

MEMORANDUM

**TO:** Brent Carbajal, Provost and Vice President for Academic Affairs  
Melynda Huskey, Vice President for Enrollment and Student Services



**FROM:** Antonia Allen, Director, Office of the Internal Auditor

**DATE:** July 12, 2019

**SUBJECT:** Woodring Internship Irregularities Investigation

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This memorandum summarizes the Office of the Internal Auditor's (OIA) analysis of concerns brought to our attention regarding potential irregularities in the application of credits for student teaching internships in the Elementary Education Department of the Woodring College of Education.

## Background

On November 14, 2018, David Brunner, Registrar, met with Senior Internal Auditor, Paul Schronen, to relay concerns that the Elementary Education (ELED) Department was issuing false internship credits to increase student credit loads to meet or exceed 12 credits in an academic term in order for qualified financial aid students to be eligible for full-time financial aid. He shared additional concerns about summer internship courses that were not being recorded during the appropriate term. The Registrar indicated that he had advised the department to cease the practices in question without success, and was, therefore, seeking OIA's assistance to resolve the issue.

During our investigation, OIA contacted the Dean of Woodring to relay our preliminary findings associated with an identified practice of allowing students to participate in courses without being formally enrolled in them. After receiving this notification, the Dean voiced concerns to the Director of the Office of Field Experience (OFE) about another ongoing practice throughout the Woodring College of Education that allows students who fail their internships to retake them within a year at no additional cost to the students. The students in question receive "K" (incomplete) grades on their transcripts, are placed in new public school classrooms, and advised that they do not have to formally register for their internship credits with Western Washington University (WWU). After their discussion, the Director of OFE contacted OIA and self-disclosed that she had been facilitating this practice since her hire date in September 2015 due to a misunderstanding about the "K" grade process.

Horacio Walker has been the Dean of Woodring College of Education since August 1, 2017. Tracy Coskie has been the chair of the Elementary Education Department since September 1, 2017. Matthew Miller has been a professor in the Elementary Education Department since September 16, 2005. Marsha Riddle Buly

has been a professor in the Elementary Education Department since September 16, 1999. Bow Jerns has been the Administrative Services Manager for Elementary Education Department since July 25, 2016. Molly Baumann has been a Program Coordinator for Elementary Education Department since July 24, 2017. Laura Wellington has been the Director of the Office of Field Experiences since September 8, 2015.

ELED 494, Internship – Elementary, is defined in WWU’s course catalog as a *supervised teaching experience to develop and demonstrate teaching competency at the primary and/or intermediate grades*. Prior to 2016, student teachers received 14-16 credits of this course during the third quarter of the ELED student teaching professional program to represent their full-time internship. The internship had separately defined learning outcomes and objectives, which were assessed by university intern coordinators (UIC) and cooperating teachers (CT) in the public classrooms. The Office of Field Experience (OFE) tracked student progress of the internship objectives and assigned grades accordingly.

The student teaching portion of the ELED professional program spans three quarters of an academic year, regardless of when students start their student teaching. Student teachers are in public schools from 8 AM - 12 PM on Tuesdays and Thursdays during the first quarter, all day on Tuesdays and Thursdays during the second quarter, and full-time Monday through Friday during the third quarter. Prior to August 2016, student teachers received credit for their classroom time during the first two quarters through a variety of practicum courses that combined class time on campus and hands-on application of learning objectives in a public school setting. In the spring of 2016, several ELED faculty members, including the chair, petitioned to rearrange the existing format to ease student teacher workloads during the second quarter to allow students to focus on passing their [edTPA](#) (teacher performance assessment). Their proposal included moving a practicum course from the second to the third quarter, while simultaneously moving some of the ELED 494 credits from the third to the second quarter. It was ultimately decided that five of the fourteen ELED 494 credits would be moved from the third quarter to the second quarter to represent half of the classroom time during the second quarter. A chronology of the correspondence related to this transition can be found in [Appendix C](#). Two particular items to note from this correspondence include:

- The Registrar communicated to the department that if they split the internship credits into two quarters, they needed to ensure that *the course has separately identified learning outcomes/objectives, and therefore stands alone contributing to the degree*. (See [#19](#))
- The proposal did not include any ELED 494 credits during the first quarter of the student teaching experience. The previous chair indicated that *Some students are completing major requirements or need to do a PE course or something like that that gets them to the minimum of 12 for full time status/financial aid eligibility. Occasionally, there are students who need to add credits to make the full time status, and they have taken ELED 494 for 2 credits*. (See [#14](#)) OIA notes that the addition of ELED 494 credits to the first quarter would duplicate credits the students were already receiving for their classroom time through credits attached to practicum courses. (Also see [Appendix B.IV.2](#))

ELED 491, September Experience, is defined in WWU’s course catalog as *observation and participation in the opening of school*. This two-credit course is required for all students in the elementary education professional program including, but not limited to, students pursuing the Language, Literacy, and Cultural Studies (LLC) endorsement, and students pursuing their teacher certification through the post-baccalaureate program.

## Objective and Scope

Paul Schronen, Senior Internal Auditor, led the engagement. The objective of the investigation was to determine the extent of any fraudulent and/or inappropriate activities, reporting requirements and/or remediation required due to those activities, the amount of any potential financial losses, and to identify opportunities for control improvements.

Our investigation procedures included:

- Interviewing staff to determine relevant practices, events, and timelines.
- Reviewing selected Elementary Education staff and faculty Outlook data to determine the nature, and extent, of related activities.
- Reviewing Banner enrollment data, Canvas course data, and financial aid records to determine the nature, and extent, of related activities.
- Identifying and reviewing relevant Revised Code of Washington (RCW), Washington Administrative Code (WAC), Code of Federal Regulations (CFR), Northwest Commission on Colleges and Universities (NWCCU) standards and policies, and university policies, procedures, and online resources.
- Determining if any losses occurred through review of records and supporting documents.
- Determining if any relevant laws, agreements, policies, or procedures were violated through review of records and supporting documents.

The fieldwork took place from December 27, 2018, through June 12, 2019, and focused on irregularities associated with ELED 494 (Internship – Elementary), ELED 491 (September Experience), and ELED 691 (Research Seminar).

Our test work and conclusions are based upon representations made to us by management, which were verified on a judgmental basis. OIA plans to perform a follow-up review of the items identified in this investigation.

Authority and Purpose: Internal Auditing is an independent appraisal function established within the university to examine and evaluate its activities as a service to the organization. The objective of the Office of the Internal Auditor is to assist the Board of Trustees, President, and university management in the discharge of their oversight, management, and operating responsibilities. This objective is accomplished by providing analyses, appraisals, recommendations, and information about the activities reviewed by the Office of the Internal Auditor. The Internal Audit function has the authority to review all areas of university operation. This audit report is presented to university administration for their information and to assist them in taking appropriate corrective or enhancement action(s). This report is provided to the Finance, Audit and Enterprise Risk Management Committee of the Board of Trustees for their information.

## I. Fraudulent Manipulation of Credit Loads for Financial Aid Qualification (“Financial Aid Fraud”)

### Conclusions

Our review concluded that ELED staff and faculty members may have offered, and granted, fraudulent Elementary Internship (ELED 494) course credits to 20 students between winter quarter 2016 and winter quarter 2019, to increase student credit loads to full-time (i.e., 12 credits) for financial aid qualification purposes. Correspondence and documentation appear to indicate that this practice was systemic throughout ELED, and widely communicated to their students. OIA noted two additional instances where the chair of the department appears to have issued fraudulent Research Seminar (ELED 691) course credits for the same purpose in September 2013 and January 2016 respectively. See [Appendix B, Section I](#) for selected correspondence related to this practice.

In addition, OIA noted that certain ELED staff and faculty appear to have regularly shifted ELED 494 internship credits from one quarter to the next in apparent attempts to increase student credit loads to full-time for financial aid qualification purposes. Learning objectives and expectations were not adjusted accordingly when these credit modifications were made.

See [Appendix A, Section I](#) for a detailed listing of financial aid fraud findings and the associated CFR, U.S.C., and NWCCU requirements and consequences for violations.

- 34 CFR 668.16 – Standards of Administrative Capability
- 34 CFR 668.72 – Nature of Education Program
- 34 CFR 668.82 – Standard of Conduct
- 34 CFR 668.84 – Fine Proceedings
- 34 CFR 668.85 – Suspension Proceedings
- 20 U.S.C. §1097 – Criminal penalties
- NWCCU – Standards
- NWCCU – Fraud and Abuse Policy

These actions may have resulted in students receiving fraudulent course credits and financial aid for courses they did not complete. WWU appears to have over-awarded \$4,742 in financial aid to 9 students as a direct result of this practice. Per discussion with the Special Agent in Charge at the Western Regional Office of the Inspector General (OIG) of the Department of Education (DOE), this practice constitutes fraud and must be referred to their office for possible investigation per 34 CFR 668.16. The DOE Secretary may impose fines of up to \$57,317 per violation and/or limit, suspend, or terminate WWU’s participation in the Title IV, HEA program. In addition, the NWCCU could sanction WWU or withdraw our accreditation.

Correspondence appears to indicate that ELED staff and faculty engaged in these activities for the benefit of their students without consideration of the financial or academic implications of their actions. If the OIG determines that ELED staff or faculty knowingly and willfully misapplied any Title IV funds, and/or furnished any false information in connection with the assignment of Title IV loans, the employees in question may be subject to possible fines and/or imprisonment.

During our review, we noted areas where controls could be strengthened. Implementing the following recommendations should decrease the likelihood of such events occurring in the future.

## Recommendations

### 1. Immediately cease any practices to assist students financially by manipulating or granting fraudulent course credits to increase financial aid.

We recommend that ELED staff and faculty immediately cease any practices to assist students financially by manipulating or granting fraudulent course credits to increase financial aid. Practices include, but are not limited to:

- Granting fraudulent credits for “ghost” courses to increase student credit loads to full-time for financial aid qualification purposes.
- Shifting internship credits from one quarter to the next to increase student credit loads to full-time for financial aid qualification purposes.

We further recommend that the Dean of Woodring take appropriate personnel actions as deemed necessary due to the circumstances noted in this report.

#### Management Response:

Management acknowledges these recommendations. As expressed in our [attached memorandum](#) dated July 10, 2019, while Management does not agree with the conclusion that faculty committed fraud or awarded fraudulent credits, we certainly concur that student enrollment records must accurately reflect coursework undertaken and completed. After receiving notification from Internal Audit on March 8, 2019, a response from the Department Chair was provided on March 11, 2019, indicating that all practices which did not result in accurate student records have been addressed and rectified.

Training to ensure university policy will be followed by all relevant faculty and staff will be provided in Fall Quarter, 2019.

Management also acknowledges that Internal Audit’s investigation does not extend to the determination of criminal or civil charges such as fraud, or to the recommendation of disciplinary action against employees. Management will take necessary next steps before the beginning of Fall Quarter, 2019 to consider what, if any, further action should be taken.

### 2. Make appropriate referrals and restitution payments to the Department of Education.

We recommend that the Vice President for Enrollment and Student Services, and the Assistant Vice President & Director of Financial Aid, with assistance from the Registrar, determine any reporting and/or repayment requirements to the Department of Education and/or other state agencies due to the circumstances noted in this report.

#### Management Response:

Management acknowledges this recommendation. The Vice President for Enrollment and Student Services, and the Assistant Vice President & Director of Financial Aid, with assistance from the Registrar, will assess the extent of financial aid overpayments requiring resolution, and will communicate with the U.S. Department of Education and state agencies as needed to resolve them appropriately before July 1, 2020.

### 3. Make appropriate transcript adjustments.

We recommend that the Dean of Woodring coordinate with the Registrar to determine if the identified fraudulent course credits should be removed from the related student records and facilitate any adjustments deemed necessary.

#### **Management Response:**

Management acknowledges this recommendation. The Registrar, in coordination with the Dean of Woodring, or his designee, will review individual student records to determine if course credits were inaccurately assigned, assess potential impacts of record changes, and take appropriate action as needed to ensure accuracy of student records before July 1, 2020.

## II. Course Participation Without Registration

### **Conclusions**

Our review concluded that ELED administration instructed 14 Language Literacy and Cultural Studies (LLC) majors, one non-LLC major, and two independent study students to complete all required elements of the September Experience course (ELED 491) without formally registering for the course in order to avoid paying associated tuition costs. ELED faculty and staff subsequently “waived” the course so the students could graduate without officially completing this course. Note that this course is required for all students in the professional education sequence. See [Appendix B, Section II](#), for selected correspondence related to this practice. Correspondence, Canvas records, and Banner records indicate that all of these students successfully completed all required course elements without receiving credit for the courses on their transcripts. The university sustained \$6,882.64 in tuition revenue losses due to this practice.

We also noted fourteen instances where students who had failed or withdrew from their internships were permitted to retake them during subsequent quarters without re-registering for the courses. OIA estimates tuition revenue losses associated with this practice will total \$42,471.10. See [section IV](#) below for additional details.

OIA also noted the following instances where ELED administration requested ELED 491 waivers for their students.

- Eight LLC students who had formally registered for the course and successfully completed all required course elements per Canvas records.
- One non-LLC student who was added to the Canvas course but not officially enrolled in the course. This student did not complete the required course elements per Canvas records.
- Pre-waivers for 45 LLC majors who had not started their student teaching at the time of the request.

While the university did not sustain tuition revenue losses due to these additional waiver requests, the practice appears to mirror the previous cases and consequently may have facilitated additional cases of course participation without registration.

The university’s academic policy does not allow students to attend or participate in classes without formally being registered. See [Appendix A, Section II](#) for a detailed listing of course participation without registration findings and the associated university guidance.



Correspondence appears to indicate that this practice was implemented by ELED staff and faculty in response to contact with the parent of an LLC student in the fall of 2017. The parent was upset because they had to pay higher tuition due to the additional LLC program requirements, which pushed their student's quarterly credit load above the banded tuition rate. ELED staff and faculty engaged in these activities for the financial benefit of their students without consideration to university policy, the financial impact on the university, or the academic impact on the students who did not receive credit for completed coursework. Control weaknesses in the university's Learning Management System (Canvas) permitted ELED staff and faculty to add students to the Canvas course who were not officially enrolled in the course. Weaknesses in the university's waiver process permitted ELED staff and faculty to subsequently waive the course for the students without providing sufficient justification or documentation indicating how the students had met the required major course requirements.

We also noted four instances where the chair of the ELED department advised her Research Seminar (ELED 691) students that they were expected to attend the seminar tied to the course each quarter, regardless of whether they were registered for course credits or not. (See [Appendix B, Section II, Item 8](#)) OIA was unable to verify if any of these students participated in the seminar during quarters that they were not formally enrolled in the course. Therefore, we were unable to determine if the university sustained any tuition revenue losses due to this practice. The correspondence; however, indicates a lack of awareness of the university's academic policy prohibiting this practice.

During our review, we noted areas where controls could be strengthened. Implementing the following recommendations should decrease the likelihood of such events occurring in the future.

## **Recommendations**

### **1. Immediately cease any practices to assist students financially by manipulating course credits to avoid tuition costs.**

We recommend that Woodring staff and faculty immediately cease any practices to assist students financially by manipulating course credits to avoid tuition costs. Practices include, but are not limited to:

- Advising students to attend or participate in courses when they are not formally registered for them.
- Waiving major course requirements without justification or documentation indicating how the students had met the required elements.

We further recommend that the Dean of Woodring take appropriate personnel actions as deemed necessary due to the circumstances noted in this report.

#### **Management Response:**

We acknowledge the above recommendations, and concur that all participation in courses and provision of course waivers should be governed by relevant university policy. Upon receiving notice from Internal Audit on March 28, 2019, the Department Chair informed the Dean of Woodring by email on April, 2, 2019 that "We have stopped all procedures which were revealed to be problematic..."

Management will work with the Academic Coordinating Commission (ACC), the body charged by the Faculty Senate with "oversight of all aspects of the curriculum, curricular policy, and Western academic enterprise," in Fall Quarter of 2019 to ensure understanding

of the policy for documenting course waivers and ensure that this is shared, distributed, and reviewed annually by program directors and staff.

Management will work with ACC in fall 2019 to ensure understanding of policy for distribution of master's thesis and project credits and guidelines.

Training to relevant faculty and staff will be provided in Fall Quarter 2019 to ensure that university policy is followed.

Management also acknowledges that Internal Audit's investigation does not extend to the determination of criminal or civil charges such as fraud, or to the recommendation of disciplinary action against employees. Management will take necessary next steps before the beginning of Fall Quarter 2019 to consider what, if any, further action should be taken, in accordance with relevant collective bargaining agreements, human resources and employment policies and procedures.

## **2. Make appropriate transcript adjustments.**

We recommend that the Dean of Woodring coordinate with the Registrar to ensure that the students in question, who have successfully completed the course requirements for ELED 491, receive credit for the course on their transcript.

### **Management Response:**

Management acknowledges this recommendation. The Registrar will coordinate with Dean of Woodring, or designee, to determine if course credits for ELED 491 should be added to individual student records retroactively, assess potential outcomes if credit(s) were to be added to individual student records, and take appropriate action as needed to ensure accuracy of student records by July 1, 2020.

## **3. Reimburse tuition revenue losses.**

We recommend that the Dean of Woodring coordinate with the Provost to identify an appropriate funding source and transfer funds to cover all associated tuition losses, including late fees or penalties.

