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Action

Educator Preparation Committee

Initial Institutional Approval – Stage II: Eligibility Requirements for Grand Canyon University

Executive Summary: This agenda item presents, as part of the Initial Institutional Approval process, Grand Canyon University's responses to the Eligibility Requirements for consideration and possible approval by the Commission.

Recommended Action: That the Commission review the responses to the Eligibility Requirements and determine if the institution may move forward to Stage III of the Initial Institutional Approval process.

Presenters: Hart Boyd and Frances Kellar, Consultants, Division of Standards, Accreditation, and Workforce Investment

Strategic Plan Goal

Educator Preparation and Advancement

- **Goal 1.** Educator preparation programs hold candidates to high standards and adequately prepare them to support all students by using culturally and linguistically responsive and sustaining practices in equitable, inclusive, and safe environments.
 - A. Set and uphold rigorous standards for educator preparation programs
 - C. Enact a rigorous accreditation process that ensures programs meet standards and are effective in preparing educators for public schools

Initial Institutional Approval – Stage II: Eligibility Requirements for Grand Canyon University

Introduction

This agenda item presents for consideration one institution of higher education (IHE) seeking to become a program sponsor through the Initial Institutional Approval (IIA) process. Grand Canyon University (GCU) seeks IIA in order to offer Preliminary Multiple Subject and Preliminary Education Specialist: Mild to Moderate Support Needs programs. GCU has submitted responses to the Eligibility Requirements and relevant Preconditions for consideration and possible approval by the Commission on Teacher Credentialing (Commission).

Grand Canyon University was first chartered in 1949 in Prescott, Arizona. In 1951, the college relocated to Phoenix and earned accreditation from the Commission on Institutions of Higher Education in 1968. Established as a Baptist-affiliated institution with an emphasis on religious studies, the school initially offered bachelor's programs in education. As of 2025, GCU is officially recognized as a nonprofit institution of higher education by the U.S. Department of Education. GCU grew its campus student body from fewer than 1,000 students in 2009 to over 24,671 on-campus students in 2025. GCU's non-traditional student body increased from approximately 22,000 students at the start of 2009 to over 107,815 online students in Fall 2025. GCU is regionally accredited by the Higher Learning Commission (HLC).

Approval of an institution for Stage II does not permit the institution to offer an educator preparation program that leads to a credential or license. Approval in Stage II allows an institution to move forward to Stage III in which Common Standards will be submitted for review and the institution brought before the Commission again at that time. In addition, although there is important information about the proposed program contained in the submission for Stage II, review of the Common Standards and applicable program Preconditions and standards will occur in subsequent stages. Please see the table on page three of this item for more information about the five stages of the IIA process.

Background

California law provides the Commission with the authority to accredit institutions to offer programs that lead to a credential to serve as an educator in California's public schools. Among other responsibilities, Education Code section 44372(c) sets forth the Commission's responsibility to rule on the eligibility of an applicant for initial accreditation for the purpose of offering a program of educator preparation.

The Commission requires that an institution seeking to offer new educator preparation program(s) must first be approved for initial accreditation as a new program sponsor and must do so by completing the Commission's IIA process. A table detailing the five stages of the IIA process is provided on page three of this item.

Grand Canyon University

GCU seeks Initial Institutional Approval to offer the following programs:

- Preliminary Multiple Subject
- Preliminary Education Specialist: Mild to Moderate Support Needs

Summaries and excerpts of GCU's responses to the twelve [Eligibility Requirement Criteria](#), two [Initial Program Preconditions](#), and [General Precondition #9](#) are provided in this item. GCU's full response is also available on [GCU's College of Education accreditation website](#) under California Compliance Disclosures. Criteria 1 through 9 have been reviewed by staff and a recommendation has been provided. Criteria 10, 11, and 12 have been summarized for the Commission's review and consideration. All relevant Preconditions have been reviewed by Commission staff and have been determined to be met.

Five Stages of the Initial Institutional Approval Process

Grand Canyon University is seeking approval of Stage II in order to be eligible for Stage III as highlighted and italicized in the chart below.

