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# 3F

## Action

### *Educator Preparation Committee*

#### **Initial Institutional Approval – Stage II: Eligibility Requirements for Palo Alto University**

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**Executive Summary:** This agenda item presents, as part of the Initial Institutional Approval process, Palo Alto University's responses to the Eligibility Requirements for consideration and possible approval by the Commission to move forward to Stage III of the Initial Institutional Approval process.

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

**Presenter:** Frances Kellar, Consultant, Professional Services Division

#### **Strategic Plan Goal**

##### ***Educator Preparation and Advancement***

- **Goal 1.** Education 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

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## **Initial Institutional Approval – Stage II: Eligibility Requirements for Palo Alto University**

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### **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. Palo Alto University (PAU) seeks IIA in order to offer Pupil Personnel Services programs in School Counseling and Social Work. PAU has submitted responses to the Eligibility Requirements and relevant Preconditions for consideration and possible approval by the Commission on Teacher Credentialing (Commission). PAU is an independent, private, institution of higher education located in Palo Alto, California. PAU has served its students, faculty, staff, and community for over 45 years as a psychology-focused education institution serving students both in-person and online across the state.

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 by the Commission. 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 program 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 authorizes the Commission to accredit institutions to offer educator preparation 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.

### **Palo Alto University (PAU)**

PAU was founded as a free-standing, independent professional school in 1975. At that time, it offered a single degree program leading to a PhD in clinical psychology. Expanding its offerings over the past 20 years, the institution was reincorporated as Palo Alto University in 2009. With approval by the Western Association of Schools and Colleges Senior College and University Commission (WSCUC), PAU added a PsyD in clinical psychology in 2002 in consortium with

Stanford University Medical School's Department of Psychiatry, BA and MS in Psychology (2006), MA in clinical counseling (2011), and PhD in counselor education and supervision (2024). The institution's clinical psychology doctoral programs are accredited by the American Psychological Association (APA), and the MA counseling and PhD counselor education and supervision programs are accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP).

Currently, PAU has over 600 students in PhD and PsyD Clinical Psychology programs, and nearly 500 students in the MA Counseling programs, which lead to licensure as Marriage and Family Therapists (LMFT) and Professional Clinical Counselors (LPCC). Nearly 100 students at PAU are enrolled in MS and BS Psychology programs. The clinical programs provide significant numbers of graduates to California's behavioral health workforce each year. PAU seeks Initial Institutional Approval to offer two credentialing programs:

- Pupil Personnel Services: Social Work
- Pupil Personnel Services: School Counseling

Summaries and excerpts of PAU's responses to the twelve [Eligibility Requirement Criteria](#), two [Initial Program Preconditions](#), and [General Precondition](#) #9: Faculty and Instructional Personnel Participation, are provided in this item. [PAU's full response](#) is also available on the PAU Accreditation [Webpage](#). 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

Palo Alto 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	<b>Stage II – Eligibility</b>	Stage III – Provisional Approval	Stage IV – Initial Program Approval	Stage V – Full Approval
<b>Purpose</b>	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
<b>Institutional Requirements</b>	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
<b>Reviewed By</b>	Staff	<i>Staff</i>	BIR	<b>Preconditions: Staff</b> <b>Program Standards: BIR</b>	Site Visit Team & COA
<b>Authority</b>	Staff	<i>Commission</i>	Commission	COA	Commission
<b>Decision</b>	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
<b>IIA Status*</b>	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

- Palo Alto University (PAU) is proposing to offer two programs:
  - Pupil Personnel Services (PPS): School Social Work (SSW)
  - PPS: School Counseling (SC)
- PAU has submitted a complete organizational chart that indicates the proposed PPS: SSW and PPS: SC programs will be housed in the Division of Academic and Student Affairs (DASA).
- Dr. Rose Wong, the Director of the Social Work Department, will be the PPS: SSW program coordinator who will be responsible for the day-to-day operations of the program.
- Dr. Donna Sheperis, the Director of the Counseling Department, will be the PPS: SC program coordinator who will be responsible for the day-to-day operations of the program.
- Both directors report to Dr. Erika R.N. Cameron, Provost and Vice President of Academic and Student Affairs. Dr. Cameron will be the Unit Head responsible for ongoing oversight of all educator preparation programs.
- PAU assures that the duties related to credential recommendations will be performed only by employees of PAU and that these individuals will take part in the Commission training related to the recommendation process.
- PAU has identified, Derek Wang, MSW, LCSW, PPSC, Assistant Professor for the School Social Work Department and Sandi Logan-McKibben, PhD, NCC, NCSC, BC-TMH, ACS, LPC (CT), CSC (CA), Associate Director for Clinical Training in the School Counseling Department, as the individuals who will be responsible for credential recommendations.

### Criterion 2: Lawful Practices

Staff Recommendation: Aligned

- A non-discrimination policy for the institution's **candidates** is provided in the Student Handbook and on the PAU website.