### **Management Response:**

Management does not agree with this recommendation. Tuition is charged to individual students, not to the institution, and flows to the institution as a whole, not to individual departments or colleges. Students followed the directions they were given by advisors as to their registration, and to charge them now for those courses would likely cause significant distress to them. Use of college or department funds to reimburse the university simply redistributes costs within the institution without increasing revenue, and with the likelihood of further reducing funds for the use of other students uninvolved in this matter within the college. The Provost and Dean of Woodring will confer with colleagues in the Budget Office, Business and Financial Affairs, and the Attorney General's Office to determine what action might be taken to mitigate fiscal impact on the institution as a result of inaccurate tuition charges made to students.



#### **4. Strengthen waiver approval, justification, and documentation requirements.**

We recommend that the Registrar communicate with the Academic Coordinating Commission (ACC) to establish course waiver approval and documentation requirements that ensure waivers for required major, minor, endorsement and certificate courses are appropriately approved, justified, and supported.

##### **Management Response:**

Management acknowledges this recommendation. The Registrar will formally request the ACC to establish procedures for the approval and documentation of course waivers applied to major, minor, certificate and endorsement programs of study, when they convene in Fall Quarter of 2019.

#### **5. Disable faculty rights to add students to their credit-bearing Canvas courses.**

We recommend that the Director of Academic Technology and User Services disable rights for faculty to add/remove students to/from Canvas credit-bearing courses. Controls should be established to ensure that Canvas enrollment directly correlates with Banner enrollment data. If necessary, the Director should establish an exception process which ensures compliance with the university's academic policy.

##### **Management Response:**

Management acknowledges this recommendation. Faculty rights to add students to their credit-bearing Canvas courses will be disabled by the end of July 2019. Canvas enrollments will consequently conform to Banner enrollment data. Exceptions such as enrolling guest experts into online conversations will be considered on a case-by-case basis and will not be performed for any credit-receiving activity.

### **III. Misrepresentation of Credit Hours to Avoid Tuition Costs**

#### **Conclusions**

Our review concluded that ELED staff and faculty appear to have advised and permitted students to shift internship and graduate research course credits from one quarter to the next in apparent attempts to help students avoid tuition costs. Learning objectives and expectations do not appear to have been adjusted accordingly when these credit modifications were made. See [Appendix B, Section III](#), for selected correspondence related to this practice.

See [Appendix A, Section III](#) for a detailed listing of each misrepresentation of credit hours earned finding and the associated CFR, NWCCU, and university policy requirement.

These practices may have violated federal law, university policy, and resulted in unspecified tuition revenue losses for the university. OIA was unable to quantify the losses given that ELED had not clearly defined how the associated credits tied to measurable learning outcomes or reflected defined criteria for credit hours.

ELED staff and faculty do not appear to have a clear understanding of how credits tie to measurable learning outcomes or accurately reflect defined criteria for credit hours.

During our review, we noted areas where controls could be strengthened. Implementing the following

recommendations should decrease the likelihood of such events occurring in the future.

## **Recommendations**

### **1. Immediately cease any practices to assist students financially by manipulating course credits to avoid tuition costs.**

We recommend that ELED staff and faculty immediately cease any practices to assist students financially by manipulating course credits to avoid tuition costs. We further recommend that the Dean of Woodring take appropriate personnel actions as deemed necessary due to the circumstances noted in this report.

#### **Management Response:**

Management acknowledges these recommendations. As expressed in our corresponding memorandum dated July 10, 2019, Management does not agree with the conclusion that faculty committed misrepresentation. We certainly concur that student enrollment records must accurately reflect coursework undertaken and completed, so that appropriate tuition and fees may be charged. Immediately after receiving notification from Internal Audit on April 5, 2019, the department chair responded indicating that changes will be made to ELED 491, ELED 494, and ELED 691 in response to the issues raised by the audit.

Training will be provided in Fall Quarter, 2019 to all relevant faculty and faculty to ensure that university policy will be followed.

Management also acknowledges that Internal Audit's investigation does not extend to the determination of criminal or civil charges such as fraud, or to the recommendation of disciplinary action against employees. Management will take necessary next steps before the beginning of Fall Quarter 2019 to consider what, if any, further action should be taken.

### **2. Ensure learning objectives are properly defined.**

We recommend that the Dean of Woodring consult with the Vice Provost for Undergraduate Education to ensure that learning objectives are properly defined for ELED 494 and that credits are assigned based on the amount and type of work expected.

#### **Management Response:**

We acknowledge the recommendations. The department will develop syllabi and learning objectives and outcomes for ELED 494. This work will be completed in Summer 2019.

### **3. Ensure course credits are clearly defined, properly supported, tied to measurable learning outcomes, and provided to students in a syllabus.**

We recommend that ELED faculty ensure that all course credits tie to measurable learning outcomes, accurately reflect defined criteria for credit hours, and are consistently granted to all students in the program regardless of their financial need or the location of their internship. The ELED administrative team should work with the Office of Field Experiences to establish clear criteria for how internship credits will be represented, distributed, and tied to specific measured learning outcomes and objectives. The criteria should be codified in a course syllabus and provided in written form to enrolled students as required by NWCCU standard [2.C.2](#).

### **Management Response:**

We acknowledge the recommendation. The department will develop syllabi and learning outcomes for all quarters of the internship tied to course credits. This work will be completed in Summer 2019 and will go through the Faculty Senate's curriculum approval process in AY-2019-20.

Regarding ELED 491, the Department will revise the course sequence so that Language, Literacy, and Cultural Studies students no longer face an overload of credits if they begin their internship during Fall Quarter.

Regarding ELED 691, we will provide a clear policy to chairs and directors outlining master's thesis and project credits. The sequence of credits will be tied to course syllabi and specific outcomes.

## **IV. Misapplication of Incomplete (K) Grades**

### **Conclusions**

Our review concluded that certain faculty and/or staff in the Woodring College of Education (WCE) appear to have engaged in an ongoing practice of granting incomplete (K) grades to students who walk away from, are removed from, or are unsuccessful in their internship courses. The K grades appear to be placeholders used to provide students with the opportunity to retake their internships during subsequent quarters without registering for additional credits or to allow students to demonstrate competency in additional registered internship courses and retroactively apply the passing grades to the incomplete/failed credits.

See [Appendix A, Section IV](#) for a detailed listing of misapplication of K grade findings and the associated university policy requirements.

Between fall quarter 2015 and spring quarter 2019, OIA identified fourteen students who had failed or withdrew from their internships and were permitted to retake them during subsequent quarters without re-registering for the courses. Tuition revenue losses associated with this practice will total \$42,471.10 if the Registrar confirms OIA's testing results and determines that the K's, and subsequent placements, were inappropriate.

OIA also identified one student who failed and one student who walked away from their second quarter five credit offering of ELED 494. They were given K's until they completed their third quarter nine credit offering of the internship. Once they successfully completed their third quarter internship, the student's second quarter K's were changed to Satisfactory's (S) without requiring them to retake the previously incomplete/failed course credits. OIA was unable to determine the specific tuition revenue losses associated with these instances due to the unknown nature of future tuition costs and potential course loads of the students had they originally received grades that accurately reflected the nature of their circumstances and had been required to retake the course at a later date.

We also noted eleven students who voluntarily stepped away from, were removed from, or failed their internships between fall quarter 2018 and spring quarter 2019 and were granted K grades which are still on their academic history. Potential tuition revenue losses if these students are granted additional internship placements without requiring them to register for additional credits will total \$35,551.

Correspondence and documentation appear to indicate that Woodring staff and faculty engaged in these activities for the benefit of their students without consideration of the financial or academic implications of their actions. It also appears that Woodring staff and faculty do not have a clear understanding of the appropriate application of K grades or the university's policy on course attendance without registration.

During our review, we noted areas where controls could be strengthened. Implementing the following recommendations should decrease the likelihood of such events occurring in the future.

## **Recommendations**

### **1. Make appropriate transcript adjustments.**

We recommend that the Dean of Woodring coordinate with the Registrar to determine whether any of the identified K grades were issued in a manner consistent with WWU's academic policy. Student records that are not consistent with university policy should be updated to accurately reflect the nature of the circumstances.

#### **Management Response:**

Management acknowledges this recommendation. The Registrar will coordinate with Dean of Woodring, or designee, to determine if the relevant K grades were issued in a manner consistent with WWU's academic policy, and where inconsistent, will assess the impact to individual student records, and where necessary, take action to ensure accuracy by 1 July 2020.

### **2. Reimburse tuition revenue losses.**

We recommend that the Dean of Woodring coordinate with the Provost to identify an appropriate funding source and transfer funds to cover all associated tuition losses, including late fees or penalties.

#### **Management Response:**

Management does not agree with this recommendation. Tuition is charged to individual students, not to the institution, and flows to the institution as a whole, not to individual departments or colleges. Students followed the directions they were given by advisors as to their registration, and to charge them now for those courses would likely cause significant distress to them. Use of college or department funds to reimburse the university simply redistributes costs within the institution without increasing revenue, and with the likelihood of further reducing funds for the use of other students uninvolved in this matter within the college. The Provost and Dean of Woodring will confer with colleagues in the Budget Office, Business and Financial Affairs, and the Attorney General's Office to determine what action might be taken to mitigate fiscal impact on the institution as a result of inaccurate tuition charges made to students.

### **3. Ensure faculty of record are trained on the appropriate application of K grades.**

We recommend that the Dean of Woodring ensure that all faculty of record for internship courses throughout WCE receive training on the appropriate application of K grades.

#### **Management Response:**

We acknowledge the recommendation. Training will be provided in Fall Quarter of 2019 to all relevant faculty of record to ensure university policy is followed.

We thank you, the Elementary Education Department, the Office of Field Experience, Registrar, and Financial Aid staff for their cooperation and assistance during the course of our review. If you have any questions, please feel free to contact me at (360) 650-3435.

- c: Sabah Randhawa, President
- Horacio Walker, Dean, Woodring College of Education
- Chuck Lanham, Vice Provost Information Technology and Chief Information Officer
- Clara Capron, Assistant VP & Director of Financial Aid, Enrollment and Student Services
- David Brunnemer, Registrar, Enrollment and Student Services
- Melissa L. Nelson, Assistant Attorney General
- Tracy Coskie, Chair, Department of Elementary Education, College of Education
- Laura Wellington, Former Director, Office of Field Experiences, College of Education
- John Farquhar, Director, Academic Technology and User Services
- Western Washington University Board of Trustees Finance, Audit and Enterprise Risk Management Committee Members
- Bill Lyne, President of the United Faculty of Washington State
- Deena Garza, Audit Manager, State Auditor's Office
- Adam Shanedling, Special Agent in Charge, Western Regional Office of the Inspector General of the Department of Education

File: 1906

**To:** Antonia Allen, Director, Office of the Internal Auditor

**From:** Brent Carbajal, Provost and Vice President for Academic Affairs *BJC*  
Melynda Huskey, Vice President for Enrollment and Student Services *MH*

**Date:** July 10, 2019

**Subject:** Management Responses – WCE Internship Irregularities Investigation

We appreciate your office's work on the report that resulted from the "Woodring Internship Irregularities" investigation. Per protocol and practice, management responses have been provided in the attached version of the report.

This memo is provided as a certain preface or framing for those management responses. We have taken all the recommendations very seriously, as you'll see by our responses.

We would also like to take this opportunity to explain why in some of the responses we have not specifically addressed Internal Audit's advice pertaining to "personnel actions." Such action, of course, is the responsibility of management and any determination would be made on the basis of appropriate personnel processes, not in response to an Internal Audit recommendation. Related, we've not responded to the terms "fraud" and "fraudulent" used in a number of sections of the report. This owes not to any lack of concern for the practices Internal Audit describes in that way, but rather to our sense that fraud is actually a legal conclusion that would fall outside the descriptive parameters of an Internal Audit investigation report. In other words, while we do not believe that faculty and staff engaged in fraudulent actions, we recognize that would be a legal conclusion for others to make. For the same or similar reasons, we've not addressed language in the attachments that characterizes behavior as "fraudulent" or that would appear to assume legal culpability or specific intent as defined by law.

Throughout our responses you will find commitment to addressing procedural infelicities and to training to address any residual lack of alignment between policy and practice. We do not agree that faculty made misrepresentations about program requirements, so we focus on process improvement and training. At this writing, a number of these issues have already been addressed (many outlined in the email your office received from the Chair of the Elementary Education Department on April 5, 2019). As we question whether Internal Audit's role is to reach legal conclusions, to attribute motivation or intent, and to propose that

“personnel action” be taken, we also recognize the fact that the investigation has brought to light inappropriate practices in a way that the Administration can address and correct them. In this latter sense the report and the opportunity to provide responses have been very helpful and are appreciated.

**Auditor's Note:** As noted above in [Section I.](#) of the report, and communicated to executive management on several occasions during the engagement, the decision to classify the noted activities as fraud was made after consultation with the Western Regional Office of the Inspector General (OIG) of the Department of Education (DOE). The OIG is the law enforcement arm of the DOE responsible for identifying fraud, waste, abuse, and criminal activity involving DOE funds, programs, and operations. They are also responsible for ensuring that programs are operating in accordance with established laws, regulations, and policies.

Related, during our discussion with the OIG Special Agent in Charge, he repeatedly emphasized the importance of the university taking appropriate personnel actions against the responsible parties. He indicated that their office would be taking the university’s response into consideration when determining potential future actions by their agency. This information was also communicated to executive management on several occasions during the engagement.



ITEM	CONDITION	CRITERIA
<p>I. Financial Aid Fraud (<a href="#">Back to Report</a>)</p>		
1	<p>ELED staff and faculty appear to have granted fraudulent course credits to increase student credit loads to full-time for financial aid qualification purposes.</p> <p>WWU is required to notify the Office of the Inspector General of the Department of Education of the identified practice to demonstrate to the Secretary of Education that WWU is capable of adequately administering our Title IV, HEA program.</p>	<p><a href="#">34 CFR 668.16</a> – Standards of Administrative Capability</p> <p><i>To begin and to continue to participate in any Title IV, HEA program, an institution shall demonstrate to the Secretary that the institution is capable of adequately administering that program under each of the standards established in this section. The Secretary considers an institution to have that administrative capability if the institution—</i></p> <p><i>(g) Refers to the Office of Inspector General of the Department of Education for investigation—</i></p> <p><i>(2) <b><u>Any credible information indicating that any employee, third-party servicer, or other agent of the institution that acts in a capacity that involves the administration of the Title IV, HEA programs, or the receipt of funds under those programs, may have engaged in fraud, misrepresentation, conversion or breach of fiduciary responsibility, or other illegal conduct involving the Title IV, HEA programs.</u></b> The type of information that an institution must refer is that which is relevant to the eligibility and funding of the institution and its students through the Title IV, HEA programs; [Emphasis added.]</i></p>
2	<p>ELED staff and faculty appear to have granted fraudulent course credits to increase student credit loads to full-time for financial aid qualification purposes.</p> <p>This practice may constitute a misrepresentation of the courses in question, exposing the university to an investigation by the Office of Inspector General of the Department of Education and the subsequent consequences including fines or the limitation,</p>	<p><a href="#">34 CFR 668.72</a> – Nature of Education Program</p> <p><i>Misrepresentation concerning the nature of an eligible institution's educational program includes, but is not limited to, false, erroneous or misleading statements concerning—</i></p> <p><i>(d) The requirements for successfully completing the course of study or program and the circumstances that would constitute grounds for terminating the student's enrollment;</i></p> <p><i>(m) The subject matter, content of the course of study, or any other fact related to the degree, diploma, certificate of completion, or any</i></p>

ITEM	CONDITION	CRITERIA
	suspension, or termination of our participation the Title IV, HEA program.	<i>similar document that the student is to be, or is, awarded upon completion of the course of study;</i>
3	<p>ELED staff and faculty appear to have granted fraudulent course credits to increase student credit loads to full-time for financial aid qualification purposes.</p> <p>This practice does not appear to be consistent with demonstrating that WWU is administering our financial aid program with the highest standard of care and diligence, thus exposing the university to investigation by the Office of Inspector General of the Department of Education and subsequent consequences including fines or the limitation, suspension, or termination of our participation the Title IV, HEA program.</p>	<p><a href="#">34 CFR 668.82</a> – Standard of Conduct</p> <p><i>(a) A participating institution or a third-party servicer that contracts with that institution acts in the nature of a fiduciary in the administration of the Title IV, HEA programs. To participate in any Title IV, HEA program, the institution or servicer must at all times act with the competency and integrity necessary to qualify as a fiduciary.</i></p> <p><i>(b) In the capacity of a fiduciary—</i></p> <p><i>(1) A participating institution is subject to the highest standard of care and diligence in administering the programs and in accounting to the Secretary for the funds received under those programs; and</i></p> <p><i>(c) <b><u>The failure of a participating institution or any of the institution's third-party servicers to administer a Title IV, HEA program, or to account for the funds that the institution or servicer receives under that program, in accordance with the highest standard of care and diligence required of a fiduciary, constitutes grounds for—</u></b></i></p> <p><i><b><u>(1) An emergency action against the institution, a fine on the institution, or the limitation, suspension, or termination of the institution's participation in that program;</u></b> [Emphasis added.]</i></p>
4	ELED staff and faculty appear to have granted fraudulent course credits to increase student credit loads to full-time for financial aid qualification purposes.	<p><a href="#">34 CFR 668.84</a> – Fine Proceedings</p> <p><i>(a) Scope and consequences. (1) The Secretary may impose a fine of up to \$57,317 per violation on a participating institution or third-party servicer that—</i></p>

