

Update on Challenges Related to Initial Program Approval Submissions

January 2024

Overview

This agenda item presents topics for discussion and guidance by the Committee on Accreditation (COA) regarding challenges related to Initial Program Approval submissions received as part of the Initial Program Review (IPR) process. Commission staff have seen an increase in incomplete/inaccessible IPR proposals which has led to a reduction of efficiency as staff have had to redirect efforts to supporting institutions in revising their proposals so they can be ready for review. These multiple rounds of review and revision between the IPR Team and the institution also result in delays. These delays affect, not only the proposed program in question, but also all other proposed programs awaiting review, as staff focuses a greater amount of time and attention on the problematic submission.

Recommendation

Staff are presenting information to the COA about the common issues consistently found in IPR proposals. Staff asks that the COA discuss this matter and provide any guidance that may contribute to ensuring that institutions provide all the necessary information, and in the manner it is requested, so the review and approval process may be more efficient and timelier.

Background

The IPR Team has worked diligently over the past couple of years to strengthen and streamline the IPR process. The process has shifted from a reliance on lengthy narrative to a reliance on specific evidence that address the program standards. In this way, the IPR process is in alignment with the Program Review process that all programs participate in during Year 5 of the 7-year Accreditation Cycle. The work to strengthen and streamline the IPR process has also included the following:

- updates to the IPR webpage (drop-down menus with information on each step of the IPR process);
- an IPR webinar for the PK-3 ECE Specialist Instruction credential (which is also helpful for institutions considering other types of programs);
- the creation and updating of required evidence documents used for Preconditions submissions in Year 1 and 4 of the accreditation cycle;
- the creation of submission requirements for the IPR Common Standards responses,
- twice-monthly IPR office hours;
- one-on-one meetings with institutions;
- the reallocation of support staff to help intake IPR forms; and, most recently,
- an IPR Intake Form identifying readiness/accessibility of proposals. This IPR Intake Form will be sent to institutions after their IPR Proposals are received and reviewed by staff. (This step has been implemented to ensure submissions are complete prior to being sent to a team of peer reviewers.)

Incomplete/inaccessible IPR Proposals have resulted in more challenging and difficult reviews and have resulted in volunteer reviewers spending additional time trying to determine alignment to the standards with missing exhibits and elements. The IPR Team considers IPR proposals incomplete/inaccessible if:

- they are missing one or more of the following IPR Proposal components:
 - Initial Program Preconditions
 - Program-Specific Preconditions
 - IPR Common Standards elements, and/or
 - Program Standard Exhibits and Elements
- they do not address the submission requirements;
- they contain broken links to evidence;
- the links provided in the course matrix or other evidence go to the first page of a syllabus or handbook rather than to the specific, relevant section of the document where the evidence is located;
- the course matrix is incomplete;
- they include links that require permission to access; and/or
- they include links to evidence that are for programs other than the one proposed.

The above list notes common issues the IPR Team has seen but is not exhaustive.

The IPR Team acknowledges that creating an IPR proposal is complex, and, as such, has built a system of support to assist institutions as indicated above. What is perplexing is that IPR is a process used by institutions who are already Commission-approved program sponsors seeking to add another educator preparation program. These are existing program sponsors that have participated in other accreditation activities such as Preconditions, Program Review, and Common Standards Review. As stated above, the IPR process is aligned with these activities, most specifically with Program Review.

These issues in IPR proposals have resulted in a significant and unanticipated investment in Commission resources. In many instances, Commission staff have had to redirect institutions frequently to existing, publicly available resources so that institutions can update the IPR proposals to be ready for review. Consequently, this delays the process for institutions who have used the existing resources and submitted complete IPR proposals.

Incomplete/inaccessible IPR proposals also lead to additional efforts by the institution that submitted the proposal. This delays the institution's ability to receive program approval and ultimately slows down the review process for every institution with an IPR proposal in the queue.