### Criterion 3: Commission Assurances and Compliance

Staff Recommendation: Aligned

- PAU provided a statement of assurance signed by Dr. Erika R.N. Cameron, Provost and Vice President of Academic and Student Affairs, 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, 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

- Dr. Rose Wong, Program Director of Social Work in the Department of Social Work within the Division of Academic and Student Affairs, 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

- PAU has provided a grievance process which will be accessible to all candidates and applicants in the Student Handbook.
- The Student Handbook is accessible to students on the MyPAU student intranet.
- Grievance procedures are also available to the public on the Consumer Information webpage on the PAU website under "Institutional Appeals and Grievance Procedures."
- Both the Candidate Handbook and University Catalog (pages 84-85) outline the grade appeal process.
- Candidates will be informed of the grievance process early in their enrollment into the program. The candidate handbook is discussed during orientation for all incoming PAU candidates.

#### **Criterion 6: Communication and Information**

Staff Recommendation: Aligned

- PAU's webpage will be accessible to the public without the requirement of login information.
- PAU will include the mission, governance, administration and admission procedures on the institution's webpage.
- Information will be made available through information flyers for prospective students and on the institution's public website.

### **Criterion 7: Student Records Management, Access, and Security**

Staff Recommendation: Aligned

- The university's Registrar's Office is the official recorder and keeper of student (candidate) academic records. Student records are retained in alliance with federal Family Educational Rights and Privacy Act (FERPA) and American Association of Collegiate Registrars and Admissions Officers (AACRAO) guidelines.
- The Registrar's Office is responsible for maintaining and managing students' academic records, which includes tracking enrollment, grades, transcripts, degree progress, and all other official documentation. It is the authoritative source for all official academic records related to students. It ensures records are kept accurate and secure.
- Candidates and graduates will have access to their transcripts/documents for the purpose of verifying academic units and program completion through the PAU intranet, their Program Director, and/or the Registrar Office.
- Records are stored and maintained digitally (2016 to present) on the institutions secured server and can be accessed only via secure login to parties granted permission. The Registrar's office has not kept paper copies of records since 2016.

### **Criterion 8: Disclosure**

Staff Recommendation: Aligned

- The proposed delivery model of the two-year PPS: School Social Work program is online with three three-day in-person immersion residencies per year.
- The proposed delivery models of the PPS: School Counseling program, completed over a two- or three-year period of study, are hybrid and online. The online candidates attend two four-day in-person immersion residencies during the period of study. In-person immersion residencies will be held on one of PAU's campuses, either in Palo Alto or Mountain View, or in community facilities.
- No outside organizations provide any direct educational services as all or part of PAU's educator preparation programs.

### **Criterion 9: Veracity in all Claims and Documentation Submitted**

Staff Recommendation: Aligned

- An assurance signed by Dr. Erika Cameron, Provost and Vice President of Academic and Student Affairs, has been submitted attesting to the veracity of all statements and documentation submitted to the Commission. The letter also attests to PAU'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**

- PAU's proposal states that it seeks to offer accredited PPS: School Social Work and PPS: School Counseling educator preparation programs that support the rigorous academic performance for the full range of California PK-12 students while positioning its candidates to tailor assistance to exceptional needs students and students of diverse backgrounds, and advocacy and intervention for every child not at grade level. PAU states that it is committed to California's adopted state standards and frameworks through the provision of high quality, research-based professional development relevant to the professional expectations of credentialed pupil personnel services professionals in school social work and school counseling.
- Through education in school social work and school counseling, PAU states in its mission statement that the institution "will prepare its candidates to address pressing and emerging issues in California's public schools in support of wholesome learning environments and high standard of academic accomplishment for K-12 pupils."
- PAU's states that the philosophical approach underlying the design of educator preparation is guided by three institutional values: (1) equity and inclusion; (2) excellence and integrity; and (3) innovation. PAU is guided in its design in educator preparation through the following theoretical and conceptual frameworks: Psychosocial-Spiritual, Ecological Systems Theory, Cultural Humility, Ethics and Values, and Community Organizing.

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

- PAU has not yet sponsored an education preparation program but has nearly 50 years' experience in providing psychology-focused education to its students. PAU is regionally accredited through the Western Association of Schools and Colleges (WASC) and have specialty accreditation for their programs through the American Psychological Association (APA) and the Council for Accreditation of Counseling & Related Educational Programs (CACREP). The MSW program is currently in pre-candidacy for accreditation by the Council on Social Work Education's (CSWE) Board of Accreditation (BOA). Accreditation by CSWE is typically a 3-year process.
- PAU has posted the third-party invitation for comments on the PAU's website where the public and all constituencies can access and submit comments. No comments have been received at this time.
- As required by this criterion, staff researched the possibility of any additional available information relevant to PAU's application for IIA and found none.