ITEM	CONDITION	CRITERIA
	<p>This practice appears to constitute a misrepresentation of the nature of the courses in question and exposes the university to fines of up to \$57,317 per violation.</p>	<p><i>(i) Violates any statutory provision of or applicable to Title IV of the HEA, any regulatory provision prescribed under that statutory authority, or any applicable special arrangement, agreement, or limitation entered into under the authority of statutes applicable to Title IV of the HEA; or</i></p> <p><i>(ii) Substantially misrepresents the nature of—</i></p> <p><i>(A) In the case of an institution, its educational program, its financial charges, or the employability of its graduates;</i></p>
5	<p>ELED staff and faculty appear to have granted fraudulent course credits to increase student credit loads to full-time for financial aid qualification purposes.</p> <p>This practice appears to constitute a misrepresentation of the nature of the courses in question and exposes the university to suspension of our participation the Title IV, HEA program.</p>	<p><a href="#">34 CFR 668.85</a> – Suspension Proceedings</p> <p><i>(a) Scope and consequences. (1) The Secretary may suspend an institution's participation in a Title IV, HEA program or the eligibility of a third-party servicer to contract with any institution to administer any aspect of the institution's participation in any Title IV, HEA program, if the institution or servicer—</i></p> <p><i>(i) Violates any statutory provision of or applicable to Title IV of the HEA, any regulatory provision prescribed under that statutory authority, or any applicable special arrangement, agreement, or limitation entered into under the authority of statutes applicable to Title IV of the HEA; or</i></p> <p><i>(ii) Substantially misrepresents the nature of—</i></p> <p><i>(A) In the case of an institution, its educational program, its financial charges, or the employability of its graduates;</i></p>
6	<p>ELED staff and faculty appear to have granted fraudulent course credits to increase student credit loads to full-time for financial aid qualification purposes.</p> <p>If the OIG determines that ELED staff or faculty knowingly and willfully misapplied any Title IV funds, and/or furnished any false information in connection with the assignment of Title IV loans,</p>	<p><a href="#">20 U.S.C. §1097</a> – Criminal penalties</p> <p><i>(a) In general</i></p> <p><b><u>Any person who knowingly and willfully embezzles, misapplies, steals, obtains by fraud, false statement, or forgery, or fails to refund any funds, assets, or property provided or insured under this subchapter and part C of subchapter I of chapter 34 of title 42 or attempts to so embezzle, misapply, steal, obtain by fraud, false</u></b></p>

ITEM	CONDITION	CRITERIA
	<p>the employees in question may be subject to possible fines and/or imprisonment.</p>	<p><i>statement or forgery, or fail to refund any funds, assets, or property, <b><u>shall be fined not more than \$20,000 or imprisoned for not more than 5 years, or both</u></b>, except if the amount so embezzled, misapplied, stolen, obtained by fraud, false statement, or forgery, or failed to be refunded does not exceed \$200, then the fine shall not be more than \$5,000 and imprisonment shall not exceed one year, or both. [Emphasis added.]</i></p> <p><b><i>(b) Assignment of loans</i></b></p> <p><i><b><u>Any person who knowingly and willfully</u></b> makes any false statement, <b><u>furnishes any false information</u></b>, or conceals any material information <b><u>in connection with the assignment of a loan</u></b> which is made or insured under this subchapter and part C of subchapter I of chapter 34 of title 42 or attempts to so make any false statement, furnish any false information, or conceal any material information in connection with such assignment <b><u>shall, upon conviction thereof, be fined not more than \$10,000 or imprisoned for not more than one year, or both.</u></b> [Emphasis added.]</i></p> <p><b><i>(c) Inducements to lend or assign</i></b></p> <p><i>Any person who knowingly and willfully makes an unlawful payment to an eligible lender under part B of this subchapter or attempts to make such unlawful payment as an inducement to make, or to acquire by assignment, a loan insured under such part shall, upon conviction thereof, be fined not more than \$10,000 or imprisoned for not more than one year, or both.</i></p> <p><b><i>(d) Obstruction of justice</i></b></p> <p><i>Any person who knowingly and willfully destroys or conceals any record relating to the provision of assistance under this subchapter and part C of subchapter I of chapter 34 of title 42 or attempts to so destroy or conceal with intent to defraud the United States or to</i></p>



ITEM	CONDITION	CRITERIA
		<p><i>prevent the United States from enforcing any right obtained by subrogation under this part, shall upon conviction thereof, be fined not more than \$20,000 or imprisoned not more than 5 years, or both.</i></p>
7	<p>ELED staff and faculty appear to have granted fraudulent course credits to increase student credit loads to full-time for financial aid qualification purposes.</p> <p>The credits awarded under these circumstances do not appear to be based on documented student achievement, nor were they awarded in a manner consistent with institutional policies that reflect generally accepted learning outcomes, norms, or equivalencies in higher education. If the Northwest Commission on Colleges and Universities determined that this practice was designed to create a falsification, they could sanction WWU or withdraw our accreditation.</p>	<p>Northwest Commission on Colleges and Universities – <a href="#">Standards</a></p> <p><i>2.C Education Resources</i></p> <p><i>2.C.1 The institution provides programs, wherever offered and however delivered, with appropriate content and rigor that are consistent with its mission; culminate in achievement of clearly identified student learning outcomes; and lead to collegiate-level degrees or certificates with designators consistent with program content in recognized fields of study.</i></p> <p><i>2.C.2 The institution identifies and publishes expected course, program, and degree learning outcomes. Expected student learning outcomes for courses, wherever offered and however delivered, are provided in written form to enrolled students.</i></p> <p><i><b>2.C.3 Credit and degrees, wherever offered and however delivered, are based on documented student achievement and awarded in a manner consistent with institutional policies that reflect generally accepted learning outcomes, norms, or equivalencies in higher education. [Emphasis added.]</b></i></p>
8	<p>ELED staff and faculty appear to have granted fraudulent course credits to increase student credit loads to full-time for financial aid qualification purposes.</p> <p>This practice appears to be designed to create a falsification and exposes the university to sanctions or loss of our accreditation.</p>	<p>Northwest Commission on Colleges and Universities – <a href="#">Fraud and Abuse Policy</a></p> <p><i>An institution shall not engage in fraud and abuse, as outlined in state and federal law and regulation, <b>or in practices or procedures that are designed or have the tendency to create a falsification or deceive students.</b> [Emphasis added.]</i></p> <p><i>If the Commission receives an allegation of fraud and abuse concerning an institution from the federal government, any state</i></p>

ITEM	CONDITION	CRITERIA
		<p><i>entity or other party, the Commission will determine whether the alleged fraud and abuse constitutes a violation of the criteria for accreditation, particularly related to institutional integrity. In considering any allegation of fraud and abuse, the Commission may consider the nature of the allegation, whether the alleged fraud and abuse appears to meet the Commission's understanding of fraud and abuse as outlined in this policy or in federal or state definitions of fraud and abuse, and whether the source of the allegation has provided any evidence of such fraud and abuse. The Commission will review such allegations through its complaint process or through other mechanisms provided for in Commission policy and practice.</i></p> <p><b><u>An institution that has been determined through those processes to have engaged in fraud and abuse</u></b> as outlined in this policy shall be considered to be in violation of Commission standards related to institutional integrity and may be found to be in violation of other Commission standards as well, and <b><u>shall be subject to Commission sanctions or withdrawal of accreditation as outlined in those policies.</u></b> [Emphasis added.]</p> <p><i>The Commission shall report suspected incidents of fraud and abuse to the U.S. Department of Education.</i></p>
9	<p>WWU appears to have over-awarded \$4,742 in financial aid to 9 students as a direct result of ELED staff and faculty granting fraudulent course credits to increase student credit loads to full-time for financial aid qualification purposes. Per federal guidance, WWU is liable for the overpayments and is required to return the funds as directed.</p>	<p>1. <a href="#">20 U.S. Code § 1087ll</a> - Cost of attendance  <i>For the purpose of this subchapter, the term "cost of attendance" means-</i>  <i>(1) tuition and fees normally assessed a student carrying the same academic workload as determined by the institution, and including costs for rental or purchase of any equipment, materials, or supplies required of all students in the same course of study;</i></p>

ITEM	CONDITION	CRITERIA
		<p>2. Federal Student Aid Handbook, Vol. 4, Ch. 3, <a href="#">Overawards and Overpayments</a></p> <p>p. 4-65 <i>An overaward exists when a student’s aid package exceeds his or her need.</i></p> <p><i>Overawards only become overpayments if a school cannot correct them before funds are disbursed to a student.</i></p> <p><i>An <b>overaward</b> exists whenever a</i></p> <ul style="list-style-type: none"> <li>• <i>Pell award [is] based on the wrong payment schedule/enrollment status</i></li> <li>• <i>student’s award exceeds his or her cost of attendance (COA);</i></li> <li>• <i>student’s aid package exceeds his or her need [need = cost of attendance minus expected family contribution];</i></li> </ul> <p>p. 4-66 <i>A Pell Grant awarded to an ineligible student is an overaward, as is a grant based on an enrollment status greater than that for which the student is enrolled.</i></p> <p>p. 4-71 <i>In addition, a school must return any Direct Loan funds that it disbursed directly to a student if the school knew prior to disbursing the funds directly to the student that the student would not begin attendance.</i></p> <p><i>A school may not ignore information available to any office at the school indicating that a student failed to begin attendance.</i></p> <p><i>Schools must return funds disbursed to a student who failed to begin attendance as soon as possible but no later than 30 days after the date they become aware that the student will not or has not begun attendance.</i></p> <p>p. 4-72 <b><i>Overpayments for which the school is responsible</i></b></p>



ITEM	CONDITION	CRITERIA
		<p><i>Your school is liable for any amount of a Pell Grant, Iraq and Afghanistan Service Grant, TEACH Grant, Perkins Loan or FSEOG overpayment (including amounts under \$25) that occurred because your school failed to follow the requirements in 34 CFR parts 668, 673, 674, 676, 690, or 691, as applicable.</i></p> <p><i>A school may attempt to collect from a student funds it has returned. However, this is not an FSA debt because an overpayment for which a school is responsible can never become an FSA debt for a student. Therefore an overpayment for which a school is responsible can never result in a student's losing FSA eligibility and should never be reported to NSLDS or referred to the Department for collection.</i></p> <p>p. 4-83 <i>You must report overpayments or changes to previously submitted information to NSLDS within 30 days of the date you learn of the overpayment or change.</i></p> <p>3. 34 CFR  <a href="#">668</a> – General student and institutional eligibility  <a href="#">673</a>, <a href="#">674</a> – Perkins Loan Program  <a href="#">676</a> – FSEOG Program  <a href="#">690</a> – Federal Pell Grant Program  <a href="#">691</a> – Academic Competitiveness Grant (ACG) and National SMART Grant</p> <p>4. Federal Student Aid Handbook, Vol. 2, Ch. 7, <a href="#">Record Keeping</a>  p. 2-186 <b><i>Records relating to student eligibility</i></b>  <i>A school must keep records that substantiate the eligibility of students for FSA funds, such as:</i></p> <ul style="list-style-type: none"> <li><i>data used to establish student's admission, <b>enrollment status</b>, and period of enrollment</i></li> </ul>

ITEM	CONDITION	CRITERIA
<b>II. Course Participation Without Registration</b> <a href="#">(Back to Report)</a>		
1	<p>ELED staff instructed students to complete all required elements of ELED 491, September Experience, without formally registering for the course to avoid paying associated tuition costs. ELED faculty and staff subsequently “waived” the course so the students could graduate without formally enrolling in this course which is required for all students in the professional education sequence.</p> <p>The university sustained \$6,882.64 in tuition revenue losses due to this practice.</p> <p>In addition, the students did not receive credit for a required course for which they successfully completed all course elements.</p> <p>We also noted that the ELED Department Chair advised ELED 691 students that they were expected to attend the seminar tied to the course each quarter, regardless of whether they were registered for credits or not. This practice violates university policy and exposes the university to additional tuition revenue losses.</p>	<p><a href="#">University Catalog</a> – University Academic Policy on Class Attendance (Page 55)</p> <p><i>University policy does not allow a student to attend or participate in a class without formally being registered for it.</i></p>
2	<p>ELED staff instructed students to complete all required elements of ELED 491, September Experience, without formally registering for the course to avoid paying associated tuition costs. ELED faculty and staff subsequently “waived” the course so the students could graduate without formally enrolling in this course which is required for all students in the professional education sequence.</p> <p>The university sustained \$6,882.64 in tuition revenue losses due to this practice.</p>	<p><a href="#">Woodring College of Education Teacher Education Handbook – Registration, Tuition &amp; Fees</a> (Page 17)</p> <p><i>Candidates register and pay tuition for student teaching.</i></p>

ITEM	CONDITION	CRITERIA
<b>III. Misrepresentation of Credit Hours to Avoid Tuition Costs</b> <a href="#">(Back to Report)</a>		
1	<p>ELED staff and faculty do not appear to consistently ensure that course credits are tied to measurable learning outcomes or reflect defined criteria for credit hours. We noted a number of instances where ELED shifted or reduced ELED 494 internship credits in apparent attempts to help students avoid paying excess tuition for credits above the banded credit rate, lower credit loads below the banded credit threshold to decrease their tuition amount or increase their credit load to full-time for financial aid qualification purposes. Learning objectives and expectations were not adjusted accordingly when these credit modifications were made.</p> <p>We noted two additional instances where the ELED Department Chair advised students that they could manage their ELED 691 credit disbursement without regard to <i>student work per week or its equivalent</i>.</p> <p>These practices may have violated federal law, university policy, and resulted in unspecified tuition revenue losses for the university. OIA was unable to quantify the losses given that ELED has not clearly defined how internship credits tie to measurable learning outcomes or accurately reflect defined criteria for credit hours.</p> <p>Shifting credits for financial aid qualification purposes without regard to <i>student work per week or its equivalent</i> could also be considered financial aid fraud and further expose the university to associated consequences including fines or the limitation, suspension, or termination of our participation the Title IV, HEA program.</p>	<p><a href="#">34 CFR 600</a></p> <p><i>.1 Scope - This part establishes the rules and procedures that the Secretary uses to determine whether an educational institution qualifies in whole or in part as an eligible institution of higher education under the Higher Education Act of 1965, as amended (HEA). An eligible institution of higher education may apply to participate in programs authorized by the HEA (HEA programs).</i></p> <p><i>.2 Definitions</i></p> <p><i>Clock hour: A period of time consisting of—</i></p> <p><i>(1) A 50- to 60-minute class, lecture, or recitation in a 60-minute period;</i></p> <p><i>(2) A 50- to 60-minute faculty-supervised laboratory, shop training, or internship in a 60-minute period; or</i></p> <p><i>(3) Sixty minutes of preparation in a correspondence course.</i></p> <p><i>Credit hour: Except as provided in 34 CFR 668.8(k) and (l), a credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than—</i></p> <p><i>(1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or</i></p> <p><i>(2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by</i></p>

ITEM	CONDITION	CRITERIA
		<i>the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.</i>
2	<p>ELED staff and faculty do not appear to consistently ensure that course credits are tied to measurable learning outcomes or reflect defined criteria for credit hours. We noted a number of instances where ELED shifted or reduced ELED 494 internship credits in apparent attempts to help students avoid paying excess tuition for credits above the banded credit rate, lower credit loads below the banded credit threshold to decrease their tuition amount or increase their credit load for financial aid qualification purposes. Learning objectives and expectations were not adjusted accordingly when these credit modifications were made.</p> <p>We noted two additional instances where the ELED Department Chair advised students that they could manage their ELED 691 credit disbursement without regard to student work per week or its equivalent.</p> <p>These practices may have violated federal law, university policy, and resulted in unspecified tuition revenue losses for the university. OIA was unable to quantify the losses given that ELED has not clearly defined how internship credits tie to measurable learning outcomes or accurately reflect defined criteria for credit hours.</p> <p>Shifting credits for financial aid qualification purposes without regard to <i>student work per week or its equivalent</i> could also be considered financial aid fraud and further expose the university to associated consequences including fines or the limitation, suspension, or termination of our participation the Title IV, HEA program.</p>	<p>Northwest Commission on Colleges and Universities – <a href="#">Credit Hour Policy</a> <i>Federal Definition of Credit Hour</i></p> <p><i>In accordance with federal regulations effective July 1, 2011, both institutions and accrediting agencies are required to come into compliance with regulations regarding the definition and assignment of credit hours under Section 600.2 and 600.24.</i></p> <p><i>Federal regulations mandate that all candidate and accredited institutions comply with the definition of the credit hour as set forth in Section 600.2, which defines the credit hour as:</i> <i>Except as provided in 34 CFR 668.8(k) and (l)*, a credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than:</i></p> <p><i>(1) One hour of classroom or direct faculty instruction and a minimum of two hours of out- of-class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or</i> <i>(2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution, including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.</i></p> <p><i>Institutional Fulfillment of this Policy</i></p>



ITEM	CONDITION	CRITERIA
		<p><i>As required by Section 600.24, the Commission will evaluate as part of the Resources and Capacity (Year Three) evaluation the extent to which the institution meets the federal definition by reviewing:</i></p> <p><i>(1) The adoption of a policy on credit hour for all courses and programs at the institution;</i></p> <p><i>(2) The processes the institution employs to review periodically the application of its policy on credit hour across the institution to assure that credit hour assignments are accurate and reliable; and</i></p> <p><i>(3) Any variations in the assignment of credit hours to assure that these variations conform to commonly accepted practices in higher education.</i></p> <p><i>In implementing this policy, evaluation committees will review institutional documentation including the institution’s policy on credit hour and expectations at each degree level, evidence of the implementation of institutional review processes to assure the consistency and accuracy of credit hour assignments in all courses and programs, and through sampling, a variety of course credit assignments based on degree level, academic discipline, delivery modes, and types of academic activities. Evaluation committee findings will be included in reports to the Commission and where deficiencies are found, they shall be so noted, and the Commission will act to assure that these deficiencies are addressed through follow-up reporting. If the Commission finds systematic non-compliance with the policy regarding one of more programs at the institution, the Commission will promptly notify the Secretary of Education in addition to any follow-up required by the Commission.</i></p>
3	ELED staff and faculty do not appear to consistently ensure that course credits are tied to measurable learning outcomes or reflect defined criteria for credit hours. We noted a number of instances	<a href="#">University Catalog</a> – Page 53, Credits and Credit Loads

