

California State Auditor

B U R E A U O F S T A T E A U D I T S

California Commission on Teacher Credentialing:

*It Could Better Manage Its Credentialing
Responsibilities*



November 2004
2004-108

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CALIFORNIA STATE AUDITOR

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November 9, 2004

2004-108

The Governor of California
President pro Tempore of the Senate
Speaker of the Assembly
State Capitol
Sacramento, California 95814

Dear Governor and Legislative Leaders:

As requested by the Joint Legislative Audit Committee, the Bureau of State Audits presents its audit report concerning the efficiency and effectiveness of the teacher credentialing process administered by the California Commission on Teacher Credentialing (commission).

This report concludes that the commission could increase its ability to measure the effectiveness of its teacher development programs, the efficiency of the teacher credentialing process, and the performance of its internal operations. In addition, by focusing its customer service, better managing its workload, and taking full advantage of a new automated processing system, the commission could improve its credential application process. Further, we identified several areas in the commission's process for developing program standards, which college and universities follow when preparing prospective teachers, that lack structure and could be improved. Finally, in December 2002 the commission suspended its continuing accreditation reviews of most colleges and universities, which limits its ability to ensure that they operate teacher preparation programs in accordance with the commission's standards. The commission is evaluating its accreditation policy and it does not plan to propose a revised policy to its governing body until August 2005.

Respectfully submitted,

ELAINE M. HOWLE
State Auditor

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SUMMARY

Audit Highlights . . .

Our review of the credentialing process administered by the California Commission on Teacher Credentialing (commission) revealed the following:

- The commission could better evaluate the effectiveness of the programs it oversees and better measure the performance of the teacher credentialing process.*
 - The commission could take additional steps to improve its processing of credential applications, including focusing its customer service activities.*
 - Several areas of the commission's process for developing program standards lack structure and could be improved.*
 - The commission suspended its continuing accreditation reviews in December 2002 and is evaluating its accreditation policy, and it does not expect to present a revised policy to its governing body until August 2005.*
-

RESULTS IN BRIEF

The California Commission on Teacher Credentialing (commission) was created in 1970 with the responsibility of ensuring excellence in education by establishing high standards for the preparation and licensing of public school educators. The commission also issues licenses and permits for school administrators and educators working in specialized teaching areas. In fiscal year 2003–04 the commission granted approximately 239,000 teacher and administrator licenses and renewals. In addition to its licensing responsibility, the commission develops program standards to address the quality of the programs that accredited colleges and universities provide to prospective teachers. The commission's other duties include adopting credential exams, accrediting colleges and universities that meet program standards, operating teacher development programs designed to help prospective teachers complete the requirements needed for a credential, and reviewing allegations of misconduct against credential holders or applicants. Our review found that the commission could make improvements to better evaluate the programs it oversees and its internal operations, more effectively manage its application processing, and refine how it updates program standards. In addition, the commission should resume its continuing accreditation reviews of colleges and universities.

The commission could increase its ability to measure the effectiveness of its teacher development programs, the efficiency of the teacher-credentialing process (process), and the performance of its internal operations. By doing so, the commission would be able to streamline and improve its efforts. For example, its teacher development programs provide funding for individuals who do not yet meet the requirements for a teaching credential, yet the commission has not sufficiently evaluated and accurately reported on two of its three teacher development programs. As part of its oversight of the process in California, the commission has some measures of the overall health of the process. However, it could improve its analysis of those measures and could develop further measures to better track the performance of the process and of individual teacher preparation programs.

Despite the importance of strategic planning, the commission has lacked specific performance measures to guide and evaluate its efforts. Further, the commission's February 2001 strategic plan is outdated and lacks performance measures. In addition, the commission does not annually track its progress in completing the tasks it described in the strategic plan. Subsequent to our fieldwork, the commission updated the tasks in its strategic plan.

The commission has implemented some reforms of the process and is contemplating others. It has also worked to reduce the barriers to becoming a California teacher. In addition to these efforts, the commission is considering whether to consolidate the examinations that it requires prospective teachers to pass.

By focusing its customer service, better managing its workload, and taking full advantage of a new automated application-processing system, the commission could improve its processing of applications. Facing a significant volume of contacts, the commission has not taken sufficient steps to focus its customer service activities. Proper management of customer service is necessary because the large volume of telephone calls and e-mails that the commission receives takes staff away from the task of processing credential applications.

Although the commission typically processes applications for credentials in less than its regulatory processing time of 75 business days, applications go unprocessed for a significant amount of this time because staff members are busy with other duties. The commission has taken some steps to improve its process, including automating certain functions as part of its Teacher Credentialing Service Improvement Project (TCSIP), which is a new automated application processing system that the commission plans to implement in late October 2004. However, the commission has not performed sufficient data analysis to make informed staffing decisions. TCSIP offers tangible time-saving benefits, such as allowing colleges and universities to submit applications electronically and automating the commission's review of online renewals, but the commission does not plan to use either function to its full potential in the foreseeable future.

Although online renewals offer the benefit of faster and more efficient processing, the commission has not sufficiently publicized this benefit. The commission could do more to inform teachers about the benefits of online renewal by

performing the data analysis necessary to determine where the commission needs to do additional outreach and by better highlighting online renewal's availability and faster processing time.

The commission is in the midst of a 10-year process of developing program standards that comply with the requirements of Senate Bill 2042, Chapter 548, Statutes of 1998 (act). The commission does not have an overall plan to guide its efforts to finish implementing program standards or its ongoing standard-setting activities. Further, the commission's recent experiences developing program standards to meet the act's requirements offer an opportunity to evaluate how to better manage its future efforts. Our review of five sets of recently developed program standards identified areas in the commission's process for developing program standards that lack structure and could be improved. Among other issues, the commission does not use a methodical approach to form advisory panels of education professionals that assist it in developing program standards; neither does it always put in perspective the results of its field-review surveys to the commission's governing body (commissioners) when recommending standards for adoption.

Finally, the commission suspended its continuing accreditation reviews of colleges and universities in December 2002. Continuing accreditation reviews are an important component of the commission's accreditation system and help ensure that colleges and universities operate teacher preparation programs that meet the commission's standards. The commission indicated that it suspended continuing accreditation reviews to allow colleges and universities time to implement the commission's new standards and for it to evaluate its accreditation policy. Although the commission has been working with representatives from colleges and universities to evaluate its accreditation policy, it does not plan to propose a revision to the commissioners until August 2005.

RECOMMENDATIONS

To determine their success, the commission should establish performance measures for each of its teacher development programs.

To better plan and evaluate its efforts, the commission should regularly update its strategic plan and when appropriate quantify performance measures for tasks, in terms of the results it aims to achieve.

The commission should continue to consider ways to streamline the process.

The commission should improve application processing by better focusing its customer service efforts, analyzing application-processing data, requiring institutional customers to submit applications electronically to the extent that it is economically feasible, and encouraging more educators to renew their credentials online.

To improve the process by which it develops program standards for college and university teacher preparation programs, the commission should develop an overall plan to guide its efforts to fully implement the act's requirements. This plan should describe the commission's process for developing standards and should provide more structure for that process. Further, to ensure that colleges and universities meet these program standards, the commission should promptly resume its continuing accreditation reviews.

AGENCY COMMENTS

The commission concurs with many of our recommendations, but believes that it will need changes in its statutory authority or additional funding and staffing to implement them. Moreover, the commission believes the report has significant omissions, errors, and misinterpretations. We carefully analyzed the commission's response and, although we made some minor modifications to the report text, we stand by our audit conclusions and recommendations. ■

INTRODUCTION

BACKGROUND

The California Commission on Teacher Credentialing (commission) was created in 1970, with the responsibility to ensure excellence in education by establishing high standards for the preparation and licensing of public school educators. Previously, the California Department of Education (Education) issued licenses, known as credentials, to teachers, but the Legislature believed that the public would be better served by having a separate state entity issue teaching credentials. The commission also issues licenses and permits for school administrators and educators working in specialized teaching areas.

The commission's governing body (commissioners) is a group of 19 individuals, of whom 15 are voting members. The governor, with the advice and consent of the State Senate, appoints 14 of the voting members; the superintendent of public instruction or a designee is the remaining voting member. The Regents of the University of California, the Trustees of the California State University, the California Postsecondary Education Commission, and an association representing independent colleges and universities each provide one of the nonvoting members. State law requires the commissioners to meet at least once each month in no fewer than 10 months per year to conduct commission business. The commissioners also appoint an executive director who is responsible for the commission's daily operations. As of September 2004 the commission had 165 positions. Figure 1 on the following page shows the organization of the commission.

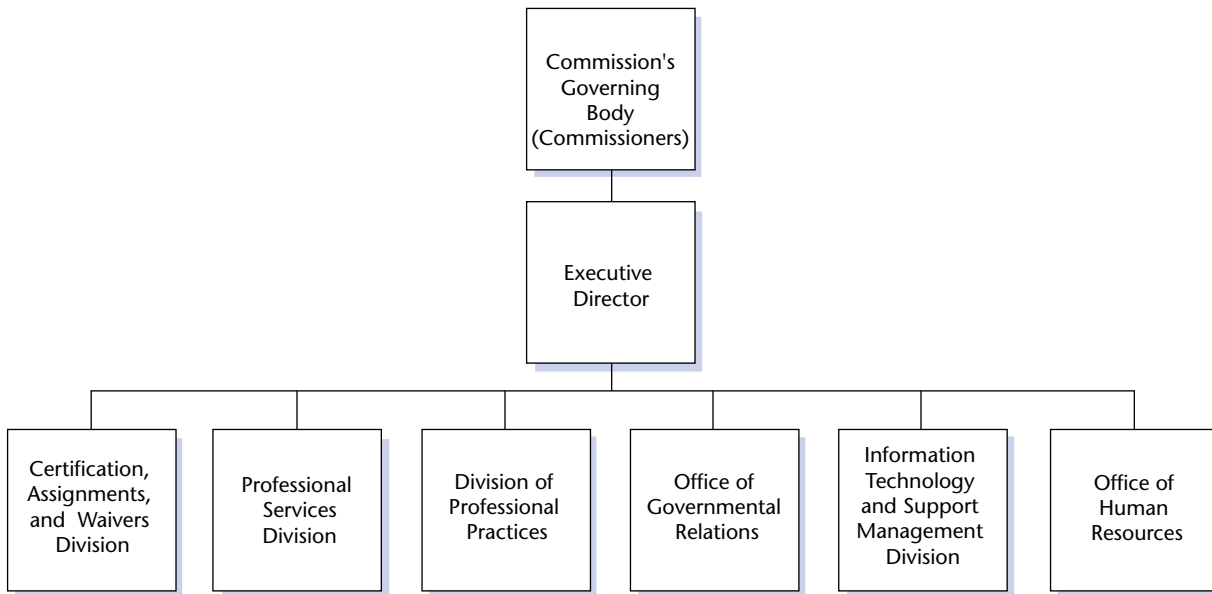
The certification, assignments, and waivers division evaluates and processes teacher and administrator applications and renewals, which totaled approximately 239,000 in fiscal year 2003–04. It also provides customer service and deposits fees, among other functions.

The professional services division develops program standards that college and university teacher preparation programs must adhere to in order for the commission to accredit them. These program standards address the quality of the programs that accredited colleges and universities provide to prospective

teachers, including curriculum, field experiences, knowledge, and skills. In addition, this division implements credential examinations, accredits colleges and universities that meet program standards, and administers teacher development programs designed to help prospective teachers complete the requirements they need for a credential.

FIGURE 1

Organization of the California Commission on Teacher Credentialing



Source: California Commission on Teacher Credentialing.

The division of professional practices helps the commission's committee of credentials (whose members the commissioners appoint) review allegations of misconduct against credential holders or applicants. The committee of credentials also makes recommendations to the commissioners as to whether probable cause exists to take adverse action against those individuals. In situations in which a credential holder or applicant has been convicted of a serious crime, the commission revokes or mandatorily denies the credential or application. According to its records, the commission resolved approximately 4,900 cases in fiscal year 2003–04.

License fees and license examination fees support the commission. The fiscal year 2004–05 license fee is \$55 for all credential types and for renewals; this fee funds all of the commission's

operating expenses. The State establishes the fee amount annually in its budget act. The last fee change was in fiscal year 2000–01, when the State reduced the fee from \$60 to \$55. Examination fees can range from \$41 to \$226, with the commission receiving a portion of these fees and the companies that administer the examinations receiving the rest. The commission’s portion of examination fees is designated for the development, maintenance, and administration of tests and other assessments. In fiscal year 2003–04 the commission’s operating budget was \$26.6 million.

OVERVIEW OF THE TEACHER-CREDENTIALING PROCESS

California law requires that the commission issue licenses, known as teaching credentials, to individuals teaching in California’s public schools. Many types of teaching

and administrative credentials, permits, and certificates exist. As the text box shows, among the most common are single-subject credentials for those teaching in grades 7 through 12 and multiple-subject credentials for those teaching in grades kindergarten through 6. In addition, the commission issues emergency permits to those who have completed most of a credential program or hold a credential in another subject, and it also issues 30-day substitute permits to those that serve as a day-to-day substitute teacher in a classroom.

Type and Number of Credentials Granted During Fiscal Year 2003–04

Single subject	31,453
Multiple subject	59,698
Emergency and 30-day substitute permits	72,617
Administrative services	10,400
All others	64,571
Total	238,739

Source: California Commission on Teacher Credentialing.

Typically, to earn a teaching credential in California, a prospective teacher must earn a college degree at an accredited college or university. The individual must demonstrate academic preparation in the subject he or she wishes to teach by either completing an approved

course of study in the subject or passing an examination on the subject (prospective teachers seeking a multiple subject credential must take and pass the examination to demonstrate academic preparation). In addition, the prospective teacher must complete a teacher preparation program and take several examinations, depending on the credential he or she seeks. After the prospective teacher’s college work is complete, the college or university that the individual attended submits an application to the commission, which the commission evaluates against the credential requirements. If the prospective teacher meets the requirements and passes a background check, the commission will grant a preliminary credential. The preliminary credential

allows the individual to teach for up to five years. To continue teaching after that time, the individual must complete a fifth year of study at an accredited California college or university, or obtain National Board Certification, and complete an induction program (a program of support and assessment). Once these requirements are completed, the individual or the individual's sponsor applies to the commission, which grants the individual a professional clear credential if all items are in order. After this time, the teacher needs to renew the credential every five years by passing a background check, meeting professional growth and service requirements, and paying the renewal fee.

Because the demand for teachers often exceeds the supply of credentialed teachers available, schools have several options to fill teacher positions. The most common of these is the use of an emergency permit. The commission often issues such permits to persons who have completed most of a credential program or who hold a credential in a subject area different from the one they will be teaching. Emergency permits allow individuals to teach for one year, after which they may reapply up to four times, apply for a credential if they now meet the requirements, or discontinue teaching. The commission also administers several programs designed to help prospective teachers complete the requirements for a teaching credential with the assistance of a school district, county office of education, college, or university.

OTHER ENTITIES INVOLVED IN THE TEACHER-CREDENTIALING PROCESS

Although the commission has a lead role in the teacher-credentialing process (process), other entities play a supporting role. Colleges and universities prepare prospective teachers by offering teacher preparation programs as a course of study. To provide a teacher preparation program, a college or university must have its program accredited by the commission as meeting the commission's standards. As of August 2004 the commission had accredited more than 80 California colleges and universities and eight school districts to offer teacher preparation programs. Of these, the California State University system prepared the most teacher candidates, almost 13,000 in fiscal year 2002–03.

The commission is required to align the program standards that colleges and universities follow in their teacher preparation programs with the State Board of Education's (state board) academic content standards. Under the direction of the state board and the superintendent of public instruction,

Education provides education policy direction to local school districts. The state board is the governing and policy-making body for Education and sets policy for academic content in grades kindergarten through 12. School districts and county offices of education hire credentialed teachers, but they also coordinate with the commission to administer several teacher development programs and to hire teachers who do not have a credential.

STATE AND FEDERAL POLICY DECISIONS AFFECT THE PROCESS

Recent changes in state and federal law have significantly affected the process by increasing the need for teachers and raising the standards of quality for the teachers that public schools hire.

The State's class-size reduction programs are intended to improve educational achievement for all students by reducing the number of students per teacher. School districts that choose to participate in these programs receive additional funding for each student enrolled in classes of about 20 students. The State implemented the most recent program, for grades kindergarten through 3, in the 1996–97 school year. Although this program provided students the benefit of closer instruction, it created an immediate need for credentialed teachers to achieve the smaller class sizes. Because not enough credentialed teachers were available to fill this need when the law became effective, many school districts needed to hire teachers by using emergency permits.

Another law affecting the process is the federal No Child Left Behind Act of 2001 (federal act). A key goal of the federal act is to ensure that all students are taught by highly qualified teachers by the end of the 2005–06 school year. To be highly qualified, a teacher of core academic subjects must meet three requirements: He or she (1) must have a bachelor's degree, (2) must either have a state teaching credential or hold intern status for no more than three years, and (3) must demonstrate competence in the core academic subject matter. To implement these requirements, the State must align its existing credentialing and professional development practices with the federal act's goals. The federal act has caused the commission to study how to replace emergency permits, because holders of emergency permits have not demonstrated competence in the core academic subject matter and thus do not meet the federal act's definition of highly qualified teachers. To ensure that the State meets the teacher requirement goal for core academic subjects, Education

has advised schools receiving Title I funds (a federal program that provides funding to schools with children at risk of failing to meet the State's academic requirements) to hire only highly qualified teachers beginning with the 2002–03 school year. Education has further stated that all other public school teachers who are teaching core academic subjects should meet the federal act's requirements by the end of the 2005–06 school year.

SCOPE AND METHODOLOGY

The Joint Legislative Audit Committee (audit committee) asked the Bureau of State Audits to study the effectiveness and efficiency of the process, including the relevant laws, rules, and regulations. The audit committee asked us to take a number of steps to study the effectiveness of the commission's activities. Specifically, the audit committee asked us to determine whether the commission evaluates the effectiveness of its training, development, and certification practices, including whether it has established and met meaningful performance measures. The audit committee also requested that we determine whether any barriers prevent qualified individuals from being certified as teachers. In addition, the audit committee asked us to review the commission's process for handling applications to identify any backlog, average processing times, and any causes or contributors to delayed processing. Further, the audit committee asked us to examine the process for establishing and evaluating standards for college and university programs that prepare prospective teachers and administrators. Finally, the audit committee asked us to examine whether the commission and other entities involved in the process overlap in roles and activities. After reviewing the roles of the commission and Education, the California State University, the University of California, the Board of Governors of the California Community Colleges, private universities, and the California Postsecondary Education Commission, we found no significant duplication of efforts among these entities.

Good management practices suggest that organizations use performance measures as a way of determining whether their efforts are productive and successful. Thus, we reviewed whether the commission evaluates the effectiveness of the teacher development programs it administers. Further, we evaluated the commission's February 2001 strategic plan, which the commission partially updated after the end of our fieldwork, to determine whether the commission has established and met its own performance measures and goals. In the areas of the

commission's key responsibilities of application processing, standards development, and teacher discipline, we examined whether the commission has established performance measures, goals, or expectations to guide its staff's efforts toward successful outcomes. Because the commission both collects data on activities related to the process and has an oversight role, we also explored whether these data could provide performance measures that the commission could use to gauge the relative success of its efforts and the overall health of the process. Finally, we examined the commission's efforts to remove barriers that prevent viable teacher candidates from receiving teaching credentials.

Processing of credential applications and renewals is one of the commission's primary responsibilities, and thus we reviewed how it manages this workload. Because a significant workload of applications and renewals exists, we reviewed whether the commission has taken appropriate steps to evaluate this workload to determine how to make the process more efficient. Because customer service activities take staff away from processing applications and renewals, we evaluated how the commission uses the customer service data it gathers, such as the reasons for the large number of e-mail and telephone inquiries it receives, to make its customer assistance activities more efficient. In late October 2004 the commission plans to implement the third phase of the Teacher Credentialing Service Improvement Project (TCSIP) to replace the existing system for processing applications and renewals. We assessed the efficiencies that the commission will gain with TCSIP and whether additional efficiencies would be possible by automating more functions. We also reviewed whether the option to renew credentials online, which became available in July 2002, has made the process more efficient for the commission and its customers.

To examine how the commission establishes and evaluates teacher and administrator program standards, we reviewed five sets of recently developed program standards that colleges and universities either have implemented or are in the process of implementing. The commission is in the midst of developing new program standards as a result of Senate Bill 2042, Chapter 548, Statutes of 1998. Because the commission used an advisory panel of education professionals to assist in the development of each set of program standards we reviewed, we determined whether it selected panel members objectively based on their qualifications. Further, we examined how the commission ensures that the content of the program standards is appropriate, is considered important by the California

education community, and is without bias. The development of the program standards is taking place over at least a 10-year period, so we assessed whether the commission has a plan to ensure that it develops program standards on a timely basis.

We also reviewed the commission's accreditation process, because accreditation of teacher preparation programs at colleges and universities is critical to ensuring that these programs follow the commission's standards. The commission suspended continuing accreditation reviews of colleges and universities in December 2002 and is evaluating the accreditation process. Thus, we reviewed the status of the revisions to the commission's accreditation process. ■

CHAPTER 1

The Commission Could Better Evaluate the Effectiveness of Its Efforts and Better Measure the Performance of the Teacher Credentialing Process

CHAPTER SUMMARY

The California Commission on Teacher Credentialing (commission) could increase its ability to measure the effectiveness of its teacher development programs, the teacher-credentialing process (process), and its internal operations. By doing so, the commission would be able to streamline and improve its efforts and the process.

The commission's teacher development programs provide funding for individuals who do not yet meet the requirements for a teacher credential. However, the commission has neither sufficiently evaluated nor accurately reported on two of its three teacher development programs. For example, the commission did not have the effectiveness of the California School Paraprofessional Teacher Training Program (paraprofessional program) independently evaluated, as state law requires, and has overstated the benefits of the Pre-Internship Teaching Program (pre-intern program) in a report to the Legislature.

In its oversight role of the process in California, the commission has some measures of the overall health of the process. However, it could improve its analysis of those measures and could develop further measures to better track the effectiveness of the process and of individual teacher preparation programs (preparation programs) that colleges, universities, and school districts offer. Further, if the commission and other entities involved worked to resolve funding and technical issues, the commission could use the results of the teaching performance assessment, annual data on retention of teachers, and administrator surveys that are currently under development to better measure various aspects of the process and the preparation programs.

The commission has lacked specific performance measures to guide and evaluate its efforts. Further, the commission's February 2001 strategic plan is outdated and lacks performance measures, and the commission does not annually track its progress in completing the tasks its plan described. Subsequent to our fieldwork, the commission updated the tasks in its strategic plan.

The commission has implemented some reforms of the process and is contemplating others. For instance, it has reduced the barriers to becoming a California teacher for individuals who received their teacher training in other states. It has also developed tests that allow teacher candidates who pass them not to take otherwise required preparation courses. In addition to these efforts, the commission is considering whether to consolidate the examinations it requires of prospective teachers.

THE COMMISSION HAS NEITHER FULLY EVALUATED NOR ACCURATELY REPORTED THE RESULTS OF TWO OF ITS THREE TEACHER DEVELOPMENT PROGRAMS

The commission's teacher development programs—the paraprofessional, pre-intern, and the California Internship Teacher Preparation (intern) programs—provide funding to help individuals meet the requirements for a teaching credential or, in some cases, to meet the requirements for entrance to a college, university, or school district preparation program. Because the commission's evaluation of its paraprofessional and pre-intern programs has been limited and, in some cases, inaccurately reported, state policy makers do not have the information they need to determine whether these programs have been successful and should be continued. However, the commission has collected information that indicates that the intern program has been successful in meeting its objectives.

For two teacher development programs, state policy makers do not have the information they need to determine whether the programs have been successful.

The Commission Has Not Adequately Evaluated the Performance of the Paraprofessional Program

Despite spending more than \$34 million on the paraprofessional program since fiscal year 1994–95, the commission has not had a third party independently evaluate the program as statute requires, nor has it established relevant and valid measures of the program's performance. The primary purpose of the paraprofessional program is to help school paraprofessionals, such as teachers' assistants, library media aides, and instructional assistants, become certificated classroom teachers

in public schools. The law requires the program to focus on recruiting to meet the demand for certain kinds of teachers, such as cross-cultural/bilingual, special education, kindergarten through third grade, and local education agencies' own specific teacher needs. The program provides scholarships of about \$3,000 per year to defray participants' costs for tuition, books, and fees. Participants continue to serve as paraprofessionals while completing their education. According to the commission, because participants typically go to school only part-time and because most enter the program having completed relatively few college courses, completing their education may take them as long as seven years. However, commission staff members stated that they have not limited the number of years that a participant may receive a paraprofessional scholarship.

For every year that they receive a scholarship, participants must commit to teach for one school year after receiving a preliminary credential in the districts or county offices of education through which they received assistance. Therefore, in return for administering the paraprofessional program, school districts and county offices of education receive a number of

years of service from a fully qualified teacher who is already accustomed to a particular school district's environment. According to the commission, other anticipated benefits include improving the instruction that paraprofessionals provide while in the program and diversifying the teaching profession.

Although the state law that authorized the paraprofessional program requires it to do so, the commission has not contracted with an independent evaluator to determine the success of the paraprofessional program. The law requires an annual evaluation that includes the seven data requirements described in the text box. However, commission documents indicate that the cost of this evaluation is a concern; and the commission has never contracted for a third party to conduct the independent evaluation.

In its December 1997 meeting, the commission's governing body (commissioners) decided to postpone the independent evaluation until an unspecified future date. In the agenda item associated with this meeting, commission staff estimated that an evaluation that fully addressed

**Data Requirements for
Independent Evaluation of the
Paraprofessional Program**

1. Total cost per program graduate.
2. Economic status of program participants.
3. Description of the other resources made available to participants.
4. Comparison of performance on standardized tests between pupils taught by program graduates and pupils taught by others with equivalent experience.
5. Improvements in pupil dropout rates and other measures of delinquency in classes taught by program graduates.
6. Extent to which program graduates remain in the communities in which they reside and in which they teach.
7. Attrition rate of program graduates.

Source: California Education Code, Section 44393.

all of the statutory requirements would cost at least \$1 million, although the commission had not solicited bids for this evaluation. At that time, the paraprofessional program was funded at nearly \$1.5 million per year. Part of the reason the commission staff gave for its high estimate of the evaluation's cost was that two of the requirements (requirements 4 and 5 in the text box) would be difficult to measure because the independent evaluator would have to compile data about a multitude of factors that cause fluctuations in student performance on standardized tests and that contribute to the dropout rate. Commission staff also suggested other options, such as proceeding with the evaluation but excluding the two problematic requirements and submitting a proposal to the Legislature to delete or substantially change the two requirements. According to the commission's director of governmental relations, after December 1997 the commission verbally informed the Legislature and the Governor's Office about the lack of funding for the evaluation. Although the commission provided us with copies of several budget requests for \$33,000 (the amount it believed the evaluation would cost before the Legislature added the two problematic evaluation requirements to the law in 1997) that it made before December 1997, the commission could not provide us documentation of budget requests that it made after that date.