IIA Process	Stage I - Prerequisites	Stage II – Eligibility	Stage III – Provisional Approval	Stage IV – Initial Program Approval	Stage V – Full Approval
Purpose	Ensures legal eligibility of institution in California Ensures institution understands requirements of Commission's accreditation system	<i>Ensures that institution has capacity to sponsor effective programs</i>	Ensures institution meets all Common Standards	Ensures all proposed programs meet all relevant program standards and program-specific preconditions	Program operates for 2-4 years and hosts a provisional accreditation site visit
Institutional Requirements	Must: 1. Have legal eligibility 2. Attend Accreditation 101 with institutional team	<i>Submit responses to:</i> • <i>12 Eligibility Criteria</i> • <i>Initial Program Preconditions</i> • <i>General Precondition #9</i>	Submit responses to: • Common Standards	Submit responses to: • Program-Specific Preconditions • Program Standards	Institution Must: • Collect data • Host provisional site visit
Reviewed By	Staff	<i>Staff</i>	BIR	Preconditions: Staff Program Standards: BIR	Site Visit Team & COA
Authority	Staff	<i>Commission</i>	Commission	COA	Commission
Decision	Determine Eligibility for Stage II	<i>Eligibility:</i> 1. <i>Grant</i> 2. <i>Deny</i>	Provisional Approval: 1. Grant 2. Deny	Program(s): 1. Approve 2. Deny	1. Grant Full Approval 2. Grant Full Approval & Remand to COA to Address Stipulations 3. Continue Provisional Status for 1 Year to Address Stipulations 4. Deny Approval
IIA Status*	Not Approved	<i>Not Approved</i>	Provisional Approval**	Provisional Approval***	Full Approval

*At conclusion of stage **Institutionally approved but cannot offer programs ***May begin offering approved program

Criterion 1 through 9

In accordance with the Commission's adopted process for determining eligibility for Initial Institutional Approval, Eligibility Criteria 1-9, as follows, includes a staff review and recommendation.

Criterion 1: Responsibility and Authority

Staff Recommendation: Aligned

- Grand Canyon University (GCU) is proposing to offer preliminary preparation programs in Multiple Subject and Education Specialist: Mild to Moderate Support Needs credential areas.
- GCU has submitted a complete organizational chart that indicates both programs will be housed within the College of Education.
- Responsibility for all educator preparation programs at GCU resides with the Dean of the College of Education (COE), Dr. Meredith Critchfield, who reports to the Provost, Dr. Randy Gibb. The Dean of the College of Education is responsible for the academic oversight of all educator preparation programs and will serve as the Unit Head.
- GCU assures that the duties related to credential recommendations will be performed only by employees of GCU and that these individuals will take part in the Commission training related to the recommendation process.
- GCU has a team of Clinical Field Experience Specialists who use a structured evaluation process to ensure candidates are supported to meet their credential requirements for credential recommendations.

Criterion 2: Lawful Practices

Staff Recommendation: Aligned

- A non-discrimination policy for the institution's **employees** is provided on the institution's website and in the university policy manual.
- A non-discrimination policy for the institution's **candidates** is provided on the institution's university policy manual and academic catalog.

Criterion 3: Commission Assurances and Compliance

Staff Recommendation: Aligned

- GCU provided a statement of assurance signed by Dr. Meredith Critchfield, Dean of GCU's College of Education, that states the institution:
 - a) Will comply with all preconditions,
 - b) Will submit all data reports and accreditation documents,
 - c) Will cooperate in an evaluation of the program by an external team or monitoring of the program by Commission staff,
 - d) Will participate fully in the Commission's accreditation system and submission timelines, and

- e) In the event the program closes, GCU will offer the program and meet all adopted standards until the candidate completes, withdraws, is dropped, or is admitted to another program.

Criterion 4: Requests for Data

Staff Recommendation: Aligned

- Erica Stolte, the GCU College of Education's Executive Director of Assessment and Program Operations, is identified as the qualified officer responsible for reporting and responding to all requests for data within timeframes specified by the Commission.