ITEM	CONDITION	CRITERIA
	<p>where ELED shifted or reduced ELED 494 internship credits in apparent attempts to help students avoid paying excess tuition for credits above the banded credit rate, lower credit loads below the banded credit threshold to decrease their tuition amount or increase their credit load for financial aid qualification purposes. Learning objectives and expectations were not adjusted accordingly when these credit modifications were made.</p> <p>We noted two additional instances where the ELED Department Chair advised students that they could manage their ELED 691 credit disbursement without regard to <i>student work per week or its equivalent</i>.</p> <p>These practices may have violated federal law, university policy, and resulted in unspecified tuition revenue losses for the university. OIA was unable to quantify the losses given that ELED has not clearly defined how internship credits tie to measurable learning outcomes or accurately reflect defined criteria for credit hours.</p> <p>Shifting credits for financial aid qualification purposes without regard to <i>student work per week or its equivalent</i> could also be considered financial aid fraud and further expose the university to associated consequences including fines or the limitation, suspension, or termination of our participation the Title IV, HEA program.</p>	<p><i>Credits are assigned to a class based on the amount and type of work expected from a typical student in class. Credit is awarded for courses only in the quarter in which the student is registered for the classes and completing the work.</i></p> <p><i>Classes will be assigned one credit for each hour per week of classroom discussion or lecture, and one credit for every two hours per week of laboratory or practice/rehearsal involving some preparation or reporting.</i></p> <p><i>Classes using different formats for at least part of the course will be assigned credit for amounts and types of work equivalent to those described above. When such a component is proposed, the type and amount of work involved must be described in detail. In particular, the activity for which credit is assigned must be structured and occur at regular or periodic intervals throughout the course, and faculty must supervise and evaluate students' work in this activity.</i></p>

ITEM	CONDITION	CRITERIA
<b>IV. Misapplication of Incomplete (K) Grades</b> <a href="#">(Back to Report)</a>		
1	<p>Testing results and supporting documentation appear to indicate that the Woodring College of Education (WCE) has engaged in an ongoing practice of granting incomplete (K) grades to students who walk away from, are removed from, or are unsuccessful in, their internship courses. The K grades appear to be placeholders used to provide students with the opportunity to retake their internships during subsequent quarters without registering for additional credits, or to allow students to demonstrate competency in additional registered internship courses and retroactively apply the passing grades to the incomplete/failed credits.</p> <p>Laura Wellington, Director of the Office of Field Experience, was the faculty of record for all internship courses from the fall of 2015 until the fall of 2018 when the responsibility was transferred to faculty in each department. <a href="#">Documentation</a> appears to indicate that this practice was in place prior to her arrival in 2015, and has continued since she was removed as the faculty of record in the fall of 2018. We noted instances in Elementary Education, Special Education, and Secondary Education.</p> <p>Between fall quarter 2015 and spring quarter 2019, we identified fourteen students who had failed, or withdrew from, their internships and were permitted to retake them during subsequent quarters without re-registering for the courses. Tuition revenue losses associated with this practice will total \$42,471.10 if the Registrar confirms our testing results and determines that the K's, and subsequent placements, were inappropriate.</p>	<p><a href="#">University Catalog</a> – Page 59, The Incomplete (K) Grade</p> <p><i>The grade of K (incomplete) may be assigned under all grading systems. It may be assigned only upon request of the student and agreement of the course instructor. <b><u>Normally it is given only to a student who has been in attendance and has been doing passing work until the final two weeks of the quarter when extenuating circumstances beyond his or her control make it impossible to complete course requirements on schedule.</u></b> (Extenuating circumstances do not include mere lateness in completing work, the desire of a student to do extra work to raise a poor grade, et cetera.) To receive a K grade, a student must print a contract form and negotiate a formal agreement with the course instructor specifying the work done and the remaining work to complete the course and earn a grade. One copy is kept by the student and one by the faculty member.</i></p> <p><i>Normally, the student completes the work agreed upon during the next quarter and a final grade is submitted by the instructor. After one year, however, if a final grade has not been submitted, the K automatically reverts to a failing grade (Z), and the student may establish credit only by registering again for the course. (Grades of K earned in thesis courses numbered 690 do not lapse to failure.) Once a final grade has been submitted, the student's record will show the K grade as well as the final grade. In no case will a final grade replacing a K affect the student's academic standing in the quarter in which the final grade is assigned.</i></p>



ITEM	CONDITION	CRITERIA
	<p>We also noted one student who failed, and one student who walked away from, their second quarter five credit offering of ELED 494 who were given K's until they completed their third quarter nine credit offering of the internship. Once they successfully completed their third quarter internship, the student's second quarter K's were changed to S's without requiring them to retake the previously incomplete/failed course credits. OIA was unable to determine the specific tuition revenue losses associated with these instances due to the unknown nature of future tuition costs, and potential course loads of the students had they originally received grades that accurately reflected the nature of their circumstances and had been required to retake the course at a later date.</p> <p>Between fall quarter 2018 and spring quarter 2019, eleven students who voluntarily stepped away from, were removed from, or failed, their internships were granted K grades which are still on their academic history. Potential tuition revenue losses if these students are granted additional internship placements without requiring them to register for additional credits will total \$35,551.</p>	
2	<p>Between fall quarter 2015 and spring quarter 2019, we identified fourteen students who had failed, or withdrew from, their internships and were permitted to retake them during subsequent quarters without re-registering for the courses.</p>	<p><a href="#">University Catalog</a> – Page 55, University Academic Policy on Class Attendance</p> <p><i>University policy does not allow a student to attend or participate in a class without formally being registered for it.</i></p>

## I. Financial Aid Fraud Correspondence ([Back to Report](#))

### I.1

**From:** Jennifer McCleery [mailto: [REDACTED] ]  
**Sent:** Thursday, November 19, 2015 10:33 AM  
**To:** Sarah Jerns <Sarah.Jerns@wwu.edu>; Nancy Nelson <Nancy.Nelson@wwu.edu>  
**Subject:** Grades

Hi Sarah & Nancy,

I was thinking about fall grades. :)

You might want to run a list of all CRNs (including those for students overseas) and then carefully prompt Laura to make sure all of those CRNs are linked to her W# on the faculty grade page through MyWestern, Web4U. She has to enter them herself through the Web4U interface and they are always due by noon the Tuesday after graduation, but may be entered prior to that Tuesday.

If internship CRN grade sheets are missing, she needs to email Troy. I would suggest she also copy in Marcia Merth this time to remind them she is the new OFE Director and these CRNs need to be moved from me to her (if not already done). She should provide Troy with her W# to make this process quicker.

I would always check the grade sheets on my Web4U prior to the end of the term to make sure all students are accounted for, etc. For ELED 494, there has been a 2 credit option during Q1 or 2 for interns to basically "pad" their registration to be full time; however, I was always the instructor of record. If there are any of those students, there isn't anything like a final, etc. that I would check. I would simply give them an S grade as long as they were moving on from Q1 to 2 or Q2 to Q3. Also, for ECE internships, they have a seminar course that goes along with the internship CRN. If that gets attached to Laura's W# for grading, they would get an S grade as long as they were also getting an S grade for internship.

I left a hard copy checklist of all fall student teachers with columns to check off receipt of midterm, final, passage of TPA, TPA video form, TPA permission slips, final, Professional Growth Plan, Grades, Cert notify. I hope Laura is using that for it is the only easy way to make sure all requirements are met for each student. In advance of the end, I would track passing TPA scores as received, look at Julie's list of TPA permission forms and TPA Policy form and check all of those off.

This needs to be tracked carefully. Fulltime students must receive a K/incomplete grade IF the student has not passed the TPA yet. If they were withdrawn, the grade is usually a W, but Registrar's Office notified after the case conference by OFE Director. If another case conference decision was made, such as an incomplete that needs to be posted.

Also, I believe you have at least 1 K/incomplete grade intern this fall with the K grade from a previous term (fall 2014 I believe)... (SEC, Spanish???) so to change that grade (if student is successful), requires an email to Laura Jensen with student name, W#, CRN (see OFE Director,

example emails - there is one in there with this type of example).

However, I would still post grades by noon IF I knew a student had passed the TPA and were successful in internship, even if I didn't yet have the final from the UIC. I would watch for the finals and email the UIC if they were not received within a day or two.

If no Professional Growth Plan (PGP) is received by the UIC (they only need 1 so check carefully through WIS for dual-endorsements usually do it during SPED and don't need it again for the ELED internship). If no PGP, I would send them an email asking for it, etc., but as long as the TPA and internship passed, I would still record the grade, I just would NOT inform certification until I had the PGP.

Also, in the winter, SEC grades will all need to be K/incompletes since they do not end until mid-April, after winter grades (except possibly any overseas students). I would run a K list (or have Kimberly do it) and send the excel to Laura Jensen (again, only if they passed everything - internship and TPA). I would do that just at the end of the internship in mid-April. Those stragglers - not passing TPA - correct those with Laura Jensen as they come in, etc. Laura must notify Susan when a student has met ALL requirements.

There are lots of notes, procedures for this, but I wanted you two to be aware for this is a mess if not done correctly and it must be done on time.

Jennifer

## I.2

**From:** [Sarah Jerns](#)  
**To:** [\(Student\)](#)  
**Subject:** RE: Winter Credits  
**Date:** Friday, December 9, 2016 1:41:00 PM

---

Hey (Student),

To reach full-time status, you can register for ELED 494 at 2 credits. I also just sent out an email about ELED 470.

Cheers!

-Sarah

**From:** (Student)  
**Sent:** Wednesday, December 07, 2016 3:57 PM  
**To:** Sarah Jerns <Sarah.Jerns@wwu.edu>  
**Subject:** Winter Credits

Hi Sarah . This is (Student) from the ELED program (W#), I start my internship at (School) next quarter. I was talking with some classmates and for some of them, they don't have enough credits to keep their scholarships or financial aid. I do have a scholarship I believe and wanted to ask how many credits I will be taking. If I am not taking 12 credits then I heard someone can move internship credits around to balance out the quarter credit load. I do not know if you are the person I should go to with my inquiry, so feel free to refer me to a different person. I was referred to you by Nancy. I am trying to get this situated before tomorrow, when I leave Bellingham for the month. I also would like to ask when I'm registering for the other class? I registered for 425 I believe, but not 470? I don't have the numbers off the top of my head.

Thank you,  
(Student)

[Sent from Yahoo Mail on Android](#)

### I.3

**From:** Sarah Jerns  
**Sent:** Monday, March 27, 2017 10:35 AM  
**To:** (Student)  
**Cc:** Laura Wellington <Laura.Wellington@wwu.edu>  
**Subject:** RE: ELED 494 "K" Grade Hi

(Student),

Thanks for the email!

You should be receiving a grade shortly. Laura Wellington has to review all ELED 494 grades, and it just takes a little bit of time with all the interns out there. She is aware that this grade is not attached to your full-time internships and it is just credits distributed.

Thanks for your patience!

**Sarah Jerns** | Manager, Elementary Education Department **Woodring College of Education** | 360.650.7948 [Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu) | [wce.wwu.edu/elementary-education](http://wce.wwu.edu/elementary-education)  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

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**From:** (Student)  
**Sent:** Monday, March 27, 2017 10:29 AM **To:**  
Sarah Jerns <[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu)> **Subject:**  
ELED 494 "K" Grade

Hi Sarah,

I received an incomplete "K" grade in ELED 494 this quarter, and was wondering if there is anything I need to do about this. **This course was technically just credits that we moved to first quarter to make me full-time, so I did not have an instructor.** Do you know anything about this, or who I should speak with to get this resolved? Any help is appreciated!

Thank you,  
(Student)

#### I.4

**From:** [\(Student\)](#)  
**To:** [Bow Jerns](#)  
**Subject:** Re: Scheduling  
**Date:** Tuesday, November 7, 2017 2:31:43 PM

---

Thank you so much!

-(Student)

---

**From:** Sarah Jerns  
**Sent:** Tuesday, November 7, 2017 2:01:51 PM  
**To:** (Student)  
**Subject:** RE: Scheduling [Hey](#)

(Student),

**You can register for ELED 494 at 2 credits.** The CRN is 11608. I just put in the override.

Hope all is well!

-Sarah

---

**From:** (Student)  
**Sent:** Tuesday, November 07, 2017 1:54 PM  
**To:** Sarah Jerns <Sarah.Jerns@wwu.edu>  
**Subject:** Scheduling

Hello Sarah,

My name is (Student) and I am pretty sure we have met before. I am emailing you because I am starting my internship in winter and struggling to find another class to add to my schedule. **I had heard that I might be able to add a "ghost" class to stay full time?** Is there a time we could meet up this week? If not, that's ok! Let me know, thank you.

-(Student)

## I.5

From: Sarah Jerns  
Sent: Monday, February 26, 2018 1:52:08 PM  
To: (Student)  
Subject: RE: Quarter 1 Internship Courses

Hey (Student),

It just represents your internship time. **It isn't a course that you need to attend. Think of it as a "ghost" course.**

Sarah Jerns | Manager, Elementary Education  
Department Woodring College of Education |  
360.650.7948 Sarah.Jerns@wwu.edu |  
wce.wwu.edu/elementary-education  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

-----Original Message-----

From: (Student)  
Sent: Monday, February 26, 2018 1:51 PM  
To: Sarah Jerns <Sarah.Jerns@wwu.edu>  
Subject: Re: Quarter 1 Internship Courses

Thank you for giving me the overuse for this course and getting me to full time status. I did look on classfinder to find some info about the course but it wasn't that clear and was wondering if you could provide some info about what the course is about.

(Student)

---

From: Sarah Jerns  
Sent: Monday, February 26, 2018 1:38:52 PM  
To: (Student)  
Subject: RE: Quarter 1 Internship Courses

Great! **I gave you an override to ELED 494 CRN 21646 at 2 credits. This will bump you up to 12 credits.**

Sarah Jerns | Manager, Elementary Education Department Woodring College of Education |  
360.650.7948 Sarah.Jerns@wwu.edu | wce.wwu.edu/elementary-education Western Washington  
University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

-----Original Message-----

From: (Student)  
Sent: Monday, February 26, 2018 1:36 PM  
To: Sarah Jerns <Sarah.Jerns@wwu.edu>  
Subject: Re: Quarter 1 Internship Courses

Hello Sarah,

I wanted to thank you for giving the crn for next quarter. In the email you said to let you know if we needed credits to get to full time and I wanted to let you know that I do need credits to get to full time status for next quarter.

Thanks for any help you can provide,

(Student)

## I.6

**Auditor's Note:** This instance is particularly relevant given that these internship credits were granted to the student the spring quarter prior to the start of their internship the following fall.

**From:** Sarah Jerns  
**Sent:** Wednesday, February 28, 2018 12:11:50 PM  
**To:** (Student)  
**Subject:** RE: Future schedule Hey

(Student),

Stop by my office and I will tell ya.

**Sarah Jerns** | Manager, Elementary Education Department **Woodring College of Education** | 360.650.7948 [Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu) | wce.wwu.edu/elementary-education  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225



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**From:** (Student)  
**Sent:** Wednesday, February 28, 2018 11:59 AM  
**To:** Sarah Jerns <Sarah.Jerns@wwu.edu>  
**Subject:** Re: Future schedule

Thank you! Although, I am not sure what this course it about. Could you explain?

---

**From:** Sarah Jerns  
**Sent:** Wednesday, February 28, 2018 11:09:23 AM  
**To:** (Student)  
**Subject:** RE: Future schedule

Hey (Student),

I've given you an override for ELED 494 at 2 credits.

Sarah Jerns | Manager, Elementary Education Department Woodring  
College of Education | 360.650.7948 [Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu) |  
wce.wwu.edu/elementary-education  
Western Washington University | 516 High St. | MS 9092 |Bellingham, Washington| 98225

-----Original Message-----

**From:** (Student)  
**Sent:** Tuesday, February 27, 2018 2:02 PM  
**To:** Sarah Jerns <[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu)>  
**Subject:** Re: Future schedule

Hey Sarah,

I registered today and have 11 credits. I remember a while back; you spoke of applying for full time financial aid if you're 1 credit off full time and are almost done with your major. Do I remember hearing that correctly? If so, how can I apply for that if you know? Much appreciated!

## I.7

**Auditors Note:** ELED administrators provided the student with fraudulent course credits for ELED 494 rather than having them receive credit for the ELED 491 course that they actually completed.

On May 9, 2018, at 9:44 AM, Megan Brown <[Megan.Brown@wwu.edu](mailto:Megan.Brown@wwu.edu)> wrote:

No, think of it like a space-filler and/or credit-adder (?) ha. It usually just represents your internship time. It's not a traditional class with coursework etc.