In addition to requiring an independent evaluation, state law requires the commission to provide the Legislature an annual status report that includes, among other elements, the number of paraprofessionals in the program who are subsequently employed as teachers in the public schools. This retention rate is one of the more critical measures of the program's success in meeting its objectives, but two problems weaken its value as a program performance measure. First, the local program directors report the retention rate themselves, and neither they nor the commission track program graduates after they fulfill their years-of-service obligation. Second, the commission could not provide supporting documentation for the 823 program graduates that it reported as of the end of fiscal year 2002–03 who were still serving in the classroom, and this number was inconsistent with a table in the report indicating that local programs reported only 616 program graduates still serving in the classroom. Commission staff could not provide us with supporting documentation for the table either. This inconsistency and lack of supporting documentation casts doubt on the validity of

the data the commission used in its fiscal year 2002–03 annual report and makes it difficult for policy makers to determine the program’s success.

Because the commission did not develop ways to measure and monitor local program performance, nearly 70 participants of programs whose participation was scheduled to end by December 2003 have not completed credential requirements.

Although the commission collects data from local program directors on retention and other matters involving the paraprofessional program, it does not use these data as performance measures to evaluate the success of individual local programs. Further, commission staff explained that when the commission developed the paraprofessional program, it did not establish a way to monitor whether local programs were verifying participants’ academic progress and did not develop a set of consequences for underperformance by local programs or by individual program participants. The commission is now trying to determine what to do about nearly 70 participants in local programs who were to have completed their credential requirements by December 2003 or sooner but who have not completed credential requirements. If the commission had developed ways to measure and monitor local program performance and developed specific consequences for underperformance, it might have been able to avoid this dilemma.

The Commission Has Not Demonstrated That the Pre-Intern Program Has Accomplished Its Objectives

In 1997, when the number of teachers serving with emergency permits was increasing dramatically, legislation created the pre-intern program to help retain and prepare emergency-permit teachers to become credentialed teachers. However, after seven years of program operation and \$80 million in costs, the commission has not shown that the pre-intern program has achieved this and other program goals. The pre-intern program is ending after the 2004–05 school year because pre-interns do not meet the requirements of the federal No Child Left Behind Act of 2001 (federal act), which requires a highly qualified teacher in every classroom after June 2006. Although the commission is discontinuing the pre-intern program and has no current plans to replace it with a similar funded effort, our review of the commission’s process of evaluating the program offers insight into how the commission can improve its practices.

One purpose of the pre-intern program is to decrease the number of teachers holding emergency permits by providing individuals who have not yet completed the subject matter requirements for entry into a preparation program with education in the subject matter that they are assigned to teach. Another

purpose is to improve participants' teaching performance by providing training in classroom management, pupil discipline, and teaching strategies. To achieve these goals, the commission annually awards to competitively selected counties and local school districts (local programs) grants of \$2,000 to provide training and support for each pre-intern participant. Individuals can participate in the program for two or, in some cases, three years. The requirements for an individual to participate are the same as those for an emergency permit: Both require the individual to pass the California Basic Educational Skills Test and to have a bachelor's degree with a minimum number of units in the subject of the teaching assignment.

In October 2001, after three years of program operation, the commission submitted a final program report to the Legislature, as state law required, providing information on the success of the pre-intern program and including recommendations on whether the Legislature should continue, modify, or discontinue the program. In the report, the commission recommended that the Legislature continue the program with increased funding, based on the following measures of program performance that the commission provided:

- In the first two years of the pre-intern program, almost 90 percent of all pre-interns were retained for a second year, compared to around 65 percent of first-year emergency-permit teachers.
- In the first two years, nearly 60 percent of pre-interns passed their subject matter examinations. These pass rates are similar to those of all test takers, despite the fact that pre-interns are largely members of groups that tend to pass at lower rates than the general population.
- Sixty-one percent of principals responding to a commission survey believed that pre-intern teachers performed "better" or "much better" than other teachers with a similar amount of experience.

Although these three measures indicate some level of program success and may support a recommendation to continue the program, we found problems with them. For instance, to support the claim that only 65 percent of first-year emergency-permit holders are retained for a second year, the commission provided us with a 1996 agenda item describing a then-recent commission study of a sample of individuals holding multiple-subject

emergency permits. To obtain a more current view of retention, we used commission data for fiscal years 1998–99 and 1999–2000 and calculated that 80 percent of first-year emergency-permit holders were retained in those years. This compares more favorably to the 90 percent retention rate for pre-interns during the same period.

Given the problems we found with the commission's evaluation, we believe that it may have incorrectly concluded that the pre-intern program should be continued without substantial modification.

Further, the commission could not provide supporting documentation for the statement that pre-interns are largely members of groups that tend to pass subject matter examinations at lower rates than the general population. Without these data, it is difficult for the commission to defend its position that the rate at which pre-interns pass these examinations, which the commission says is similar to the pass rates of all test takers, is an indication of program success. In addition, the commission could not provide us with supporting documentation for the results of the principal survey cited in its report. Although we could not examine the statement's validity, the results of the principal survey alone would not indicate program success. Given the problems we found with the commission's evaluation, we believe that the commission may have incorrectly concluded that the pre-intern program should be continued without substantial modification.

Indeed, subsequent to this final program report, the commission conducted a review of the pre-intern program that cast some doubt on the program's success in helping participants reach credential status. The commission randomly selected 248 pre-interns from the 5,800 program participants in fiscal year 1999–2000 and determined their credential status as of fiscal year 2002–03. Three years after taking part in the two-year pre-intern program, only 45 percent of participants in the commission's study had received either an intern position or a preliminary or professional clear credential. Because the legislative intent of the program was to help pre-interns progress into an internship as quickly as possible, we believe these initial findings should have caused the commission to determine the reason for these lower-than-expected results and implement corrective action.

No Requirement Exists to Formally Evaluate the Intern Program, but Commission Data Points to Program Success

Although the Legislature has not required the commission to report the results of the intern program, the commission has collected information that indicates the program is meeting its objectives. A teaching internship allows an individual to serve as

a fully paid teacher of record while simultaneously participating in a one- or two-year preparation program through a university or school district. The State has authorized university and school district teaching internships since 1967 and 1983, respectively. Therefore, in 1993, when legislation established a local assistance program to provide funding for teaching internships, the internship model of teacher preparation was not a new concept. At that time, the Legislature did not build any annual reporting requirements or independent evaluations into the intern program, as it did with the commission's other teacher development programs.

Commission data indicates that the intern program has been successful in retaining teachers and advancing them toward full credential status.

Despite this lack of external reporting requirements, the commission has collected information that indicates the program has been successful in bringing underrepresented groups and individuals qualified to teach in hard-to-staff subject areas into the education workforce. In addition, commission data indicate that the intern program has been successful in retaining teachers and advancing them toward full credential status. Based on information the commission collected from reports of local intern programs, 85 percent of fiscal year 1998–99 interns were retained after five years; according to the commission's credential database as of August 2004, approximately 90 percent of all individuals who participated in the intern program before fiscal year 2002–03 have obtained full credential status.

THE COMMISSION COULD IMPROVE ITS ABILITY TO MEASURE THE PERFORMANCE OF PREPARATION PROGRAMS AND THE PROCESS

In its oversight role of the process in California, the commission has some measures of the overall effectiveness of the process; however, the commission could improve its analysis of those measures and could develop further measures to better track the performance of the process and of college, university, and school district preparation programs. In particular, the commission annually reports on the number of California teaching credentials it issues and the number of emergency permits and credential waivers it grants. However, it provides this information with limited, if any, analysis of the trends associated with these numbers and does not account for external factors that could affect these statistics. In addition, if the commission and the other entities involved worked to remove current obstacles, the commission could use the results of the teaching performance assessment, annual data on retention

of teachers, and administrator surveys that are currently in development to better measure various aspects of the process and the preparation programs.

The Commission Is Required to Provide Oversight of the Process and Preparation Programs

Statute requires the commission to establish professional standards, assessments, and examinations for entry and advancement into the education profession. Although legislation provides the basic framework for standards, assessments, and examinations, the law recognizes that the commission will exercise its prerogative to determine the details of those requirements. In addition, the law requires the commission to streamline the credentialing system to ensure competence in the subject areas while allowing flexibility in staffing local schools. Our legal counsel believes that the law allows the commission to exercise professional judgment in developing credential requirements and then authorizes the commission to oversee the credentialing system, looking to improve teacher quality while maintaining an adequate quantity of teachers to staff local schools. In addition, as the entity that accredits and establishes standards for preparation programs, the commission has the responsibility to monitor the performance of these programs to ensure that they follow through on the plans they submitted during the accreditation process and to determine whether the preparation program standards result in quality teachers.

The Commission Has Some Performance Measures of the Process but Could Improve Its Analysis of Those Measures

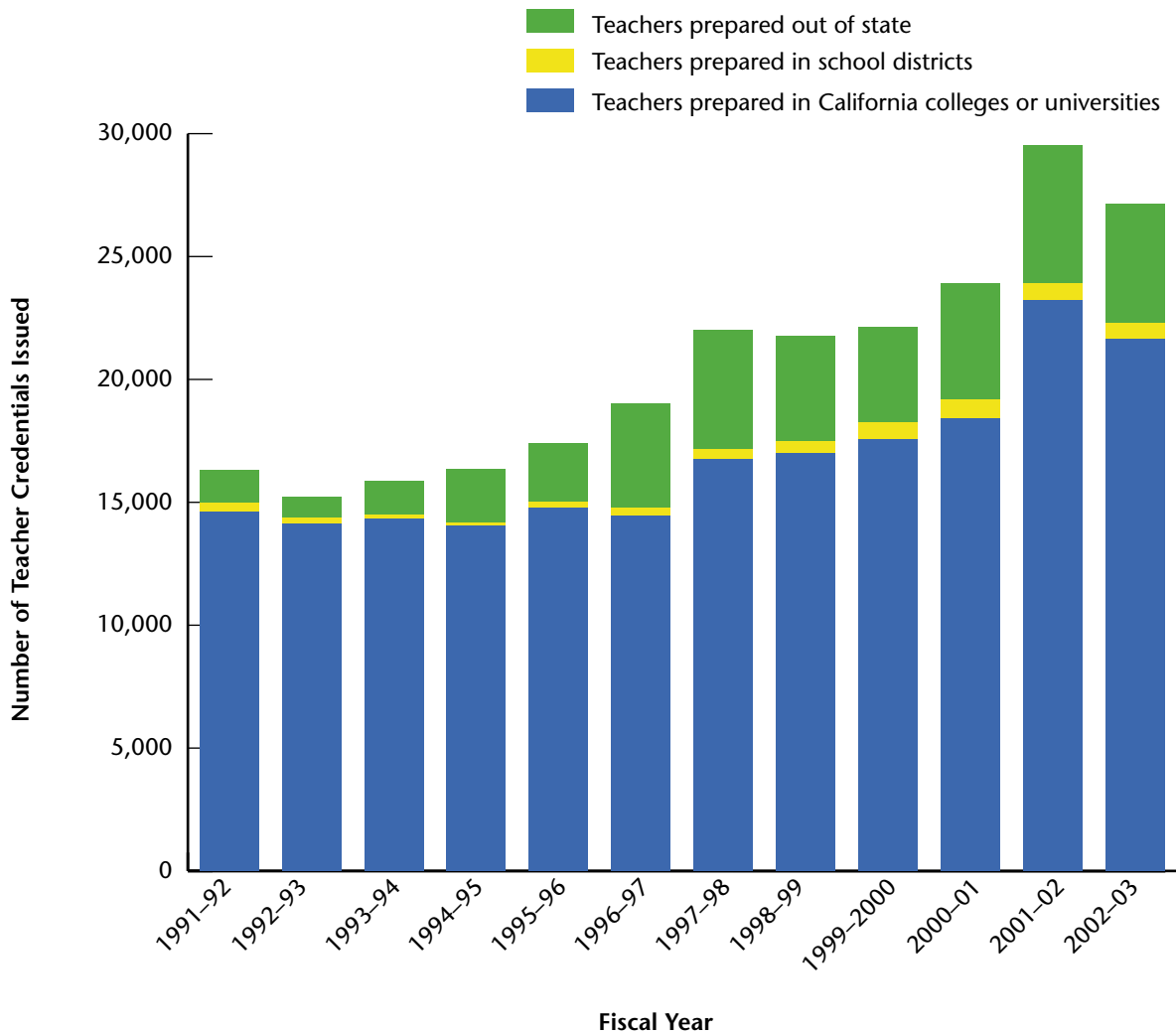
Because of its oversight role, the commission has some performance measures of the process but it could improve its analysis of those measures. For instance, state law requires the commission to report annually the number of individuals recommended for credentials by colleges and universities and by school districts operating internship programs and to report the number of individuals receiving a credential from a training program completed outside of California. The same state law declares that the number of teaching credentials the commission issues is a measure of whether preparation programs are meeting the challenge of preparing increasing numbers of new teachers. Figure 2 on the following page shows a general increase in the number of teaching credentials that the commission issued since fiscal year 1991–92. However, in its annual reports, the

Although the commission annually reports statistics on the teacher credentialing process, it provides limited, if any, analysis of the trends associated with these numbers.

commission does not explain why the number has changed or what efforts have been particularly successful in increasing the number of credentialed teachers.

FIGURE 2

**Number of California Teacher Credentials Issued by Year
Fiscal Years 1991–92 Through 2002–03**



Source: California Commission on Teacher Credentialing.

Another statutorily required measure of the capacity of the process to meet the demand for teachers is the number of emergency permits and credential waivers (permits and waivers) the commission issues. When a school cannot recruit a credentialed teacher for a vacancy, these permits and waivers allow schools to hire individuals who do not have a teaching credential or do not hold the applicable teaching credential.

The commission has not used important factors to determine and explain why the number of emergency permits has decreased in recent years.

Therefore, the number of permits and waivers that the commission issues is a strong indicator of whether the supply of credentialed teachers currently meets the demand. Although the commission has presented the overall numbers of permits and waivers in its annual reports, it has not used important factors, such as the unemployment rate, to determine and explain why these numbers have decreased in recent years.

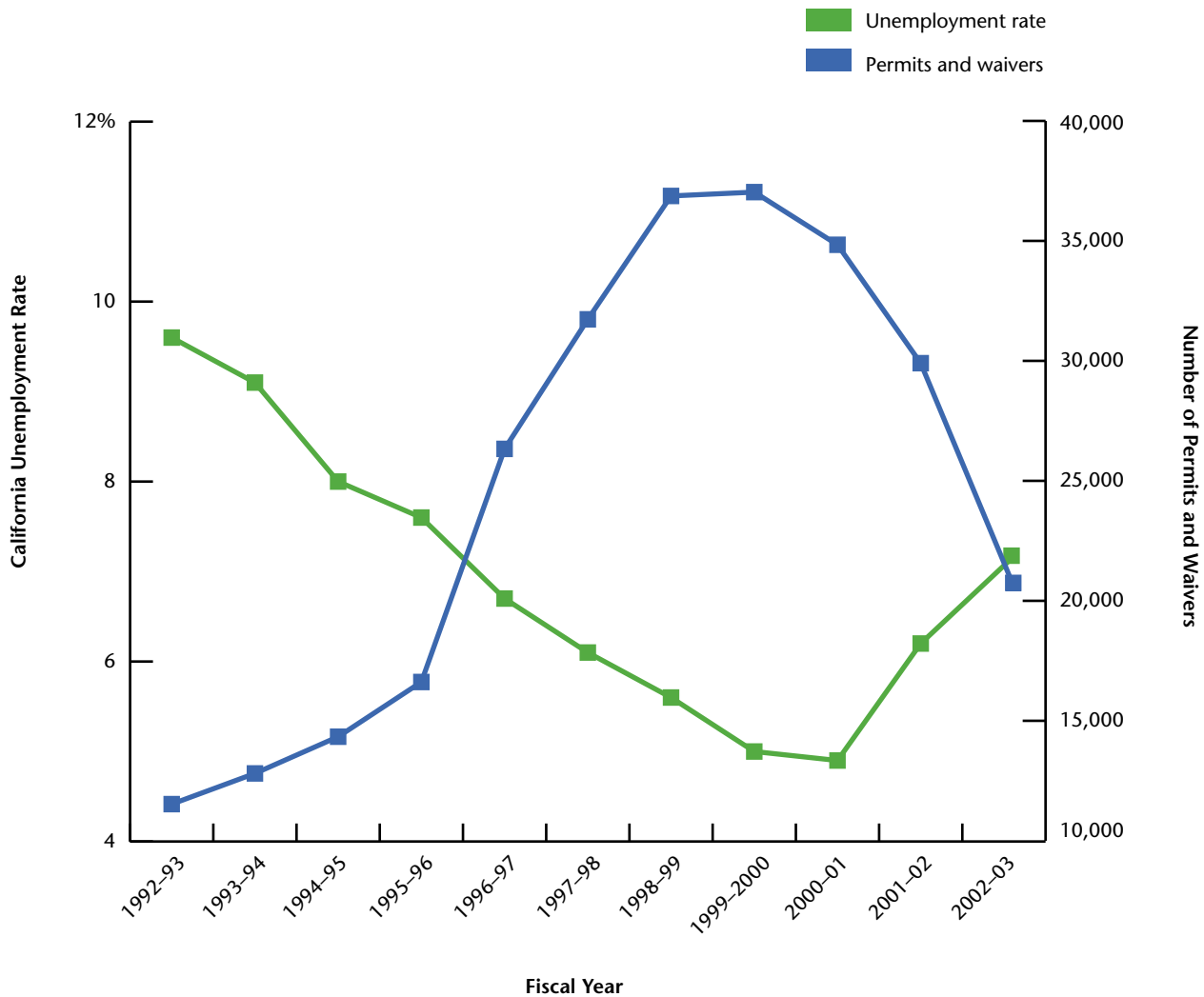
A number of factors independent of the process could affect the number of teaching credentials, permits, and waivers issued each year, and the commission should account for these factors when analyzing this type of data. For instance, the relative attractiveness of the teaching profession—salary, benefits, and job conditions compared to other available employment opportunities—affects an individual’s desire to enter and stay in the teaching profession.

The unemployment rate is a measure of the other employment opportunities available to prospective or established teachers. According to information contained in the Little Hoover Commission’s 2001 report titled *Teach Our Children Well*, during times of high unemployment, the proportion of teachers with emergency permits decreases; in turn, during times of low unemployment, the proportion of teachers with emergency permits increases. Figure 3 on the following page shows that from fiscal years 1999–2000 to 2002–03, when unemployment rates in California increased, permits and waivers decreased.

Analyzing the factors we have just discussed would be useful, but the state law that requires the commission to report these statistics does not instruct the commission to include an analysis of trends. However, because the commission is the state entity providing oversight of the process and of preparation programs, it seems reasonable that the commission would formally analyze and discuss these indicators of the process and programs’ performance annually. When these statistics appear without any analysis or discussion, they hold little value, and users of the reports, such as legislators and educators, must draw their own conclusions.

FIGURE 3

**Number of Emergency Permits and Waivers Compared to the Unemployment Rate
Fiscal Years 1992–93 Through 2002–03**



Sources: Permits and waivers data are from the Certification, Assignments, and Waivers Division of the California Commission on Teacher Credentialing. Unemployment data are from the Employment Development Department.

**If Fully Implemented, the Teaching Performance Assessment
Could Be Used to Measure the Performance of Teacher
Preparation Programs**

In addition to better analyzing the data it already collects, the commission could also annually collect data related to the quality of preparation programs. The primary tool the commission currently uses to evaluate these programs' quality is its continuing accreditation reviews, which include, as we discuss in Chapter 3, on-site reviews of each preparation program

every five to seven years. However, the commission can also use data from the teaching performance assessment, a partially implemented assessment of prospective teachers' ability to teach, to evaluate preparation programs and reform efforts.

Although Senate Bill 2042, Chapter 548, Statutes of 1998 (act), requires all preparation programs to use a teaching performance assessment, it makes this assessment subject to the availability of funds in the annual budget act. In March 2003, before the commission implemented the teaching performance assessment, a state senator and the then-secretary for education wrote to the commission on behalf of the California State University (CSU), the University of California (UC), and independent colleges and universities, stating that given the significant budget cuts to every area of education, funding was not available for the colleges and universities to meet the new requirement within the time frame that the commission adopted. They then requested the commission revise its implementation schedule according to the availability of state funding. As a result, in April 2003 the commissioners voted to delay implementing the teaching performance assessment until the State's budget improves, but they encouraged preparation programs to implement the assessment on a voluntary basis. According to the commission, of the more than 80 preparation programs, at least 18, including three CSU campuses, voluntarily implemented the commission's teaching performance assessment in the 2003–04 school year. Six other preparation programs reported that they would implement it in the 2004–05 school year.

In April 2003 the commissioners delayed implementing the teaching performance assessment until the State's budget improves, but encouraged programs to voluntarily implement the assessment.

The act also allows preparation programs to develop their own teaching performance assessment, which must have commission approval, rather than use the commission's model. In fact, despite the availability of the commission's model and the budget concerns these entities expressed, a consortium of California universities, including Stanford University, eight UC campuses, and two CSU campuses, created its own teaching performance assessment, which the commission indicates the consortium has not submitted for review and approval. Although this assessment and any others must be based on the same performance standards for teacher candidates, the scoring systems are not likely to align with one another or with the commission's model. These differences could limit the commission's ability to use the assessment data to compare the performance of preparation programs.

Because of Recent Efforts to Combine Its Data With California Department of Education Data, the Commission May Be Able to Use Teacher Retention as a Measure of Preparation Programs

Although the retention rate of teachers is an important measure of the performance of teacher preparation programs, the commission does not have a process for following credential recipients into the workforce to see how long they are retained.

Education research indicates that well-prepared teachers are more likely to stay in the teaching profession; thus, the retention rate of teachers is an important measure of the performance of preparation programs. Although the State does not currently have a way to determine teacher retention accurately and efficiently, recent efforts by the commission and the California Department of Education (Education) may help overcome some of the technical obstacles to obtaining this data. In January 2004 the commission and Education entered into an agreement to develop a database that the commission could potentially use to study teacher retention. The database, which will satisfy the federal act's reporting requirements, links the commission's data with data that Education's California Basic Education Data System (CBEDS) maintains. The commission has data on the types of credentials it issued, the dates of issuance, and the colleges and universities that recommended the credentials. However, according to a report that a commission consultant wrote, the commission does not have a process for following credential recipients into the workforce to see how long they remain in teaching, which makes it difficult for the commission to provide policy makers with this information.

On the other hand, the commission's consultant explained that the CBEDS database holds a vast amount of data on currently employed teachers, their schools, their years of teaching experience, and their teaching assignments. The consultant also explained that the CBEDS database contains information about teachers' credential status, but because teachers report this information themselves, it is not the official record of credential status. Thus, the agreement between the commission and Education calls for replacing the CBEDS credential information with the official credential status from the commission's records. This will allow the State to meet federal reporting requirements and allow the commission to monitor whether teachers' assignments match their credential status. In addition, the commission will be able to use CBEDS data to determine which of the teachers to whom it has issued credentials remain in the teaching profession. The commission could then calculate a retention rate of teachers in the aggregate and also by other categories, including school district, the preparation program

that recommended the candidate for a credential, and credential type. Such information could provide valuable insights into the California teacher workforce.

Combining its data with Education's data might allow the commission to determine which of the teachers to whom it has issued credentials have remained in the teaching profession.

Although combining commission and CBEDS data provides better data for understanding the teacher workforce, the director of the commission's certification, assignments, and waivers division (certification division) categorized its current efforts as preliminary and exploratory. He explained that the commission still faces some technical obstacles, one of which is that most records of the credential information before 1989 are on microfiche and not in the commission's database. Despite these obstacles, the director believes that the commission may be able (perhaps within the next five years) to use the shared data to study the retention of teachers.

Another potential obstacle to obtaining data on the retention of teachers is that the commission believes it has no specific policy directive to do so. The commission explained that various departments, including the Employment Development Department and Education, collect data on teachers but that the major barriers to combining these data sources is the lack of a common teacher identifier and the absence of a policy directive to bring the systems together. The commission and Education were able to overcome the lack of a common teacher identifier by asking school districts to include each teacher's credential number in their annual CBEDS reports. However, the language of the agreement between the commission and Education shows that the primary motivation for the current data-sharing arrangement is the federal act's reporting requirements. Without a clear policy directive, the commission may decide not to use its resources to overcome the technical obstacles necessary to analyze and report on the retention of teachers.

The Commission Could Use the Results of an Administrator Survey as One Measure of the Performance of Preparation Programs

Along with its use of other measures, such as retention and the teaching performance assessment results, the commission could measure the performance of preparation programs by soliciting feedback from the supervisors of beginning teachers through an administrator survey. Commission staff agreed that an administrator survey could be a valuable source of data for evaluating the performance of preparation programs and said that the commission could possibly modify the current

surveys as part of the commission's continuing accreditation visits to standardize them and quantify the results. Data from an administrator survey would allow the commission to compare the classroom performance of graduates of the various preparation programs throughout the State. The CSU system, which educated nearly half of the newly credentialed teachers in fiscal year 2002–03, is currently developing an administrator survey to evaluate the success of its preparation programs. CSU staff explained that the survey still needs more development but said that it could eventually be useful statewide. However, CSU staff explained, and best business practices suggest, that evaluators should not focus on only one measure of program performance, such as a single survey's results, to make decisions that affect preparation programs.

THE COMMISSION HAS NOT ESTABLISHED SPECIFIC PERFORMANCE MEASURES FOR ITS DIVISIONS

The commission's February 2001 strategic plan (2001 plan), which the commission partially updated just after we completed our fieldwork, was outdated and did not establish the specific performance measures the commission needed to evaluate the results of its current efforts. In addition, the commission does not systematically track whether it is successfully completing the tasks it outlined in the 2001 plan. As a result of inadequate strategic planning, the commission has lacked specific performance measures to guide, evaluate, and improve its efforts.

The Department of Finance (Finance) explains in its strategic planning guidelines that performance measures, which are the quantified results an agency seeks to achieve, are one component of an effective strategic plan. The guidelines further state that performance measures provide a basis for assessing the successful achievement of the agency's mission, vision, goals, and objectives by focusing on attainment of the objectives. In a report issued in February 2000, a consultant that the Legislative Analyst's Office (legislative analyst) hired to conduct a comprehensive management study of the commission's credential process said that the commission's 1999 strategic plan did not conform to Finance's guidelines. Specifically, the consultant criticized the plan for not quantifying objectives or establishing specific performance measures. Despite these criticisms of the 1999 strategic plan, the commission's 2001 plan did not establish performance measures for 18 of the 56 tasks it outlined, even though the results the commission wanted to achieve in these areas are quantifiable.

The commission did not establish performance measures for 18 of 56 tasks outlined in its February 2001 strategic plan, even though the results that the commission wanted to achieve in these areas are quantifiable.

One example of a task for which the commission did not quantify its goals is the expansion of teacher development programs. The performance measures that the 2001 plan describes are increased numbers of credential candidates entering teaching through alternative routes and a reduction in the number of individuals serving on emergency permits. However, the commission did not quantify the increase or reduction that it wanted to achieve. For the task of expanding teacher development programs, the commission could have specified, based on a cost-benefit analysis, a certain percentage increase in the annual number of credential candidates entering teaching through alternative routes as a performance measure. It could then have used that measure to evaluate the success of its efforts and adjust its activities to achieve a successful outcome. Without specific performance measures, the commission cannot determine whether its expansion of teacher development programs was a success or whether it should modify or discontinue it.