Criterion 5: Grievance Process

Staff Recommendation: Aligned

- GCU has provided a grievance process which will be accessible to all candidates on the program website and in the university policy handbook.
- Candidates will be informed of the grievance process during their self-paced program orientation module provided through both video and written formats. This module, which must be completed prior to beginning the first course, introduces key university policies, expectations, and student support resources. If a candidate wishes to file a grievance, their assigned Student Services Counselor reviews the applicable policy and supports them in understanding the steps of the grievance process.

Criterion 6: Communication and Information

Staff Recommendation: Aligned

- GCU's program website will be accessible to the public without the requirement of login information.
- GCU will include the mission, governance, administration and admission requirements and procedures on their proposed program website. Additionally, the program page for each proposed program will outline the program description, required courses and the related course descriptions, field experience courses, tuition, and state licensure disclosures.
- Information will be made available through the program website and digital and paper communications and/or meetings with key constituencies.

Criterion 7: Student Records Management, Access, and Security

Staff Recommendation: Aligned

- Candidates and applicants of GCU will have access to, and be provided with, transcripts and/or documents to verify academic units and program completion through the existing online GCU student portal. Candidates can view and print unofficial grade reports and download their unofficial transcripts by using the class schedule/grade icon in their GCU student portal. To obtain official transcripts, candidates can either submit a request through the student portal or reach out to their Student Services Counselor, who will complete the

Transcripts Request Form on their behalf. GCU's publicly available website includes a request for transcript candidate resource that outlines the process for requesting transcripts.

- Candidate records will be maintained and retained electronically by the Office of Academic Records (OAR) on GCU's main campus in Phoenix, Arizona including admission materials and transcripts. The systems used to house the records will be backed up via several servers.
- All candidate records will be kept securely within GCU's private online Customer Relationship Management (CRM) database system and backed up on redundant servers. The records and the servers on which they are stored will be secured in locations not accessible to the public in Phoenix, Arizona.

Criterion 8: Disclosure

Staff Recommendation: Aligned

- The proposed programs will be delivered online from GCU's campus in Phoenix, Arizona. As with all programs and student populations, candidates in these programs will use GCU's learning management system (HALO). The required courses in each program of study will be delivered asynchronously. All courses within the program will adhere to specified timelines and entail a structured format that requires candidate participation and completion of assigned tasks for each topic. Undergraduate courses will be eight weeks in length while graduate courses will be six weeks.
- GCU will offer the proposed California programs online. All online programs offered by GCU are based at GCU's main campus located in Phoenix, Arizona. Candidates will conduct all clinical practice and student teaching in California and will be supported and overseen by a cooperating teacher/mentor and faculty site supervisor. Faculty site supervisors will engage with candidates through both the online platform as well as face-to-face or via virtual meetings based on course and student needs.
- GCU submission notes that it has partnered with Grand Canyon Education, Inc. (GCE) as a direct educational service partner to support the university's students, faculty, and staff. The institution states that this partnership will increase efficiencies with GCE's personnel providing organizational support in areas such as marketing, accounting, and human resources as well as in the overall student services such as counseling, document processing, and technology. While GCE provides operational and administrative support, it does not make academic determinations regarding curriculum, degree requirements, candidate progression, program completion, or other matters under the guidance of GCU faculty and academic leadership. GCU retains full authority and oversight for all academic functions, including academic policy, curriculum, admissions standards, candidate progression requirements, graduation requirements, faculty oversight, and candidate performance evaluation. All academic decisions are made by GCU faculty and academic leadership to ensure academic integrity, quality, and mission alignment

Criterion 9: Veracity in all Claims and Documentation Submitted

Staff Recommendation: Aligned

- An assurance signed by Dr. Meredith Critchfield, Dean of GCU's College of Education, has been submitted attesting to the veracity of all statements and documentation submitted to the Commission. The letter also attests to GCU's understanding that a lack of veracity is a cause for denial of Initial Institutional Approval.