The IPR Team has noticed in many recent IPR proposals there appears to be a lack of collaboration between the proposed program and the education unit. Regardless of whether the proposed program is inside or outside of the institution's school of education, there are concerns from reviewers about the level of integration of the program into the existing education unit and its collaboration with internal and external partners. This raises questions at

the Common Standards and/or Preconditions level. The IPR Team is also noticing that some institutions are hiring consultants or outside individuals to write IPR proposals for them and it is unclear if these outside individuals have a background in accreditation or are familiar with the organization of the institution for which they are writing the proposal.

Given the complexity of the PK-3 ECE Specialist Instruction credential, members of the IPR Team have regularly attended ECE Office Hours and monthly Community Circles since early 2023 to address the many questions related to developing proposals for this new credential. Because so many of the questions raised during ECE Office Hours were related to IPR proposals, staff now host IPR Office Hours so that programs have a space to ask questions specific to developing a IPR proposal. Additionally, IPR Team members designed and facilitated a webinar in late 2023 on clinical practice to assist institutions designing and submitting IPR proposals for this new credential.

Next Steps

Staff will monitor the effectiveness of the IPR Intake Form, continue to hold regular office hours, and provide clear communication and evidence guidance in order to address any questions institutions may have regarding the IPR process and expectations for submitting the proposal. The IPR Team expects institutions with questions to attend office hours prior to submitting a program proposal. Should an institution's representative(s) be unable to attend office hours, they should submit questions to the IPR Team at IPR@ctc.ca.gov. If the inquiry warrants a one-on-one meeting, an IPR Team consultant will meet with the representative(s).

The IPR Team will continue to brainstorm ways in which to emphasize to institutions the need to submit complete and accessible IPR proposals. Incomplete IPR proposals not only hinder the institution's ability to start their own program, but, as discussed in this item, they also slow down the process for any other program seeking approval, as the IPR Team must redirect efforts that would otherwise be used to ensure complete IPR proposals submitted by institutions are sent to review teams in a timely manner. Other possible courses of action could include, among other considerations:

- charging Cost Recovery Fees for incomplete IPR proposals (which may require a change in regulations);
- de-prioritizing incomplete/inaccessible proposals;
- hosting IPR sessions at CCAC and other applicable conferences;
- replacing an IPR Office Hour once every three months with a quarterly IPR 101 to review the IPR process; and
- restructuring the IPR process so that components of the proposal are submitted at different times.

The IPR Team is also prepared to release a Program Sponsor Alert (PSA) to emphasize to institutions that only complete IPR proposals will move forward for review and that incomplete/inaccessible submissions significantly delay the review process for all IPR proposals.

Please see the appendix in this item for an example IPR Intake Form.

Example IPR Intake Form

Appendix: Example IPR Intake Form

IPR Intake Form – Review of IPR Proposal

Identifier	Information
Name of Institution:	<i>Name of Institution</i>
Type of Proposed Program:	PK-3 ECE Specialist Instruction Credential
Link to IPR Proposal:	<Link>
Date of Intake Review(s):	December 2023

Reviewer Instructions:

- Review the IPR Proposal to see if the evidence provided for each of the three IPR components (preconditions, common standards, exhibits and elements) aligns with the submission requirements and links are accessible.
- If all required evidence is present, and every link that has been clicked on is working, please check the first box below indicating the proposal is complete and accessible.
- If most of the evidence is present, and links that were clicked on are accessible, please check the second box below indicating most of the proposal is complete and accessible.
- If, after review of the Initial Program Preconditions, Program-Specific Preconditions, the course matrix (if applicable) and one or two Common Standards, the IPR Proposal is incomplete and has many missing/ inaccessible components, you may stop reviewing and mark the third checkbox below.
- If any links are broken, please note the broken link for the institution to fix in the respective chart below.
- If broken links or access issues are pervasive, do not continue with the review.