We found that six of the 2001 plan's 56 tasks did quantify the results the commission wanted to achieve. For example, the 2001 plan states that the commission's certification division will use statistical reports to ensure that it processes credential applications within 75 business days and credential renewals within 10 business days, with an acceptable deviation of no more than one business day. As we describe in Chapter 2, the commission's certification division tracks application processing times, which it uses to shift resources among processing teams.

The 2001 plan also contains 32 tasks for which no adequate measure of the commission's performance exists or for which the only performance measure is a particular completion date. For example, one task that the 2001 plan outlined is to complete an independent evaluation of the beginning teacher support and assessment program by December 2001. In this case, the only applicable performance measure is the completion of the task by the stated date. Although this task and its corresponding completion date are wholly appropriate, the completion date, like all the other specific completion dates in the plan, had already passed. Therefore, these tasks, assuming that the commission actually completed them, are outdated, which highlighted the need for the commission to update its 2001 plan to reflect its current or future efforts.

In March 2001, a month after the commission issued its 2001 plan, the legislative analyst published a follow-up report to the consultant's study that again criticized the commission for not clearly identifying how it will assess and track the impact of its reform efforts and for establishing few quantifiable performance measures. Despite this criticism and the fact that all completion dates outlined in the 2001 plan had passed, the commission did not update the tasks in its 2001 plan until September 2004, shortly after we pointed out that the plan's tasks were obsolete.

According to its executive director, the commission did not update the 2001 plan tasks due to several events during the past two years that caused a shift in staff assignments, including implementation of the federal act, budget and personnel cuts, and development of the Teacher Credentialing Service Improvement Project. In addition, the executive director explained that the commission has had four leadership changes among the commissioners since December 2002 and has not had a full complement of commissioners since 1999. The executive director further stated that, at the commissioners' direction, the commission has postponed long-range strategic planning until commission vacancies are filled. Although we acknowledge that the commission has had significant challenges, proper planning—including following a current strategic plan—is a generally accepted practice for achieving success in challenging times. In September 2004, at the request of the chair of the commissioners, commission staff presented updated strategic plan tasks to the commissioners. However, because the commission updated the tasks after we completed our fieldwork, we were not able to evaluate the tasks and associated performance measures.

The commission does not systematically track whether it is successfully completing the tasks outlined in the strategic plan.

In addition, the commission does not systematically track whether it is successfully completing the tasks outlined in the 2001 plan. The executive director prepares an annual list of accomplishments that are aligned with the 2001 plan's goals to present to the commissioners but does not link the list to the tasks that the 2001 plan described. When we asked the directors of the commission's three program divisions—certification, professional services, and professional practices—whether they use the 2001 plan or other performance measures to monitor their divisions' success, each director was aware of the 2001 plan, but only the director of the certification division was actively monitoring whether his division was meeting the performance measures in it. Without focused follow-up and

monitoring of the performance measures the commission established in its 2001 plan, a strategic plan holds little value for the commission.

THE COMMISSION HAS MADE EFFORTS TO STREAMLINE AND REMOVE BARRIERS FROM THE PROCESS

In exercising its oversight of the process, the commission has implemented some reforms and is contemplating others. Although state law mandates the framework of the process, the commission has the responsibility to analyze the process periodically and report to the Legislature if particular requirements are no longer necessary or need adjustment. In addition to proactively seeking improvements in the process, the commission also must carry out legislative mandates that streamline the process but that were developed independently of the commission.

In recent years, the commission has implemented reforms of both types. For instance, the commission administers the paraprofessional, pre-intern, and intern programs, which assist teacher applicants in meeting credential requirements. In addition, because of recent legislation, the commission has adopted tests that allow teacher candidates who pass them not to take otherwise required courses in preparation programs. The commission has also reduced the barriers to becoming a California teacher for individuals who received their teacher training in other states. Specifically, since 1998 state law has allowed the commission to grant preliminary teaching credentials to individuals with at least three years' public school teaching experience in other states. For individuals without three years' experience, state law since 1998 has allowed the commission to issue preliminary teaching credentials to individuals who graduated from out-of-state preparation programs that the commission deemed equivalent to California preparation programs. However, the commission has not analyzed how many additional teachers it has certified as a result of these two reforms.

The commission administers three programs, which assist teacher applicants in meeting credential requirements, and it has adopted tests that, if passed, allow teacher candidates not to take otherwise required teacher preparation courses.

To streamline credential requirements, the commission is planning to hold public meetings with stakeholders to discuss the current structure of teacher examinations. The commission plans to address issues, such as the appropriate way to assess basic skills and overlapping content among examinations. In April 2005 the commission expects to decide on possible actions to take on the current teacher examination structure.

RECOMMENDATIONS

To determine the success of its paraprofessional, pre-intern, and intern programs, the commission should establish performance measures for each of these teacher development programs. In addition, the commission should do the following:

- Ensure that the statistics it presents in its program reports are consistent and that it maintains the supporting documentation for these statistics.
- Monitor how local teacher development programs verify the academic progress of participants and establish consequences for underperformance.
- Resume requests for budget increases to fund an independent evaluation of its paraprofessional program that assesses all the requirements in the applicable statute or seek to amend those parts of the law that it believes would be too costly to implement.

To provide context to education professionals and policy makers for why the number of credentials, permits, and waivers it issues has changed, the commission should include an analysis with the statistics it publishes in its annual reports.

The commission should collaborate with colleges and universities to determine what funding is necessary to activate and maintain the teaching performance assessment as the enabling legislation envisions it. It should then request the Legislature and Governor's Office to authorize this function in future budget acts.

The Legislature may wish to consider giving the commission a specific policy directive to obtain and use data on teacher retention to measure the performance of the process and preparation programs and provide this information in its annual reports.

To aid it in developing performance measures for preparation programs, the commission should keep itself informed of surveys and reports that other entities prepare, such as the administrator survey the CSU is developing.

To better plan and evaluate its efforts, the commission should regularly update its strategic plan and should quantify performance measures when appropriate in terms of the results the commission wants to achieve. Also, the commission should

present the commissioners with an annual status report on how the commission has achieved the goals and tasks it outlined in its strategic plan.

The commission should continue to consider ways to streamline the process, such as consolidating examinations it requires of credential candidates. If the commission determines that specific credential requirements are no longer necessary, it should seek legislative changes to the applicable statutes. ■

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CHAPTER 2

By Better Managing Its Customer Service, Workload, and Technology, the Commission Could Improve Application Processing

CHAPTER SUMMARY

By better handling customer service, better managing its workload, and taking full advantage of a new automated application-processing system, the certification, assignments, and waivers division (certification division) within the California Commission on Teacher Credentialing (commission) could improve its application processing. The certification unit (unit) within the certification division is primarily responsible for customer service and application processing. Facing a significant volume of contacts, the certification division has not taken sufficient steps to manage its customer service activities more effectively. Proper management of customer service is necessary because the large volume of telephone calls and e-mails that the unit receives takes staff time away from credential processing.

Although the certification division typically processes applications for credentials in less than its regulatory processing time of 75 business days, applications go unprocessed for a significant amount of this time because staff members are busy with other duties. The certification division has taken some steps to improve its process, including automating certain functions as part of its Teacher Credentialing Service Improvement Project (TCSIP). However, the certification division has not sufficiently analyzed existing data to make informed decisions as to the types and numbers of credentials it should be processing at any given time. TCSIP was intended in part to improve credential processing times, although now, as the project is about to be fully implemented, the certification division is unsure of how much efficiency TCSIP will bring to the application approval process. TCSIP offers tangible time-saving benefits, such as the electronic submission of applications from colleges and universities that choose to use this function and automated review of online renewals. However, the certification division does not currently plan to use either function to its full potential.

Although online renewals offer the benefit of faster and more efficient processing, the certification division has not sufficiently publicized this benefit. The certification division could better inform teachers who do not use online renewals about its benefits by performing the data analysis necessary to determine where to target additional outreach efforts and by better highlighting the availability of online renewal and the benefit of faster processing.

THE CERTIFICATION DIVISION COULD BETTER MANAGE CUSTOMER SERVICE

Facing a significant volume of contacts, the certification division has not taken sufficient steps to better manage its customer service activities, which consume much of the unit's time. The commission has a variety of customers, including teachers, school administrators, institutions, and the general public. Proper management of customer service is necessary because the large volume of telephone calls and e-mails that the unit receives takes staff away from credential processing. Although the certification division collects data on the reasons that people contact the unit and could take steps to collect additional data, it has not sufficiently analyzed these data to address ways that it could help customers find answers to their questions on its Web site, in its publications and forms, and through its other outreach efforts. The certification division could also improve its customer service by eliminating some inefficiencies and by making its Web site more informative.

Activities Other Than Processing Applications Consume Much of the Unit's Time

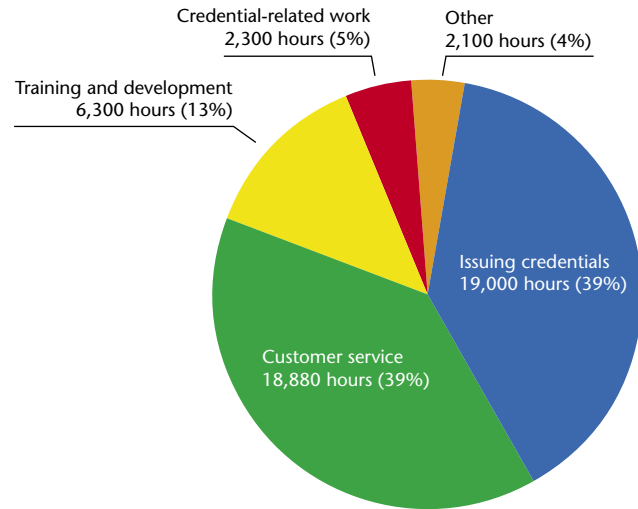
The unit faces a significant number of applications to process, a large volume of incoming telephone calls, and a volume of e-mails that has increased steadily since 2001. One of the major reasons that the unit takes nearly 75 business days to process applications is that unit employees must spend much of their time tending to other responsibilities, including customer service, training and development, and other tasks. Because we found that the certification division's timekeeping summaries were not entirely reliable, we estimated the time that unit staff spend on various activities by compiling the time sheets that staff prepared, whose results we present in Figure 4. As the figure shows, during fiscal year 2003–04, based on the unit's self-reported timekeeping reports, unit employees spent 19,000 hours (39 percent of their time) processing applications. They

One of the major reasons that applications require nearly 75 business days to be processed is that employees must spend much of their time tending to responsibilities other than processing applications.

spent an additional 18,800 hours (39 percent of their time) in customer service activities such as answering telephones and responding to e-mails.

FIGURE 4

Use of Time by Certification Unit Staff



Source: California Commission on Teacher Credentialing time reports, fiscal year 2003–04.

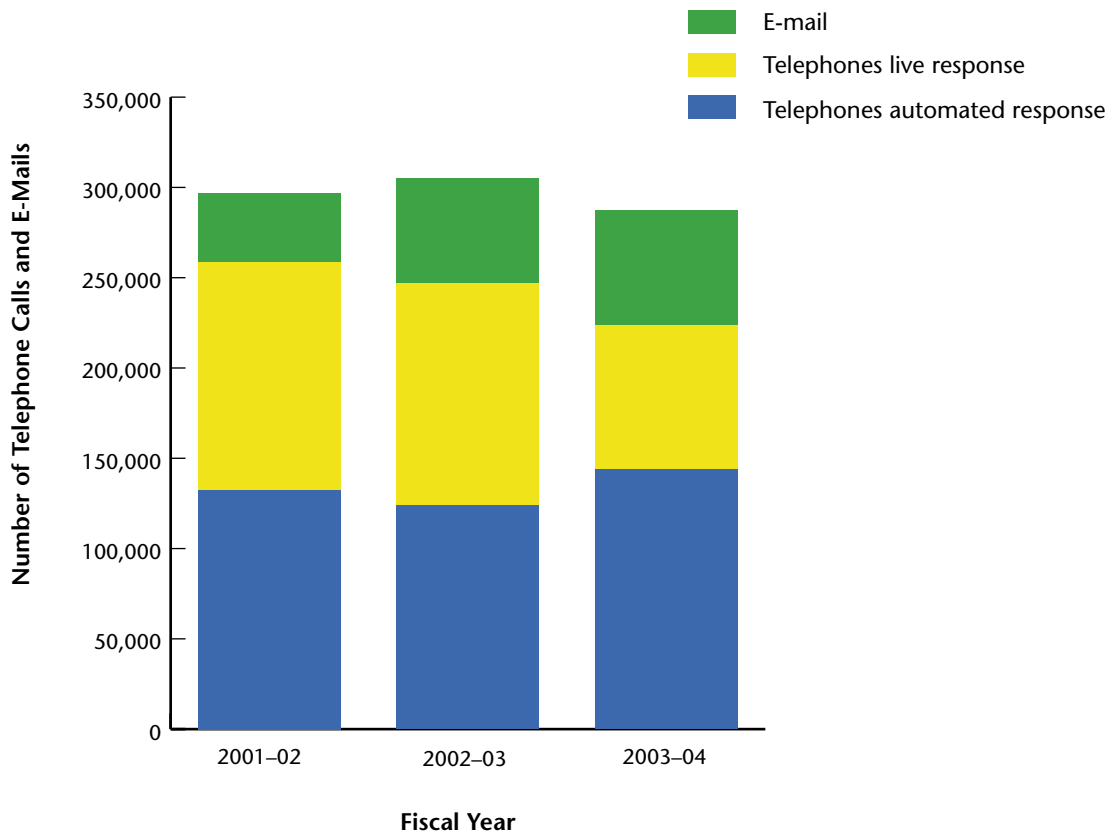
In July 2003, concerned that its workload had reached the point where it would no longer be able to meet its 75-business day regulatory limit for processing applications, the certification division cut back on the unit’s customer service operations, reducing the hours that staff answer telephones from about 450 hours a week to approximately 119 hours, a 74 percent reduction. The certification division also abandoned its goal of keeping customers on hold for no longer than five minutes and reduced the number of staff members who answer the telephones from 10 to five. The certification division also increased the time for responding to customer e-mails from three business days to between three and five business days as of July 2004.

Despite these cutbacks, the unit’s significant volume of customer service contacts has continued into 2004. Figure 5 on the following page shows the volume of telephone calls and e-mails the unit received during the past three fiscal years. During fiscal year 2003–04 customers sent nearly 64,000

e-mails, which the certification division’s records show took about 8,900 hours to review and answer. During this same period, the unit received nearly 224,000 calls. Of these, callers sought to speak directly with someone in the unit 80,000 times, which took staff 6,000 hours to field, whereas callers made nearly 144,000 calls to the commission’s automated telephone system.

FIGURE 5

**Annual Number of Calls and E-Mails to Certification Unit Staff
Fiscal Years 2001–02 Through 2003–04**



Source: California Commission on Teacher Credentialing telephone and e-mail reports.

If processing applications is to be the unit’s priority, as the certification division states it is, the commission must identify additional ways to focus the unit’s efforts on credential processing. The certification division must seek more innovative ways to handle its workload and provide customers the information they need.

The Certification Division Can Better Analyze the Types of Questions Customers Ask to Focus Its Customer Service Activities

Despite the significant number of customer contacts, the certification division has not sufficiently analyzed the types of questions customers ask so that it can better focus the unit's customer service activities. For example, although the certification division collects data on customers' reasons for calling, it has not sufficiently analyzed the data to identify the types of questions customers ask in telephone calls and to reduce the number of calls by making the information that customers seek available on the commission's Web site. The certification division's telephone system generates a report that summarizes the reason for each incoming call. The categories in the report include the number of questions about examinations, about how out-of-state teachers can obtain a credential to teach in California, and about specific types of credentials. Thus, this report provides valuable insight into the number of calls that the unit receives for different questions and types of credentials. The certification division's management uses the report to help unit staff get an idea of the types of questions callers ask, so that they will be better prepared to answer these types of questions. The certification division also uses the report to update the general information about the commission and credentials that the commission's automated telephone response system provides to callers. The information that the automated telephone response system provides is limited and most call-routing paths require the caller either to leave his or her name and address to receive more information, to visit the commission's and other related Web sites, or to speak to certification division staff for more information.

By better analyzing customer data, the commission could identify areas where customers need more guidance and make appropriate adjustments to the public information it provides.

The manager of the certification division indicated that many customers call for information that is already available on the commission's Web site, such as test dates. The manager does not believe that it is possible to control the number of these calls. However, using the information that the telephone system report provides, the certification division could identify areas in which customers need more guidance or a clearer explanation of the certification division's requirements. It could do this by performing an analysis, such as ranking the different types of calls it receives, and by consistently reviewing this information and adjusting the information that it provides to the public on its Web site and in leaflets to handle some of those more frequently asked questions.

Further, the certification division does not collect data on the types of questions that customers ask in e-mails. Although it tracks the monthly volume of e-mails that the unit receives, the certification division would understand its inflow of e-mails better if it categorized the different types of e-mails to identify areas in which it could improve customer service. It could do this by sampling e-mails regularly. Although the manager of the certification division indicated that she believed that gathering this data would be time-consuming, she occasionally looks at some of the incoming e-mails to get a sense for the questions applicants ask, and she sometimes requests a change to the Web site and leaflets based on her review.

After our inquiries, the manager studied e-mails over a one-week period in July 2004. She reviewed 1,144 e-mails and concluded that the types of questions customers asked were similar to those they asked in telephone calls. This is a useful first step, but the certification division should be analyzing this data routinely. Further, because the certification division knows that customers who are sending e-mails have access to the Internet, it should pay particular attention to the types of questions they ask to determine how it could address those questions more readily on its Web site. The certification division could also set quantifiable goals for reducing the volume and types of questions customers ask in telephone calls and e-mails in order to measure the success of its efforts to minimize those questions.

The Certification Division Wastes Time by Manually Responding to and Routing E-Mails

The certification division would also benefit from automating how it responds to and forwards e-mails to the staff members who reply to questions in e-mails. A single staff member is primarily responsible for processing e-mails that customers send to the commission's customer service address; that address received a total of nearly 64,000 e-mails in fiscal year 2003–04. When he receives e-mails, he responds to the customer if he can answer the question and has time; mostly he responds by manually copying into the e-mail a generic message informing the customer that the unit will respond to the question within three to five business days. He then looks for keywords to determine where he should send the e-mail and manually forwards it to one of the four unit teams that are responsible for replying. This staff member reported spending 500 hours in fiscal year 2003–04 manually processing e-mails.

A staff member reported spending 500 hours in fiscal year 2003–04 manually processing e-mails.

The director of the certification division does not believe that this manual process is efficient and has informally asked the commission's information technology and support management division for a better way to respond to and route e-mails. Although the information technology and support management division has not yet come up with a solution, the certification division's e-mail program can easily be set to issue an automated response and also to perform an automated scan of e-mails for keywords to forward the e-mails to the appropriate unit teams.

The Certification Division Could Do More to Encourage Customers to Use the Commission's Web Site

To be more responsive to customers and potentially reduce the volume of telephone calls and e-mails it receives, the commission should modify its Web site to help customers find their answers online more easily and to be more accurate. Using data that the certification division routinely collects on the types of questions customers ask by telephone, we searched for information on the Web site that would likely answer the customers' questions. However, we not only had difficulty finding the commission's "frequently asked questions" page, but discovered that detailed information relating to the most common reasons that people call the unit is buried within the Web site. For example, our analysis showed that among the most frequent inquiries were questions from out-of-state applicants. Looking at the opening page of the Web site, however, we found no link targeting out-of-state applicants, but rather we had to search through several links to find this information. Although many customers may be patient enough to perform a detailed search, others may not be and will instead call or e-mail the unit. Further, the commission's Web site does not group similar links together but has links to various topics on either side of the opening page, with no apparent organization. In addition, although the certification division would like customers to renew their credentials online, it could better highlight the link it uses to take a customer to this function. The commission has indicated that it is currently redesigning its Web site.

The section containing answers to "frequently asked questions" is difficult to find on the commission's Web site.

Finally, the Web site indicates that applicants should anticipate an eight- to 12-week turnaround for applications that they have submitted. However, the certification division's data show that from December 2002 to August 2004, staff took an average of 12 to 14 weeks to process applications. Because the certification division created an expectation that it would process applications faster than its actual processing times,

customers who had not heard from the certification division within 12 weeks may have been more inclined to call or e-mail to inquire about their applications' status. In August 2004 average processing times fell to seven to eight weeks, but the certification division should regularly compare actual processing times to the turnaround times it claims on its publications and adjust those times as needed.

BETTER WORKLOAD ANALYSIS COULD HELP REDUCE PROCESSING TIMES

The certification division must take appropriate measures to better manage its application workload and reduce its processing times. Although the certification division has generally been able to meet its regulatory processing time of 75 business days, credential applications go unprocessed for a significant amount of time. The certification division has taken some steps to improve the process, including automating certain functions and developing a new automated application-processing system. However, it has not gathered or analyzed sufficient data on the time it takes to process credentials so that it can make informed staffing decisions or ensure that it consistently completes all applications within 75 business days.

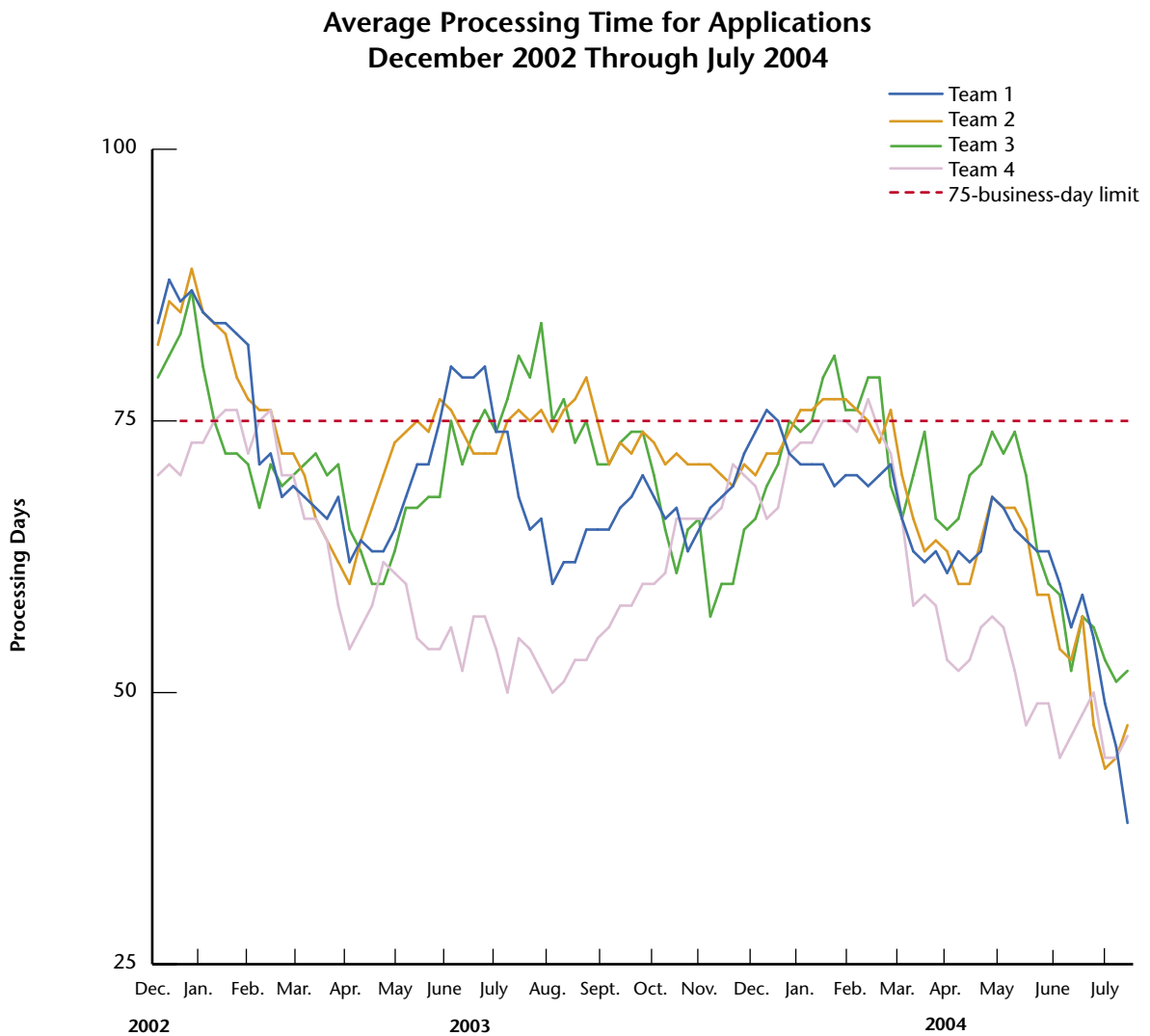
The Certification Division Generally Meets Its Regulatory Processing Time of 75 Business Days

The commission established the 75-business-day limit in 1985 in response to a law requiring state licensing agencies to put in regulation the maximum allowable times for processing permits. As a penalty for exceeding the 75-business-day limit, the commission must refund the applicant's credential filing fees at the applicant's request, except under certain conditions, such as when the background check requires extra time. Figure 6 shows the weekly average processing times for applications from December 2002 to July 2004, broken down by the four teams that process credentials, based on a report that unit staff created. From December 2002 to July 2004 the reported average processing times for the unit's four processing teams ranged from 61 to 70 business days, which shows that the unit's normal operation generally comes very close to but does not exceed the 75-business-day limit. However, the individual teams do exceed the 75-business-day limit at various times, as the figure shows. The average processing times dropped significantly in July 2004 for two reasons. To prepare to implement TCSIP, which will disrupt application processing, the staff of the certification

From December 2002 to July 2004, the average times for processing applications by the certification unit's four teams ranged from 61 to 70 business days.

division worked 450 hours of overtime. In addition, the director of the certification division indicates that the number of applications the commission received through July 2004 has decreased from the same period during 2003.

FIGURE 6



Source: California Commission on Teacher Credentialing reports of average processing time.

The certification division does not track the number of applications that take longer than 75 business days to process; instead, it relies on applicants to request a refund when they believe that processing of their applications has exceeded that limit. However, routinely tracking this information would be a useful indicator of the status of application-processing activities

and would also identify problem applications that staff have misplaced or that need management's attention. In July 2004 the director of the certification division began creating a weekly report that identifies old and lost applications that have deviated from the normal flow. The director provides the report to each unit team to determine why staff have not processed these applications. Although producing this report is a useful first step in identifying applications that may exceed the 75-business-day limit, the certification division should have TCSIP routinely track applications that are taking longer than 75 business days to process.