Criterion 10, 11, and 12

In accordance with the Commission approved process for determining eligibility for Initial Institutional Approval, [Eligibility Criteria 10-12](#) include a staff summary of the institution's submission, but do not include a staff recommendation.

Criterion 10: Mission and Vision

- GCU seeks Initial Institutional Approval to offer the following programs:
 - Preliminary Multiple Subject
 - Preliminary Education Specialist: Mild to Moderate Support Needs
- The proposed credential areas will be offered through both undergraduate integrated pathways and graduate pathways. The mission of GCU's College of Education (COE) "inspires excellence in pedagogy and scholarship; advances reflective, innovative, and collaborative teaching practices to maximize student learning and achievement; promotes servant leadership in educational communities and engages a diverse and global community of learners with purpose and passion." According to the submission, this mission promotes the importance of serving all demographics, cultures, and linguistic backgrounds with a purpose. At GCU and within the COE, the mission and vision are intentionally integrated to form a unified foundation for strategic planning and decision-making. GCU notes that this approach ensures that all initiatives are aligned with a shared purpose and clearly defined goals. Rather than maintaining separate vision statements, GCU uses this integrated framework to guide consistent action across departments, reinforcing a collective commitment to educational excellence and innovation. The COE's conceptual framework that also serves as its vision – Learning, Leading, and Serving – guides program design and reflects GCU's commitment to serving educational communities in ways that promote human flourishing. The COE aims to prepare classroom-ready educators who can effectively support diverse PK-12 learners through culturally responsive, ethical, and research-based teaching practices.
- GCU states that the proposed educator preparation programs will be aligned to the relevant program-specific preconditions and standards, Teacher Performance Expectations (TPEs), and state-adopted content standards and frameworks. GCU plans to adapt its existing Arizona-approved educator preparation programs by integrating California-specific coursework and requirements. Additionally, the proposed programs will be aligned to the Association for Advancing Quality in Educator Preparation (AAQEP) national standards. While holding AAQEP or other national accreditation is not a requirement for accreditation in California, the Commission has established partnership agreements with some national

accrediting bodies, including AAQEP, to conduct standards alignment analysis, refine the site visit process for institutions holding both Commission and national accreditation, and hold concurrent site visits with the national accrediting bodies to reduce redundancies and increase efficiencies for the institution and site visit teams.

- Due to the diverse nature of the teacher candidates and local communities GCU's COE serves, the COE does not adopt a singular educational philosophy. Programs are and will be framed by servant leadership philosophies, such as Greenleaf. This is evidenced by the foundational components of the COE's conceptual framework – Learning, Leading, and Serving. These words symbolize the COE's diverse learning opportunities where faculty and staff diligently work alongside candidates to develop a culture of mutual respect, fellowship, and servant leadership within the educational community.
- GCU's COE places emphasis on clinical practice and partnerships with schools and districts across the United States. The college supports candidates through extensive field experiences, internships, and student teaching opportunities. GCU also maintains a long-standing "COE Promise," pledging ongoing professional support to program candidates and completers.
- To ensure compliance with California standards, GCU has established a California Credential team consisting of the following:
 - Program Lead
 - Instructional Designers
 - Curriculum Developers
 - Clinical Practice Manager
 - Director of Academic Programs and State Specific Growth (proposed expansion to Program lead role)
 - Credentialing Expert (proposed expansion to Program Lead role)

Faculty selected for these programs will have experience (3-5 years) in California teacher preparation in addition to other criteria used to determine faculty expertise. This experience, as defined by GCU, is a sustained and demonstrable record of professional practice, scholarship, or teaching that directly aligns with the content area of instruction. Additionally, candidates will receive guidance from counselors specializing in California credentialing requirements.

- The proposed programs will prioritize culturally responsive teaching, inclusive instructional practices, support for English learners, assistive technology, and preparation for working with students with diverse learning needs. Coursework will integrate constructivist and student-centered learning theories, servant leadership principles, and ethical teaching frameworks.