**Megan Brown** | Office Assistant, Elementary Education Department  
Woodring College of Education | 360.650.3336  
[Megan.Brown@wwu.edu](mailto:Megan.Brown@wwu.edu) | [wce.wwu.edu/elementary- education](http://wce.wwu.edu/elementary-education)  
Western Washington University | 516 High St. | MS 9092 | Bellingham, WA | 98225

**From:** (Student)  
**Sent:** Wednesday, May 9, 2018 9:41 AM  
**To:** Megan Brown <[Megan.Brown@wwu.edu](mailto:Megan.Brown@wwu.edu)>  
**Subject:** Re: LLC Internship Courses & Info

Ok, thank you so much! Is ELED 494 a required class for first quarter interning?

(Student)

---

**From:** Megan Brown  
**Sent:** Monday, May 7, 2018 9:20:47 AM  
**To:** (Student)  
**Cc:** Sarah Jerns  
**Subject:** RE: LLC Internship Courses & Info

Hey (Student) – we will probably have you register for 2 credits of ELED 494 to get you up to 12 credits. Check in with Jerns once registration opens up.

Have a great Monday!

**Megan Brown** | Office Assistant, Elementary Education Department  
Woodring College of Education | 360.650.3336  
[Megan.Brown@wwu.edu](mailto:Megan.Brown@wwu.edu) | [wce.wwu.edu/elementary- education](http://wce.wwu.edu/elementary-education)  
Western Washington University | 516 High St. | MS 9092  
| Bellingham, WA | 98225

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**From:** Sarah Jerns  
**Sent:** Monday, May 7, 2018 11:04 AM  
**To:** Megan Brown <[Megan.Brown@wwu.edu](mailto:Megan.Brown@wwu.edu)>  
**Subject:** Fw: LLC Internship Courses & Info

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**From:** (Student)

**Sent:** Sunday, May 6, 2018 2:47 PM  
**To:** Sarah Jerns  
**Subject:** Re: LLC Internship Courses & Info  
[Hi Sarah,](#)

So I was just reading your email and realized that there might be an issue for me being a full-time student (with 12 credits) during my internship. I am taking ELED 456/486 this quarter to help decrease the load of credits in the fall. However, since you guys are not having us register for September Experience (2 credits) I will only be at 10 credits. I was counting on having the two credits from the September experience to help me reach the 12 minimum credits to be considered full time. Will this hurt me in any way (i.e. financial aid, campus resources, etc)?

I know this is a unique situation due to the changes Woodring made to benefit my fellow students, but I just want to make sure it wouldn't negatively affect me.

(Student)

## I.8

**From:** [Bow Jerns](#)  
**To:** [\(Student\)](#)  
**Subject:** ELED 494  
**Date:** Friday, January 11, 2019 8:51:00 AM  
**Attachments:** [image001.png](#)

---

Hi (Student),

You can register for ELED 494 crn 11500 to represent your time out in your internship.

**Bow Jerns** | They, Them, Theirs | Manager, Elementary Education Department  
**Woodring College of Education** | 360.650.7948  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

**From:** [\(Student\)](#)  
**To:** [Bow Jerns](#)  
**Subject:** Not Enough Credits  
**Date:** Tuesday, January 8, 2019 7:28:44 PM

---

Good Evening,

I have a concern about my financial aid since I am only enrolled in 2 five credit classes this quarter (Q1 of Internship). I heard that there is a class (I believe ELED 494) that I could take to make up the extra two credits in order to be considered full-time. What is this class? Is it possible to take this class now?

Thank you,  
(Student)

## I.9

**From:** [Tracy Coskie](#)  
**To:** [\(Student\)](#)  
**Subject:** RE: Registrations  
**Date:** Tuesday, September 17, 2013 10:11:00 PM

---

Yes, that should be fine. See you soon!

\*\*\*\*\* Tracy L.  
Coskie, Ph.D. Elementary Education  
Western Washington University 360-650-  
2164

**From:** (Student)  
**Sent:** Tuesday, September 17, 2013 1:36 PM **To:**  
Tracy Coskie  
**Subject:** Registrations

Hi! Tracy  
I need to finish registering for Fall Quarter. I need to take 8 credits for my financial aid. Can I register for 3 credits of ELED 691( will need an override) to meet my needed level of credits? Then could we meet some time this Fall and get the rest of my plan figured out? I would like to get my Reading Endorsement if possible. Hope all is going well :)  
Thanks  
(Student)

## I.10

**From:** [Tracy Coskie](#)  
**To:** [\(Student\)](#)  
**Subject:** RE: Credits  
**Date:** Tuesday, January 5, 2016 9:47:00 PM

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Sign up for 3 credits of ELED 691. I'll explain that later, but you don't need to actually do anything with them now.

tlc

---

**From:** (Student)

**Sent:** Tuesday, January 05, 2016 4:10 PM **To:**

Tracy Coskie <Tracy.Coskie@wwu.edu> **Subject:**

Credits

**Importance:** High

Hi Tracy,

So I found out through financial aid that I am at risk for losing the assistantship and getting financial aid. It seems I need to be a full time grad student and that means taking 8 credits. Is there an online course or independent study I could do for 3 credits? This whole financial thing always seems to be a hassle. Hopefully things work a bit smoother for Spring Quarter. Thanks and hope to hear from you soon.

Best, (Student)



## II. Course Participation Without Registration Correspondence ([Back to Report](#))

### II.1

**From:** [Molly Baumann](#)  
**To:** [Matthew Miller](#)  
**Subject:** Upset father  
**Date:** Thursday, September 28, 2017 10:13:00 AM  
**Attachments:** [image001.png](#)

---

Good morning Matt,

I just got off the phone with a dad whose daughter has just started her fifth year of the ELED program and is doing quarter 1 classes (ELED 491, ELED 425, ELED 470, ELED 456, and ELED 486). The dad (Parent) is upset that his daughter is taking 20 credits and that he has to pay more for it. He is also upset that our program is so long and that he has to pay for 5 years of college. He believes that his daughter is only doing 15 hours worth of worth of work each quarter and doesn't understand why she had to take so many credits. Had his daughter started her internship a different quarter, she wouldn't have had to take so many credits.

He also sent angry emails to Sarah and to the Student Business office. The SBO told the father that there was nothing they could do because that's how many credits she was signed up for, so they can't change how much they owe to the school.

This gets even more fun when you consider that we can't talk about the student due to FERPA laws.

**Molly Baumann** | Program Coordinator, Elementary Education Department **Woodring College of Education** | 360.650.2578 [Molly.Baumann@wwu.edu](mailto:Molly.Baumann@wwu.edu) | [wce.wwu.edu/elementary-education](http://wce.wwu.edu/elementary-education)  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

### II.2

**From:** [Tracy Coskie](#)  
**To:** [Steph Strachan](#); [Matthew Miller](#); [Marsha Riddle Buly](#); [Bow Jerns](#)  
**Subject:** RE: Moving ELED 491  
**Date:** Thursday, October 5, 2017 10:31:28 PM  
**Attachments:** [image003.png](#) [image004.png](#)

---

Hi Steph,

To the best of my knowledge it's only the LLC's. . . 8 credits is a big chunk. Tracy

---

**Tracy L. Coskie, Ph.D.** | Professor

Chair, Elementary Education Department Co-Director, M.Ed. – Language and Literacy Literacy Faculty

Woodring College of Education

Miller Hall 301E; MS-9092, Bellingham, WA 98225-9092 | T: 360.650.2164

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**From:** Steph Strachan

**Sent:** Thursday, October 05, 2017 8:51 PM

**To:** Matthew Miller <Matthew.Miller@wwu.edu>; Marsha Riddle Buly <Marsha.RiddleBuly@wwu.edu>; Tracy Coskie <Tracy.Coskie@wwu.edu>; Sarah Jerns <Sarah.Jerns@wwu.edu>

**Subject:** Re: Moving ELED 491

Hi all,

Just wondering, do any other majors pose a similar dilemma in terms of excess credits in the first quarter of the intern year? Or is LLC the only major that requires that many credits in quarter one?

Steph

---

**From:** Matthew Miller

**Sent:** Thursday, October 5, 2017 12:08:20 PM **To:** Marsha Riddle Buly; Tracy Coskie; Sarah Jerns

**Cc:** Steph Strachan

**Subject:** RE: Moving ELED 491

Hi there – sounds like a good solution. I'd strongly suggest that the 486 instructors create a Canvas course (or add onto the 486 Canvas course) that introduces the assignments (could be video also). You could use the existing September Experience 491 Canvas course as an initial model.

That way, the instructor wouldn't need to do a live introduction to the September Experience requirements for LLCs, but rather, it'd be introduced in the Canvas module. Students could email if they had additional questions. There could be a year where 486 instructors would not be available for the "live" introduction, so having an evergreen introduction to the requirements would be a good idea.

MM

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**Matthew J. Miller, Ph.D.** | Professor Program Director, Elementary Education Miller Hall, Room 315-D

Woodring College of Education

MS-9092, Bellingham, WA 98225-9092 | T: 360.650.2628

---

**From:** Marsha Riddle Buly  
**Sent:** Thursday, October 05, 2017 11:35 AM  
**To:** Tracy Coskie <[Tracy.Coskie@wwu.edu](mailto:Tracy.Coskie@wwu.edu)>; Matthew Miller <[Matthew.Miller@wwu.edu](mailto:Matthew.Miller@wwu.edu)>; Sarah Jerns <[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu)>  
**Cc:** Steph Strachan <[Steph.Strachan@wwu.edu](mailto:Steph.Strachan@wwu.edu)>  
**Subject:** RE: Moving ELED 491

Yes, that's what I'm proposing...they would still have the expectation of the field experience, but the 456/486 instructors, we have to have more than one in the fall, would take on grading the assignment. We always had sept experience. It became credited to "pay the instructors" and it appears to be basically grading one assignment. Since students work with their intern classroom or are thinking about it during fall for 456/486, it would probably help us to have that assignment turned in just before the class started---and we would have a better idea of how to gear the course, we could add a question related to how literacy instruction is set up in the classroom..

Marsha Riddle Buly, Ph.D. Literacy Professor  
Program Director: Future Bilingual Teacher Fellows (FBTF) Alternative Route to Certification  
Bilingual Advisor, Reading Endorsement Advisor, Co-Advisor MED Literacy GLAD Tier III Agency Trainer  
Woodring College of Education

Western Washington University 516 High Street, Miller Hall 305B Bellingham, WA 98225-9092

360 650 7348  
[Marsha.riddle.buly@wwu.edu](mailto:Marsha.riddle.buly@wwu.edu)

---

**From:** Tracy Coskie  
**Sent:** Thursday, October 5, 2017 11:28 AM  
**To:** Marsha Riddle Buly <[Marsha.RiddleBuly@wwu.edu](mailto:Marsha.RiddleBuly@wwu.edu)>; Matthew Miller <[Matthew.Miller@wwu.edu](mailto:Matthew.Miller@wwu.edu)>; Sarah Jerns <[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu)>  
**Cc:** Steph Strachan <[Steph.Strachan@wwu.edu](mailto:Steph.Strachan@wwu.edu)>  
**Subject:** RE: Moving ELED 491

Yes, but there has also been an overage for LLC students who do Q3 Fall Experience, so that is solved. So, you are proposing that Fall Q1 LLC students don't take 491, but have an extra assignment that looks like 491? I wouldn't want them to miss out on that experience.  
Tracy

---

**From:** Marsha Riddle Buly  
**Sent:** Thursday, October 05, 2017 11:25 AM

**To:** Tracy Coskie <[Tracy.Coskie@wwu.edu](mailto:Tracy.Coskie@wwu.edu)>; Matthew Miller <[Matthew.Miller@wwu.edu](mailto:Matthew.Miller@wwu.edu)>; Sarah Jerns <[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu)>  
**Cc:** Steph Strachan <[Steph.Strachan@wwu.edu](mailto:Steph.Strachan@wwu.edu)>  
**Subject:** RE: Moving ELED 491

It's quarter 1 LLCs who are quarter 1 in the fall...it's not 494 credits, I don't think.

No there is already too much in 456/486, can't reduce that. BUT could add the sept experience to the expectations for 456/486 in the FALL only, and waive the 2 credits of September experience. That makes more sense...they get way more out of those 2 credits of 456/486 than they do from the 2 credits of Sept experience..

Marsha Riddle Buly, Ph.D. Literacy Professor  
Program Director: Future Bilingual Teacher Fellows (FBTF) Alternative Route to Certification  
Bilingual Advisor, Reading Endorsement Advisor, Co-Advisor MED Literacy GLAD Tier III Agency Trainer  
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Western Washington University 516 High Street, Miller Hall 305B Bellingham, WA 98225-9092  
360 650 7348  
[Marsha.riddle.buly@wwu.edu](mailto:Marsha.riddle.buly@wwu.edu)

**From:** Tracy Coskie  
**Sent:** Thursday, October 5, 2017 11:19 AM  
**To:** Matthew Miller <[Matthew.Miller@wwu.edu](mailto:Matthew.Miller@wwu.edu)>; Marsha Riddle Buly <[Marsha.RiddleBuly@wwu.edu](mailto:Marsha.RiddleBuly@wwu.edu)>; Sarah Jerns <[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu)>

**Subject:** RE: Moving ELED 491

Sarah and I just reviewed the sequences for LLC majors. We are going to work on moving around some 494 credits, which will solve the overage for Q3 Fall Experience LLC's.

I'm wondering if we can consider revising 486 to 2 credits . . . It's the cleanest solution. Could we make that work? It'll reduce the number of credits overall for LLC majors and solve the overage problem for that one group.

Best, Tracy

---

**Tracy L. Coskie, Ph.D.** | Professor

Chair, Elementary Education Department Co-Director, M.Ed. – Language and Literacy Literacy Faculty

Woodring College of Education

Miller Hall 301E; MS-9092, Bellingham, WA 98225-9092 | T: 360.650.2164

**From:** Matthew Miller  
**Sent:** Thursday, October 05, 2017 10:57 AM  
**To:** Marsha Riddle Buly <[Marsha.RiddleBuly@wwu.edu](mailto:Marsha.RiddleBuly@wwu.edu)>; Tracy Coskie <[Tracy.Coskie@wwu.edu](mailto:Tracy.Coskie@wwu.edu)>; Sarah Jerns <[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu)>  
**Subject:** RE: Moving ELED 491

Rather than solving this w/email, could we all meet soon to discuss, putting proposals on the table? It won't be an issue again until next fall, so we have time. I'd want to make sure it doesn't represent a logistical challenge for our systems and 491 instructors.

Matt

---

**Matthew J. Miller, Ph.D.** | Professor Program Director, Elementary Education Miller Hall, Room 315-D  
Woodring College of Education  
MS-9092, Bellingham, WA 98225-9092 | T: 360.650.2628

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**From:** Marsha Riddle Buly  
**Sent:** Thursday, October 05, 2017 10:25 AM  
**To:** Tracy Coskie <[Tracy.Coskie@wwu.edu](mailto:Tracy.Coskie@wwu.edu)>; Sarah Jerns <[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu)>  
**Cc:** Matthew Miller <[Matthew.Miller@wwu.edu](mailto:Matthew.Miller@wwu.edu)>  
**Subject:** Re: Moving ELED 491

That would help some, then they would pay \$250 instate \$500 out of state--they still will be unhappy about it. What if we just lumped it with their 456/486 requirements for fall only when there is a big group? We can make sure we have enough instructors for 456/486 fall quarter to make that work? We have to do fall quarter totally different for 456/486 anyway due to the numbers---22 this quarter, something like 3 next quarter--last winter 3, last spring 5 or reversed.

Marsha

Marsha Riddle Buly, Ph.D. Literacy Professor  
Program Director: Future Bilingual Teacher Fellows (FBTF) Alternative Route to Certification  
Bilingual Advisor, Reading Endorsement Advisor, Co-Advisor MED Literacy  
GLAD Tier III Agency Trainer Woodring College of Education

Literacy TOSA/POL (Professor on Loan) 2015/2016 Bellingham Schools

Western Washington University 516 High Street, Miller Hall 305B Bellingham, WA 98225-9092

360 650 7348

[Marsha.riddle.buly@wwu.edu](mailto:Marsha.riddle.buly@wwu.edu)

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**From:** Tracy Coskie  
**Sent:** Thursday, October 5, 2017 10:22:39 AM  
**To:** Marsha Riddle Buly; Sarah Jerns  
**Cc:** Matthew Miller  
**Subject:** RE: Moving ELED 491

Well, can we make the variable credit thing work? Get [Outlook for Android](#)

**From:** Sarah Jerns

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**Sent:** Thursday, October 5, 2017 10:21:51 AM  
**To:** Tracy Coskie; Marsha Riddle Buly  
**Cc:** Matthew Miller  
**Subject:** RE: Moving ELED 491

They are over by 2 credits in fall. This only happens when LLCs start in fall, which is the majority of LLCs plan.

**From:** Tracy Coskie  
**Sent:** Thursday, October 05, 2017 10:19 AM  
**To:** Sarah Jerns <[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu)>; Marsha Riddle Buly <[Marsha.RiddleBuly@wwu.edu](mailto:Marsha.RiddleBuly@wwu.edu)>  
**Cc:** Matthew Miller <[Matthew.Miller@wwu.edu](mailto:Matthew.Miller@wwu.edu)>  
**Subject:** Re: Moving ELED 491

How many credits "over" are the LLC's? Can we make 492 variable credit, then have LLC's only sign up for one credit?  
tlc

Get [Outlook for Android](#)

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**From:** Marsha Riddle Buly  
**Sent:** Thursday, October 5, 2017 9:51:00 AM  
**To:** Sarah Jerns  
**Cc:** Matthew Miller; Tracy Coskie  
**Subject:** Re: Moving ELED 491 I was also not thinking of it as ghost but that they could turn in the assignments winter quarter to an instructor. There were 22 this quarter so that would justify an instructor in the winter.