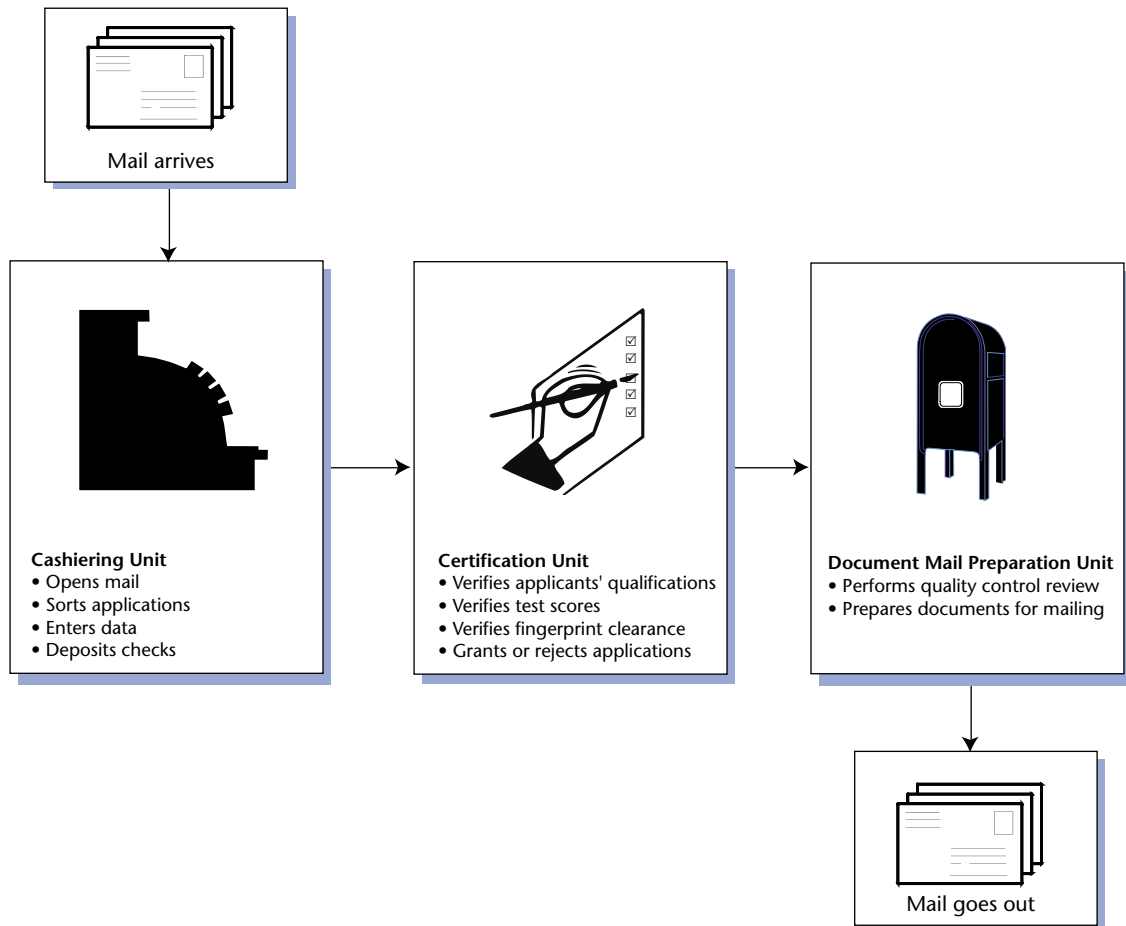
Processing applications takes several steps. Three units within the commission's certification division are primarily responsible for processing applications. Figure 7 illustrates this workflow.

Figure 7 shows that the cashiering unit's work is the first step in processing an application. On average, applications typically wait an average of three business days before the cashiering unit processes them. It opens the mail, sorts the applications, enters data from the applications into the certification division's automated system, and deposits applicants' checks before routing the applications to the certification unit.

The certification unit (unit) is responsible for determining whether to grant or deny an application, the second step. The unit consists of four teams, each responsible for reviewing and processing certain types of applications. Depending on the type of credential for which the individual applied, this review can range from the simple—verifying that the applicant completed the application properly, passed the required examinations, and received a background clearance—to a more extensive review of the applicant's college transcript to verify that he or she met specific course requirements. The certification division does not track the time that reviewing different types of applications takes but instead tracks only the amount of time that blocks of applications stay in the unit. On average, applications await a team's review for 54 to 63 business days, comprising a workload on hand for a week that ranged from a minimum of around 22,000 applications to a maximum of 57,000 applications from December 2002 to July 2004.

FIGURE 7

Units Responsible for Processing Applications



Source: California Commission on Teacher Credentialing.

According to the director of the certification division, this wait is not due to external factors, such as waiting to receive applicants' examination scores or fingerprint clearance, because the commission generally receives both electronically. He believes that the certification division could reduce this wait time if more staff were available to process these applications; yet, as we discuss in the next section, the certification division has not performed the analysis necessary to balance its current staff allocation. Also, by better managing customer service and further automating its process, the certification division might be able to free unit staff to work on applications and reduce this wait time.

The work of the document mail preparation unit (mail unit) is the final step in the processing of applications. Mail unit staff perform a final quality control review of the approved credentials and then mail copies to applicants and to the counties in which applicants teach. Applications wait an average of four business days before the mail unit processes them.

There are exceptions to this process, most notably for applicants who require additional background checks and for online renewals. When a background check issue is raised, the unit forwards the application to the commission's division of professional practices for follow up. The director of the certification division indicated that this follow up can take up to several months to resolve, depending on the severity of the issue and the length of time it takes the commission to receive the documents it needs to complete its review. On the other hand, applicants who renew their credentials online reap the benefit of having their applications processed within 10 business days. Because the commission receives information and payments from these applicants electronically, their renewals avoid the cashiering unit and receive priority in the certification and mail units.

Better Data Analysis Could Help the Certification Division More Effectively Manage Its Workload

The certification division does not sufficiently analyze data to effectively manage its application processing workload, nor does it set adequate processing goals. It collects a great deal of data on its activities related to processing applications, including information on the number of different types of credentials and renewals that the commission grants and rejects over a period of time and individual production statistics showing the number of applications that individual staff members process and the frequency of staff errors. Although the certification division generates a weekly report that shows the number of applications or renewals waiting for staff to review or mail, the report does not break down these applications by unit team. Further, the certification division does not have a goal for the maximum number of applications it can have in its workload, although the director indicated that he prefers to have a workload of fewer than 20,000 applications and renewals.

The certification division has only a general sense of the time it takes to process different types of applications and has not conducted time studies on the effort needed to process them.

The certification division began manually generating a new report in June 2004 that shows the unit's daily workload by team. This report enables the unit to identify when a team can anticipate a large number of incoming credential applications.

Further, the certification division has only a general sense of the time it takes to process different types of applications. For instance, it knows that less complex applications, such as those for single-subject or emergency permits, do not take staff as long to process as do cross-cultural language and development permits. However, the certification division has not conducted time studies on the effort needed to process different types of applications to know the time needed on average to process each type. Without such data analysis, the certification division does not know whether the credential types it assigned to each of the four teams to process are optimal or if each team has sufficient staff.

Finally, the certification division's report of average processing time does not provide sufficiently detailed information on the status of applications. The certification division creates this report manually rather than generating it from the automated application-processing system. This report provides the difference in business days between the current date and the dates that the commission received the applications currently with the unit. It uses a similar calculation to determine the length of time that applications wait for processing by the cashiering unit and the mail unit. This report is the primary tool that the certification division uses to monitor whether it is meeting its 75-business-day limit and to make staffing decisions among the teams. However, the report does not provide information on the number of applications that the certification division has not processed within the 75-business-day limit nor on applications that are nearing the limit. This information would provide the certification division more useful information with which to make decisions to move staff among the unit's four teams. The director indicated that the certification division prepares this report manually because the current application-processing system cannot produce it. As is common when designing a new automated system, we would have expected the commission to have had the opportunity to replace existing manual reports, such as this one, with an automated version when it designed TCSIP. However, the commission states that it did not have such an opportunity, and TCSIP will generate only the same reports that the previous computer system produced. Nonetheless, the certification division indicated that TCSIP will allow staff to create new reports and the certification division is considering creating an automated report of average processing time.

The average processing time report does not provide information on the number or types of applications that have not been processed within the 75-business-day limit or that are nearing the limit.

A New Fingerprint Interface and the Use of Overtime Have Helped the Certification Division Manage Its Workload

The certification division's new fingerprint interface with the Department of Justice (Justice) has reduced the effort required to process applications for credentials. As part of the background check, an applicant must pass a fingerprint check that Justice administers. Prior to 2002 applicants had to send paper copies of their fingerprints to the certification division's fingerprint unit, which then mailed them to Justice for review. In 2002 the certification division set up an electronic interface with Justice's Live-Scan system, which allows applicants to register their fingerprints electronically in their county with Justice rather than sending paper fingerprint cards to the certification division. Justice performs the background check and then notifies the certification division electronically of the results, which has significantly reduced the effort that processing fingerprints requires.

Use of overtime in June and July 2004 reduced the average processing days.

The use of overtime hours has also helped the certification division better manage its application backlog. From November 2003 through July 2004 the certification division staff worked approximately 1,000 hours of overtime, at a cost of roughly \$31,000, to process applications. For example, to prepare to implement the third phase of TCSIP (planned for late October 2004), staff worked 450 hours of overtime in June and July 2004, processing credentials to reduce the number of applications in its workload. Due to this effort, the certification division reduced its average processing time from between 52 to 74 business days to between 44 and 51 business days.

THE CERTIFICATION DIVISION MUST SEEK WAYS TO FULLY USE ITS NEW AUTOMATED APPLICATION-PROCESSING SYSTEM

The certification division is unsure of the benefit that TCSIP will ultimately have on processing times, although it is intended partially to streamline the processing of applications. TCSIP is a three-phase computer project designed to provide Web-based lookup of application status, provide teachers the ability to renew credentials over the Internet, and replace obsolete hardware. The first two phases, implemented in October 2001 and June 2002, reside in a computer system separate from the new credential database and hardware to be developed in the third phase, which the commission will implement in late October 2004.

The potential benefits of TCSIP will have no effect on much of the certification division's caseload, including all applications from school districts. Several of TCSIP's functions, including the electronic submission of applications from colleges and universities and the automated review of renewals and applications, have promise for improving credential processing if they work properly and can be expanded to other processing areas.

Although TCSIP Is Designed Partly to Reduce Processing Times, the Certification Division Is Now Unsure Whether It Will Provide Significant Efficiencies

Although the commission gave the Department of Finance (Finance) and the Joint Legislative Budget Committee (budget committee) the impression that TCSIP, which will cost the commission approximately \$8.9 million, would provide efficiencies that would likely improve its application processing times, the certification division is now uncertain of the specific efficiencies it expects to receive. In the TCSIP feasibility report that the commission provided to Finance and the now-defunct Department of Information Technology in May 2001, the commission stated that it undertook TCSIP to address critical business problems, including unacceptably high application processing times. The budget committee was also under the impression that TCSIP would help address what it termed as the commission's lengthy processing times. In a letter to Finance in June 2001 supporting continued funding for TCSIP, the chair of the budget committee discussed TCSIP's potential to streamline the credentialing process and reduce processing times.

In its May 2001 feasibility report, the commission stated that the Teacher Credentialing Service Improvement Project was undertaken to address critical business problems, including unacceptably high credential processing times.

In actuality, the certification division does not know what efficiencies to expect from the third phase or from TCSIP as a whole. The director of the certification division has stated that the commission does not know what overall effects TCSIP will have on processing time and that he does not know whether the new system will be more or less complicated than the current system. Moreover, with the implementation of TCSIP, the certification division is automating parts of its processing of applications but is not revising its processing method. That said, TCSIP does offer some benefits. The commission implemented the first phase in October 2001, enabling anyone to view the status of a teacher's credentials online. This appears to be a success, as calls to the unit for this information have decreased substantially. The second phase, implemented in June 2002, enabled credential holders to renew their credentials online; this provides some efficiencies to the certification division

because these applications bypass the cashiering unit. However, the certification division has not sufficiently encouraged customers to use this online renewal function. Additionally, two functions that will be installed as part of the third phase, namely the electronic submission of documents from colleges and universities and the virtual credential officer, which will be used for online renewals, should provide additional savings. However, decreased staffing in the unit may also affect the efficiencies from TCSIP. As of July 2001, shortly after the commission proposed TCSIP, the unit had 40 positions. In September 2004 unit staffing had decreased to 33.8 positions. Having less staff to process applications will likely negate some of the efficiencies that may result from automation.

Requiring Institutional Customers to Submit Documents Electronically Could Free Up Cashiering Unit Resources

To increase the efficiencies that it could potentially realize from electronic submission of prospective teachers' applications, the certification division should require all colleges and universities to use this feature. Electronic submission of applications should provide savings to the commission because such applications bypass the cashiering unit, free up cashiering unit staff to work on other activities, and reduce the chance that the commission will reject an application that an institutional customer completed incorrectly. According to the commission, TCSIP will feature edit checks for electronically submitted applications that will prevent a customer from submitting a document that lacks mandatory data. Based upon our review of the certification division's study of rejected applications and our discussions with certification division management, we determined that online edit checks might easily have caught and corrected at least 1,000 of the 2,203 applications that colleges and universities submitted from July 2003 to March 2004 that the commission later rejected.

Unless the commission requires all colleges and universities to submit applications electronically, the electronic submission capability will not provide as much efficiency as it could.

Unless the commission requires all colleges and universities to submit applications electronically, the electronic submission capability will not provide the certification division nearly as much efficiency as it could. The certification division does not know how many colleges and universities will actually take advantage of this feature, nor does it plan to require all institutional customers to do so. Also, if an applicant does not have a credit card, the application cannot be submitted electronically. The director asserts that not all colleges and universities may feel comfortable with the electronic process.

However, it is reasonable to assume that most are sophisticated enough to do so. The commission granted approximately 22,000 credentials that colleges and universities submitted during fiscal year 2002–03; receiving all of these applications in electronic form would have created significant efficiencies.

Further, the certification division did not design this feature to accept applications from school districts, which submit paper applications to the unit for substitute teachers. Processing these applications makes up a significant amount of the unit’s workload, with approximately 21,000 applications granted in fiscal year 2003–04, or 18 percent of the nonrenewal applications granted for the year. The director stated that he was unsure whether TCSIP could be designed to include electronic submission from school districts, because the certification division never formally studied the complexity or cost of this potential feature. To increase the efficiency of application processing, the certification division should strive to get as many applications in electronic form as is economically feasible.

Expanding the Use of TCSIP’s Virtual Credential Officer Function Could Free Up Certification Resources

The virtual credential officer function, which the commission plans to implement in late October 2004 as part of TCSIP’s third phase, allows for the automatic approval of online renewals if the customer completes the form properly, passes the background check, and pays the renewal fee. Thus, those applications that the virtual credential officer function can process eliminate the need for a manual application review, allowing the certification division to reallocate unit staff resources elsewhere.

The certification division has no current plans to use the virtual credential officer function to process applications for the more routine credential types.

However, the certification division has no current plans to use the virtual credential officer function to process applications for the more routine credential types, such as multiple- and single-subject credentials or permits for 30-day substitutes. The director of the certification division cited technology concerns and the cost of the additional programming that would be required as the reasons for not developing these functions to work with these credential types. However, the commission never solicited a quote from the vendor that is developing TCSIP to determine the cost of adding these functions, nor did it formally analyze the benefits.

Expanding the virtual credential officer function to process applications for multiple- and single-subject credentials and for 30-day substitute permits would be logical because these applications are relatively straightforward to process compared to some other types. For multiple- and single-subject applications that colleges and universities submit, unit staff must perform a background check, review test scores, verify transcript information, and confirm that an authorized representative at the university has recommended the application. Applications for 30-day substitute permits require only that unit staff perform a background check and verify that the applicant has passed the California Basic Educational Skills Test and earned a bachelor's degree. On the other hand, applications for child-center permits require unit staff to verify work experience with an employer and perform a detailed review of a college transcript to confirm that the individual completed core course requirements.

In fiscal year 2003–04 the unit rejected 11.2 percent of the child-center permit applications it received, whereas it rejected only 4 percent of the first-time multiple- and single-subject applications and 4.4 percent of the first-time 30-day substitute permits. The renewal applications for which the certification division plans to use the virtual credential officer had a rejection rate of 3.5 percent in fiscal year 2003–04. Because rejection rates seem to indicate the complexity of an application and thus the likelihood of error on the customer's part, the certification division should at a minimum consider using the virtual credential officer to process multiple- and single-subject applications and 30-day substitute permits in the near future.

In discussing the technology concerns that prevent the certification division from expanding the virtual credential officer, the director of the certification division indicated that he did not believe it would be feasible for the virtual credential officer to approve automatically an application that requires transcript submission. The certification division requires all first-time applicants that colleges and universities recommend to submit a paper transcript so that the unit staff can verify that the individual has earned a bachelor's degree. Further, the unit staff also review transcripts for specific course requirements on the applications submitted by college and university staff who did not attend the training academy that the commission held in 2001.

The certification division could remove this potential obstacle by no longer requiring applications that colleges and universities submit to include transcripts and instead relying on authorized representatives of the colleges and universities to verify that applicants have met credential requirements. Such representatives already perform this function by signing and completing a checklist certifying that they have reviewed the applications and that the applicants have met all of the course requirements for multiple- and single-subject credentials, such as the requirement for a U.S. Constitution course. When we consider this review and the fact that the commission accredits the teacher preparation programs of these colleges and universities, a separate review by unit staff does not appear necessary for every application that a college or university submits. To save staff resources in the unit and to make applications easier to use with the virtual credential officer, the certification division should consider reviewing transcripts only for colleges and universities that have not met reasonable quality standards that the commission establishes.

Similarly, the commission's transcript requirement for 30-day substitute permits may not always be necessary if a school district submits the application. The director of the certification division indicated that the Los Angeles Unified School District has several staff members who are responsible for submitting applications to the certification division and that it does very well at submitting them. The certification division should consider using the virtual credential officer for school districts from which the unit receives a low percentage of erroneously submitted applications. If the certification division successfully automates these functions, it could eliminate the need for manual review of a significant number of applications.

THE CERTIFICATION DIVISION'S MANAGEMENT OF ONLINE RENEWALS NEEDS IMPROVEMENT

Although online renewals offer the benefit of faster and more efficient processing, the certification division has not sufficiently publicized this benefit. The certification division also has not taken sufficient measures to encourage applicants to renew their credentials online, nor has it identified the number of renewals it receives online versus through the mail. Without knowing the percentage and types of teachers who choose to renew online, the certification division cannot gauge its progress.

The Virtual Credential Officer Will Streamline Online Renewals

The certification division has not fully realized the potential of renewing credentials online, an option that became available in June 2002 and cost the commission almost \$1.2 million as part of TCSIP. When a teacher's credential comes up for renewal, the teacher may choose to renew it either through the commission's Web site or by mailing a paper renewal. Those who choose to renew online are rewarded with a turnaround time of seven to 10 business days, instead of the up to 75 business days that the certification division takes to process all other applications, including renewals that arrive by mail. Although the certification division receives an average of 10,000 renewals a month, most require very little human interaction. Generally, unless the application is subject to an audit, the certification division requires only that the individual pay the appropriate fee and properly complete the renewal form. Thus, the certification division's role in this process is to record the payment, update the credential status on its automated application processing system, and mail the new credential to the teacher and the appropriate county office of education. For the certification division, the main benefit of online renewals is that they bypass the entire cashiering process, which eliminates the need to input renewal data manually and deposit checks, freeing up cashiering staff for other activities.

Teachers who choose to renew their credentials online are rewarded with a turnaround time of seven to 10 business days.

As we mentioned previously, with the implementation of the third phase of TCSIP, planned for late October 2004, the certification division plans to streamline the online renewal process further by implementing the virtual credential officer function. If successful, this function will eliminate much of the human intervention needed to grant renewals by performing a variety of edits on an online renewal to take the place of the current manual review process. However, even with the virtual credential officer function, the certification division intends to continue to print out a copy of the paper application to scan for its microfiche records.

The Certification Division Could Better Inform Customers About Online Renewals and Lacks Crucial Data Needed to Target Its Outreach Efforts

The certification division could better inform teachers about online renewals by highlighting its availability and the benefit of faster processing. The certification division currently informs the teaching community about the availability of online renewals at workshops and conferences. The certification division also told

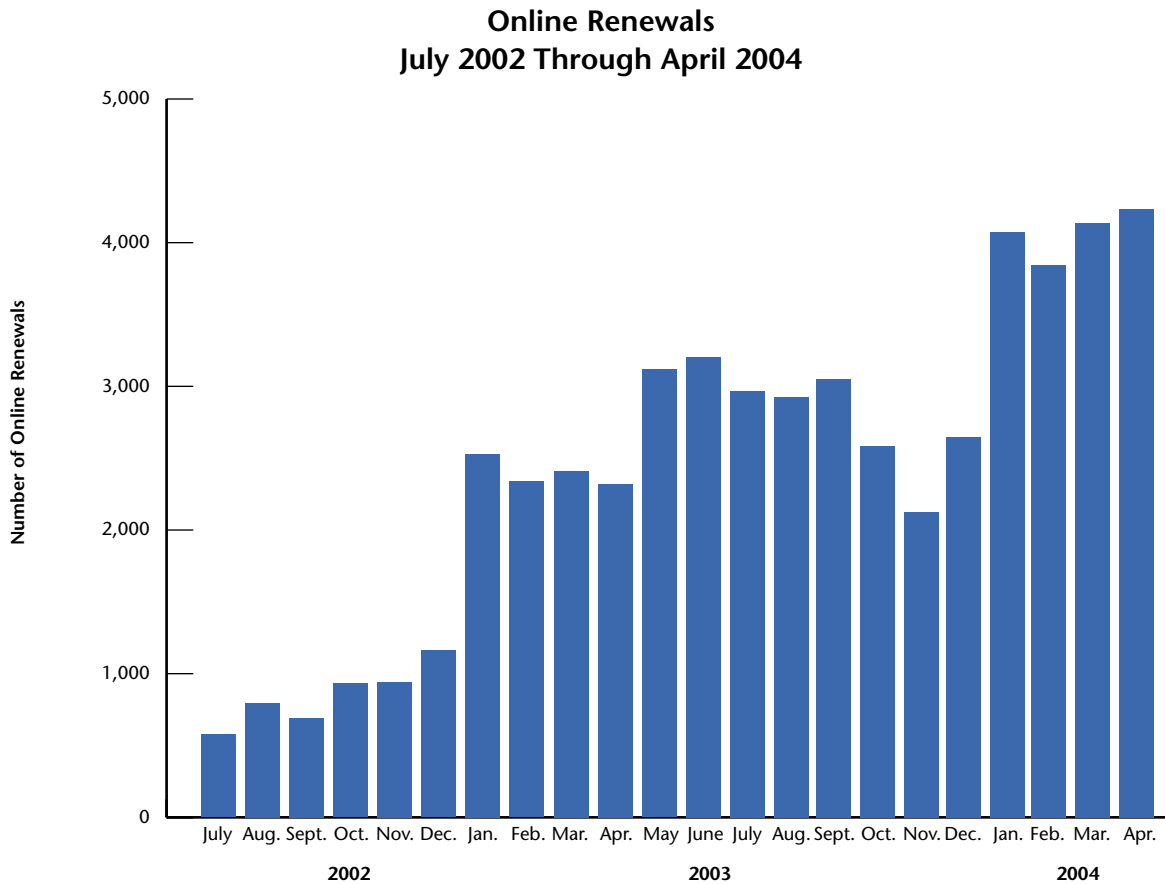
us that it communicates the availability of online renewals to applicants who call about renewals. In addition, the certification division indicated that it includes leaflets promoting online renewals when it mails 30-day substitute permits, because they are on a one-year cycle for renewal. However, the commission's Web site makes the online renewal option less obvious than the paper renewal application. To urge credential holders to use the online renewal function, the commission should structure its Web site to highlight this option.

The commission has done little to publicize the benefit of faster processing of online renewals to teachers.

The certification division has done little to communicate the benefit of faster processing of online renewals to teachers. Not only has it not included this information on the commission's Web site, but it also does not convey it in information leaflets that are specifically about online renewals. The director of the certification division acknowledged that most teachers probably do not know that the commission processes online renewals in seven to 10 business days until after they have submitted an application.

The certification division also lacks crucial information about online renewals that it could use to increase the number of teachers who use this function. Currently, the certification division knows how many online renewal applications it receives per month, and it should want to know what percentage of total renewals these represent. This percentage would provide the certification division with a fairly good measure of whether it has convinced applicants to renew online. Knowing this percentage would also allow the certification division to compare it to a target percentage or percentages for different credential types and measure whether it was meeting these targets. However, the certification division cannot calculate this percentage because it currently does not know the total number of renewals that applicants could perform online. It does know that the total number of renewals and credential upgrades from preliminary to professional clear status is approximately 10,000 per month, but it can use that figure only for a rough comparison. Without this percentage, the certification division will have difficulty gauging the success of the online renewal function. As Figure 8 on the following page shows, the number of online renewals has increased steadily since the commission introduced this option in June 2002.

FIGURE 8



Source: California Commission on Teacher Credentialing cashing reports and estimates.

In addition, because there are different types of credentials, a critical first step that could help the certification division is to know which types of credentials teachers commonly renew online. This information would be useful to determine whether some segments of credential holders are not renewing online. For example, if the certification division noticed that only a low percentage of teachers with multiple-subject credentials, which are for teaching in elementary schools, renewed online, it could focus its outreach efforts on elementary school teachers. Until the certification division collects and analyzes crucial data on the number and type of online renewals versus paper renewals it receives, it will not be able to gauge the impact of the online renewal option.

RECOMMENDATIONS

To ensure that the public information it provides meets its customers' needs, the certification division should routinely update its Web site and leaflets based on an analysis of customer data. Specifically, the certification division should do the following:

- Use the telephone system report to its full potential by identifying specific areas in which the certification division can improve the information it communicates to the general public on the Web site and in leaflets.
- Gather meaningful data about the types of e-mail questions the certification division receives and use the data to improve the information it communicates to the general public on the Web site and in leaflets.
- Ensure that the information on the Web site is accurate and easy for customers to use.

To improve the efficiency of e-mail processing, the certification division should automate its response to and routing of e-mails.

To ensure the effective management of the unit's application workload, the certification division should routinely monitor the composition of the applications that it has not yet processed and collect and analyze data on the average review times for different types of applications.

To ensure that it continues to meet the 75-business-day limit, the certification division should routinely have TCSIP create automated reports to track the average processing times and regularly list all applications that are taking more than 75 business days to process.

To ensure that it optimizes the time-saving benefits of TCSIP, the certification division should use automated processes rather than manual ones where possible. Specifically, the certification division should do the following:

- Require colleges and universities to submit credential applications to the commission electronically to the extent that is economically feasible.
- Consider expanding TCSIP to allow school districts to submit applications electronically and to allow the virtual credential officer function to process routine applications.

To encourage more customers to renew their credentials online and to determine whether additional outreach efforts may be necessary, the certification division should gather data on and study the percentage of renewals it receives online for different types of credentials. Also, the certification division should do the following:

- Publicize the fact that it processes online renewals faster than paper renewals.
- Make the link to online renewals more obvious on the commission's Web site. ■

CHAPTER 3

The Commission Should Refine Its Process for Developing Program Standards and Resume Its Continuing Accreditation Reviews of Colleges and Universities

CHAPTER SUMMARY

The California Commission on Teacher Credentialing (commission) is responsible for setting program standards for colleges and universities that prepare prospective teachers. The commission's recent experiences developing program standards to meet the requirements of the legislative mandate in Senate Bill 2042, Chapter 548, Statutes of 1998 (act), offer an opportunity to evaluate how to manage these efforts better in the future.