Criterion 11: History of Prior Experience and Effectiveness in Educator Preparation

- GCU operated as a nonprofit institution from 1949 until 2004, when it partnered with private investors to avoid closure and expand operations. In 2018, the university returned to nonprofit 501(c)(3) status and currently has accreditation through the Higher Learning

Commission (HLC), approval by the State of Arizona and the Arizona Private Postsecondary Board and participates in the National Collegiate Athletic Association (NCAA).

- GCU's COE has over 70 years of educator preparation rooted in a Christ-centered mission focused on the conceptual framework of Learning, Leading, and Serving. The COE highlights extensive partnerships with schools and districts nationwide and prioritizes field experiences, internships, and student teaching placements. Additionally, GCU has partnered with Grand Canyon Education to provide operational and administrative support services including:
 - Enrollment and registration
 - Marketing and communications
 - Technology infrastructure and learning management support
 - Financial aid processing
 - Instructional design and academic support services
 - Human resources, accounting, and document processing

While GCE provides operational and administrative support, it does not make academic determinations regarding curriculum, degree requirements, candidate progression, program completion, or other matters under the guidance of GCU faculty and academic leadership. GCU retains full authority and oversight for all academic functions, including academic policy, curriculum, admissions standards, candidate progression requirements, graduation requirements, faculty oversight, and student performance evaluation. All academic decisions are made by GCU faculty and academic leadership to ensure academic integrity, quality, and mission alignment.

- Between 2009 and 2023, nearly 80,000 candidates graduated from the COE nationwide. In 2022 alone, GCU reported 4,109 initial licensure graduates nationally, including 573 California completers – these program completers in California earned Arizona teaching licenses. GCU submission reports that the base educator preparation programs aligning with the proposed California credential areas graduated a total of 23,122 candidates from 2020-2024. Of these candidates, 2,670 identified as California residents.
- COE states that its existing programs are grounded in continuous improvement and aligned with professional standards such as the Interstate Teacher Assessment and Support Consortium (InTASC), Council for Exceptional Children (CEC), Association for the Advancement of Quality in Educator Preparation (AAQEP), and state licensure requirements. Candidates must complete benchmark assessments, field experiences, coursework, background checks, GPA requirements, and state-mandated exams before student teaching. GCU also provides remediation support, test preparation resources, tutoring, and online professional learning networks.
- GCU's educator preparation programs received full 7-year accreditation from AAQEP beginning in 2019. GCU is also accredited by the Higher Learning Commission and participates in the State Authorization Reciprocity Agreement (SARA) for distance education.
- GCU's End of Program (EOP) survey is presented to all GCU teacher candidates, including candidates near completion of a program of study, to assess overall satisfaction, career preparation, and employment outlook. Of the 10,181 traditional and nontraditional

education program respondents from all GCU's College of Education programs from 2020-2023, 67.9% reported employment or graduate school acceptance near the time of program completion. Completers from the base programs aligning with the proposed California credential areas reported a total of 4,012 candidates from 2020-2024 had employment or enrollment in a graduate program upon completion. Of these candidates, 304 were identified as California residents.

- GCU also outlines its extensive California partnerships. GCU reports approximately 3,000 Educational Alliance participant organizations in California and over 150 active affiliation agreements with California districts and schools. From 2021–2023, GCU placed 1,481 teacher candidates in California PK-12 classrooms across more than 330 districts.
- GCU additionally highlights partnerships with Ventura County Office of Education (VCOE) and Riverside County Office of Education (RCOE) to support induction programs and graduate education opportunities for teachers. The university states it aims to help address California teacher shortages through classified-to-certificated pathways, universal transitional kindergarten initiatives, and professional development collaborations.
- Pending California Commission on Teacher Credentialing approval, GCU plans to establish a California Advisory Board comprised of California educators and education leaders to guide program development, ensure alignment with state needs, and strengthen partnerships with schools and districts.
- GCU has posted the third-party invitation for comments on the institution's website where the public and all constituencies can access it. No comments have been received at this time.
- As required by this criterion, staff researched the possibility of any additional available information relevant to GCU's application for IIA and found no additional information beyond what is included in this item.