Sent from my iPhone

On Oct 5, 2017, at 8:56 AM, Sarah Jerns <[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu)> wrote:

Hey All,

Trying to move credits to a different quarter to avoid charges sounds like a logistical nightmare on my end and isn't something that would be approved by the Registrar. We had 90 students in all ELED 491 sections, which took immense coordination to get them all into the right sections. I can't imagine trying to juggle some that were actually registered, and some that weren't.

Having them register for ELED 491 gives them access to their log, canvas courses, and accurately sets up contracts for the instructor. I would get in trouble on my end if a NTT instructor was paid for a ghost ELED 491 section in fall, but put on the books in winter. There is some contractual obligations with the faculty union when an instructor is attached to a crn.

Students would also still run into credit issues with being too low or too high if we moved it around. How we have credits set up now, a LLC going out of area for quarter 3 would still run into additional charges in quarter 2 if we moved ELED 491.

Now that we also don't have UICs in quarter 1, the ELED 491 instructor is the first university supervisor to connect with the student and classroom teacher. This is also mostly the same instructor who then continues the support into ELED 470 for the rest of quarter 1.

-Sarah

---

**From:** Matthew Miller

**Sent:** Wednesday, October 04, 2017 7:04 PM

**To:** Marsha Riddle Buly <[Marsha.RiddleBuly@wwu.edu](mailto:Marsha.RiddleBuly@wwu.edu)>

**Cc:** Tracy Coskie <[Tracy.Coskie@wwu.edu](mailto:Tracy.Coskie@wwu.edu)>; Sarah Jerns <[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu)>

**Subject:** Re: RE: RE:

It's not really about the visits in the field, it's monitoring of In the projects/assignments that are part of the experience. There is work involved for those instructors and that's what supported by the credits. But yes, we should try to figure out a solution so they aren't penalized.

We can also continue to make sure that the experience is sufficient to justify the credits (and revise if not). In my opinion, it still should stay credited as it is an official requirement for our program. MM

---

**Matthew J. Miller, Ph.D.** | Professor Program Director, Elementary Education Miller Hall, Room 315-D

Woodring College of Education  
MS-9092, Bellingham, WA 98225-9092 T: [360.650.2628](tel:360.650.2628)

On Oct 4, 2017, at 6:59 PM, Marsha Riddle Buly  
<[Marsha.RiddleBuly@wwu.edu](mailto:Marsha.RiddleBuly@wwu.edu)> wrote:

It was an extra \$500 for in state and \$1000 for out of state. The rationale was so it had instructors but it doesn't sound like much happens with instructors. In the past they simply were required to do it, no credits. They're happy to do it.. just not happy to pay extra when they have other quarters with 12 credits.

Sent from my iPhone

On Oct 4, 2017, at 6:54 PM, Matthew Miller  
<[Matthew.Miller@wwu.edu](mailto:Matthew.Miller@wwu.edu)> wrote:

So officially register for September Experience in Winter? As long as they don't get an overload in 2nd quarter, that might work -

I'll let others weigh in. I had "quite" a conversation with a (somewhat helicopter-oriented) father about this issue last week.

Matt

-----  
Matthew J. Miller, Ph.D. | Professor Program Director, Elementary Education Woodring College of Education  
Western Washington University  
MS-9092, Bellingham, WA 98225-9092 | T: 360.650.2628

-----Original Message-----

From: Marsha Riddle Buly  
Sent: Wednesday, October 04, 2017 6:51 PM  
To: Matthew Miller <[Matthew.Miller@wwu.edu](mailto:Matthew.Miller@wwu.edu)>  
Cc: Tracy Coskie <[Tracy.Coskie@wwu.edu](mailto:Tracy.Coskie@wwu.edu)>; Sarah Jerns <[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu)>  
Subject: Re: RE:

It wouldn't need to go through registrar. They would simply turn in their work winter, and earn the credits then.

Sent from my iPhone

On Oct 4, 2017, at 6:49 PM, Matthew Miller  
<[Matthew.Miller@wwu.edu](mailto:Matthew.Miller@wwu.edu)> wrote:

I'm aware of the issue; I'm not sure, but I think it was very difficult to get approval to move the charge for September Experience to fall instead of summer (since it takes place prior to the academic year). To move it to winter would likely face resistance by the registrar.

Matt

-----  
Matthew J. Miller, Ph.D. | Professor  
Program Director, Elementary Education Woodring College of Education  
Western Washington University MS-9092, Bellingham, WA 98225-9092 | T:  
360.650.2628

-----Original Message-----

From: Marsha Riddle Buly  
Sent: Wednesday, October 04, 2017 6:25 PM  
To: Tracy Coskie  
<[Tracy.Coskie@wwu.edu](mailto:Tracy.Coskie@wwu.edu)>; Matthew Miller  
<[Matthew.Miller@wwu.edu](mailto:Matthew.Miller@wwu.edu)>; Sarah Jerns  
<[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu)> Subject:

Any reason we can't charge sept exp to lles who are in first quarter fall at a different time? They all had to pay 2 extra credits and they wouldn't if we charged it in winter.

Frankly they don't think it's worth 2 credits.. if visited at all, an instructor comes once to check in for about 5 minutes.

Sent from my iPhone

## II.3

**From:** [Sarah Jerns](#)  
**To:** [Student 1](#); [Student 2](#); [Student 3](#); [Student 4](#); [Student 5](#); [Student 6](#); [Student 7](#); [Student 8](#); [Student 9](#); [Student 10](#); [Student 11](#); [Student 12](#); [Student 13](#); [Student 14](#)  
**Cc:** [Megan Brown](#); [Kris Baldrige](#); [Molly Baumann](#)  
**Subject:** LLC Internship Courses & Info  
**Date:** Monday, April 30, 2018 1:54:00 PM  
**Attachments:** [image001.png](#)

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Hello future LLC Quarter 1 interns!!!!

Please see the email below in regards to internship courses and your internship quarter coming up.

We put overrides on all internship courses (ELED 470, ELED 425) because sections are based on the placement of **all** interns. Even if you have a confirmed placement, we still need to wait for the other folks to get placed to break up the sections. This is to help our faculty not have to drive all over the whole state! So please hang tight while we wait on some more information. You will all be guaranteed your internship courses. You will likely get your CRNS much later than the first two weeks of registration.

All quarter 1 interns will be out in their placement from 8 am to noon on Tuesdays and Thursdays. You will then head back to main campus and be in class (ELED 470 & ELED 425) until 4 pm.

LLC majors will also take ELED 456 & ELED 486. There are no overrides on these courses. These courses include an **addition 2 hour per week practicum** and meet at Wade King Elementary.

Here is the internship credit distribution for LLC Majors:

Fall 2018	
Q1	
ELED 470	5
ELED 425	5
ELED 456	4
ELED 486	4
18 Credits	

**We decided to not have LLC majors register for the September Experience this fall.** This is to avoid having you folks go into overload and having to pay more for tuition. You will be manually added to the September Experience canvas course with Marsha Riddle Buly as your instructor. It is expected that you start the public school year with your classroom teacher and put in at least 40 hours associated with the September Experience. In most cases it will actually start at the end of August! So really, it is the August Experience! You can find this out by checking your public school's calendar when your placement gets confirmed.

HOORAY!

**Jerns** | Manager, Elementary Education Department **Woodring College of Education** | 360.650.7948  
[Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu) | [wce.wwu.edu/elementary-education](http://wce.wwu.edu/elementary-education)  
 Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

## II.4

**From:** [Molly Baumann](#)  
**To:** [\(Student\)](#)  
**Subject:** RE: ELED Credit Evaluation  
**Date:** Monday, December 10, 2018 12:36:00 PM

**Attachments:** [image001.png](#)

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Good afternoon (Student),

I would recommend submitting it to the Registrar's office as soon as possible. I'm not sure if there will be any penalties to turning it in late. You can always check in with them as well.

Have a good day,

**Molly Baumann** | Program Coordinator, Elementary Education Department **Woodring College of Education** | 360.650.2578 [Molly.Baumann@wwu.edu](mailto:Molly.Baumann@wwu.edu) | [wce.wwu.edu/elementary-education](http://wce.wwu.edu/elementary-education)  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

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**From:** (Student)  
**Sent:** Monday, December 10, 2018 12:35 PM  
**To:** Molly Baumann <[Molly.Baumann@wwu.edu](mailto:Molly.Baumann@wwu.edu)>  
**Subject:** Re: ELED Credit Evaluation

Hi Molly,

Thank you so much for the information. Saving money is preferred! The "waived" status for my SE will be perfectly fine. I will make sure Credit Evaluations are submitted this week.

Should I be concerned that the one for the Registrar's Office is already late? I do not recall seeing anything about this deadline other than your email on the 6th.

Thank you again for your help! Sincerely,  
(Student)

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**From:** Molly Baumann  
**Sent:** Monday, December 10, 2018 10:10:11 AM  
**To:** (Student)  
**Subject:** RE: ELED Credit Evaluation Good morning (Student),

I believe the deadline to submit this to the Registrar's office was last Friday. You will have to double check with them to be sure.

The deadline for the Office of Certification is December 15<sup>th</sup>.

The reason September Experience was waived on your transcript is because we didn't have you register for the class in order to save you money. If you would like it to be depicted on your evaluation, you will need to pay for the class and then you will get a "P" for the course.

How would you like to move forward?

**Molly Baumann** | Program Coordinator, Elementary Education Department **Woodring College of Education** | 360.650.2578 [Molly.Baumann@wwu.edu](mailto:Molly.Baumann@wwu.edu) | [wce.wwu.edu/elementary-education](http://wce.wwu.edu/elementary-education)  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

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**From:** (Student)  
**Sent:** Monday, December 10, 2018 10:00 AM  
**To:** Molly Baumann <[Molly.Baumann@wwu.edu](mailto:Molly.Baumann@wwu.edu)>  
**Subject:** Re: ELED Credit Evaluation

Good Morning Molly,

Thank you so much. Two questions:

- 1) By when do I need to have these submitted to the specified offices?
- 2) It says my September Experience was waived, however I worked really hard to complete the SE Independent Study that Matt Miller and I designed. I completed the 40 hours in my student teaching classroom as well as every required assignment. Would it be possible for my Credit Evaluation to reflect this?

Thank you again very much. Please let me know if there is anything you need from me. Sincerely,  
(Student)

---

**From:** Molly Baumann  
**Sent:** Thursday, December 6, 2018 1:34:06 PM  
**To:** (Student)  
**Subject:** ELED Credit Evaluation Good afternoon (Student),

Attached is you ELED Credit evaluation. You will need to take one copy of this to the Registrar's office and another to the office of Certification.

Let me know if you have any questions about this.  
Have a good day,

**Molly Baumann** | Program Coordinator, Elementary Education Department **Woodring College of Education** | 360.650.2578 [Molly.Baumann@wwu.edu](mailto:Molly.Baumann@wwu.edu) | [wce.wwu.edu/elementary-education](http://wce.wwu.edu/elementary-education)  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

## II.5

**From:** [Molly Baumann](#)  
**To:** [Virginia Prowell](#)



**Subject:** RE: ELED 491 : (Student)  
**Date:** Monday, January 14, 2019 3:19:00 PM  
**Attachments:** [image001.png](#) [image002.png](#) [image005.png](#) [image006.png](#)

---

Virginia,

We have waived ELED 491 for this student. Nothing is replacing the course. It is just waived. Thank

you,

**Molly Baumann** | Program Coordinator, Elementary Education Department **Woodring College of Education** | 360.650.2578 [Molly.Baumann@wwu.edu](mailto:Molly.Baumann@wwu.edu) | [wce.wwu.edu/elementary-education](http://wce.wwu.edu/elementary-education)  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

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**From:** Virginia Prowell <[virginia@wwu.edu](mailto:virginia@wwu.edu)>  
**Sent:** Monday, January 14, 2019 2:25 PM  
**To:** Molly Baumann <[baumann2@wwu.edu](mailto:baumann2@wwu.edu)>  
**Subject:** ELED 491 : (Student)

Molly:

The statement below doesn't make sense:

*"we waived ELED 491 because they are an LLC major as well"*

The LLC inquiry about the ELED 491 IS in the major, not in addition to the major.....they aren't anything else but the LLC major, and ELED 491 is not for the minor.

Can you explain what is fulfilling the ELED 491? Thank you!

Sincerely, Virginia Prowell

Degree Evaluation | Registrar's Office | Old Main 230

Western Washington University | 360.650-6275 | [virginia.prowell@wwu.edu](mailto:virginia.prowell@wwu.edu)

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**From:** Molly Baumann <[baumann2@wwu.edu](mailto:baumann2@wwu.edu)>  
**Sent:** Friday, January 11, 2019 9:22 AM  
**To:** Virginia Prowell <[virginia@wwu.edu](mailto:virginia@wwu.edu)>  
**Subject:** RE: TESOL Minor Eval : (Student)      Good morning Virginia,

Congratulations on your coming retirement! Attached is the ELL minor for (Student).

Also, as for the student below, we waived ELED 491 because they are an LLC major as well. Sorry, that was my mistake.

**Molly Baumann** | Program Coordinator, Elementary Education Department **Woodring College of Education** | 360.650.2578 [Molly.Baumann@wwu.edu](mailto:Molly.Baumann@wwu.edu) | [wce.wwu.edu/elementary-education](http://wce.wwu.edu/elementary-education)  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

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**From:** Virginia Prowell <[virginia@wwu.edu](mailto:virginia@wwu.edu)>  
**Sent:** Friday, January 11, 2019 9:11 AM  
**To:** Molly Baumann <[baumanm2@wwu.edu](mailto:baumanm2@wwu.edu)>  
**Subject:** RE: TESOL Minor Eval : (Student)

Molly:

Can you also review the major eval for this student (attached).

The student was to take ELED 491 September Experience Fall 2018, and did not.

I do not see any substitution on the eval, nor do I see any “September Experience” in the academic history for this student.

FYI: I will be retiring – Feb 1 will be my last day.

**It will be very important on all major/minor evals to make certain you have your course substitutions filled in, considering someone new will be working the Woodring files.**

If the major evals do not explain the course substitutions, it makes is difficult and time consuming to develop the degree evaluation.

We thank you in advance for taking care of this detail for us moving forward! Sincerely,

Virginia Prowell

Degree Evaluation | Registrar's Office | Old Main 230

Western Washington University | 360.650-6275 | [virginia.prowell@wwu.edu](mailto:virginia.prowell@wwu.edu)

## II.6

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**From:** [\(Student\)](#)  
**To:** [Molly Baumann](#)  
**Subject:** Re:  
**Date:** Monday, January 14, 2019 4:23:41 PM  
**Attachments:** [image001.png](#)

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Molly,

Thank you so much for resolving this so quickly! You're amazing!

---

**From:** Molly Baumann <[baumanm2@wwu.edu](mailto:baumanm2@wwu.edu)>  
**Sent:** Monday, January 14, 2019 3:48 PM  
**To:** (Student)  
**Subject:** RE:

Hello (Student),

I sent an updated to you and Carolyn. This should make this problem go away. If anything else needs to happen, I will do my best to take care of it.

Have a good day,

**Molly Baumann** | Program Coordinator, Elementary Education Department **Woodring College of Education** | 360.650.2578 [Molly.Baumann@wwu.edu](mailto:Molly.Baumann@wwu.edu) | [wce.wwu.edu/elementary-education](http://wce.wwu.edu/elementary-education)  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

**From:** [Molly Baumann](#)  
**To:** [\(Student\)](#); [Carolyn Swinburne](#)  
**Subject:** RE:  
**Date:** Monday, January 14, 2019 3:48:00 PM  
**Attachments:** [20190114153512644.pdf](#) [image001.png](#)

---

Good afternoon (Student) and Carolyn,

Please see the updated and attached LLC credit evaluation for (Student). ELED 491 has been waived for this student.

Have a good day,

**Molly Baumann** | Program Coordinator, Elementary Education Department **Woodring College of Education** | 360.650.2578 [Molly.Baumann@wwu.edu](mailto:Molly.Baumann@wwu.edu) | [wce.wwu.edu/elementary-education](http://wce.wwu.edu/elementary-education)  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

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**From:** (Student)  
**Sent:** Monday, January 14, 2019 2:50 PM  
**To:** Molly Baumann <[baumanm2@wwu.edu](mailto:baumanm2@wwu.edu)>  
**Subject:**

Molly,

I received an email from Carolyn Swinburne regarding my degree evaluation. I will attach a copy of the evaluation she sent me to this email. She said I did not take the course ELED491, and that it does not appear on my academic history. BUT, I did take the course this past fall, I recall Bow Jerns letting us know via email that in order to not put the Fall Quarter interns in an overload status we did not have to register for it but would be still added to the canvas course and required to take it. I completed this

course with Marsha and received a passing grade for it, it is still available on canvas if proof is necessary. I completed all assignments and even met with her in person at my internship site. Carolyn said that since there is no proof on my transcript that I took it, I needed to talk to you about it and figure out what to do.

Also, she asked me to speak to my advisor to get a proof of the waiver I received for one of the AMST courses as well as a TESOL minor evaluation , but I do not know who my advisor is (it used to be David Carroll before he left WWU). I hope that you can help me with this.

(Student)

## II.7

**From:** [Tracy Coskie](#)  
**To:** (Student)  
**Subject:** RE: \*Esign\* Masters Degree Application : (Student)  
**Date:** Friday, March 23, 2018 1:02:00 PM

---

Hi (Student),

I just signed off on this. As part of the process, I reviewed your plan of study against your transcripts. It looks like you registered for 4 credits of 691 for spring quarter. You don't need those, so you can drop that class! (You will, of course, want to continue attending the seminar, but you don't need to pay for any more credits.) Please let me know when you've received this.