Our review of five sets of recently developed program standards identified several areas in the commission's process for developing program standards that lack structure and could be improved. For example, the commission does not use a methodical approach to form advisory panels of education professionals that assist it in the development of program standards. Using a methodical approach would help the commission ensure that it chooses the most qualified individuals as panel members and that its selections are objective. Also, the commission does not always present in proper perspective the results of its field-review surveys of education professionals on draft program standards so that the commission's governing body (commissioners) could understand their relevance.

In addition, the commission is missing opportunities to ensure further that its standards are free from bias toward any particular group, because its process excludes the views of some groups whose total number of responses to the survey is less than the number that would otherwise trigger a review. In addition, the commission does not have an overall plan to guide its efforts to finish implementing some program standards that the act required and to guide its ongoing standard-setting activities.

Planning would help the commission identify the steps necessary to periodically update program standards and the resources it plans to use.

In December 2002, the commission suspended its continuing accreditation reviews of colleges and universities. Continuing accreditation reviews are an important component of the commission's accreditation system and are intended to ensure that colleges and universities are operating teacher preparation programs that meet the commission's standards. The commission indicated that it suspended the continuing accreditation reviews in order to allow colleges and universities time to implement the commission's new standards and for it to evaluate its accreditation policy. Although the commission has been working with representatives from colleges and universities to evaluate its accreditation policy, it does not plan to propose a revised policy to the commissioners until August 2005.

LEGISLATION REFORMED THE STATE'S TEACHER PREPARATION, DEVELOPMENT, AND CREDENTIALING REQUIREMENTS

Key Changes in Teacher Preparation and Credentialing Requirements

Prospective teachers must:

- Complete a subject matter program, or examination equivalent, that the commission has approved and that is aligned with the state content and performance standards for pupils adopted by the State Board of Education.
- Complete a program of professional teacher preparation that includes a teacher performance assessment prior to earning a preliminary teaching credential.
- Complete an induction program of support and formative assessment during the first two years of teaching as a requirement for earning a professional clear credential.

Source: California Commission on Teacher Credentialing.

The act created substantial reforms in the way California teachers are prepared and licensed. The act implements new standards to govern all aspects of teacher preparation, including a standards-based teacher performance assessment in teacher preparation programs, and it requires all new teachers to complete a beginning-teacher support program. The act's requirements are based on the recommendations of an advisory panel composed of education professionals that the commission formed in response to a legislative mandate for a review of the commission's teacher preparation and credentialing policies. The text box presents some of the key changes in teacher preparation and credentialing resulting from the act.

In response to the act's requirements, the commission began developing three new interrelated sets of standards for program quality and effectiveness in subject matter preparation, teacher preparation, and induction. The commission indicated that these three program standards create a learning-to-teach continuum that rigorously prepares prospective teachers in

Teacher Preparation Program Standards

Subject matter standards require prospective teachers to demonstrate that they possess sufficient knowledge in the subject they will be authorized to teach.

Professional preparation standards require prospective teachers to demonstrate that they possess the ability to teach pupils and manage classrooms.

Teacher induction program standards require prospective teachers to complete a two-year support program to refine their knowledge, skills, and abilities to teach pupils.

Source: California Education Code, Section 44225.

the subject they will be authorized to teach, as well as in the methods of teaching and classroom management. The text box describes the intent of these three standards.

To develop program standards that are effective in preparing teachers, the commission coordinates its efforts with education professionals and independent contractors. To assist it in developing standards, the commission forms advisory panels staffed with education professionals who have expertise in the subject. In addition, for the subject matter standards, the commission's contractor develops an examination that prospective teachers can take in lieu of completing a teacher preparation program. As part of this process, the commission forms a bias review committee—also staffed with education professionals—to

identify whether the standards contain any biased content or language that the commission should remove. The contractor also conducts a content validity study, surveying education professionals to determine the knowledge, skills, and abilities that entry-level teachers need for effective job performance. The survey requests respondents to rate each requirement and also solicits written comments to allow respondents to indicate whether any content requirements that are necessary for effective entry-level job performance are missing. After its advisory panel analyzes the survey's results, commission staff propose the subject matter requirements to the commissioners for approval. Once the commissioners approve the requirements, the commission's advisory panels develop subject matter standards for teacher preparation programs, and the contractor develops the subject matter content examination.

Before finalizing teacher preparation program standards, the commission sends draft copies of the program standards to education professionals throughout California for review. The commission also conducts this review, known as a field survey, for subject matter program standards and other standards that the commission develops, such as standards for induction programs and administrative services. The review is intended to determine whether the program standards that colleges and universities will implement will prepare effective teachers. The survey asks respondents to rate the importance of each program standard and also solicits written comments to allow respondents to indicate whether they believe critical

characteristics of program quality that are necessary for preparing effective teachers are missing from the standards. After its advisory panels analyze the results of the field surveys, commission staff recommend the draft program standards for the commissioners' approval.

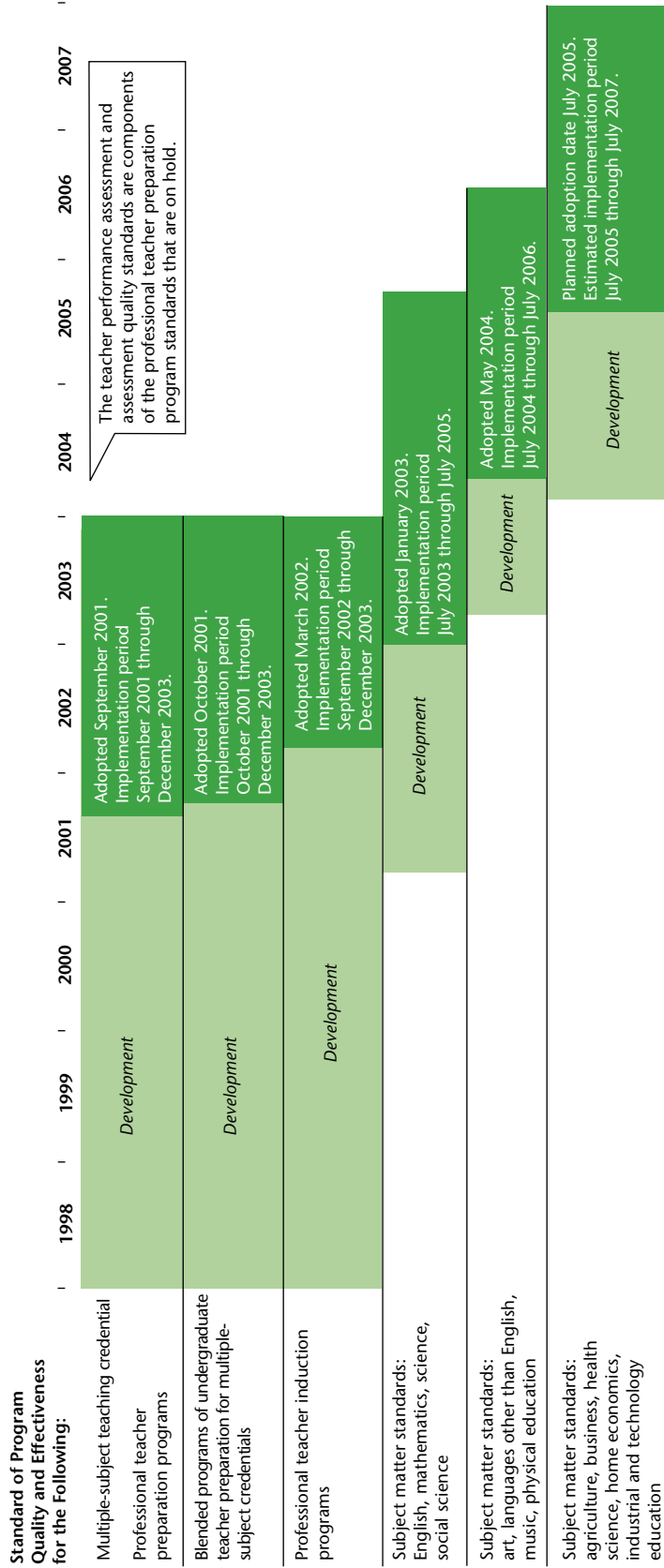
Once the commissioners adopt a new program standard, they also adopt an implementation plan, which typically provides colleges and universities a two-year transition period in which to revise their teacher preparation programs to conform to the newly adopted program standards. In addition, it allows the commission time to review and approve their new program proposals. The implementation plan includes a timeline for colleges and universities to phase out the teacher preparation programs they administered under the commission's previous standards. This phase-out period is also necessary so that students who began their coursework under the commission's previous teacher preparation standards can complete their course of study.

THE COMMISSION DEVELOPED PROGRAM STANDARDS IN A REASONABLE ORDER, BUT IT SHOULD DEVELOP AN OVERALL PLAN TO FINISH IMPLEMENTING THE ACT'S REFORMS

The commission has been developing standards in four phases. The order of these phases appears reasonable because the commission focused first on developing standards that reflect key credentialing changes that the act required. Specifically, the commission began by developing new multiple subject teaching credential standards, professional teacher preparation, and induction standards, which it believed had the broadest impact. The three subsequent phases focused on developing 13 new single-subject standards. The order in which the commission chose to develop the subject standards appears reasonable because it first developed core curriculum subjects for pupils—English, mathematics, science, and social science. The remaining phases focused on developing other subjects, such as art and agriculture. Figure 9 provides an overview of the commission's progress in developing program standards, along with the dates that the commissioners adopted the standards and the implementation periods for each standard.

FIGURE 9

The Commission's Progress in Developing Standards That the Act Required



The teacher performance assessment and assessment quality standards are components of the professional teacher preparation program standards that are on hold.

Source: California Commission on Teacher Credentialing.

Some program standards are still under development, and not all colleges and universities have implemented several others, including the program standards for core curriculum subjects.

As the figure indicates, the commission has been developing program standards since 1998. However, some are still under development, and several others, including the program standards for core curriculum subjects, have not yet been implemented by all colleges and universities. For example, the English standard was adopted in January 2003. The commission indicates that as of September 30, 2004, it has approved two of the 11 revised program proposals that it has received; and it estimates that about 43 more colleges and universities will submit revised program proposals for approval around March 2005. The commission began developing the final phase of program standards covering five subjects in April 2004. Because developing a program standard takes about a year and a half, the commission staff plan to propose these five standards to the commissioners in July 2005. If the commissioners adopt a two-year implementation period, as they have previously, colleges and universities will not finish implementing these program standards until mid-2007, nearly nine years after the act became law.

Although the commission created an approach to develop standards as the act required, it did not use an overall plan that included timelines for developing standards and the resources it planned to use. Such a plan would also provide a framework for describing how the commission would finish implementing the program standards that the act required. For example, in addition to the standards still undeveloped, the commission has not fully implemented all aspects of its teacher preparation program standards, including the teaching performance assessment and assessment quality standards. These standards are critical components of the learning-to-teach continuum that the act intended to put in place to strengthen teacher preparation. As we noted in Chapter 1, although the act requires all teacher preparation programs to use a teaching performance assessment, it makes this subject to the availability of funding in the annual budget act. Nevertheless, the commission is working with colleges and universities to implement this requirement on a voluntary basis. In addition, the commission indicates that it has initiated a study on the potential consolidation of the teaching performance assessment with other exams.

An overall plan would also guide the commission's efforts to perform all of its other regular standard-setting activities, including periodically updating program standards and validating examinations. The commission believes that program standards and examinations should be reviewed periodically

An overall plan would provide a framework for how the commission would finish implementing the program standards required by the act and also guide the commission's efforts to perform all of its other regular standard-setting activities.

and rewritten as job requirements and expectations change over time. These standard-setting activities can be costly and require coordination with education professionals and independent contractors. Thus, such a plan would benefit the commission by allowing it to plan for the resources it needs to meet its ongoing standard-setting responsibilities.

Although the commission recently developed a planning calendar to guide its professional services division in reporting to the commissioners, it does not include estimates of staff time. Also, in June 2004 commission staff prepared a status report for the commissioners that included a description of its progress in implementing the act's requirements and its efforts in assisting colleges and universities to implement new programs. However, the report does not include a timeline or a strategy for the commission to complete its planned tasks, nor does it list the resources the commission plans to use. Although these two reports are useful, they do not represent an overall plan that the commission could use to guide its efforts to implement the act's requirements fully.

The commission recognized the need for planning and required prospective contractors to prepare a management plan in their response to the commission's request for proposals to develop examinations related to program standards. The process of developing examinations takes time, resources, and significant coordination with education professionals. Therefore, the contractor who won the bid created management plans that described an approach for managing its responsibilities in the phases of developing examinations. For each of the phases, the contractor also developed detailed project management plans that described how the contractor planned to accomplish key activities. For example, the management plans included monitoring elements, such as a timeline that schedules the estimated dates for starting and completing key activities.

This type of planning would also be helpful to the commission to guide its efforts and focus future activities. Although the commission has made progress over the past six years, not all of the intended benefits of the act have yet been realized. An overall plan could help the commission determine what it has yet to complete and the resources it will need to put in place the learning-to-teach continuum that the act intended to achieve.

THE COMMISSION'S RECENT EXPERIENCES IN DEVELOPING PROGRAM STANDARDS PROVIDE AN OPPORTUNITY TO REFINE ITS STANDARDS DEVELOPMENT PROCESS

The commission's recent experiences in developing standards in response to the teacher preparation reforms that the act required provide it with an opportunity to refine the process it uses to establish program standards in order to improve its future efforts. The commission's staff coordinate and monitor the development of each standard, and they informally share with one another the lessons they learned from developing each standard. Although this informal process is helpful, it does not ensure that the commission rigorously evaluates what went well or poorly during the development of a program standard and does not ensure that it makes future improvements. Further, a formal process is valuable should staff turnover occur between standard revision periods.

During our review of the five sets of standards identified in the text box, we identified several areas in the commission's development of standards that lack structure and that it could improve, including how it forms advisory panels and how it

conducts and analyzes survey results. Further, the commission has an inadequate policy for ensuring that staff maintain important documents relating to the development of program standards.

The five sets of standards we reviewed:

1. English
2. Mathematics
3. Art
4. Induction
5. Administrative services

The commission's policy requires that the commission retain in office areas all records that it produces or maintains for as long as they serve the immediate purposes for which they were created. The policy also requires that staff retain advisory panel research records in office areas for at least one year and then transfer

them to the state records center for 15 years. However, the commission's policy does not include guidelines for retaining specific documents created during the development of program standards. Consequently, the commission staff assigned to a program standard decide which documents to keep and the length of time to keep them; individual staff members store these documents in their workspace. Letting staff decide how to maintain documents is a poor idea, because people have different views about what documents are important, how to store them, and how long to keep them. Further, if some staff members leave the commission, others may not be able to locate

these documents. As a result of this inadequate practice of retaining records, we were not able to review some of the key documents relating to how the commission developed program standards.

The Commission Does Not Use a Methodical Approach to Form Advisory Panels

Lacking a methodical approach, the commission may have difficulty ensuring that its panel member selections are considered objective by outside parties.

Our review of the selection process for the five advisory panels found that the commission does not use a methodical approach to evaluate candidates for panels. Although we did not determine that the panel members whom the commission selected were unqualified, without a way to evaluate or rate candidates' qualifications, the commission does not know whether other candidates are more qualified. Further, it may have difficulty ensuring that outside parties consider its selections of panel members to be objective.

For four of the panels we reviewed—English, mathematics, art, and administrative services—the commission required candidates to submit an application and in most cases a résumé to show their interest in serving on the panel. In addition, for the English, mathematics, and art panels, the commission asked candidates to demonstrate that they met at least one of the commission's qualifications, which were similar among the three standards. For example, candidates for the English advisory panel were to meet at least one of the qualifications outlined in the text box on the next page. For the administrative services panel, the commission's qualifications were that the candidate hold a current position as an administrator, educator, or school board member or be a parent. For all four standards, the commission solicited the availability of panel members to attend meetings to develop standards. Commission staff evaluated the candidate applications and proposed a panel to the executive director, who made the final decision to appoint panel members.

However, the commission's applications for the English, mathematics, and art panels asked the candidates only for a general description of how they met the commission's qualifications rather than asking them to address specifically how they met the qualifications. Lacking a more structured application to solicit explicitly how candidates met the qualifications, the commission may not have received sufficient information to be able to evaluate the candidates. For the administrative services panel, the application appropriately asked for the candidate's position.

The commission advertised that it would select English panel members who possessed one or more of the following qualifications:

1. Teacher in grades 7 to 12 with outstanding programs in English.
2. Active in current efforts to improve curriculum, instruction, and teacher preparation.
3. Recent experience teaching English in grades 7 to 12.
4. Leadership role in English at the statewide level or at the local level.
5. Experience providing professional development to teachers or prospective teachers of English.
6. Experience teaching students from diverse linguistic and cultural backgrounds.
7. Experience developing, administering, or scoring constructed-response test items.
8. Experience as mentor teacher or supervising teacher of English.
9. Distinguished college or university faculty member who teaches English to prospective teachers.
10. Knowledgeable specialist in school curricula who focuses primarily in English.
11. Highly competent school principals and assistant principals who have expertise in teaching English.

Source: California Commission on Teacher Credentialing.

For four of the panels we reviewed, the commission did not consistently use a ranking process to ensure that it appointed the most qualified or desired candidates to serve. For example, when forming the English and mathematics advisory panels, the commission assigned each candidate a rank of 1, 2, or 3, with the score based on the candidates' qualifications and availability for meetings. However, the commission could not show us how it arrived at these rankings and explained that the rankings were based on what the commission called a "holistic" approach of evaluating candidate qualifications. According to the commission, the holistic approach evaluated candidates based on their educational qualifications, experience, and knowledge of academic content standards for pupils. The commission also indicated that members of the State Board of Education (state board) who were particularly interested in assuring the alignment of the subject matter standards for teachers with academic standards for pupils, participated in reviewing the panel member qualifications and selecting panel members. However, the commission did not rank 13 of the 61 candidates who applied for the English panel and 19 of the 103 who applied for the mathematics panel.

The commission did not use a ranking process when evaluating candidates to serve on the art and administrative services panels. According to the commission, it selected panel members based on their educational qualifications and experience. However, the commission stated that the art standards, although important, were not as important as the English and mathematics standards; therefore, the review process did

not involve the same level of rigor. When forming the administrative services panel, the commission indicated that it focused on selecting panel members who possessed specific knowledge of the administrative services credential area.

For all four panels, the commission did not use a checklist or other review tool to ensure that the proposed panel collectively met all the commission's qualifications. Without a tool that showed how the commission methodically selected the candidates, we could not ascertain how it determined that the candidates it

appointed were the best qualified. Although the panel members appear to possess the qualifications that the commission required, a methodical approach to making selections would help ensure that the commission selects the best qualified candidates and would better establish that the commission selects panel members objectively.

The role of ethnic diversity and other factors was unclear in advisory panel selections, despite the significance that the commission placed on them in its documents requesting candidates to apply.

In the documents soliciting candidates to apply for these four panels, the commission indicated that its panel selection process would also focus on other factors, such as whether the candidate was a teacher or an administrator, and that it would emphasize ethnic diversity in making its selections. Although the commission sometimes gathered this information, we found no evidence of how the commission evaluated these factors when selecting members for these four panels. Thus, the role of these factors was unclear, despite the significance that the commission placed on them in its documents requesting candidates to apply.

For the fifth standard we reviewed, induction programs, the commission used a different process when forming the advisory panel. It did not solicit nominations, nor did it require interested candidates to submit an application. Instead, the commission indicated that it selected panel members that were actively working in beginning-teacher support programs and individuals from the California Department of Education. Although the commission stated that panel members have experience in administering Beginning Teacher Support and Assessment programs, it does not know whether other interested candidates might be more qualified than those it selected.

The Commission Could Do More to Report Its Survey Results and Consider the Views of Minority Groups

When presenting the results of its field-review survey to the commissioners as a basis for recommending the standards to adopt, commission staff did not always put the results in perspective in such a way that the commissioners could understand their relevance. For example, when commission staff proposed the four core subject matter standards to the commissioners for adoption, it reported in its agenda item that it had received 432 responses to the field-review survey. However, only 23 of the responses the commission received were for English and 21 responses were for mathematics. Although the commission received 33 responses for social science, it could not locate any of the remaining responses related to the science standard and thus could not tell us the composition of

Commission staff did not always put the field survey results in perspective so that the commissioners could understand their relevance.

the remaining 355 responses. Similarly, commission staff also reported 115 responses for the art and three other single subject matter standards rather than reporting the results for each standard. Disclosing the actual responses for each standard, as commission staff did for the induction and administrative services standards, would have provided the commissioners with a better perspective on the actual results of the field-review survey.

Also, the commission is missing an opportunity to ensure further that its subject matter requirements are free from biased language and content because its process excludes the views of some groups. As we noted previously, the commission's contractor conducts a content validity study. The commission's contractor analyzes the results of its survey and presents the results to the commission and the advisory panels in a tabular format that aggregates the responses from population groups including African-American, Asian, Hispanic, and other target groups of education professionals. The contractor flags for the advisory panel's review subject matter requirements that receive a lower rating for necessity at entry or importance for effective job performance. However, our review of the criteria for flagging an item found that in some instances the contractor did not flag subject matter requirements to which minority groups gave low ratings because the number of people responding in these groups was less than the number that would trigger a review flag. Although these groups represent a low percentage of the total responses, when the majority of respondents in one group expresses a concern, the commission could benefit from providing the results to its advisory panels and bias review committee to ensure further that its subject matter requirements are free from biased language or content.

The Commission Needs to Better Document Its Process for Ensuring That Program Standards Align With State Academic Content Standards

In response to the act's credentialing requirements, the commission developed new program standards and examinations that align with the academic content standards for students that the state board adopted. This alignment requirement is applicable to three of the five standards we reviewed—English, mathematics, and art. However, the commission did not always adequately document how it ensured the alignment of standards.

The commission asked its advisory panels to develop subject matter standards that align with the student academic content standards. According to the commission, it secured a contractor to independently review the English and mathematics subject matter standards to address alignment and congruence concerns that members of the state board and a stakeholder had raised. However, for these two standards, the commission was not able to provide us with all of the relevant documents that would demonstrate that the contractor performed an adequate review. For example, for the English standards, the commission was not able to provide us with the recommendations developed from the review or how the advisory panel addressed any related recommendations. Further, commission staff were not able to answer our questions about the contractor's method of performing the independent reviews or about other inconsistencies on the documents that it provided. Because the commission could not demonstrate to us that its contractor performed the studies appropriately, we question whether the commission could defend that these two subject matter requirements were appropriately aligned. The commission was able to provide sufficient documentation for us to conclude that the alignment study of art standards was performed.

THE COMMISSION HAS SUSPENDED CONTINUING ACCREDITATION REVIEWS, AND IT IS EVALUATING ITS ACCREDITATION POLICIES

Continuing accreditation reviews are an important component of the commission's accreditation system because they help ensure that colleges and universities operate teacher preparation programs that meet the commission's standards. The commission performs continuing accreditation reviews primarily through on-site reviews. However, in December 2002 the commission suspended its continuing accreditation reviews of all colleges and universities, except for the few seeking national accreditation, to allow them time to implement new teacher preparation programs and to evaluate its own accreditation policies and procedures. Since then, the commission has limited its accreditation activities to performing initial accreditation reviews, which are primarily desk reviews of college and university teacher preparation program proposals. In March 2004 the commission extended this suspension, indicating that doing so would provide financial relief to the commission and to colleges and universities. However, suspending continuing accreditation reviews limits the commission's ability to ensure that colleges and universities that

Suspending continuing accreditation reviews limits the commission's ability to ensure that colleges and universities are operating programs that meet its standards.

recommend prospective teachers for credentials are operating programs that meet the commission's eight common standards and specific teacher preparation program standards. For example, one of the eight common standards, resources, requires colleges and universities to demonstrate that they consistently allocate resources to credential programs.

The California Education Code requires the commission to adopt and implement an accreditation system to ensure that colleges and universities operate teacher preparation programs that meet the commission's program standards. To comply with this requirement, the commission adopted an accreditation policy that includes initial reviews of teacher preparation program proposals combined with a continuing accreditation process that consists primarily of on-site reviews of how colleges and universities operate their teacher preparation programs. Following a continuing accreditation review, the commission may do one of three things: (1) grant colleges and universities full accreditation, (2) grant them accreditation with stipulations, or (3) deny accreditation. Once it has granted a college or university full accreditation, the commission does not conduct another continuing accreditation review for five to seven years. However, if it grants accreditation with technical or substantive stipulations, the college or university must take corrective action within one year, and the commission may schedule another on-site review. Finally, if the commission denies accreditation, the college or university must phase out its teacher preparation program by the end of the semester or quarter of that accreditation denial.

In the four and a half years before it suspended continuing accreditation reviews, the commission granted half of the colleges and universities it reviewed accreditation with stipulations because they did not operate their programs fully in accordance with standards.

In its December 2003 agenda item, the commission reported that in the four and a half years before it suspended continuing accreditation reviews, it found that colleges and universities did not always operate their programs in accordance with its standards. For example, of the 73 continuing accreditation reviews it conducted between fiscal years 1997-98 and 2002-03, the commission accredited 37 of the colleges and universities with substantive or technical stipulations; it granted full accreditation to the remaining 36. The commission indicated that the 36 colleges and universities have since taken corrective action to clear the stipulations, and the remaining one is in the final process of clearing the stipulations.

Although the commission planned to resume continuing accreditation reviews in July 2004, it instead extended the suspension in March 2004 to June 2005, to give it time to focus

on reviewing its accreditation policy. Until the commission resumes the continuing accreditation reviews, it cannot ensure that colleges and universities operate teacher preparation programs that meet its program standards. Further, because the commission conducts on-site reviews of colleges and universities every five to seven years as part of the continuing accreditation policy, when the commission resumes its continuing accreditation review activities in July 2005, up to 25 colleges and universities could be overdue for a continuing accreditation review.

The commission believes that it should evaluate its current accreditation policy, which it adopted in 1993, to address current state and national trends that call for greater accountability in education using performance measures for teachers and pupils. However, before making significant changes to its policy, the commission is required to consult with an independent evaluator and with representatives from colleges, universities, and other educational organizations. To comply with this requirement, it secured an independent contractor in fiscal year 1999–2000 to examine the policy, including the process for conducting continuing accreditation reviews, over a three-year period. It asked the contractor to determine whether the continuing accreditation review process provides a fair and productive review that results in college and universities making improvements. However, the commission did not ask the contractor to recommend alternatives that would result in meaningful oversight of colleges and universities in light of state and federal requirements for greater accountability and performance measures. Consequently, when the commission received the contractor’s final report in March 2003, it found that the recommendations had limited use for this purpose. Further, although the commission has been working with representatives from colleges and universities to evaluate the accreditation policy, under its current plans, it will not propose a revised policy to the commissioners until August 2005.

RECOMMENDATIONS

The commission should develop an overall plan to guide its efforts to finish implementing program standards that the act required and to guide its ongoing standard-setting activities to include timelines and the resources it plans to use.

To ensure that it objectively appoints education professionals to its advisory panels, the commission should develop a methodical approach that includes evaluating candidates' qualifications against the qualifications the commission seeks in panel members.

To provide the commissioners with a better perspective on the results of field-review surveys, commission staff should present the actual results for each standard.