Criterion 12: Capacity and Resources

- As evidence of capacity and resources, GCU has provided its most recent audited budget for the 2022 fiscal year as well as a proposed operations budget for its education unit and proposed programs.
- The proposed programs will be delivered asynchronously online through GCU's learning management system (LMS), HALO, with support from online full-time faculty, adjunct faculty, and faculty site supervisors. Faculty assignments will be based on qualifications and course expertise. Faculty site supervisors will support candidates through online communication as well as face-to-face or virtual meetings, depending on candidate and course needs. The proposed faculty breakdown for the proposed programs will be as follows for each respective pathway:
 - Preliminary Multiple Subject (Traditional)
 - Full Time: 14
 - Adjunct: 156
 - Site Supervisors: 551
 - Preliminary Education Specialist: Mild to Moderate Support Needs (Traditional)
 - Full Time: 10

- Adjunct: 48
 - Site Supervisors: 556
- Dual Credential Pathway (Integrated):
 - Full Time: 30
 - Adjunct: 262
 - Site Supervisors: 520
- GCU's faculty site supervisors will be responsible for overseeing teacher candidate evaluations during student teaching and clinical practice. Faculty site supervisors must hold a master's or doctoral degree in education, maintain valid teaching or administrative licensure, and possess at least 3-5 years of classroom experience. Their responsibilities will include mentoring candidates, communicating with cooperating teachers, conducting observations, facilitating evaluation conferences, and completing formal clinical practice evaluations throughout student teaching placements.
- Candidates will document practicum and field experience hours using electronic verification forms reviewed by site mentors and faculty. During student teaching, candidates will maintain clinical practice time logs signed by faculty site supervisors (cooperating teachers) and faculty supervisors to verify attendance and completion requirements.
- GCU's learning management system (HALO) was developed collaboratively by Grand Canyon Education (GCE) and GCU constituencies specifically for GCU's online programs. The platform supports asynchronous instruction, assignment submission, grading, discussion forums, plagiarism checks, communication tools, and classroom management functions similar to Canvas or Blackboard.
- Faculty use technology tools such as Flipgrid, Loom, Zoom, Comevo, and the Programmatic Assessment Tool (PAT) to support engagement, assessment, and instructional delivery. The COE also developed over 20 Comevo training modules on topics such as suicide prevention, restorative practices, assessment instruction, virtual teaching, and student teaching support.
- GCU will provide candidates with support resources through its virtual Student Success Center (SSC), which includes tutoring, writing and math support, certification testing resources, field experience guidance, and career services. Additional support will be available through the GCU Library, which offers research databases, scholarly resources, librarian assistance, webinars, and tutoring services.
- Technical support services will be available a minimum of 17 hours per day, seven days a week. GCU will also maintain a Faculty Technology Committee that reviews technology enhancements and instructional needs based on faculty feedback.
- GCU's submission outlines faculty expectations related to communication, grading, feedback, participation, and responsiveness in online classrooms. Faculty for the proposed programs will be expected to:
 - Engage regularly in discussion forums
 - Respond to student inquiries promptly
 - Return assignment feedback within seven days
 - Maintain updated gradebooks
 - Provide substantive feedback aligned with assignment rubrics
 - Follow established grading and late-work policies

- The Faculty Resource Center (FRC), housed within the Center for Innovation in Research on Teaching (CIRT), will provide faculty with policies, professional development, technical support, workshops, podcasts, and instructional resources to improve teaching effectiveness and student engagement.
- GCU notes that if a program were to close, currently enrolled candidates would be allowed to complete the program with continued access to faculty, advising, and field experience services. In the event of institutional closure, GCU states it would notify state agencies, preserve student records through the Arizona State Board for Private Postsecondary Education, and maintain access to transcript requests through its website.
- GCU notes that all supportive services will be provided to candidates from its main campus in Phoenix, Arizona. GCU's philosophy is to provide a support structure focused on the needs of every candidate, regardless of modality. Many services are similar but might be operationalized differently based on the needs of the specific candidate population.