#### **Criterion 12: Capacity and Resources**

- As evidence of capacity and resources, PAU has provided a copy of its most recent audited budget dated January 31, 2025, as well as a copy of a proposed operations budget for its



education unit. The proposed PPS programs should have minimal financial impact on the university. The proposed programs do not increase the costs associated with current facilities, hardware, software licenses, or other services or programs. Support for adding relevant programs and meeting the regional demand of well-trained, master-level social work and counseling professionals is central to the priorities set by the PAU Board of Trustees in the strategic plan. All start-up program costs are paid out of an operational fund within the Division of Academic and Student Affairs.

- PAU has also detailed within its submission the facility resources that will be available for its candidates. These include two campuses containing at least six classrooms, multiple conference rooms, therapy rooms, faculty offices and labs, as well as libraries and resources for academic and student affairs.
- Additionally, within the submission, PAU has identified the job responsibilities and minimum qualifications for the program personnel and instructional support. PAU's personnel and instructional support will consist of the following:
  - Pupil Personnel Services: Social Work: one program director, one field director, one assistant/associate professor, adjunct faculty (number TBD), one administrative assistant, and teaching assistants (as needed, depending on enrollment). PAU will maintain a balance of approximately 50% of courses taught by adjuncts and 50% taught by full-time faculty members. During the first several years of the new MSW program (with an annual student cohort of approximately 20-25 students), PAU currently expects to have 8-10 adjunct faculty members teaching in an academic year. Note: adjunct faculty at PAU may teach courses of .5 to 3 units per term.
  - Pupil Personnel Services: School Counseling: one MA counseling program director/department chair, one program director, one clinical coordinator, one program assistant/associate professor, adjunct faculty members (number TBD based on enrollment), one program administrative assistant, and teaching assistants (as needed, depending on enrollment). Because the MA Counseling program overall is accredited by the Council for Accreditation of Counseling and Related Programs (CACREP), PAU is required to maintain during any 12 continuous months a pattern where not more than 49% of course credits are taught by adjunct faculty (such that at least 50% of course credits are taught by full-time faculty). During the first several years of the new School Counseling option, PAU currently expects to have 6-8 adjunct faculty members teaching students who are in the School Counseling option during an academic year.
  - For the purposes of fieldwork, PAU is partnered with Solano County Office of Education and Santa Clara County Office of Education.

### **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 PAU Meets the Precondition:*

PAU highlights data from the Hopeful Futures Campaign, a national coalition of 17 school mental health groups, published, “America’s School Mental Health Report Card: February 2022,” which scores each state in eight areas, including ratios of students to school mental health professionals. This report shows that California scored low particularly in staff-to-student ratios for school social workers and school counselors, indicating an extremely high need for both. While the recommended ratio for counselor per student is 1:250 (with the same recommended ratio for social workers) it is starkly noted that the ratios for school social workers and counselors per student are 1:6,312 and 1:612, respectively.

Additionally, PAU notes that surveys with Bachelor of Social Work (BSW) and Master of Social Work (MSW) students conducted as part of a market analyses by the university in 2022 show students’ preferences for online and hybrid delivery. Survey data from 43 BSW students from three universities located in northern and central California found the top preferences in delivery model for MSW education to be online and in-person, with equal numbers of respondents (37%) endorsing each. Among these BSW students, school social work (SSW) was the second most endorsed career goal for their MSW degree, endorsed by 21.7% of respondents. The top career goal was working with children and youth, endorsed by 28.3% of respondents. In addition, BSW students’ top preference for MSW program length was two years or full-time, endorsed by 77.4% of respondents, if they were to attend a regular rather than an Advanced Standing program. (Advanced Standing programs allow BSW students, if admitted, to complete a reduced unit MSW program.)

***(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 PAU Meets the Precondition:*

PAU established an SSW community advisory council comprised of members from local education agencies such as Santa Clara County Office of Education, Solano County Office of Education, and an independent participant from Alameda County Office of Education. The roles and responsibilities of members of the advisory council were provided as documentation in response to this Precondition. Agenda and meeting minutes for the council’s May 2024, June 2024, and August 2024 meetings were also provided. In the draft Memorandum of

Understanding (MOU) between PAU and Santa Clara County Office of Education (SCCOE), SCCOE's collaboration in the program design, implementation, and continuous improvement of both the PPS: SSW and PPS: SC programs were noted. The draft MOU was also provided as evidence.

### **General Precondition 9**

#### ***(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).

PAU's programs are not proposed to be operated out of a department or School of Education and therefore, this precondition does not apply.

#### **Staff Recommendation**

Staff recommends that the Commission consider the responses to the Eligibility Requirements and relevant Preconditions submitted by PAU and grant eligibility.

Granting eligibility would allow PAU 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 PAU to offer an educator preparation program that leads to a credential or license, such as the Pupil Personnel Services Programs in School Social Work and School Counseling.

If the Commission grants eligibility, it may identify topics of particular interest for inclusion 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.