The commission should follow its policy for retaining records to ensure that it maintains important documents for a specified time in case it needs them later for general information, research, or legal proceedings. The commission should also implement a policy to designate the specific standard-setting records that its staff should retain.

To ensure that colleges and universities operate programs that meet the commission's standards, the commission should promptly resume continuing accreditation reviews. Further, it should take steps to complete the evaluation and revision of its accreditation policy promptly.

We conducted this review under the authority vested in the California State Auditor by Section 8543 et seq. of the California Government Code and according to generally accepted government auditing standards. We limited our review to those areas specified in the audit scope section of this report.

Respectfully submitted,



ELAINE M. HOWLE
State Auditor

Date: November 9, 2004

Staff: Nancy C. Woodward, CPA, Audit Principal
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Agency's comments provided as text only.

Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento, California 95814

October 20, 2004

Ms. Elaine M. Howle*
State Auditor
555 Capitol Mall, Suite 300
Sacramento, California 95814

Dear Ms. Howle:

All state agencies in California need to be ever mindful of opportunities to review and revise their policies and procedures to be more responsive to the public and their elected representatives. The Commission welcomes objective reviews of its programs and operations as well as resulting commendations and recommendations for improvement. We appreciate the Legislature's interest in determining whether the Commission can continue to pursue efficiencies while maintaining effectiveness.

On behalf of the Commission on Teacher Credentialing I want you to know that we have reviewed the draft audit findings entitled "California Commission on Teacher Credentialing: It Could Better Manage Its Credentialing Responsibilities" received October 14, 2004. Given the significance of this review in relation to comprehensive studies of state government it is important to note the conclusion that the work of the Commission is not duplicative of any other entity. We appreciate the commendations regarding effectiveness of teacher intern programs and efforts by the Legislature and the Commission to streamline credentialing for teachers prepared in other states. The Commission has serious concerns, however, about what we believe are significant omissions, errors and misinterpretations.

I have included a detailed summary of our concerns, which fall into the following categories:

1. Omissions. The audit charge may have constrained the scope of this particular review with respect to a workload analysis. For example, teacher credential candidates, through their fees, funded an extensive workload analysis conducted by an independent contractor supervised by the Office of the Legislative Analyst. This workload analysis showed that the Commission was significantly understaffed. The Legislature corrected this understaffing, however, subsequent to that Legislative effort the Commission staff has been cut by 22% percent while the workload has increased by 6% percent.

We believe it is important to at least acknowledge circumstances created by the ongoing loss of staff, increasing workload, across the board program reductions and the critical revenue deficiencies that have resulted in further staff and program reductions is negligent in that these factors have a direct impact on the Commission's capacity to

* California State Auditor's comments begin on page 109.

address its core mission. Further, it may be useful to describe procedures put into place over the past three years to modify business practices and reassign workload to reflect ever-increasing workload with less staff resources in an effort to address critical credentialing priorities, such as credential suspensions and revocations.

2. Proposals that Would Necessitate Changes in Statutes. Some recommendations, although welcome, would necessitate amendments to the Education Code since they propose responsibilities that exceed the Commission's current legislative mandates.
3. Proposals that Would Require Additional Funding. Other recommendations would require substantial new funding. For example, the Commission was funded to replace outdated technology to avoid a collapse of the credentialing issuance system. The level of funding provided was intended only to replace worn equipment and to process the additional workload anticipated due to mandates such as class size reduction. Adding technology to substantially reduce processing times would result in significant costs that the Commission does not currently have revenue to support.
4. Proposals that Would Require Additional Staffing. Other recommendations would require additional staffing. For example, conducting ongoing analyses of unemployment trends would require additional staff positions, as this is outside of the Commission's current scope of work.

In addition, the attachment summarizes what we believe are inaccuracies and misinterpretations of the data. For example, to conclude that the Commission has suspended accreditation of preparation programs is not accurate. Indeed, the Commission, with the assistance of a large number of classroom teachers, site administrators, parents and educators has reviewed and revised four sets of preparation standards—for teacher preparation, induction, subject matter and advanced preparation. To date, all teacher preparation that have submitted proposals for these programs have been reviewed against these standards. This is the first step in the mandated restructuring of standards governing teacher preparation designed to align teacher preparation standards with standards for pupil performance adopted by the State Board of Education, as mandated by Senate Bill 2042 (Alpert).

Again, we welcome the opportunity to discuss Commission operations with representatives of the public and state policymakers as we all strive to improve our services in the most efficient and effective manner possible.

Sincerely,

(Signed by: Lawrence H. Madkins, Jr.)

Lawrence H. Madkins, Jr.
Commission Chair

Attachment

COMMISSION RESPONSES TO BSA AUDIT REPORT RECOMMENDATIONS

Audit Report Recommendations	Commission Responses
CHAPTER 1	
<p>To determine their success, the Commission should establish performance measures for each of its teacher development programs. In addition, the Commission should do the following:</p> <ul style="list-style-type: none"> • Ensure that the statistics it presents in its program reports are consistent and that it maintains the support for these statistics. • Monitor how local teacher development programs assess the academic progress of participants and establish consequences for underperformance. • Resume requests for budget augmentations to fund an independent evaluation of its paraprofessional program that assesses all the requirements in the applicable statute or seek to amend those parts of the law that it believes would be too costly to implement. 	<p>The Commission has historically evaluated its teacher development programs based on compliance with the requirements for grant funds that are set forth in the Request for Applications. The Commission agrees it could adopt additional performance measures that address the effectiveness of programs in meeting statutory objectives. The consent form process, which the Commission implemented in 2001 to track candidate enrollment in each of its teacher development program will help the Commission monitor the effectiveness of programs in helping candidates achieve a credential.</p>
<p>To provide context to education professionals and policy makers for why credential, permit, and waiver numbers have changed, the Commission should include an analysis with the statistics it publishes in its annual reports.</p>	<p>The Commission agrees that a thoughtful analysis of teacher supply and demand data is helpful to policy makers at all levels however such an analysis would require additional resources and information that are not currently available to the Commission. Such an analysis could be at odds with state policy directives or increase the State's exposure to litigation. Historically, this type of analysis has been undertaken by independent entities that specialize in conducting research and analysis on important educational issues. The Commission provides data upon request to independent bodies that conduct such analyses.</p>

COMMISSION RESPONSES TO BSA AUDIT REPORT RECOMMENDATIONS

<p>The Commission should collaborate with colleges and universities to determine what funding is necessary to activate and maintain the teaching performance assessment, as envisioned by the enabling legislation. They should then request the Legislature and governor's office to authorize the function in future budget acts.</p>	<p>The Commission agrees that implementation of the Teaching Performance Assessment (TPA) would help complete the vision of SB 2042, and the Commission has endeavored to work with institutions to implement the TPA. The Commission looks forward to direction from state policy makers in resolving the funding issues that have prevented the full implementation of the assessment. Commission staff continues to work with colleges and universities to implement the TPA on a voluntary basis.</p>
<p>The Legislature may wish to consider giving the Commission a specific policy directive to obtain and use teacher retention data to measure the performance of the teaching credential process and of teacher preparation programs and provide this information in its annual reports.</p>	<p>The Commission agrees that teacher retention data would be helpful information for policy makers to have. Such data could be useful analyzing the effect teacher preparation programs, induction programs, and employment conditions have on teacher retention. However, the collection of such data would require an integrated data collection system and coordination with other state entities and could have significant costs to both state and local agencies.</p>
<p>To aid it in developing performance measures for teacher preparation programs, the Commission should keep itself informed of surveys and reports that are prepared by other entities such as the administrator survey the CSU is developing.</p>	<p>The Commission is aware of, and has commended, the efforts of the CSU in developing its annual employer survey. Data collected from such a survey could provide useful information about the quality of teacher preparation programs. The systematic collection of valid and reliable data gathered through surveys and performance assessments is under consideration as part of the Commission's review of its accreditation system.</p>
<p>The Commission's executive office should present the Commissioners with an annual status report on how the Commission has achieved the goals and tasks outlined in the strategic plan.</p>	<p>The Executive Director annually prepares a list of accomplishments directly linked to the strategic goals that are read at a Commission meeting and in the Official Minutes of the meeting. Also, the agenda items provide a status report on the goals and tasks at each meeting.</p>
<p>The Commission should continue to consider ways to streamline the teacher credentialing process, such as the consolidation of examinations required of credential candidates. If the Commission determines that specific requirements are no longer necessary credential requirements, it should seek legislative changes to applicable statutes.</p>	<p>The Commission concurs and has been exploring the streamlining of exams for the past year.</p>

COMMISSION RESPONSES TO BSA AUDIT REPORT RECOMMENDATIONS

CHAPTER 2	
<p>To ensure that the public information it provides meets the needs of its customers, the certification division should routinely update its Web site and leaflets based on an analysis of customer data. Specifically, the certification division should do the following:</p> <ul style="list-style-type: none"> • Use the phone system report to its full potentials by identifying specific areas where the certification division can improve the information it communicates to the general public on the web site and in leaflets. • Gather meaningful data about the types of e-mail questions the certification division receives and use the data to improve the information it communicates to the general public on the Web site and in leaflets. • Ensure that the information presented on the Web site is accurate and easy for customers to use. 	<p>The Commission concurs with this recommendation and has already implemented a method to gather data on e-mails. Also, the Web site is currently being redesigned to reflect the questions that are being asked on the phones and in e-mails. The new Web site will be unveiled on January 3, 2005.</p>
<p>To improve the efficiency of e-mail processing, the certification division should automate its response to and routing of e-mails.</p>	<p>The Commission concurs and has already started a pilot project.</p>
<p>To ensure the effective management of the unit's application workload, the certification division should routinely monitor the composition of the applications that are waiting to be processed, and collect and analyze data on the average review times for different types of applications.</p>	<p>The Commission does not believe that this recommendation is feasible due to the way the applications are entered into the database. The specific type of application is entered at the time it is evaluated, which is at the end of the processing time. To redesign the system would be cost prohibitive because it would require costly design modifications to a system that has not been completely tested and implemented as well as reclassification of staff. There is no cost benefit analysis in this report that addresses any added value of having this data. The division already monitors the number of applications that each team processes and effectively manages staff based on that report.</p>

COMMISSION RESPONSES TO BSA AUDIT REPORT RECOMMENDATIONS

<p>To ensure that the certification division continues to meet the 75-business-day regulatory limit, the certification division should routinely create automated reports from TCSIP to track the average processing times and regularly list all applications that have taken more than 75 business days to process.</p>	<p>The Commission concurs and expects to develop an automated report once TCSIP is implemented.</p>
<p>To ensure that it optimizes the timesaving benefits of TCSIP, the certification division should use automated processes rather than manual ones were possible. Specifically, the certification division should do the following:</p> <ul style="list-style-type: none"> • Require colleges and universities to submit credential applications to the commission electronically to the extent that is economically feasible. • Consider expanding TCSIP to allow school districts to submit applications electronically and to allow the virtual credential officer to process routine applications. 	<p>Although the Commission concurs that electronic submission is the more efficient method and should be encouraged, instituting such a requirement would require regulatory change. The recommendation is silent as to the effect such a requirement would have on candidates who do not have the requisite credit card necessary to accomplish an on-line transaction. The issue of enhancing the on-line process by expanding TCSIP is dependent on resources.</p>
<p>To encourage more customers to renew their credentials online, the certification division should gather data on and study the percentage of renewals it received online for different types of credentials to identify areas where additional outreach efforts may be necessary. Also, the certification division should do the following:</p> <ul style="list-style-type: none"> • Publicize the fact that online renewals are given a processing priority over paper renewals. • Make the link to online renewals more obvious on the Commission’s Web site. 	<p>The Commission concurs and is already in the process of making changes to the Web site.</p>

COMMISSION RESPONSES TO BSA AUDIT REPORT RECOMMENDATIONS

CHAPTER 3	
<p>The Commission should develop an overall plan to guide its efforts to finish implementing program standards by the act and to guide its ongoing standard setting activities that include timelines and resources it plans to use.</p>	<p>The Commission has finished its work related to the development and implementation of program standards pursuant to SB 2042 with the exception to the implementation of the Teaching Performance Assessment. Program sponsors are submitting responses to the standards according to the timelines adopted by the Commission. Staff look forward to further direction from state policy makers with regard to the availability of funding for the Teaching Performance Assessment. The Commission agrees that a long-range plan with associated timelines for reviewing and updating future program standards would be a helpful planning tool.</p>
<p>To ensure that it objectively appoints education professionals to its advisory panels, the Commission should develop a methodical approach that includes evaluating candidate’s qualifications against the Commissions qualifications.</p>	<p>The Commission staff uses a methodical approach to the appointment of advisory panels. The type of work to be done and balancing factors relative to staff, stakeholders, agencies, and political context are considered when evaluating applicant qualifications. The Commission staff strives to assemble panels that are balanced, not only in terms of the individual qualifications of each member, but also relative to geography, gender, race and ethnicity, urban/rural, size of institution or local education agency, and constituent representation. While such an approach does not lend itself to a “checklist” type of evaluation of applicants relative to qualifications and standards adopted by the Commission. This has resulted in consensus by the field with regard to both the process and product.</p>
<p>To provide the Commissioners with a better perspective on the results of the field review surveys, commission staff should present the actual results for each standard.</p>	<p>This has not been an issue raised by the Commission or stakeholders.</p>

<p>The Commission should follow its record retention policy to ensure that important documents are maintained for a specified time in case they are needed later for general information, research, or legal proceedings. The Commission should also implement a policy to designate the specific standard setting records that should be retained, the length of time to retain them, and the locations and format – paper or electronic – in which they should be stored.</p>	<p>The Commission agrees that improving the existing records management policy is a worthwhile goal.</p>
<p>To ensure that colleges and universities operate programs that meet the Commission’s standards, the commission should promptly resume continuing accreditation reviews. Further, it should take steps to promptly complete the evaluation and revision of its accreditation policy.</p>	<p>The Commission continues to be fully engaged in the evaluation and revision of its accreditation framework. All programs have undergone in-depth, rigorous initial accreditation review within the past two years for one or more educator preparation programs. To resume site visits during the 2004-2005 fiscal year would be both premature and unproductive. Institutions would not have sufficient time to prepare for accreditation visits and would face significant unanticipated costs in planning and organizing a visit. Without sufficient lead-time to prepare for a visit, the quality of findings could be compromised. Given the 24-month lead-time institutions need (and have requested) to plan, budget, and prepare for a visit, the earliest practical date that the Commission could initiate site visits would be the fiscal year 2006-2007. The Commission looks forward to working with the state policy makers to ensure that the Commission’s funding is adequate to support this important responsibility.</p>
<p>EXECUTIVE SUMMARY</p>	
<p>To better plan and evaluate its efforts, the commission should regularly update its strategic plan and quantify performance measures in terms of the results to be achieved of all tasks where appropriate.</p>	<p>The Commission regularly updates its strategic plan and quantifies performance measures where appropriate.</p>

Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento, California 95814

CONFIDENTIAL

October 20, 2004

Ms. Elaine M. Howle
State Auditor
555 Capitol Mall, Suite 300
Sacramento, California 95814

Re: "California Commission on Teacher Credentialing: It Could Better Manage Its Credentialing Responsibilities"

Dear Ms. Howle:

The Commission always welcomes reviews of its policies, programs and procedures as such reviews allow us to be more responsive to the public and their representatives. We appreciate the Legislature's interest in determining whether the Commission can continue to pursue efficiencies while maintaining effectiveness. Be assured that the Commission takes the audit process and the impact of this forthcoming report very seriously.

However, given the significance of this endeavor, I have serious concerns that the audit report and resulting recommendations did not take into consideration the statutory, resource and fiscal reality within which the Commission works. This is significant to understanding both why current business practices are the way they are, as well as the Commission's capacity to implement the audit recommendations given current legislative authority and fiscal constraints. We have what I consider to be a very serious obligation to the school children of California and we strive every day to fulfill this mission given fiscal, staffing and workload constraints.

The attached documents are provided as a response to the recommendations in the draft audit report entitled "California Commission on Teacher Credentialing: It Could Better Manage Its Credentialing Responsibilities" received October 14, 2004. The attachment includes a detailed summary of our concerns, which fall into the following categories:

1. Omissions. The audit charge may have constrained the scope of this particular review with respect to a workload analysis. For example, teacher credential candidates, through their fees, funded an extensive workload analysis conducted by an independent contractor supervised by the Office of the Legislative Analyst. This workload analysis showed that the Commission was significantly understaffed. The Legislature corrected this understaffing, however, subsequent to that Legislative effort the Commission staff has been cut by 22% percent while the workload has increased by 6% percent.

2. Proposals that Would Necessitate Changes in Statutes. Some recommendations, although welcome, would necessitate amendments to the Education Code since they propose responsibilities that exceed the Commission's current legislative mandates.
3. Proposals that Would Require Additional Funding. Other recommendations would require substantial new funding. For example, the Commission was funded to replace outdated technology to avoid a collapse of the credentialing issuance system. The level of funding provided was intended by the Legislature only to replace worn equipment and to process the additional workload anticipated due to mandates such as class size reduction. Adding technology to substantially reduce processing times would result in significant costs that the Commission does not currently have revenue to support.
4. Proposals that Would Require Additional Staffing. Other recommendations would require additional staffing. For example, conducting ongoing analyses of unemployment trends would require additional staff positions.

I would also like to take this opportunity to point out two issues that are of serious concern with regard to the content and tone of the draft document.

While I understand that the auditors assigned to this task may have felt constrained by what was prescribed/limited by the scope of the audit, I find it inexplicable that the audit report and recommendations do not address the state fiscal, staffing and political framework that effects the Commission's capacity to address its core mission, the licensure and discipline of educators in California. Not acknowledging circumstances created by the ongoing loss of staff, increasing workload, across the board program reductions and the critical revenue deficiencies neglects factors having a direct impact on the Commission's capacity to address its core mission. Further, the audit report does not, by any significant measure, acknowledge the fact that, as a result of these circumstances, Commission has modified its business practices and reassigned workload over the past three years to assure that strategic priorities, credential issuance and credential revocations, are addressed first.

The resulting dilemma for legislators as they review this work is that audit findings and recommendations are presented without reference to the reality that the Commission has lost both a significant amount of personnel and fiscal resources over the last three fiscal years, while at the same time workload continues to grow. Further, the audit recommendations effectively assign responsibilities without the fiscal or personnel resources or legislative authority to complete these tasks. Absent the presentation of this type of information, and the attendant analysis with regard to the impact on the Commission's operations, there is no way that the Commission can be effective in implementing a significant portion of the audit recommendations. Given this situation, I find myself asking, what is the point of presenting the findings and recommendations if the other side of the analysis isn't also presented for discussion and consideration?

Ms. Elaine M. Howle
October 20, 2004
Page 3

Confidential

Finally, after reviewing the draft I feel that it is important to share the impression that the draft document appears to reflect an excessively negative tone, inconsistent with what was actually reported in the audit findings and recommendations. This is of significant concern as the language of the document, specifically the chapter and subchapter headings appear to be misleading generalizations where in fact, there is scant evidence supported only by broad assumptions. This is further confused by recommendations that, while they may be useful (in fact, the Commission has already implemented several of them), are relatively minor in impact. Such recommendations are made to appear as if they will result in significant changes in the way the Commission does business when in fact, they are simply making minor and untested changes to the process.

We hope that this letter, and the longer document attached can assist you and your staff review as you consider revisions in the draft audit report. The Commission will receive the larger document at their November 30/December 1 meeting should the draft audit be finalized as is. In any case, we request that the shorter letter and summary constitute our official response to the audit report, as provided by law. If you would like to address any of these matters, please do not hesitate to contact me at the number provided above.

Sincerely,

(Signed by: Lawrence H. Madkins, Jr.)

Mr. Lawrence H. Madkins, Jr.
Chair, California Commission on Teacher Credentialing

Attachments

CCTC Clarifications to BSA Audit Report

Page 5 (last paragraph)

Response: Overall, the report does not make a distinction between the process of developing and implementing standards for teacher preparation programs pursuant to SB 2042 and other standards development activities, such as single subject, pupil personnel services, and administrative services. Further, the report confuses program standards with test specifications and requirements. Although the goal is to align the program standards and tests, the two are not comparable or interchangeable in consideration of the overall development process. This confusion has resulted in erroneous and misleading conclusions and recommendations.

Page 6 (2nd paragraph)

The report states that the “Commission suspended visits in fiscal year 2001-2002.”

Response: To clarify, the Commission continues to be fully engaged in the evaluation and revision of its accreditation framework. All programs have undergone in-depth, rigorous initial accreditation review within the past two years for one or more educator preparation programs. To resume site visits during the 2004-2005 fiscal year would be both premature and unproductive. Institutions would not have sufficient time to prepare for accreditation visits and would face significant unanticipated costs in planning and organizing a visit. Without sufficient lead-time to prepare for a visit, the quality of findings could be compromised. Given the 24-month lead-time institutions need (and have requested) to plan, budget, and prepare for a visit, the earliest practical date that the Commission could site visits would be the fiscal year 2007-2007. The Commission looks forward to working with state policy makers to ensure that the Commission’s funding is adequate to support this important responsibility. The report also indicates that the Commission was evaluating its accreditation policy because it “believes it is outdated.” It should be noted that the Commission has not said that it believes the system to be outdated, only that they want to review the system to see if it is outdated. The Commission’s Committee on Accreditation has been working with representatives from colleges and universities and K-12 education on a monthly basis to review its accreditation policies. The recommendations for revised policies will be presented to the Commission in May 2005.

In addition, we note that the report generally uses “colleges and universities” when talking about accreditation, and does not appear to take into consideration that the Commission also accredits school districts that operate professional preparation programs.

Page 8

“State law requires the commissioners to meet at least 10 times per year to conduct commission business.”

Response: This statement is not accurate. Education Code Section 44219 requires the Commission to meet at least once each month in no fewer than ten months each year. The Commission is meeting this requirement with only eight meetings in 2004 and seven meetings in 2005 by scheduling two day meetings which span two months whenever possible.

Page 11

Response: Inclusion of 30-day sub permits and emergency permit data in the chart is misleading.

Type and Number of Credentials Granted (Processed) During FY 2003-04
 (This is workload data, not based on Issue Date, includes First/New types and Renewals)
 Source: CCTC (2003-04Workload Report)

Auditor Report	Totals	CCTC Workload Report	Totals
Single Subject	30,704	Single Subject	31,453
Multiple Subject	58,538	Multiple Subject	59,698
Emergency Permits	72,617	Emergency Permits	14,261
		Day-to-day Sub Permits (all types)	58,356
		Other permits	845
Cross-cultural / Bilingual	10,647	Cross-cultural / Bilingual	16,049
Administrative Service	9,899	Administrative Service	10,403
All Others	56,334	All Others	47,674
Total	238,739		238,739

Page 11

The report indicates that to continue teaching after the five-year preliminary credential, an individual must complete an induction program, fifth year of study, or obtain national board certification.

Response: Attainment of National Board Certification does not waive the induction requirement for beginning teachers who are prepared in state.

Page 11

The report states that candidates “demonstrate academic preparation in the subject he or she wishes to teach by either completing an approved course of study in the subject or passing an examination on the subject.”

Response: The statement is true for single subject credential candidates only. The statement is no longer true for multiple subject credential candidates, who can only demonstrate academic preparation by passage of a commission-approved examination.

Page 13 (1st paragraph)

The report states that “Under the direction of the State Board of Education, the superintendent of public instruction, Education provides education policy direction to local school districts.”

Response: The word “Education” that follows superintendent of public instruction should be deleted.

INTRODUCTION

Page 16 (last paragraph)

The report indicates that the Commission is in the midst of developing new program standards as a result of SB 2042.

Response: This statement is incorrect. The Commission has completed developing new program standards pursuant to SB 2042, and has adopted all new program standards pursuant to SB 2042.

Page 17 (1st paragraph)

The report indicates that the Commission uses a panel of education professionals to develop each program standard.

Response: A more accurate statement would be to indicate that the Commission seeks the advice from and participation of education professionals in the development of each set of program standards. (Each set of program standards typically includes several individual standards). The Commission has used advisory panels, task forces, design teams, focus groups, review teams, and work groups depending on the scope of work to be done.

Page 17 (last paragraph, next to last sentence)

The report states that “The Commission suspended continuing accreditation reviews of colleges and universities in December 2002 and is updating the accreditation process to meet the requirements of the act.”

Response: It is unclear what is meant by this statement. The Commission suspended accreditation site visits in December 2002 in order to allow programs to respond and go through the initial accreditation review for 2042 programs and to focus its material and human resources on conducting those in-depth initial reviews. The Commission’s review of its accreditation policies is not related to the requirements of SB 2042.

Chapter 1

Overall, the report does not make a distinction between the process of developing and implementing standards pursuant to SB 2042 and other standards development activities, such as single subject, pupil personnel services, and administrative services.

Page 18 (2nd paragraph)

The report indicates that the Commission has responsibility for three teacher development programs.

Response: The Commission’s co-administration of the Beginning Teacher Support and Assessment (BTSA) program actually gives the Commission responsibility for four teacher development programs.

Page 19

The report notes that the Commission has not fully evaluated and accurately reported results from two of its teacher development programs.

Paraprofessional Teacher Training Program

Response: In Chapter 1, "The Commission Could Better Evaluate the Effectiveness of Its Efforts and Better Measure the Performance of the Teacher Credentialing Process", the report addresses the California School Paraprofessional Teacher Training Program (paraprofessional program). Two major issues are discussed. The first is in relation to the implementation of an external, independent evaluation of the paraprofessional program. The report states that "the commission has not contracted with an independent evaluator to determine the success of the paraprofessional program."

In response, it is important to clarify that steps were taken to pursue funding for an independent evaluation but funding for this purpose has not been included in the annual budget act. Commission staff submitted Budget Change Proposals in September, 1991 and again in September, 1992. In June, 2000 a letter was written from the CCTC to the Budget Conference Committee stating that the CCTC did not receive funding support for the independent evaluation and requested \$100,000.00 and two positions for administrative support. Again, funding was not provided. Given that financial support was not provided, staff could not proceed with securing a contractor to conduct the independent evaluation. Staff has, however, collected information from paraprofessional programs annually and reports this data in its annual legislative report.

The second issue that surfaces in the audit report is focused on program quality and success. Commission staff are currently working to improve the quality of program level data collection as well as the focusing the process of the analysis of this data. Staff are working with districts who hold paraprofessional grants to document candidates annual progress and to identify candidates that have not made adequate progress.

Pre-Intern

Chapter 1 also examines the condition of the pre-intern program administered by CCTC staff. It is important to clarify the purpose of the pre-intern program. The purpose of the program was to provide funding to districts who would in turn, support candidates to increase their capacity to provide instruction and classroom management and to assist these candidates to pass a subject matter exam (in some single subject candidate cases, coursework). The "survival pedagogy" and the test preparation and goal of passing the exam was in order to advance these pre-intern candidates to an Intern program. In 2000-2001 the issue of assisting candidates advancement to an Intern program surfaced among pre-intern program Directors. At that point in time, the Commission added requirements to both pre-intern and Intern programs grant award process requiring pre-intern programs to be directly linked to Intern programs in order to receive funding, thus ensuring the intended ongoing relationship between the two programs. Specifically, program applicants were directed to explain how they would assist candidates in progressing through teacher development and gain preliminary credentials.