Initial Program Preconditions

(1) Demonstration of Need

To be granted initial program accreditation by the Committee on Accreditation, the program sponsor must demonstrate the need for the type of program in the service area in which it will operate or a need for educators prepared through the specific program delivery model. Proposals must include data on the number of individuals currently serving on less than full credentials, where available, in the service area of the proposed program, projected need based on a needs analysis, and affirmations from employers with their anticipated hiring need for individuals with the planned credential.

Meets Precondition: Yes

How GCU Meets the Precondition:

GCU conducted research using third party sources, such as the Educator Supply Data, and found that, for education specialists, California employed approximately 186,538 special education-related professionals in 2023 with projected growth to 205,847 jobs by 2033, reflecting an increase of 19,309 positions (+10.4%). GCU found that demand growth exceeds national growth rates for comparable occupations, indicating sustained and above-average need in California. For teachers prepared in multiple subjects, California employed approximately 69,778 Elementary School Teachers, non-special education, in 2022. Employment concentration in this area is slightly below the national baseline.

GCU noted that an estimated 35,712 workers in the special education workforce are approaching retirement age, creating substantial replacement demand even beyond projected job growth. For educators in multiple subjects, there has been a -1.2% employment change (2022–2024) and approximately 5,383 annual openings, marking a substantial share of demand reflects replacement needs due to retirements and attrition.

GCU believes it is positioned to meet these employment needs through California-based enrollment personnel. Grand Canyon University works with Grand Canyon Education, Inc. (GCE)

as a direct educational service partner to support the University's students, faculty, and staff. This partnership leverages experts at Grand Canyon Education in organizational support areas such as marketing and student services. The relationship between GCU and GCE is addressed in further detail in *Grand Canyon University's Eligibility Requirements* document under Criterion 8, 11, and 12.

Members of GCE's enrollment team work with school partners, prospective candidates, and currently enrolled GCU candidates in California. These enrollment personnel cover the Northwest, Northeast, Central, Southeast, and Tribal territories across the state. As part of their work, the enrollment team connects with faculty, staff, and students at the K-12 and community college levels to engage in discussions on the needs and drivers for their unique areas. This leads to focused event and activity planning to build awareness of educator program opportunities and engagement with individuals in their territories. Additionally, the enrollment team supports prospective students and families through the admissions process, collection of key documents, and counseling continuing students.

The work of the enrollment team serves as a qualitative data source to complement the quantitative employment data. Because members of the GCE enrollment team live and work in the California communities they serve, they bring both personal and professional ties to local TK-12 school systems. These connections position them as valuable liaisons between the state's education workforce needs and the university. Their on-the-ground insights inform the development and revision of programmatic offerings, support the creation of unique pathways, and guide partnerships with districts to address specific staffing demands. Approximately 50 fulltime GCE enrollment team members reside permanently in California, ensuring ongoing, community embedded engagement that directly shapes and strengthens GCU's educator preparation efforts.

In addition to the enrollment team, GCU's ability to fulfill the employment needs in California is evidenced by the number of student teaching placements. From 2021-2023, GCU placed 1,481 teacher candidates in California PK-12 classrooms across more than 330 districts. The College of Education records data on candidates' placement for the student teaching portion of their program including candidates placed within California schools earning corresponding educational specialists and multiple subject credentials. As some candidates require two placements for dual licensure programs, there are additional placements during the period reflected.

Additionally, this data only reflects candidates' student teaching in California, though the College notes that even when students stay in Arizona to student teach, many return to California to teach following graduation. As GCU enrolls candidates across the state of California, in partnership with Commission-approved credential recommending agencies, these student teaching placements represent a range of territories.