Best, Tracy

## II.8

**From:** Tracy Coskie [Tracy.Coskie@wwu.edu]  
**Sent:** Sunday, December 29, 2013 2:24 PM  
**To:** (Student 1); (Student 2); (Student 3); (Student 4); (Student 5); (Student 6); (Student 7); (Student 8); (Student 9); (Student 10); (Student 11); (Student 12); (Student 13); (Student 14); (Student 15)  
**Subject:** ELED 691 - Masters' Project Seminar - Winter Quarter

Hi Everyone,

I hope you all are having both a restful and productive break. I've received a few drafts and am working my way through them now. I imagine I'll hear from more of you soon.

A few reminders:

- 1) Everyone receives an "incomplete" for 691 credits until their project is finished. This is how the system handles 691 credits across the university.

- 2) If you are working on your project you are expected to attend the seminar each quarter, regardless of whether you are registered for credits or not.
- 3) Currently we are scheduled to meet on the following Saturdays, from 9am-12noon: January 11 and 25, February 8 and 22, March 1 and 15. The 15<sup>th</sup> is an optional session for anyone who needs to see me or who had to miss one of the other sessions during the quarter. Assume that unless you hear otherwise we are meeting in the same space in Academic West.

One other thing. I have had a few people request that we change the meeting from a Saturday morning to an evening. It's hard from me to tell how many of you have a preference for that. If you WOULD prefer a weekday evening, please reply (to me only). Let me know that you have that preference AND what weekday evenings you would *and would not* be available.

See you soon!  
Tracy

\*\*\*\*\* Tracy L. Coskie, Ph.D. Elementary Education  
Western Washington University 360-650-2164

### III. Misrepresentation of Credit Hours to Avoid Tuition Costs Correspondence ([Back to Report](#))

#### III.1

**From:** Sarah Jerns  
**Sent:** Tuesday, March 13, 2018 3:47 PM  
**To:** Student 1; Student 2; Student 3; Student 4  
**Cc:** Megan Brown <Megan.Brown@wwu.edu>  
**Subject:** New ELED 494 Credit Amount  
**Importance:** High

Hey All!

I need to put you into ELED 494 at 6 credits for spring quarter. You are all currently register a 5 credit version (because I told you to!). We are shifting some credits around to avoid you having to register for 19 credits in fall.

The CRN is 23889. It is currently set up as being a variable credit course, so please put in 6 credits. Please do not adjust this to any other amount. This amount sets you up to graduate! Wohoo!

**Sarah Jerns** | Manager, Elementary Education Department **Woodring College of Education** |  
**360.650.7948** [Sarah.Jerns@wwu.edu](mailto:Sarah.Jerns@wwu.edu) | [wce.wwu.edu/elementary-education](http://wce.wwu.edu/elementary-education)  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

#### III.2

**From:** Tracy Coskie  
**Sent:** Wednesday, May 22, 2013 9:10 AM  
**To:** (Student)  
**Subject:** RE: EDUC 691

Students must take at least 4 credits, but can take more if they need them.

It doesn't actually matter when you register for them or whether you take all 4 at once or spread them out. The year you take them, though, should be the year you are working on your master's project. During that year you attend the 691 workshop with me each quarter as a support for completing the project. Does that make sense? The credits aren't tied to a "class" in the same way the others are, but we do expect folks who are working on their project to attend the workshop.

tlc



\*\*\*\*\* Tracy L. Coskie, Ph.D. Elementary Education  
Western Washington University 360-650-2164

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**From:** (Student)  
**Sent:** Tuesday, May 21, 2013 12:41 PM  
**To:** Tracy Coskie  
**Subject:** RE: EDUC 691

Hi again,

Thanks for the information. The course is taken throughout the year, correct? How many times do you take the class/is it offered? Just trying to see the plan for the year(s).

Thanks, (Student)

---

**From:** Tracy Coskie [<mailto:Tracy.Coskie@wwu.edu>]  
**Sent:** Tuesday, May 21, 2013 12:04 PM  
**To:** (Student)  
**Subject:** RE: EDUC 691

If you want to save a bit of money, you can just register for 1 credit for fall . . . tlc

\*\*\*\*\* Tracy L. Coskie, Ph.D. Elementary Education  
Western Washington University 360-650-2164

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**From:** (Student)  
**Sent:** Tuesday, May 21, 2013 11:59 AM  
**To:** Tracy Coskie  
**Subject:** EDUC 691

Hi Tracy,

I am enrolled in this grad cohort; however, I am only taking one class a quarter. I made the decision for grad school last minute, and my husband and I already had plans for the summer. I will not be around, so I will not be taking classes this summer. Given that, I was wondering if I should sign up for EDUC 691 this fall? I am working on my National Boards next year, and I know this class is support for that. I am taking another ELED class, but I figure I can muster a bit more workload at the start of the year. □

Thanks for your insights, (Student)

### III.3

**Auditor's Note:** This correspondence appears to show intent to shift course credits for financial aid qualification purposes, advising a student to participate in a course regardless of whether they were officially registered, and misrepresentation of credits earned for financial aid.

**From:** [Tracy Coskie](#)  
**To:** [\(Student\)](#)  
**Subject:** RE: Confirming course of study for financial aid  
**Date:** Wednesday, August 8, 2018 11:45:00 AM  
**Attachments:** [image001.png](#)

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Yes, I don't link the registered credits with the seminar. Just plan to be at all the sessions. Are you at Jumpstart?  
Best, Tracy

---

**Tracy L. Coskie, Ph.D.** | Professor

Chair, Elementary Education Department Co-Director, M.Ed. – Language and Literacy Literacy Faculty

Woodring College of Education

Miller Hall 301E; MS-9092, Bellingham, WA 98225-9092 | T: 360.650.2164

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**From:** (Student)  
**Sent:** Wednesday, August 08, 2018 11:43 AM  
**To:** Tracy Coskie <Tracy.Coskie@wwu.edu>  
**Subject:** Re: Confirming course of study for financial aid

Hi Tracy,

Thanks so much for getting back to me about this. I need to be enrolled in at least 4 credits in order to qualify for financial aid. Can I take all five of these credits in one quarter, and still show up for all of the Saturday meetings throughout the year?

Thanks, (Student)

---

**From:** Tracy Coskie

**Sent:** Monday, July 30, 2018 2:55:55 PM  
**To:** (Student)  
**Subject:** RE: Confirming course of study for financial aid

Hi (Student),  
I just reviewed your transcript against your plan of study. According to that, you only need to complete 5 credits of the ELED 691. You need 5 credits in order to meet the 47 credit program minimum. **Those you can split up and/or take any time before you graduate.** You will probably want to register for at least 1 credit each quarter and save 2 credits for spring to fulfill Graduate School requirements.  
Best, Tracy

---

**Tracy L. Coskie, Ph.D.** | Professor  
Chair, Elementary Education Department Co-Director, M.Ed. – Language and Literacy Literacy Faculty  
Woodring College of Education  
Miller Hall 301E; MS-9092, Bellingham, WA 98225-9092 | T: 360.650.2164

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**From:** (Student)  
**Sent:** Tuesday, July 24, 2018 8:19 AM  
**To:** Tracy Coskie <[Tracy.Coskie@wwu.edu](mailto:Tracy.Coskie@wwu.edu)>  
**Subject:** Confirming course of study for financial aid

Good morning Tracy,

**I am trying to decide how much financial aid to accept for the upcoming school year.** I believe I have satisfied all course/credit requirements for the MEd, with the exception of the children's lit class that I am taking now (multicultural lit, 405, with Joy Wiggins.) **It is my understanding that all I have left is the 691 course, which is 4 credits and can be paid for any time between now and spring quarter.** But I just wanted to confirm this before making the official acceptance for my financial aid. Can you confirm?

Thanks so much! I am really looking forward to the upcoming school year. (Student)

### III.4

**From:** [Bow Jerns](#)  
**To:** [Peter Johnson](#)  
**Subject:** RE: Process for Internship Grades and Certification  
**Date:** Monday, December 10, 2018 10:06:12 AM  
**Attachments:** [image001.png](#)

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Sounds good!

**Bow Jerns** | They, Them, Theirs | Manager, Elementary Education Department  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

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**From:** Peter Johnson <[Peter.Johnson@wwu.edu](mailto:Peter.Johnson@wwu.edu)>  
**Sent:** Monday, December 10, 2018 10:04 AM  
**To:** Bow Jerns <[Bow.Jerns@wwu.edu](mailto:Bow.Jerns@wwu.edu)>  
**Subject:** RE: Process for Internship Grades and Certification

Hey there,

Hope it was a good weekend! CRN 41930 has been deleted...I kept 42663 on there for OFE's purposes. (It's just Laura and our temp Melissa there atm, so just being safe...)

**From:** Bow Jerns <[Bow.Jerns@wwu.edu](mailto:Bow.Jerns@wwu.edu)>  
**Sent:** Friday, December 7, 2018 3:16 PM  
**To:** Peter Johnson <[Peter.Johnson@wwu.edu](mailto:Peter.Johnson@wwu.edu)>  
**Subject:** RE: Process for Internship Grades and Certification

Hey Peter,

ELED 494 (2) CRN 41930 can be removed

ELED 494 (5) CRN 42663 – OFE might track midterms and finals on this, even though not associated with a grade. I can't remember from my OFE days.

**Bow Jerns** | They, Them, Theirs | Manager, Elementary Education Department  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

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**From:** Peter Johnson <[Peter.Johnson@wwu.edu](mailto:Peter.Johnson@wwu.edu)>

**Sent:** Friday, December 7, 2018 3:12 PM  
**To:** Bow Jerns <[Bow.Jerns@wwu.edu](mailto:Bow.Jerns@wwu.edu)>  
**Cc:** Tracy Coskie <[Tracy.Coskie@wwu.edu](mailto:Tracy.Coskie@wwu.edu)>  
**Subject:** RE: Process for Internship Grades and Certification

Hey Jerns,

Thanks for letting us know! Would you prefer that we remove them from the excel sheet? I'll let OFE know and make sure whatever y'all would prefer is reflected.

Thanks, Peter

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**From:** Bow Jerns <[Bow.Jerns@wwu.edu](mailto:Bow.Jerns@wwu.edu)>  
**Sent:** Friday, December 7, 2018 2:52 PM  
**To:** Peter Johnson <[Peter.Johnson@wwu.edu](mailto:Peter.Johnson@wwu.edu)>; Lisa Burn <[Lisa.Burn@wwu.edu](mailto:Lisa.Burn@wwu.edu)>  
**Cc:** Tracy Coskie <[Tracy.Coskie@wwu.edu](mailto:Tracy.Coskie@wwu.edu)>  
**Subject:** RE: Process for Internship Grades and Certification

Hey you two,

Thanks for putting in a system that works for this. All the managers really appreciate it.

There are a few CRNs that don't need to be included in this grading system. We use ELED throughout the internship, and some grades won't be associated with the PGP/MID/FINAL...you know..all that jazz.

The ones we don't need on this list with those requirements to give grades. We just check on our end to make sure they passed their other internship courses.

ELED 494 (2) CRN 41930

ELED 494 (5) CRN 42663

**Bow Jerns** | They, Them, Theirs | Manager, Elementary Education Department  
Western Washington University | 516 High St. | MS 9092 | Bellingham, Washington | 98225

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**From:** Peter Johnson <[Peter.Johnson@wwu.edu](mailto:Peter.Johnson@wwu.edu)>  
**Sent:** Friday, December 7, 2018 2:23 PM  
**To:** Bow Jerns <[Bow.Jerns@wwu.edu](mailto:Bow.Jerns@wwu.edu)>; Susan Cahill <[Susan.Cahill@wwu.edu](mailto:Susan.Cahill@wwu.edu)>; Janna Cecka <[Janna.Cecka@wwu.edu](mailto:Janna.Cecka@wwu.edu)>  
**Cc:** Laura Wellington <[Laura.Wellington@wwu.edu](mailto:Laura.Wellington@wwu.edu)>; Melissa Gaines <[Melissa.Gaines@wwu.edu](mailto:Melissa.Gaines@wwu.edu)>  
**Subject:** Process for Internship Grades and Certification

Hi all,

As all of you likely know, Lisa will be in Thailand over the next few weeks so I will be taking over recommending our completers to the state for certification. A huge part of that is the internship grade. Lisa was kind enough to set up a Microsoft Team and Sharepoint file to help in the tracking of internship requirements (Midterm, EdTPA, Final, etc). I have attached the e-mail she sent to Student Services about accessing Microsoft Teams and Sharepoint. I have already discussed this new process with each of you over the phone but thought it would be helpful to have it in writing as well.

Essentially, this will be the process:

1. When OFE has verified all requirements for the internship have been met, they will highlight the student in **Green** in the Sharepoint file. This will be the go ahead for Program Managers to issue a passing score on the internship.
2. Program Managers/Chairs will issue the grade for students highlighted in **Green** and make a note that the grade has been issued in the Sharepoint file. They can do so by writing a note in the spreadsheet or by highlighting the student in **Blue**. (*Only Program Managers have been given access to make edits to the Sharepoint file – Lisa will be sending instructions on how to do so shortly.*)
3. When Cert Office has seen that a grade has been issued, they will verify that all other requirements have been met and move forward with recommending the student for Certification.

It is my intent that this process will make things easier for everyone and will prevent the need for separate tracking sheets for each department. If you have any questions or concerns, please don't hesitate to reach out!

Thanks all! Hope you have a great weekend! Peter



## IV. Source Documents

[\(Back to Report\)](#)

### IV.1 Source: P:\WCE\ELED\Publications\ELED\Old (Rev. Date 10/27/2015)

#### Elementary Education Certificate Program

**Elementary Education Department**  
**Woodring College of Education, Western Washington University**

NAME \_\_\_\_\_ Student Number W \_\_\_\_\_

Fill out this form as completely as you can, and then meet with your advisor for review and signature.

The purpose of this form is to assist you in planning your courses in the Elementary Education Certificate Program. The first quarter consists of a 3-course block (ELED 303,

**SCHEDULE OF COURSES TO BE COMPLETED ALONG WITH YOUR MAJOR. ALL COURSES MUST BE COMPLETED WITH A GRADE OF**

**B YOU MUST COMPLETE COURSE PREREQUISITES BEFORE YOU WILL BE ALLOWED TO REGISTER FOR UPPER-DIVISION CLASSES.**

PLEASE COMPLETE THE TABLE BELOW AS FOLLOWS

If you have completed a course, please indicate the grade received (under "completed").

If a course has not been completed, indicate the quarter and year in which you plan to take it (pending registration availability).

**Coursework in the Elementary Education Professional Sequence**

	Fill in the quarter and year for the current quarter and future quarters that you will be taking classes----->	Prerequisites	Completed/Grade	Quarter	
				Year	Enrolled
<b>Qtr. 1</b>	*ELED 303 Educ Psych: Development & Learning (5)	Co-requisites ELED 310, ELED 370			
	† *ELED 310 Education, Culture and Equity (4)	Co-requisites ELED 303, ELED 370			
	*ELED 370 Introduction to Teaching (5)	Co-requisites ELED 303, ELED 310			
	† IT 344 Tech in Teaching and Learning (1)	Admission to WCE			
	† This course includes a required 15 hr/qr service-learning component in the community.				
<b>Qtr. 2</b>	SPED 384 Teaching Each Student (4)	Admission to WCE			
	MATH 381 Teaching K-8 Mathematics I (4)	MPT or C or better in Math 112 or College Intern. Algebra; ELED 370 or 372 or SPED 420 or ECE 391			
	HLED 455 Health Ed Grades K-8 (2)	Admission to WCE; ELED 370 or 372 or SPED 420 or PE 340 and			
	PE 345 PE for Elementary School (3)	Admission to WCE; ELED 303 or SPED 301			
<b>Qtr. 3 + The Arts</b>	<b>Choose one from each category:</b>	All (3) credits unless otherwise noted			
	ART 398 (3) or DNC 398 (3) or MUS 398 (3) or THTR 398 (3)				
	<b>AND</b>	Admission to WCE			
	ART 380 (3) or DNC 433 (4) or MUS 361 (3) or THTR 350 (3) or THTR 351 (4)				
<b>Internship</b>	IT 442 Digital Decisions: Technology (3)	IT 344; co-req ELED 481 (highly recommended)			
	MATH 382 Teaching K-8 Mathematics II (4)	MATH 381			
	MATH 383 Teaching K-8 Mathematics (4)	MATH 382			
	SCED 480 Methods/Curriculum Elem Sch (5)	Natural Sciences GUR block (or equivalent) including SCED 201; ELED 370 or ELED 372 or SPED 420			
	SCED 490 Lab/Field Exp Elemen Science (3)	SCED 480			
	ELED 480 Literacy: Beginning (5)	LING 201 or ELL 432; ELED 303, ELED 310, ELED 370			
	***ELED 481 Literacy: Fluent (5)	ELED 480; co-req IT 442 (highly recommended)			
<b>Q 1</b>	ELED 491 September Experience (2)	See notes below**			
	*** ELED 470 Developing Teaching (5)	ELED 370, ELED 481, SCED 490			
	ELED 425 Social Studies for Elem School (5)	ELED 370, ELED 481 and SCED 490			
<b>Q 2</b>	ELED 471 Documenting Teaching (5)	ELED 470			
	ELED 492 Literacy Methods Practicum (4)	ELED 480 and ELED 481			
	MATH 491 Intmshp Sem: TeachK-8 MATH (2)	C or better in Math 383			
	ELED 494 Internship (2) (if needed for financial aid)	Completion of all coursework in the Elementary Education Professional Sequence			
<b>Q 3</b>	ELED 494 Internship (14)	Completion of all coursework in the Elementary Education Professional Sequence			
	Total credits in the program: 102-103 credits				

\* These 3 courses must be taken together as a block in Quarter 1.