In addition in an attempt to measure the success of the pre-intern program the audit report attempts to compare pre-intern candidates with emergency permit holders. Pre-interns and emergency permit holders are not easily comparable. The pre-intern program purposefully selects candidates who need support and test preparation. Often, emergency permit holders have already passed their subject matter examination. In order to truly compare these two groups, much more data and analysis is necessary than is currently provided in the audit report. The goal is to assure that all teachers are credentialed. The pre-intern program assisted many toward reaching this goal by providing a pathway into an Intern program.

Pages 22-23

The report implies that inconsistency and lack of support casts doubt on the validity of the data the Commission uses in its annual reports.

Response: Notwithstanding the error noted in the specific report cited in the report, supporting documentation is on file in PSD for prior years. As was explained to the auditors, there were extenuating circumstances surrounding the 2002-03 report. These conditions were unique and will not be repeated in the future. To call into question the validity of all annual reports based on the error contained in a single report is misleading. We note the availability of the following supporting documentation:

1995 – 1997- Program and participant data was included in paper project summaries which describe the status of the program as well as participant’s academic progress. The summaries are on file in PSD.

1997 – 2001-02 – A paper Annual Report Form that includes the evaluation elements identified in Education Code Section 69619.1 (re-authorized as 44393) was devised to collect program and participant data. Clarification, if necessary, was obtained by e-mail and phone. The reports are on file in PSD.

2002-2003 – Participant and program data was collected through an electronic consent form. With the exception of evaluation elements 4 and 5, the form includes evaluation elements identified in Education Code Section 44393.

2003-04 – Program, participant and recent graduate data was collected through the electronic consent form with clarification obtained by e-mail and phone. To ensure that all graduate data was collected, programs were asked to complete a paper annual report form. The reports are on file in PSD.

Page 23 (1st full paragraph)

The report states that “As a possible result, the commission is now trying to determine what to do about nearly 70 individuals who are participating in local program that were scheduled to end in December 2003 or sooner, but who have not completed credential requirements.”

Response: It should be noted that prior to the audit, the Commission had already taken steps to determine the appropriate way to handle these cases. A letter sent on May 12, 2004 was sent to program directors asking for explanations why the identified individuals who were participating in local programs scheduled to end in December 2003 had not completed program requirements.

On 9/22/04 and 9/27/04, letters directed programs to request reimbursement from remaining participants, as necessary, and a status report on funds reimbursed to date.

Page 23

The report states that the Commission has not demonstrated that the Pre-Intern Program has been successful in accomplishing its objectives.

Response: One of the primary purposes of the Pre-Intern Program is to provide support to individuals who would otherwise be teaching on an Emergency Permit that enables them to meet the subject matter requirement necessary for entry into an internship or teacher preparation program. In other words, the program helps individuals reach the first step on the road to a preliminary credential. Prior to the establishment of the program, it was common for some individuals serving on an Emergency Permit to receive little support or guidance in attaining subject matter competency.

Although we understand the point made by the report, we believe that the use of Commission data for 1998-99 and 1999-2000 does not provide an appropriate data set for analyzing the program. The data collected in 1998-99 and 1999-2000 that showed the retention rate of 80% was based on emergency permits holders after thousands of pre-interns had been removed. Most of those permit holder who remained were, as noted on pages 10 and 12 of the report were those who had completed most of their preparation coursework or held another credential. The pre-interns were those who had the farthest to go and based on the 1996 study were far more likely to drop out. That they stayed at a high rate was remarkable and was therefore noted in the legislative report.

As was pointed out in the Report to the Legislature, pre-interns as a whole had taken the required subject matter exam at least once. Therefore, it seemed reasonable that the comparison group should be those who had taken and failed the subject matter exam. Second time test takers have a pass rate of less than 30%. These data were provided to the auditors, and have been provided to the CCTC in agenda items.

Page 36

“In addition, the commission’s executive office does not systematically track whether the commission is successfully completing the tasks outlined in the strategic plan. As a result of inadequate strategic planning, the commission lacks specific goals and performance measures to guide, evaluate, and improve its efforts.”

Response: The commission agenda items are linked to the strategic goals of the Commission. Also, the Executive Director meets weekly with all Sr. Managers to monitor the status of all projects as they relate to the Commission’s goals. In addition, the Executive Director annually prepares a list of accomplishments that are directly linked to the strategic goals of the Commission.

Page 37

The audit report states that “One example of a task for which the Commission did not quantify the results to be achieved, but could have, is the task to expand its teacher development programs.”

Response: For ten straight years the Commission expanded its alternative certification program. Both the intern and pre-intern programs were designed to be per capita, market sensitive programs. For all ten of the years of the intern program, each intern for which there was a request and a verified intern who became a teacher of record received funding. We did not set targets or quotas because this is a program that was designed to respond to the needs of school districts. We did seek fiscal flexibility so that we could move funds from the intern program to the pre-intern program as an effort to make both programs more responsive to the participating districts. Our task was to respond to demand not set predetermined, quantified targets. The quantified target was set by the funds available. Staff has seen its task as responding to local needs not setting quantifiable targets as the priority.

Page 39

“In addition, the commission’s executive office does not systematically track whether the commission is successfully completing the tasks outlined in the strategic plan.”

Response: The commission agenda items are linked to the strategic goals of the Commission. Also, the Executive Director meets weekly with all Sr. Managers to monitor the status of all projects as they relate to the Commission’s goals. In addition, the Executive Director annually prepares a list of accomplishments that are directly linked to the strategic goals of the Commission.

Page 41

“... maintains the support for these statistics.”

Response: It would seem that agenda items would be sufficient. It does not seem reasonable that original data would need to be kept in perpetuity or in the case of the pre-intern program for 9 years.

Page 42

“Also, the commission’s executive office should present the commissioners with an annual status report on how the commission has achieved the goals and tasks outlined in the strategic plan.”

Response: The Executive Director annually prepares a list of accomplishments directly linked to the strategic goals that are read at a Commission meeting and in the Official Minutes of the meeting. Also, the agenda items provide a status report on the goals and tasks at each meeting.

Page 43

Chapter Summary

Response: The text in Chapter 2 is provided without the backdrop of budget cuts, staff reductions and increasing workload. Without this context the findings are often misleading and sometimes inaccurate. While many of the findings center on collecting data and analyzing it, the performance of these activities requires resources and those resources have to be balanced against the gain realized from analyzing the data. None of the findings or recommendations in the report provides a cost-benefit analysis. In a time of diminished resources that type of analysis would have been helpful in weighing the usefulness of the recommendations.

It is important to know that the certification unit has suffered a decrease in staff of 22% over the past five years while experiencing a 6% increase in workload. The workload did drop by approximately 6% from 2002-03 to 2003-04 which has helped to relieve some of the tension between processing applications and providing customer service. This information is necessary to understand that even when/if all of the recommendations are in place there may not be sufficient staff to provide customer service and process applications. Additionally, there is no mention that MGT of America conducted a \$250,000 management study in 1999-2000 of the Commission, in particular the certification division, and within that report is a workload study. The BSA report suggests that the division does not have any workload analysis, however, an analysis does in fact exist. It would not be cost effective to devote staff time to do another workload analysis particularly when a new technology system is very close to implementation.

As rightly noted in the report, the certification unit can work to provide information on the web in a user-friendlier format and it is working with the Commission's technology staff to redesign the web site with a target unveiling of January 3, 2005.

The certification unit is fully aware of its processing workload and uses a biweekly report to make staff staffing decisions. The BSA report states that the certification unit is not aware of the types of applications that are pending. The report is accurate, however it does not state that the application process does not allow for this type of data because the type of application is not known until it is processed by the certification staff. To change that would require a complete redesign of the processing system, yet there is no indication in the report with regard to the benefits, if any, of knowing this information. The report acknowledges that the processing time has been within the regulatory limit and within the timeframe that the past administration deemed appropriate per a veto message in the 2000-01 budget. There is no mention of that veto message in this report, yet it was provided to the auditors.

The report also mischaracterizes the Teacher Credentialing Service Improvement Project (TCSIP) and takes out of context the comments of the certification director. The report does not provide enough detail about the project to provide the necessary context of the project. While the report states that TCSIP is a three-phase project, it does not state that the efficiencies anticipated from the project at the time the project was initiated have already been mostly realized in the first two phases, online credential lookup and application status and online credential renewals. The report accurately addresses in particular the efficiencies of the online renewal process. However, the report does not state that the third phase of the project has not been implemented and is still in the testing phase and at the time the auditors were conducting their research the project was not ready for testing. Within that context, the certification director could not make comments about the possible efficiencies of phase three because the system had not been tested. The director did mention in those fact finding sessions that there would be efficiencies realized from the college and university online credential recommendation submission process, that the edit process would reduce errors that create double work and the efficiencies of the virtual credentialing officer, comments that are not included in this report. Also the report characterizes the division as not planning to fully utilize the automated process and that we chose not to move forward with it. As with any project, it is important to have one phase functioning prior to starting a second or third phase and with any new technology system it takes from six months to a year to have it fully operational. Also without the context of budget constraints and reduced staff it would not be a sound management decision to enhance a system before it is even operational or is it sound management decision to start an enhancement when there are no financial resources to fund the project. Once the systems are fully operational and funding is available, of course the certification division will want to fully utilize all automation that can be provided so it is misleading to say the division does not plan to use the full potential in the foreseeable future given the ongoing fiscal restraints. It is important to note that the Commission suggested that the auditors consider deferral of recommendations relative to the TCSIP until after the final phase of the project had been completed, as any assumptions based on current practice or conjecture would be premature.

Lastly, the Chapter 2 summary states that the certification division could better inform teachers about the online credential renewal process. However there is no acknowledgement in this report that when the online process first became available the certification division in cooperation with California State University, Chico, developed a color leaflet explaining the process. Those leaflets

were sent to every county office of education to include with teachers payroll checks. Can we do more? Yes, we can and the redesigned web page will emphasize the online credential renewal option.

Page 44

Response: The third sentence under this heading includes information that is somewhat of a surprise since the auditors informed us that our publications and forms did not need changing and that they thoroughly explained the credential or permit requirements. In fact all of the information leaflets were redesigned through a contract with California State University, Chico following a recommendation of the MGT of America management study of the Commission in 1999-2000.

Page 44

Response: The same recommendation was made in the MGT of America Management study, yet there is no reference to the fact that in the MGT study the certification unit devoted 31% of its time processing credentials, and since that it has decreased to 39% and at the same time there has been a 6% increase in the number of applications and a 22% reduction in staff.

Page 45 (2nd Paragraph)

Response: The content of the paragraph states that the certification division reduced customer service operations, yet it does not state that there was an increase in credential applications and a reduction in staff. Without that data, it appears that this was an arbitrary decision not based in any data analysis of which there was.

Page 47 (2nd Paragraph)

At the September/October 2004 Commission meeting, the certification division established a performance goal of reducing phone calls and e-mails by 5%.

Page 49

Response: The Commission is actively redesigning its web site with a target date of January 3, 2005. When the web site is unveiled, users will find application processing data that is up-to-date and the online renewal process will be featured with an explanation of the advantages to online renewal.

Page 50

Response: The Commission strongly disagrees with the finding that the division does not gather or analyze data on the time it takes to process credentials. The certification unit staff prepares a report twice a week that provides the processing time of all applications. In addition there is a weekly report that identifies every pending application and which team it has been assigned. Nowhere in the report does it address the ebb and flow of applications. The report states that generally the division meets the regulatory 75-working day processing time, however it does not state that during the months of July through October the Commission receives 38% of its workload and it is processing applications received during this period that may exceed the 75-day limit.

Page 54

Response: The Commission strongly disagrees with the statement that the division does not perform sufficient data analysis to effectively manage its application processing workload. After this statement the report proceeds to outline all of the data reports and analysis the division performs on its workload. The general recommendation is to monitor the type of applications that are pending. The report does not state that the current or future process does not provide this type of data nor does this report provide any analysis why that data would be helpful. In order to capture that data, a reclassification of the cashiering staff and a complete change in the process would be necessary. While it is possible to do this there is no analysis in the report that shows the costly reengineering of the process would reduce the processing time.

The report states that the certification division has not conducted time studies on the effort needed to process different types of applications. The division has not done that because MGT of America conducted a management study in 1999-2000 that included a time study for processing applications. Why, after an investment of \$250,000 would the certification division replicate the MGT time study? Also, why would the division complete a time study when a new technology system is to be implemented?

In the third sentence in the paragraph at the top of page 56, there is a statement that the division had the opportunity to include an automated workload report when TCSIP was designed. That is not an accurate statement. Without the proper context of the TCSIP project and the fact that almost all of the current reports were considered out-of-scope, the division did not have a choice as stated in the report to request this report. We do hope to develop it once the system is operational.

Page 58

Response: The findings in this section are misleading and the comments of the certification director are taken out of context. Nowhere in this report does it state that phase three of TCSIP is has not yet been implemented and during the gathering of the data for this report the system was in the very early stages of testing. In fact staff informed the auditors at the beginning of the audit that the Commission is in the process of changing data systems, however the audit was not delayed. The comments the certification director made were in reference to phase three of the project, not the complete project, and at the time the system had not been tested at that time so the efficiencies were still unknown.

Also not included in this report was the statement by the Certification Director, that there would be benefits from college and universities submitting credential applications online, that there was a enhanced edit process that should eliminate having to redo processing errors and the virtual credentialing officer. The comments about the new system centered on the collection of data that was significantly different than the current system. As the report accurately states, much of the efficiencies have already been realized by the first two phases of the project, the third phase is the data collection phase where there are efficiencies but not as great as those when the first two phases were was implemented.

Page 62

Response: The Virtual Credentialing Officer (VCO) is one of the best aspects of TCSIP when it comes to efficiency and reducing staff time to process the online renewals. At the time the data for this report was collected, the VCO had not been fully designed nor had it been tested. At the time the auditors met with the certification director, he stated that the VCO needed to be operational

before any further enhancements could be planned. The report accuses the certification division of not soliciting a quote to enhance the VCO, however why would we solicit a quote when we do not have any financial resources to pay for it. The report does not include any statements about the lack of financial recourses available to the Commission and that it would be unwise to take this action without funding.

Page 64

Response: The heading is very misleading. The VCO was developed prior to the arrival of the audit team and this heading makes it sound like this is a new idea. The VCO was included in the project to streamline the online renewals.

Also the last sentence under this heading states that the Commission is going to print a copy of the application, as if that was an inefficient process. The Commission required by law to maintain a copy of the application and keep it for a period of the lifetime of the credential holder.

Page 65

Response: The text in this section does not reflect the heading. The certification staff does not need data to increase the users of the online renewal process. We concur with the report that the web site can and will be enhanced to highlight the online credential renewal process. As stated in the report a flyer is included in every 30-day substitute permit outlining the online renewal process. However, data is not needed to increase the numbers of users.

The text under this section states that data is needed to determine success of the process. There are different methods to determine success. This report would like the division to determine the total number of renewals, which of those renewals are offered online and then determine the percentage who are using the online process. By setting a percentage we could determine success. As the auditors know through discussions, because of the database design from 15 years ago, it is almost impossible for us to determine the total number of renewals and how many can be renewed on the web.

Another measure of success, which is just as valuable, is the number of teachers using the online process and how it has continued to increase. Figure 8 in the report demonstrates that the online process is a success. There has been over a 600% increase in the use of the online process from July 2002 to April 2004. By any measure, a 600% increase would be determined a success.

Response: The Commission expects to develop an automated report once TCSIP is implemented.

Page 70

The audit report notes that the Commission should revamp its process for developing program standards. And also notes that "In addition, the commission does not have an overall plan to guide its efforts to finish implementing some program standards required by the act and to guide its ongoing standard-setting activities. Planning would help the commission identify the steps necessary to periodically update program standards and the resources it plans to use." Finally, the report says "Our review of five recently developed program standards..."

Response: Throughout the document, the writers seemed to mix two different topics and treat them as one. One topic is the implementation of SB 2042 and the other is the general process that the Commission uses to develop standards. Both topics certainly are in need of review, but the presentation gave a misleading impression.

The Commission adopted a plan to implement the SB 2042 standards developed by the Advisory Committee. It is attached.

To clarify, it was not five standards, but five sets of standards.

Page 71

Implementation of SB 2042

Response: The report made a number of references to the Commission's implementation of the legislative mandates of Senate Bill 2042. Numerous times in the report the comment was made that the Commission did not have a plan that included timelines for developing and implementing the standards. That particular charge is hard to understand, given that there was a plan and the reform has taken place according to the plan.

The chart developed by the audit team clearly shows the results of the plan. Shortly after the passage of SB 2042 in 1998, the Commission began the process of developing three inter-related sets of standards of program quality and effectiveness for Elementary Subject Matter Preparation Programs, Professional Teacher Preparation Programs and Professional Teacher Induction Programs. In addition, the Commission adopted a set of Assessment Quality Standards to define the Teaching Performance Assessment. All of these standards were adopted in the 2001-2002 fiscal year. Taken together, they represent standards that create a learning-to-teach continuum that was a significant reform in teacher preparation. At the time of the adoption of each of the sets of standards, the Commission also adopted an implementation plan/schedule. Following the adoption of these sets of standards, the Commission began a 3-phase project for development and implementation of new standards for each of the 13 single subject areas. Again, when the standards are adopted, the Commission also adopts an implementation plan. The first set of standards were adopted and are being implemented. The second set of standards were adopted and are just beginning the implementation phase. The third group of standards are about half way through the development phase. Taken as a whole, this represents a massive reform in the teacher preparation system. The total length of the entire process from the very beginning to the final implementation of the last group of standards will have been about nine years. However, each individual group of standards have been implemented in a two year time period after they are adopted.

The only implementation problem in the standards is that the Secretary for Education and the chair of the Senate Appropriations Committee requested the Commission to delay the implementation of the Teaching Performance Assessment, due to the state fiscal crisis. The state fiscal crisis continues, as does the delay in implementation of the TPA. The Commission will reconsider the implementation of the TPA in the spring of 2005. It is significant to note that since the beginning of the SB 2042 standards development process in 1998, the Commission has faced some very serious financial constraints that have required some adjustments in how the work was accomplished and how it was resourced. However, the project has gone forward, and is now nearing completion.

Page 74

The audit report states that the Commission developed program standards in a reasonable order, but it should develop an overall plan to finish implementing the act's reforms.

Response: The report made a number of references to the Commission's implementation of the legislative mandates of Senate Bill 2042. Numerous times in the report the comment was made that the Commission did not have a plan that included timelines for developing and implementing the standards. That particular charge is hard to understand, given that there was a plan and the reform has taken place according to the plan.

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Page 74 – 75

The report states that: "The order in which the commission chose to develop the subject standards appears reasonable..." and "An overall plan would also guide the commission's efforts...program standards and examinations should be reviewed periodically..."

Response: The single subject standards development followed the order and coincided with the timetable already established for the regular orderly updating of single subject exams (and the program standards to which they relate). The schedule was adopted by the Commission in 1999 (agenda items of Jan. 20 and June 23, 1999).

Page 75

“If the Commissioners adopt a two-year implementation period, as they have previously, colleges and universities will not finish implementing these program standards until mid-2007, nearly nine years after the act became law.”

Response: AB 1307(Goldberg) passed in October 2001 requires that changes in education regulations allow stakeholders (candidates) two years to make the transition, upholding old regulations during that period. The Commission cannot require the “implementation” of new program requirements of candidates in less than two years. Commission staff has stood ready to conduct program reviews since the adoption of each set of standards. In addition, submission for program approval is not a required of colleges and universities who may submit at will but is an institutional option. CTC staff currently has dozens of single subject programs under review and dozens more scheduled for review over the next year. These reviews are rigorous and time-intensive. The chief obstacle to completing those reviews at this time is a lack of funds to train and coordinate expert field reviewers.

Page 75

“Although the commission developed an approach to develop standards required by the act, it did not use an overall plan that included timelines for developing standards and the resources it planned to use.”

Response: This appears to confuse the timeline and plan for the implementation of SB 2042 with the timeline and plan for test development. As we have noted, there was a detailed timeline for SB 2042 standard development with regard to test development. CTC released a Request for Proposals (RFP) developing single subject exams and standards that required bidders to submit a detailed plan structure and resources for the project. The response to that RFP from NES, Inc. (as described in the audit report) described specifically how and when they would accomplish the CTC plan within the contract budget. That project is near completion on schedule within the budget and requirements of the awarded contract.

Page 75 (2nd paragraph)

Response: The paragraph indicates that there was not a plan to develop the standards. The Commission had a plan and the standards were developed and adopted along with an implementation plan. The TPA was part of the implementation plan that was delayed after adoption because of the state fiscal crisis.

Development of Program Standards

Page 77

“Currently, the Commission informally evaluates the lessons learned from developing standards.”

Response: CTC is required by law (Ed Code Section 44225 i and 44288) to conduct standards development in the manner that it does, using advisory panels of experts. It further validates the findings of those experts with the same processes (field reviews, bias reviews, alignment and congruence reviews) that it used for the last development of standards in the late 1980’s. All standards in the 2042 reform were developed using the same process for consistency. The fact that this process is encoded in law suggests that it is formal.

Page 78

Response: The report states that the Commission does not use a methodical approach to form advisory panels. A “checklist” model could make the standard-setting process more challenging. The selection of panel members does require a review of prospective panel member qualifications and a ranking. However, the ranking is into general categories, rather than a straight serial ranking. From that point, the Commission must consider a number of other balancing factors that will affect panel member selection. They are, in no particular order, size of the panel, task of the panel, size of the pool of applicants, employment of applicants, constituency group represented, ethnicity, geographical distribution, affiliation with K-12 education or institutions of higher education, particular expertise, availability, etc. Once these factors come into the process, it is not possible to have a process that “panel members are selected objectively.”

Further there is considerable variation in the task that various panels are given that will greatly affect how panel members are selected. The Commission employs multiple strategies to utilize advice from experts in the field in the development of its policies. This includes formal advisory panels, appointed task forces, focused work groups, and design teams.

Page 78, (1st paragraph, 2nd sentence)

“...documents created during the standard setting process.”

Should be “...documents created during the *program standards field review process*.”

Page 79

“Lacking a more structured application to explicitly solicit how candidates met the qualifications, the commission may not have received sufficient information to be able to evaluate candidates’ qualifications.”

Response: The audit report seems to suggest that the Commission should rank the qualifications of applicants. However, the Education Codes cited above do not place, for instance, administrators higher than teachers or higher education faculty higher than K-12 faculty. Further, no representative from the Commission stated that one set of standards is more “important” than any other. The Commission staff uses a methodical approach to the appointment of advisory panels. The type of work to be done and balancing factors relative to staff, stakeholders, agencies, and political context are considered when evaluating applicant qualifications. The Commission staff strives to assemble panels that are balanced, not only in terms of the individual qualifications of each member, but also relative to geography, gender, race and ethnicity, urban/rural, size of institution or local education agency, and constituent representation. While such an approach does not lend itself to a “checklist” type of evaluation of applicants relative to qualifications and standards adopted by the Commission. This has resulted in consensus by the field with regard to both the process and product. Using this process, the Commission complies with the law. The auditors were provided with the selection chart and a description of the process.

Page 81

“For the fifth standard we reviewed – induction programs- the commission used a different process when forming the advisory panel. It did not solicit nominations, nor did it require interested candidates to submit an application. Instead, the commission indicated that it selected panel members who were active....”

Response: The induction standards were developed by specialists from induction programs and were under the overall guidance of the larger SB 2042 panel. The management of induction programs was a shared function between the Commission and the Department of Education, as required in the Education Code.

The SB 2042 Advisory Panel was already charged with the development of Induction program standards, and thus a new panel was not required to be selected. A subcommittee of existing SB 2042 Advisory Panel members was established and then augmented by individuals from the BTSA community who, by virtue of their background and experiences, could provide specialized background knowledge to the current SB 2042 advisory panel members on the subcommittee.

Page 82

The report states that “The Commission could do more to report its survey results and consider the view of minority groups.”

Response: The report confuses the methods used for various surveys without regard to the distinction of the purpose of the survey leading to a serious charge that the Commission does not consider the views of minority groups. The content validity study is conducted in an objective and statistical manner for a particular reason. The bias review study is charged to ensure that standards and examination items are free from biased language or content. The field survey of the draft standards is to gain further comments for experts in the field about the work that has been proposed for adoption by the Commission at a public meeting.

Page 82

“For example, when commission staff proposed the four core subject area standards to the commission for adoption, it reported...”

Response: Staff reported to auditors that some of the surveys submitted represented the response of many more than one individual, such as a whole department. This was also noted on the surveys and confirmed with the academic departments by Staff. In fact one of the Commissioners who works for the CSU system assisted staff with distributing those surveys to the CSU campuses and can confirm these facts. This explains the difference in the numbers of surveys versus the numbers of responses reported to the panels and the Commissioners.

Page 82

“Also the Commission is missing an opportunity to further ensure that its subject matter requirements are free from biased language and content because its process excludes the views of some groups.”

Response: Although the standards field surveys are “color-blind,” the subject matter requirements, upon which the standards and exams are based, are subjected to a separate bias review by a committee made up of individuals from underrepresented groups. In addition, the content validity study is submitted to a select sampling of individuals also from underrepresented groups to insure their inclusion in the process. Though items are flagged by numbers of responses, the panels were also presented with a complete set of data to consider, including minority responses. Auditors were given this information from both contractors for single subjects. Finally, the standards field surveys are sent to every education institution across the state, so without collecting specific data on the

source of the responses, every group had equal opportunity to have their responses considered equally with everyone else. Using these different methods insures fair and equitable participation of all interested groups.

Page 83

“However, the Commission did not always adequately document how it ensured that the standards were aligned.”

Response: The auditors were told how the Commission ensures alignment to the K-12 standards as follows:

- 1. The contractor drafts an alignment.*
- 2. The Commission invites the curriculum consultants from CDE to participate in the panels' work to insure alignment.*
- 3. The panels compare the present subject matter standards to the K-12 standards.*
- 4. The panels compare the contractor's alignment to the K-12 standards.*
- 5. The alignment and congruence panel compares the subject matter panel's alignment.*
- 6. The field review asks responders familiar with the K-12 standards whether the draft subject matter requirements and standards are what beginning teachers need to be able to know and teach.*
- 7. The correspondences with the K-12 standards are noted in the subject matter requirements.*

This same process was followed for developing all 13 areas of single subject standards. In effect a system of checks and balances was set up to insure no major areas of the k-12 standards were left out of the subject matter standards. The audit reports states that the Commission was not able to provide the results of the independent review. However, those documents are available from the contractor and staff upon request in both the contractor's alignment and the alignment and congruence committee report to the contractor. The auditors did not ask for this information.

Page 84

Commission's “. . . efforts to revise it policies have stalled . . .”

Response: The Commission has worked continuously during the past year to review its accreditation policies through the Committee on Accreditation and a workgroup of stakeholders. These groups have met regularly and are on pace with the established timeline for this project. Activities in the past 10 months have increased with the Commission assigning its Committee on Accreditation to oversee the review and utilize an Accreditation Study Work Group to assist in bringing recommendations to the Commission next spring. There is a report on the progress of the accreditation review on the agenda of each Commission meeting. Rather than stalling, the efforts have actually increased.

Resumption of Continuing Accreditation Visits

Page 84

Response: Throughout the report, there is an inconsistent reporting of the date that the Commission suspended its continuing accreditation site visits. On p. 84 the date listed is December 2002. Earlier in the chapter (p.71.) the date is listed as fiscal year 2001-2002. The correct date is December 2002 (fiscal year 2002-2003).