(2) Collaboration in Program Design and Implementation

To be granted initial program accreditation by the Committee on Accreditation, the program sponsor must demonstrate evidence of collaboration between institutions of higher education,

employers of credentialed educators, and TK-12 practitioners in the design of the program. This evidence must include verification that the partners will share authority and responsibility for the implementation and continuous improvement of the proposed educator preparation program as negotiated in the partnership agreement.

Meets Precondition: Yes

How GCU Meets the Precondition:

GCU actively engages California educators and education leaders in the design, implementation, evaluation, and continuous improvement efforts of its proposed educator preparation programs. GCU documentation notes that it currently maintains more than 150 active affiliation agreements with school districts and school sites that span the various regions in California.

GCU partnerships with institutions across the state work to collaborate in providing candidates with a variety of clinical experiences necessary to prepare, and continuously develop, California educators. This currently includes providing certificate courses (non-credential bearing) and continuous professional development units educators can apply towards graduate degree completion and increased compensation.

California credentialed teachers, site and district administrators, mentor teachers, university supervisors, subject matter experts, advisory board members, and PK-12 partner groups contribute to aspects of curriculum review, clinical practice design, candidate support systems, assessment development, data analysis, and program improvement planning for the proposed programs. This allows GCU to incorporate regional perspectives and respond to local workforce and community needs. While GCU collaborates with subject matter experts (SMEs) across the country, the institution, following approval to advance to the next phase of the Commission New Program Proposal process, will expand its program development team by leveraging existing partnerships with educators across California TK–12 schools. In collaboration with GCE, GCU will identify and engage district leaders, human resources administrators, school administrators, community college representatives, and other key constituents from existing partnerships to recruit qualified experts for the program development team. Efforts will be made to ensure representation from a broad range of geographic regions throughout California.

GCU has a substantial partnership with Grand Canyon Education (GCE). GCE is GCU's partner in providing direct educational services, including the development of the centralized curriculum. To facilitate this development, GCU employs a team of curriculum developers and instructional designers referred to as Curriculum Design and Development (CDD). Members of CDD have expertise in creating aligned instructional content and assessments to learning objectives. Instructional designers on the CDD team have expertise in evaluating instructional content and learning objectives for alignment to professional standards within the content areas, such as Interstate Teacher Assessment and Support Consortium (InTASC). Through this partnership, GCU and GCE lead the development of all programs and courses.

(9) Faculty and Instructional Personnel Participation

All faculty and instructional personnel employed by colleges and universities who regularly teach one or more courses in an educator preparation program leading to a credential, shall actively participate in the public school system at least once every three academic years, appropriate to their credential area. Faculty who are not in the Department, School or College of Education are exempt from this requirement. Reference: Education Code Section 44227.5 (a) and (b).

Meets Precondition: Yes

How GCU Meets the Precondition:

GCU assesses curriculum vitae for subject matter expertise to ensure all full-time and adjunct faculty possess the expertise needed to provide instruction and clinical support to candidates. Documentation supplied noted GCU identifies faculty expertise through their review of accolades, publication in peer-reviewed journals, and extensive experience in diverse roles within the PK-12 educational landscape.

Documentation supplied by the institution (see page 325 of institution's preconditions submission) illustrates the full list of full-time and adjunct faculty with their identified involvement in PK-12 school contexts. Levels of involvement by faculty include but are not limited to: supporting observation and student data collection, professional development facilitation, consultation to support curriculum enhancements, and providing small group and one-to-one coaching sessions.

Staff Recommendation

Staff recommend that the Commission consider the responses to the Eligibility Requirements and relevant Preconditions submitted by Grand Canyon University and grant eligibility.

Granting eligibility would allow Grand Canyon University to move forward to Stage III of the IIA process in which responses to the Common Standards are submitted for review. Approval of Stage II will not authorize Grand Canyon University to offer an educator preparation program that leads to a credential or license.

If the Commission grants eligibility, it may identify topics that it will be looking for in Stage III.

If the Commission denies eligibility, it may identify what it sees as missing in the current submission in the event the institution decides to continue to work toward institutional approval.

Next Steps

Based on the Commission's action, staff will take appropriate next steps related to the option chosen.