Status of IPR Proposal after First Intake Review:

Ready for review: The IPR Proposal is complete and the links that were checked are accessible. The IPR Proposal will continue in the review process.

Minor updates needed: Most of the IPR Proposal is complete and accessible except for a few links noted in the charts on the subsequent pages. Please see Institution Instructions for more information.

Example IPR Intake Form

Incomplete/ unable to review: This IPR Proposal was reviewed through **Common Standard 1**. Commission staff did not continue the review as the IPR Proposal is incomplete. Specific information on what is missing will not be provided as the institution must review the information on the [IPR webpage](#) under Step 3: Preparing the IPR Proposal, which includes links relevant to each IPR Proposal component, and resubmit their IPR Proposal once they are in alignment.

- Please be sure to include links as required in evidence guide to program materials/website/drafts
- Common Standard responses need to reflect how the proposed program contributes to/fits with the institution

As a result of the incomplete/ inaccessibility of the IPR Proposal as received, **your institution is required to attend IPR Office Hours**. Please review the [Accreditation Technical Assistance webpage](#) for information and the Zoom link for IPR Office Hours.

Please see Institution Instructions for more information.

For IPR Team use-only:

Institution attended office hours at this date: _____

Institution Instructions:

- *If your IPR Proposal was incomplete/ unable to review, attend IPR Office Hours as noted above.*
- Ensure that the required evidence and/or narrative is accurate and accessible. Links to evidence within a document should go directly to the intended evidence. (Linking to the first page is not acceptable.)
- Review the notes below and update your IPR Proposal accordingly.
- The IPR Proposal will only be sent to reviewers in its entirety if all components are present, accessible, and required evidence is provided. Incomplete/inaccessible submissions will significantly delay the review process.
- Once these items have been addressed and corrected, let the IPR Team know by sending an email to IPR@ctc.ca.gov.

Preconditions

Evidence	First Intake	Second Intake
Initial Program Preconditions	<ul style="list-style-type: none"> • Unable to find needs analysis • 2-Role and qualifications of title of board members is unclear 	

Example IPR Intake Form

Evidence	First Intake	Second Intake
Program-Specific Preconditions	<ul style="list-style-type: none"> • 1 – unable to find link to course sequence within a handbook, website, or other authentic program documentation that shows no more than 9 semester units or 12 with EL instruction of credential preparation courses are completed before candidates begin student teaching experience in a classroom or school. • 4- unable to find link within a handbook, website, or other authentic program documentation that indicates how candidates are provided with clear and accurate information about both options available to demonstrate subject matter competence. This evidence may be within any current authentic candidate materials where requirements are listed. • 6 – unable to find Passage of the Reading Instruction Competence Assessment (RICA) or a Commission approved literacy performance assessment for early childhood education in list. 	<ul style="list-style-type: none"> • Difficult to find evidence in handbook as it is not bookmarked/directly linked and there are no page numbers on the actual handbook pages. • 6 – unable to find Passage of the Reading Instruction Competence Assessment (RICA) or a Commission approved literacy performance assessment for early childhood education in list on this document: <Link> (form in handbook is accurate) • Handbook admissions checklist refers to Subject Matter Program and does not list accurate SMR options for this credential

Common Standards

Evidence	First Intake	Second Intake
Common Standard 1	<ul style="list-style-type: none"> • 1.1 - unable to find how proposed program furthers vision • 1.6 - unable to find recruitment and faculty development for this program – all is institution-wide 	

Example IPR Intake Form

Evidence	First Intake	Second Intake
	<ul style="list-style-type: none"> Reviewers stopped here and returned submission to institution 	
Common Standard 2		
Common Standard 3		
Common Standard 4		
Common Standard 5		

Exhibits & Elements

Evidence	First Intake	Second Intake
Element 1		
Element 2		
Element 3		
Element 4		
Element 5		
Element 6		
Element 7 (Prelim Programs Only)		
Element 8 (non-Induction programs only)		