Page 84

“However, suspending continuing accreditation limits the commission’s ability to ensure that colleges and universities....are operating programs that meet the commission’s eight common standards and specific teacher preparation program standards.”

Response: All of California’s teacher preparation programs had to respond to the Preconditions, Common Standards and Program Standards established pursuant to SB 2042. Therefore, all of California’s teacher preparation programs have been reviewed and granted initial accreditation within the last two years, and the majority within the last year. The Commission can be reasonably assured, therefore, that these programs are presently meeting Commission standards even in the absence of site visits during 2003-04.

Page 86

The report states that the Commission believes that its accreditation policy is outdated.

Response: It should be noted that the Commission has never stated that. The purpose of the accreditation review is for the Commission to gain enough information so that it can make an informed decision about its accreditation policies. At the conclusion of the review, the Commission may make that determination, but it has not been made yet.

Page 86

Response: The report indicates that the Commission did not ask the contractor to recommend alternatives to the present accreditation system. In fact, the Commission did not formally ask the contractor for the Accreditation Framework review to recommend alternatives. By statute, the Commission was required to conduct a review of the Framework (its policies) using an external contractor. The review called for was about the Commission’s policies and their implementation. The statute required that the Commission could not make substantive changes in its policies until the Framework study was completed. The study was completed in Spring 2003. Once the study was completed, the Committee on Accreditation and Commission began its review of the findings, eventually leading to the decision by the Commission to authorize and Accreditation Study Workgroup.

About one and one-half years before the completion of the study, Commission staff asked the contractor to recommend alternatives to the present system. All parties recognized that this was not in the “scope of work” of the contract and a revision of the contract would be necessary, if the scope of work were to be expanded. The contractor did, however, agree to voluntarily provide some background information about other accreditation systems without a formal change in the contract. Using the background of the results of the independent study on the implementation of the Commission’s accreditation policies, the Accreditation Study Work Group and the Committee on Accreditation are reviewing alternatives to the present system as part of its charge.

**INTRODUCTION TO THE RESPONSE TO SB2042 IMPLEMENTATION ISSUES
FROM THE AUDITORS' REPORT****SB 2042 Implementation plans and timelines**

There were two primary SB 2042 implementation plans. The first plan covered the work of the SB 2042 Advisory Panel as this group worked on the development of program standards for teacher preparation programs, elementary subject matter programs, and induction programs. The SB 2042 Advisory Panel provided regular updates to the Commission as to the progress being made in accomplishing the charge to the Panel to develop these three sets of program standards. The larger panel worked on the development of the teacher preparation and the elementary subject matter preparation program standards; a subcommittee of the SB 2042 panel worked on the development of the Induction program standards in order to take advantage of the specialized knowledge of representatives from the BTSA community. The regular updates to the Commission included plans and timelines for accomplishing the charge. See the attached timeline of Commission updates and the supporting documentation referenced within the attached timeline.

The second SB 2042 implementation plan was adopted by the Commission in September 2001, at the same time as the Commission adopted the professional teacher preparation, elementary subject matter, and induction program standards completed by the SB 2042 Advisory Panel. This plan governed the implementation in the field for the three sets of program standards adopted by the Commission (see supporting document "I" for the SB 2042 standards field implementation plan). Regular updates were subsequently provided to the Commission as to the progress in carrying out the adopted SB 2042 standards field implementation plan. See attached timeline of Commission updates and supporting documentation referenced with the attached timeline.

2042 Implementation Plan Chronology

DATE	EVENT	REFERENCE DOC.
1997	SB 1422 Advisory Panel makes final recommendations for changes to the requirements for earning and renewing teaching credentials	A
Sept. 17, 1998	SB 2042 signed	A
Sept 24-25, 1998	First meeting of Commission- appointed new Advisory Panel to develop teacher preparation standards. Panel charge based on SB 2042 legislation includes teacher preparation, elementary subject matter preparation, induction and teaching performance assessment standards development.	A
March 1999	Progress report provided to the Commission on SB 2042 Advisory Committee activities. Plan approved for 1999 timeline for the SB 2042 Advisory Committee's work, including teacher preparation, elementary subject matter preparation, and teaching performance assessment standards development. Single subject matter content also reviewed with a later timeline for single subject matter standards development.	A
May 1999	Progress report provided to the Commission on SB 2042 Advisory Committee activities. Updated timeline presented for Commission review.	B
July 1999	The Commission approved a plan and timeline for conducting single subject matter test validity studies for single subject matter tests. This process routinely takes place every five years in order to keep subject matter examinations current with student content standards.	C
September 1999	Progress report provided to the Commission on SB 2042 Advisory Committee activities. Updated timeline information presented for Commission review.	D
December 1999	Progress report provided to the Commission on SB 2042 Advisory Committee activities. Updated timeline information presented for Commission review. Joint discussions held regarding induction (Level II) with BTSA Leadership Team.	D

February 2000	The Commission approved a plan and timeline for revised single subject matter test content specifications for single subject matter tests. This process would include development of new single subject matter standards pursuant to SB 2042, in a parallel process to the other program standards being developed by the Advisory Committee.	C
June 2000	Progress report provided to the Commission on SB 2042 Advisory Committee activities, including next steps in the implementation process.	P
September 2000	Progress report provided to the Commission on SB 2042 Advisory Committee activities, including updated timelines of implementation activities.	Q
November 2000	Progress report provided to the Commission on SB 2042 Advisory Committee activities, including development of program standards and induction standards. The Commission reviewed the initial plan for the field review of the new draft standards.	F
December 2000	Progress report provided to the Commission on SB 2042 Advisory Committee activities. Further information on the plan for field review of the new draft standards provided.	G
	Progress report provided to the Commission on SB 2042 Advisory Committee activities. Results of the field review were provided	H
January 2001	Implementation plan for field review of teacher preparation and subject matter preparation standards presented to the Commission.	R
April 2001	Implementation plan for single subject matter examinations and program standards development approved by the Commission	
September 2001	New program standards adopted by the Commission. Implementation plan for new elementary subject matter preparation, teacher preparation, and induction program standards approved by the Commission. The plan includes activities and dates. Plan activities are funded in part by a federal HEA Title II Teacher Quality Enhancement State Grant.	I, J

September 2001	Implementation Plan Drafted for Transitioning BTSA programs to Induction programs	O
February 2002	Update on progress in implementing the SB 2042 Implementation Plan provided to the Commission's Executive Director	K
March 2002	Update on the development of single subject matter program standards and examinations provided to the Commission	T
April 2002	Updated progress report on the SB 2042 Implementation Plan provided to the Commission	L
November 2002	Updated progress report on the SB 2042 Implementation Plan provided to the Commission. Updates includes dates, locations, and attendees at various implementation activities.	M
May 2004	Updated progress report on the SB 2042 implementation presented to the Commission. The report includes next steps to complete the implementation process for teacher preparation program standards, induction standards, and elementary subject matter standards.	N

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COMMENTS

California State Auditor's Comments on the Response From the California Commission on Teacher Credentialing

To provide clarity and perspective, we are commenting on the response to our audit report from the California Commission on Teacher Credentialing (commission). The numbers below correspond with the numbers we have placed in the margin of the commission's response.

- As part of our quality control process, our standard practice is to provide agencies five working days—an agency review period—to review and comment on a draft copy of the report. During this time, we encourage agencies to discuss with us any concerns with the report, including any factual issues or word choices they may identify. In keeping with this practice, we provided copies of the draft report for commission staff to read at the exit conference that occurred on October 4, 2004. Further, during the agency response period, we contacted the commission's audit liaison and other staff on at least four occasions and offered to meet or discuss any concerns that the commission may have had; yet the commission rejected our offers. The commission's audit liaison did provide us with suggested title and heading changes—most of which we did not use because the evidence provided to us during the audit did not support the commission's suggested changes. The audit liaison also provided us suggested changes to the text box on page 7 in the Introduction as we explain in note 23.
- The commission is correct that the audit request did not ask for a workload study. As we describe in the Scope and Methodology section beginning on page 10 of the report, the Joint Legislative Audit Committee asked us to study the effectiveness and efficiency of the credentialing process. One of the areas we studied was how the commission manages its workload. Because a significant workload of applications and renewals exists, we reviewed whether the commission has taken appropriate steps to evaluate its workload to determine how it can make the process more efficient. Our conclusion as presented in Chapter 2 is that there are additional improvements the commission can implement to make its credentialing process more efficient.

- The State's fiscal condition has challenged all state agencies to operate their programs with fewer resources. Our audit approach was premised on the idea that the commission is not likely to receive significant increases in funding. Thus, most of our recommendations are focused on improvements the commission can make with its existing staff and funding.
- The commission may have overlooked our discussion on pages 36 through 38 where we describe the workload volumes the commission has experienced and how the commission modified its practices to respond to them. Our recommendations focus on additional ways that the commission can use existing staff time more efficiently.
- If the commission believes a change in statute is necessary to implement certain recommendations, it has the ability to initiate the process of asking the Legislature to consider the change.
- Although we agree that our recommendations related to enhancements of its automated application processing system are not ones that can be immediately implemented, we believe the commission should thoughtfully consider these enhancements. As noted on page 51 of the report, the commission has not taken the step of assessing the feasibility or costs of these enhancements. This would be a step to be undertaken before any funding requests could be made.
- We disagree that developing an analysis of factors affecting the numbers of credentials, permits, and waivers that the commission grants would necessitate an increase in staffing of the commission. Much of the information is readily available, such as unemployment data published by the Employment Development Department, or the issues are ones the commission staff know about. For example, when the commission issued its fiscal year 2002–03 teacher supply report in May 2004, several of the commissioners asked why the application numbers were higher and the commission staff noted the effects of the State's incentives to create an interest in teaching as a career and the expiration of a fee waiver incentive in 2002.
- The commission mischaracterizes our report. We state on pages 1, 3, 12, 60, and 71 of the report, that as of December 2002 the commission suspended its continuing accreditation reviews, except for those few who are seeking accreditation through a national organization. Since December 2002, the commission's

efforts have been primarily initial accreditation reviews, which are desk reviews of teacher preparation program proposals that colleges and universities submitted in response to the commission's recently adopted standards. However, the colleges and universities are continuing to operate teacher preparation programs under the previous standards and these programs are not subject to any continuing accreditation review.

- The commission mischaracterizes our recommendation. As we discuss on page 26 of the report, the commission has already begun coordinating with the California Department of Education (Education) to create an integrated data collection system to meet the reporting requirements of the federal No Child Left Behind Act of 2001. We also discuss in that section some of the analyses of teacher retention that are possible when the database is fully functional.
- The commission overstates the breadth and scope of the list of accomplishments that the executive director presents to the commission's governing body (commissioners). As we point out on page 30 of the report, this list of accomplishments does not track the progress of strategic plan tasks, which are the means by which the commission works toward its goals.
- This is an issue that we would have expected the commission to let us know about during the agency review period. We have reassessed our analysis based on the commission's response and have modified the text of the report on pages 46 and 47 to remove references to an analysis of applications in the commission's workload by credential type. However, this text change did not affect the wording of our recommendation.
- If the commission believes a change in regulation is necessary to implement this recommendation, it has the ability to initiate the change. Moreover, we recognize that not all applications may be able to be submitted electronically, which is why we phrased our recommendation to implement this to the extent that is economically feasible.
- The commission is incorrect that it is finished developing and implementing the various program standards. Figure 9 on page 63 shows the status of the commission's work and that five sets of single-subject standards are still in the development stage. Moreover, during the implementation phase, the commission continues to have an active role in performing the initial accreditation review of proposals submitted by the colleges and

universities. Thus, we stand by our recommendation that the commission needs an overall plan, which includes timelines and the resources it plans to use, to guide its efforts to finish implementing the standards.

- We disagree with the commission's assertion that its approach is methodical. We describe the lack of structure in the commission's current process on page 67 of the report. Moreover, we disagree with the commission's statement in its response on page 100, where it asserts that because of all the balancing factors it considers in making panel member selections, "it is not possible to have a process that panel members are selected objectively."
- The commission misses the point. Even though the commissioners have not expressed concerns with the lack of perspective that commission staff provide, the commission staff are not presenting the field survey results in the most factual and straightforward manner. Consequently, the commissioners and stakeholders would not know if there were any problems.
- The commission's actions contradict its assertion that it regularly updates its strategic plan. As we note on page 28 of the report, the February 2001 strategic plan (2001 plan) was the most current plan at the time of our audit and was outdated. We also acknowledge that the commission updated the tasks in the plan in September 2004—three and a half years after it prepared the 2001 plan. In its guidelines for strategic planning, the Department of Finance indicates that one characteristic of a successful strategic planning process is that both the plan and the planning process are reviewed and modified regularly (usually annually).
- The commission's designation of this document as confidential is not supported by any legal authority of which we are aware. On October 21, 2004, we notified the executive director of the commission that we planned to publish both of the commission's responses. Consequently, we have included this document in its entirety and have performed the same review and analysis of the commission's comments as we perform on any audit response. Furthermore, the page numbers that the commission uses in this document are for a draft copy of our report and thus do not match the page numbers in the final version of our report.
- We disagree with the commission's statement that the report causes confusion resulting in "erroneous and misleading conclusions and recommendations." Senate Bill 2042, Chapter 548, Statutes of 1998 (act), mandated a comprehensive

update of all program standards, including subject matter standards that it required the commission to ensure were aligned with the content of the student academic standards that the State Board of Education (state board) had adopted. Consistent with the discussion in its response on page 99, the commission asserted to us that it used a process similar to the one that it uses when it performs periodic updates of its standards. Therefore, we saw no need to make an artificial distinction based on what prompted the commission to review program standards. On page 61 of the report we provide a description of the commission's process for developing and implementing standards. Further, Figure 9 on page 63 shows the standards under development since the act was passed and the adopted implementation periods. Pages 60 and 61 of the report provide text boxes to define the commission's standards and key changes in teacher preparation and the credentialing requirements of the act. Moreover, we disagree that our report "confuses program standards with test specifications and requirements." To provide context for how the commission develops program standards, we provide information on page 61 regarding how the commission's contractor develops an examination that prospective teachers can take in lieu of completing a teacher preparation program, including the contractor's use of a content validation study. We then state on page 70 that the commission could benefit from providing the results of the contractor's content validation study to its advisory panels and bias review committee to ensure further that its subject matter requirements are free from biased language and content. Finally, as stated in note 1 on page 109, we offered to meet with the commission to discuss any concerns with the report during the agency response period and the commission rejected our offers.

- The commission misquotes our report. On page 3 of the report we state that "the commission suspended its continuing accreditation reviews." Further, as we describe in note 8 on page 110, the commission mischaracterizes its current accreditation activities.
- This is an issue that we would have expected the commission to let us know about during the agency review period. We have eliminated the phrase "which it believes is outdated" on pages 3 and 60 of the report. Also, the commission's September 2004 update to its strategic plan indicates that commission staff will present the revised accreditation policy to the commissioners in August 2005, not May 2005, as the commission stated in its response. We note the August 2005 date on pages 1, 3, 60, and 73 of the report.

- As we state in the Scope and Methodology of report on page 12, our review focused on the accreditation of college and university teacher preparation programs. We have modified the text on page 8 to add the eight school districts it has accredited in addition to the more than 80 colleges and universities that the commission has accredited to operate teacher preparation programs.
- This is an issue that we would have expected the commission to let us know about during the agency review period. We have modified the text on page 5 to more closely conform to the text of the state law.
- The commission informed us of its concern with the text box on page 7 during the agency response period, but its response does not reflect the changes we agreed to make. To the extent we could verify the commission's methodology, we made changes. Specifically, we accepted the commission's revised numbers for single- and multiple-subject credentials, expanded the heading of the third line to "emergency and 30-day substitute permits," and slightly modified the commission's count for administrative services credentials. We also moved the "cross-cultural/bilingual" numbers to the "all others" category.
- This is an issue that we would have expected the commission to let us know about during the agency review period. We have modified the text on page 8 to incorporate the commission's comments.
- This is an issue that we would have expected the commission to let us know about during the agency review period. We have added text on page 7 indicating that prospective teachers for a multiple-subject credential must take and pass an examination to demonstrate academic preparation.
- The commission misquotes our report. The correct quote is "Under the direction of the state board [of Education] and the superintendent of public instruction, Education provides education policy direction to local school districts." Therefore, we have not changed the text as the commission suggested.
- We disagree that the commission has completed the development and adoption of all program standards pursuant to the act. The act mandated a comprehensive update of all program standards, including subject matter standards that it required the commission to ensure were aligned with the content of the student academic standards that the state board

had adopted. Figure 9 on page 63 of the report shows the status of the commission's work and that five sets of single-subject standards are still in the development stage.

- This is an issue that we would have expected the commission to let us know about during the agency review period. Because the commission used advisory panels of education professionals for each of the five sets of standards we reviewed, we have changed the text on page 11 to reflect this.
- This is an issue that we would have expected the commission to let us know about during the agency review period. We have changed the text on page 12 from "updating" to "evaluating" and deleted the text "to meet the requirements of the act."
- The commission misunderstands the focus of the section beginning on page 14 of the report. Our focus is on the three commission programs that help individuals meet the requirements for a teaching credential or, in some cases, to meet the requirements for entrance to a college, university, or school district preparation program. We recognize the commission and Education co-administer the Beginning Teacher Support and Assessment program; however, it is an induction program for teachers that have already earned a preliminary credential.
- The commission incorrectly implies that we initiated the comparison of the pre-intern program to emergency permit holders. As we discuss page 18 of our report, the commission made the comparison between emergency-permit holders and pre-interns in its final program report to the Legislature. We only pointed out that the commission could not support the data it used in its comparison and that when we obtained current data from the commission's database, the difference in the retention rate between the two groups for the same time period was not as profound as the commission originally reported. Moreover, the commission's assertion that the retention of emergency permit holders increased once "thousands of pre-interns had been removed" from their ranks is not supported by its own data. In fiscal year 1998–99, which was the first year of the pre-intern program and when it had only 957 participants, the retention rate of first-time emergency permit holders was 81 percent. In fiscal year 1999–2000, when the number of pre-intern participants rose to 5,800, the retention rate of first-time emergency permit holders decreased to 78 percent. Therefore, we stand by our analysis and conclusions.

- This is an issue that we would have expected the commission to let us know about during the agency review period. We have changed the text on page 17 to be specific to the fiscal year 2002–03 annual report for the paraprofessional program.
- A comparison between the pass rates of pre-intern test takers and the pass rates of the general population of test takers would be valid but, as we point out on page 19 of our report, the commission could not support the statement that pre-interns are largely members of groups that tend to pass subject matter examinations at lower rates than the general population. Likewise, the commission could not provide us with data on the percentage of pre-interns that had taken the required subject matter exam at least once. Therefore, we could not validate the commission’s comparison of the test results of pre-interns to those of “all test takers” that it made in its October 2001 report to the Legislature (as shown in the second bullet on page 18) or the comparison that the commission makes in its response to our report on page 91.
- We believe that the documentation supporting the statistics the commission reports in its annual reports should be maintained for the length of time designated in its document retention policy. In view of the fact that this documentation is useful for follow-up analysis and the assessment of trends, the commission may wish to evaluate whether its policy specifies a reasonable length of time to retain this supporting documentation.
- The commission misses the point. Its current reports do not provide it with sufficient data to monitor its workload. For example, the commission’s weekly report, which is discussed on page 46, does not break down the application workload by unit team, which would provide a rough estimate of the relative complexity of the workload waiting to be processed. Also, as is discussed on page 43, the commission does not track the number of applications that take longer than 75 business days to process. Further, the commission’s claim that its biweekly report provides the processing time of all applications is misleading. As we discuss on page 47, the commission’s report shows the difference in business days between the current date and the dates that the commission received the applications. This is not processing time, but wait time. Monitoring the makeup of its workload and knowing the specific amount of time that different types of applications take to process would be beneficial to the commission because it would provide the

commission greater opportunities to make informed staffing decisions and to ensure that it consistently completes all applications within a 75-business-day time frame.

- We did not include a discussion of the governor’s veto message because we do not take exception to the 75-business-day processing time requirement.
- We disagree that we quoted the director of the certification division out of context. The director has consistently asserted to us that he did not know if the third phase of the Teacher Credentialing Service Improvement Project (TCSIP) would improve application processing times. In fact, the commission states later in this paragraph of its response that the director could not make comments about the possible efficiencies of the third phase because the system had not been tested. Moreover, on page 50 of the report, we note that the units’ processing staff had decreased by 6.2 positions between the time it proposed TCSIP and September 2004. We also acknowledge that having less staff to process applications will likely negate some of the efficiencies that may result from automation.
- Contrary to the commission’s statement, on pages 49 and 50 of the report we discuss the efficiencies from the online credential look-up and the online renewals. Moreover, this comment conflicts with the commission’s statement in its response on page 95 which says, “As the report accurately states, much of the efficiencies have already been realized by the first two phases of the project . . .”.
- Contrary to the commission’s statement, we note on pages 2, 11, 48, 51, and 54 of the report that the commission planned to implement the third phase of TCSIP in late October 2004.
- The commission’s assertion that we do not acknowledge the efficiencies from the third phase of TCSIP is inaccurate. We state on page 50 of the report that the electronic submission of applications from colleges and universities will provide efficiencies and on page 51 we state that the virtual credential officer will provide efficiencies. However, we believe that the commission could achieve additional efficiencies from the third phase of TCSIP if it requires all institutional customers—colleges, universities, and school districts—to submit applications electronically, to the extent that it is economically feasible.

Similarly, we believe that expanding the virtual credential officer to process more routine credential types could also provide additional efficiencies.

- The commission may have overlooked the discussion on page 55 of the report where we discuss this leaflet.
- The commission mischaracterizes the full cost of the management study performed by MGT of America (MGT) as the cost of what it calls a time study. In fact, the MGT management study report included a staffing chapter in which MGT performed a high-level analysis that resulted in an average number of credentials processed per hour. MGT did not determine how long it took commission staff to process different types of credentials. Moreover, the MGT report highlighted that it based its estimate of processing capacity on the commission's then-current allocation of resources and method of processing credentials. It also noted that changing the way staff are used would affect this calculation. Since the commission has modified its allocation of workload among its staff during the four years since the MGT report and is implementing the third phase of TCSIP, it can no longer rely on the analysis that MGT performed. We stand by our analysis and recommendation that the commission needs to routinely monitor the composition of the applications that it has not yet processed and collect and analyze data on the average review times for different types of applications.
- We have modified the text on page 47 of the report to include the commission's comment that it did not have an opportunity to request this report when it designed TCSIP.
- We do not take issue with the fact that the commission maintains a microfiche copy of the paper applications it receives. Our point is that even with the virtual credential officer, the commission intends to print paper copies of the electronic applications it receives to manually convert them into a microfiche record. This is less than optimal. The commission could more efficiently store these applications electronically.
- We have modified the heading on page 54 to more closely reflect the text of the section.
- We disagree that we "mix two different topics and treat them as one." The act mandated a comprehensive update of all program standards, including subject matter standards that it required the commission to ensure were aligned with the content of the

student academic standards that the state board had adopted. Consistent with the commission's discussion in its response on page 99, the commission asserted to us that it used a process similar to the one it uses when it performs periodic updates of its standards. Therefore, we believe the commission can use our recommendations to improve its future efforts in developing and implementing standards for teacher preparation in California.

- The commission misunderstands our recommendation to develop an overall plan. As we stated on page 64, an overall plan would include monitoring elements such as timelines for developing standards and the resources it needs to meet those timelines. Also, on page 64, we acknowledge that the commission developed an approach to developing standards; however, the approach did not include timelines for the standard development activities that were linked to the resources the commission planned to use. Further, the "SB 2042 implementation plan" the commission attached to its response and the other items that the commission describes are a series of updates, reports, agenda items, and other documents. Although such documents could be supporting elements to an overall plan, they do not represent an overall plan that could be used to efficiently manage, guide, track, and monitor the various activities needed to implement the act's requirements.
- We have modified the text to clarify that we reviewed five sets of standards.
- The commission misunderstands the need for a formal evaluation of the processes it uses to conduct standards development. Although the framework is set forth in statute, the commission has some discretion in the tasks it uses to meet the requirements of the framework. It is these tasks that the commission should evaluate to determine whether it could make further improvements in how it carries out its statutory responsibilities.
- As we state on page 69 of the report, the commission could not provide us with evidence of how it considered whether a candidate was a teacher or an administrator, or how it emphasized ethnic diversity in its selections, despite the significance that the commission placed these factors in its documents requesting candidates to apply.
- We disagree with the commission that it is not possible for panel members to be selected objectively. If done consistently and with a checklist or other review tool as we state on page 68, the

commission could ensure that the proposed panel collectively met the commission's qualifications. The commission's current process for panel member appointments is inconsistent, lacks objectivity, and may not ensure that it selects the best-qualified panel members available.

- This is an issue that we would have expected the commission to let us know about during the agency review period. To clarify and be precise about where we found that the commission's record retention practices were weak, we have changed the text on page 66 to "documents created during the development of program standards."
- Our report does not suggest or recommend that the commission use a ranking process. The ranking process we describe on page 68 is the process the commission used, albeit inconsistently, when selecting the English and mathematics advisory panels. To address weaknesses in the commission's selection of these two panels and the art and administrative services panels, we recommended that it develop a methodical approach that includes evaluating all candidates' qualifications against the qualifications the commission seeks in panel members.
- The commission's director of the professional services division made this statement to us. In an e-mail from this director to us on September 21, 2004, in which she explained the process the commission used to select art panel members, she stated "that the art standards, although important, did not have the same level of criticality as the English and math standards therefore, the process did not involve the same level of rigor." We asked the director to clarify the term "criticality," however, she did not respond. Therefore, we referred to the American Heritage Dictionary of the English Language definition of criticality, which it defines as "being of the highest importance."
- The commission misses our point. The contractor's content validation studies provide a great deal of information about the viewpoints of education professionals. However, as we note on page 70 of the report, for most minority groups responding to the surveys, the number of people responding to the surveys was less than the number that would trigger a review flag. This does not mean that the views of minority groups were unimportant, and we believe the commission could benefit from having the advisory panels and bias review committee look at these results. Doing so could provide additional assurance that program standards are free from biased language and content.

- The commission's response suggests that it can place more weight on a survey from an institution than from an individual. We disagree. Based on the surveys the commission received, there exists no valid method to place more weight on one survey versus another.
- Contrary to the commission's statement, the audit team repeatedly asked for documentation of how the commission ensured that its program standards aligned with the student academic standards the state board adopted. With reference to the report the commission describes, we followed up verbal requests for it in August and September 2004 with e-mail requests on September 2, September 29, and October 5, 2004. On October 8, 2004, commission staff provided us with the same documents they had given us in July, but the staff did not provide the report.
- This is an issue that we would have expected the commission to let us know about during the agency review period. We have changed the wording on page 71 to state that the commission is evaluating its accreditation policy.
- This is an issue that we would have expected the commission to let us know about during the agency review period. We have changed the date on page 60 to December 2002.

cc: Members of the Legislature
Office of the Lieutenant Governor
Milton Marks Commission on California State
Government Organization and Economy
Department of Finance
Attorney General
State Controller
State Treasurer
Legislative Analyst
Senate Office of Research
California Research Bureau
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