness and transparency in government by clarifying the cost recovery fees associated with initial institutional and new program review and accreditation activities in excess of the regularly scheduled data reports, program reviews, and accreditation site visits. The Commission does not anticipate that the proposed regulations will result in the protection of public health and safety, worker safety, or the environment, the prevention of social inequity, or an increase in openness and transparency in business.

### **Consideration of Alternatives**

In accordance with Government Code section 11346.5, subdivision (a)(13), the Commission must determine that no reasonable alternative considered by the agency or that has otherwise been identified and brought to the attention of the agency would be more effective in carrying out the purpose for which the action is proposed, would be as effective as and less burdensome to affected private persons than the proposed actions, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. No alternatives have yet been proposed that will be less burdensome and equally effective.

These proposed additions and amendments to regulations will not impose a mandate on local agencies or school districts that must be reimbursed in accordance with Part 7 (commencing with §17500) of the Government Code.

### **Evidence Relied Upon to Support the Initial Determination That the Regulation Will Not Have a Significant Adverse Economic Impact on Business:**

The proposed regulations will not have a significant adverse economic impact upon business. The proposed additions and amendments to the regulations apply to institutions offering Commission-approved and accredited educator programs. Although there are currently 60 private institutions of higher education offering approximately 5 programs per entity (297 active programs), the Commission anticipates nominal costs of \$0 to \$6,000 every seven-year accreditation cycle per institution with document review or extraordinary accreditation activities. Since the implementation of cost recovery fees no institution has closed as a result of cost recovery fees. Additionally, prospective institutions have continued to pursue Initial Institutional Approval, despite the fees associated with the process.