\*\* You will take September Experience during the fall of your internship year, regardless of which quarter you began your internship. This will generally start the week before

\*\*\* Writing Proficiency course = 3 WP points

**IV.2 Source:** Email Attachments from Megan Brown to Bow Jerns on 9/13/16 ([Back to Report](#))

## **Internship Overview**

*This Overview is intended to answer Frequently Asked Questions about the WCE ELED Internship*

### **How much time will ELED candidates from Woodring’s Bellingham site spend in schools as part of their year-long internship?**

Students in the Elementary Education program in Bellingham will participate in a 3-quarter internship sequence:

- Internship Quarter 1—half-time, two days per week (Tuesday and Thursday)
- Internship Quarter 2—two days per week (Tuesday and Thursday)
- Internship Quarter 3—full-time

### **What courses do I register in for my internship year?**

Students will register in courses detailed on the Internship Schedule Information Sheet during their internship year:

- Internship Quarter 1 – your internship this quarter comes from practicum credit attached to ELED 425 and ELED 470. These will include class times and two mornings per week in a school classroom.
- Internship Quarter 2: your internship this quarter comes from practicum credit attached to ELED 471 and ELED 494. MATH 491 and ELED 471 support you in completing the Teacher Performance Assessment. ELED 471 stops meeting for 2-3 weeks around weeks 6-8 in the quarter to enable you to teach your edTPA unit.
- Internship Quarter 3 – ELED 494 (full time student teaching) and ELED 492.

### **How will interns be placed in schools?**

Interns will be placed in one school through the Office of Field Experience (OFE) for the three quarters of their internship—preferably in the same classroom, unless arrangements are made in advance for an out of the area placement for Quarter 3. This year-long placement will enable interns to learn about the distinctive characteristics of a particular school in-depth, and discover how they might draw upon community resources to support the needs of diverse learners.

### **What schedule will interns follow when in schools—WWU or the school’s?**

Interns will follow the Western academic schedule during the first two internship quarters. During Q3 they will follow the public school’s calendar. The exception would be for the *September Experience*—which is a three-week unit (40 hours) done whenever students are in internship during a fall quarter.

### **What is the *September Experience*?**

September Experience interns will observe, participate in, and reflect upon the tools, strategies, and skills that teachers use to promote a positive beginning of a new school year. Interns will report when teachers begin the school year. It will be supervised by a September Experience Instructor.

### **If I’m a classroom teacher, what kinds of assignments can I expect my intern to be working on each quarter?**

#### **Quarter 1**

**Focus:** school, classroom, community and key aspects of the instructional cycle.

**Assignments:** Inquiry into student & community learning assets; identify academic language demands; design of a short instructional unit, with a requirement to teach the whole class or a group of students and analyze the impact of teaching on student learning.

### Quarter 2

**Focus:** using standards-based instructional practices and thinking in an evidentiary manner to make teaching/learning decisions in literacy & math; documenting teacher professional development.

**Assignments:** Interns will apply their knowledge of theoretically-sound and research-based instructional strategies in both math & literacy. They will produce a Teacher Performance Assessment that calls for them to teach a series of lessons, collect evidence of student learning, analyze assessment data, and use it to reflect on their teaching effectiveness.

### Quarter 3

**Focus:** management of classroom learning community; large & small group instructional planning, implementation, and evaluation.

**Assignments:** Interns' responsibilities in the classroom will increase incrementally, with a minimum of 3 weeks' full-time responsibility for the operation of the classroom.

*Please note: During all three quarters interns will be asked to videotape selected episodes of their teaching for the purpose of analysis and evaluation.*

## How will interns be supervised and supported in their learning?

**Quarter 1:** A University Internship Coordinator (UIC) from Woodring's Office of Field Experience along with Western faculty teaching *Developing Teaching* and *Social Studies for the Elementary School* will do limited, targeted supervision. Cooperating teachers will be asked to collaborate with interns on a self-assessment of their performance in the classroom.

**Quarter 2:** A University Internship Coordinator (UIC) along with Western faculty teaching the *Documenting Teaching* will supervise interns. Cooperating teachers will be asked to collaborate with interns on a self-assessment of their performance in the classroom.

**Quarter 3:** A University Intern Coordinator will do student teaching supervision. Cooperating teachers will be asked to complete the WCE Intern Evaluation. Western faculty will do limited, targeted supervision.

## What student outcomes does the Elementary Education Department hope to achieve by means of the year-long internship?

*Candidates will be responsible for meeting all Washington Standards for Beginning Teachers (<https://wce.wvu.edu/ofe/internship-materials>) and the following department expectations:*

- Demonstrate essential standards-based teaching competencies in a demanding, rigorous, professionally-supported environment so as to be prepared for full-time teaching.
- Engage in a professional learning community to practice the public examination of teaching practice important for continuing professional development.
- Demonstrate a commitment to inquiry into school, family, and community as the basis for meeting the needs of diverse students.
- Demonstrate a commitment to inquiry into classroom community, subject matter, curriculum, and student learning—translating what is learned into practice.
- Respond to classroom situations using socially-just practices that recognize the needs of students of different ethnic and language backgrounds, socio-economic status, and learning profiles.
- Demonstrate the capacity to draw upon best practice recommendations, educational scholarship, and inquiry into teaching to devise an integrated classroom practice.
- Demonstrate parent/guardian communication competencies.

- Demonstrate knowledge of the various support services in a school and community.



**Credit Evaluation**  
**ELEMENTARY EDUCATION Endorsement**  
Woodring College of Education

Name: \_\_\_\_\_

Student #: \_\_\_\_\_

WCE Admit Quarter: \_\_\_\_\_ Major: \_\_\_\_\_

Course Name	Course #	Credits	C, P, R*	Proposed Qtr./Notes
Educational Psychology: Development & Learning		5		
Basic Instructional Technology	IT 344	1		
The Teacher & the Social Order	ELED 310	4		
Introduction to Teaching	ELED 370	5		
Teaching All Students	SPED 364	4		
Teaching K-8 Mathematics I	MATH 381	4		
Teaching K-8 Mathematics II	MATH 382	4		
Teaching K-8 Mathematics III	MATH 383	4		
Science Methods & Curriculum for Elementary School	SCED 480	5		
Science Practicum	SCED 490	3		
Physical Education for Elementary School	PE 345	3		
Choose One: ART 398, DNC 398, MUS 398 or THTR 398		3		
Choose One: ART 380, DNC 433, MUS 361, THTR 350, THTR 351		3-4		
Literacy II: Begin. Communicators	ELED 480	5		
Health Education Grades K-8	HLED 455	2		
Literacy III: Fluent Communications	ELED 481	5		
Classroom Use of Instructional Tech.	IT 344	3		
September Experience	ELED 491	2		
Developing Teaching	ELED 470	5		
Social Studies for Elementary School	ELED 425	5		
Documenting Teaching	ELED 471	5		
Internship (if needed for Financial Aid)	ELED 494	5		
Mathematics Intemship Seminar	MATH 491	2		
Literacy Methods	ELED 492	4		
Intemship	ELED 494	9		

\_\_\_\_\_  
Advisor Signature

\_\_\_\_\_  
Date

Rev. 09/13/2016

\*C=Complete; P=In Progress; R=Remaining

**IV.3 Source:** Email Attachment from Megan Brown to Molly Baumann on 3/5/18

**LLC Majors:**

Fall Start

Q1 – Fall	Q2 – Winter	Q3 – Spring
ELED 491 (2)	ELED 471 (5)	ELED 492 (4)
ELED 470 (5)	ELED 494 (5)	ELED 494 (9)
ELED 425 (5)	MATH 491 (2)	ELL 436 (4)
ELED 456 (4)		
ELED 486 (4)		
<b>20 Credits</b>	<b>12 credits</b>	<b>17 credits</b>

Winter Start

Q1 – Winter	Q2 – Spring	Q3 – Fall
ELED 470 (5)	ELED 471 (5)	ELED 491 (2)
ELED 425 (5)	ELED 494 (5)	ELED 492 (4)
ELED 456 (4)	MATH 491 (2)	ELED 494 (9)
ELED 486 (4)		ELL 436 (4)
<b>18 credits</b>	<b>12 credits</b>	<b>19 credits</b>

Spring Start

Q1 – Spring	Q2 – Fall	Q3 – Winter
ELED 470 (5)	ELED 491 (2)	ELED 492 (4)
ELED 425 (5)	ELED 471 (5)	ELED 494 (9)
ELED 456 (4)	ELED 494 (5)	ELL 436 (4)
ELED 486 (4)	MATH 491 (2)	ELED 492 (4)
<b>18 credits</b>	<b>14 credits</b>	<b>17 credits</b>

Internship Overview:

- Internship Quarter 1 – **half-time, two days per week (Tuesday and Thursday)**; your internship this quarter comes from practicum credit attached to ELED 425 and ELED 470. These will include class times and two mornings per week in a school classroom.
- Internship Quarter 2 – **two full days per week (Tuesday and Thursday)**; your internship this quarter comes from practicum credit attached to ELED 471 and ELED 494. MATH 491 and ELED 471 support you in completing the Teacher Performance Assessment. ELED 471 stops meeting for 2-3 weeks around weeks 6-8 in the quarter to enable you to teach your edTPA unit.
- Internship Quarter 3 – **full-time**; ELED 494 (full time student teaching) and ELED 492.



**Non-LLC Majors:**

Fall Start

Q1 – Fall	Q2 – Winter	Q3 - Spring
ELED 491 (2)	ELED 471 (5)	ELED 492 (4)
ELED 470 (5)	ELED 494 (5)	ELED 494 (9)
ELED 425 (5)	MATH 491 (2)	
<b>12 credits</b>	<b>12 credits</b>	<b>13 credits</b>

Winter Start

Q1 – Winter	Q2 – Spring	Q3 – Fall
ELED 470 (5)	ELED 471 (5)	ELED 491 (2)
ELED 425 (5)	ELED 494 (5)	ELED 492 (4)
	MATH 491 (2)	ELED 494 (9)
<b>10 credits</b>	<b>12 credits</b>	<b>15 credits</b>

Spring Start

Q1 – Spring	Q2 – Fall	Q3 - Winter
ELED 470 (5)	ELED 491 (2)	ELED 492 (4)
ELED 425 (5)	ELED 471 (5)	ELED 494 (9)
	ELED 494 (5)	
	MATH 491 (2)	
<b>10 credits</b>	<b>14 credits</b>	<b>13 credits</b>

Internship Overview:

- Internship Quarter 1 – **half-time, two days per week (Tuesday and Thursday)**; your internship this quarter comes from practicum credit attached to ELED 425 and ELED 470. These will include class times and two mornings per week in a school classroom.
- Internship Quarter 2 – **two full days per week (Tuesday and Thursday)**; your internship this quarter comes from practicum credit attached to ELED 471 and ELED 494. MATH 491 and ELED 471 support you in completing the Teacher Performance Assessment. ELED 471 stops meeting for 2-3 weeks around weeks 6-8 in the quarter to enable you to teach your edTPA unit.
- Internship Quarter 3 – **full-time**; ELED 494 (full time student teaching) and ELED 492.

IV.4 Source: P:\WCE\Student Services.Teacher Education\Private\Office\Policies



Woodring College of Education - Office of Field Experiences  
516 High Street, Bellingham, WA 98225  
360.650,3310

FORMS & TEMPLATES - 4.11  
Case Conference Report Form

CASE CONFERENCE REPORT  
Woodring College of Education  
Office of Field Experiences

Intern: Name & W#  
Program:  
Conference Date:

**Present**

Intern:  
UIC:  
Program Faculty:  
OFE Director of Designee:

**SECTION 1 – Background**

XXXX was placed at Roosevelt High School in Seattle for her 14-week Secondary internship fall 2014. Her CTs were XXXXXXXX. Prior to internship, XXXX was unable to pass the ACTFL, but was granted permission to intern without those required scores.

XXXX was initially assigned Spanish II and Spanish III; however, it became quickly clear that XXXX's Spanish language skill would not enable her to instruct students in the Spanish III classes. As such, her assignment was adjusted by adding a Spanish I courses.

XXXX's language challenges were often reflected as a lack of confidence during instruction, which made it difficult for her to gain momentum in her teaching. In addition, she had challenges with her primary CT, XXXX, whom she felt was difficult to communicate with and develop professionally.

On November 14, XXXX withdrew herself from the internship citing a need to develop her language skills further and challenges with her CT.

Please see attachments for additional information (midterm, CT summary, UIC summary).

**SECTION 2 – Decision**

Did the Case Conference Committee recommend another internship? YES.

An incomplete (K) grade was posted. XXXX has 12 months to complete the internship before the K grade changes to an X and she will have to pay tuition.

**SECTION 3 – Next Steps and Timeline**

34 - P:\WCE\Student Services.Teacher Education\Private\Office\Policies

**IV.5 Source:** Email Attachment from Bow Jerns to Pam Brock on 8/1/17

LLC Majors			Non-LLC Majors		
<b>Fall Sept Ex. In Q1</b>			<b>Fall Sept Ex. In Q1</b>		
<b>Q1</b>		<b>Q2</b>		<b>Q3</b>	
ELED 491	2	ELED 471	5	ELED 492	4
ELED 470	5	Math 491	2	ELL 436	4
ELED 425	5	ELED 494	5	ELED 494	9
ELED 456	4				
ELED 486	4				
20 Credits		12 Credits		17 Credits	
<b>Fall Sept Ex. In Q2</b>			<b>Fall Sept Ex. In Q2</b>		
<b>Q1</b>		<b>Q2</b>		<b>Q3</b>	
ELED 470	5	ELED 491	2	ELED 492	4
ELED 425	5	ELED 471	5	ELL 436	4
ELED 456	4	Math 491	2	ELED 494	9
ELED 486	4	ELED 494	5		
18 Credits		14 Credits		17 Credits	
<b>Fall Sept Ex. In Q3</b>			<b>Fall Sept Ex. In Q3</b>		
<b>Q1</b>		<b>Q2</b>		<b>Q3</b>	
ELED 470	5	ELED 471	5	ELED 491	2
ELED 425	5	Math 491	2	ELED 492	4
ELED 456	4	ELED 494	5	ELL 436	4
ELED 486	4			ELED 494	9
18 Credits		12 Credits		19 Credits	
<b>Note:</b>		<b>Q2</b>		<b>Q3 out of area</b>	
LLC Majors going out of area would complete ELED 492 & ELL 436 in Q2		ELED 471	5	ELED 494	12
		Math 491	2	or	
		ELED 492	4	ELED 494	16 (EA)
		ELL 436	4		
		ELED 494	2		
17 Credits		12 or 16 Credits			
<b>Note:</b>		<b>Q2</b>		<b>Q3 out of area</b>	
Students going out of area would complete ELED 492 in Q2		ELED 471	5	ELED 494	12
		Math 491	2	or	
		ELED 492	4	ELED 494	16 (EA)
		ELED 494	2		
13 Credits		12 or 16 Credits			

*\*ELED 494 at 2 credits available for financial aid purposes*

Chronology of ELED 494 Internship Credit Redistribution

[\(Back to Report\)](#)

#	Date	Time	Event, Form, or Email Title	From: Name	From: Title	To: Name	To: Title	C: Name/Title	Event/Communication (Items in <i>italics</i> are direct quotes from referenced email communication)
1	05/23/16	9:30:00 AM	Math 491 Fall	Kimberly Markworth	Associate Professor: Mathematics	David Carroll	Chair: ELED		<i>I would argue that we don't add sections, but instead just plan on teaching these courses without the individual meetings. I am beginning to be seriously dismayed by the pressures of the edTPA and the other expectations on the teacher candidates during that quarter, and the math department isn't part of that conversation. I propose that we scale back on our expectations for how we can support candidates through that course until there are more substantive changes made that support the candidates during that quarter.</i>
2	05/23/16	9:45:00 AM	Re: Math 491 Fall	David Carroll	Chair: ELED	Kimberly Markworth	Associate Professor: Mathematics		<i>I believe the 50 or so students for winter is likely an aberration, but it's hard for me to assess that right now as I've been without a program manager now for 9 weeks. We are always willing to co-plan these issues with you all. <b><u>We made an effort earlier this year to explore moving the ELED 492 Literacy Practicum to 3rd quarter of the internship, but met with resistance from the Office of Field Experience and their concern that it would interfere with the full time student teaching internship. Since then, faculty have been working on adjusting the scheduling of literacy teaching during quarter 2 to try to lessen the impact on edTPA.</u></b> [Emphasis added.] I don't have reliable evidence for this, but it's been my perception that interns this year have seemed more stressed than in the past. I don't think anything in particular has changed, but I'm finding the last couple of groups to be less on</i>

#	Date	Time	Event, Form, or Email Title	From: Name	From: Title	To: Name	To: Title	C: Name/Title	Event/Communication (Items in <i>italics</i> are direct quotes from referenced email communication)
									<i>top of their responsibilities. I'd be sorry to see you withdraw the individual support, but I can understand the staffing pressure.</i>
3	05/23/16	10:10:00 AM	Re: Math 491 Fall	Kimberly Markworth	Associate Professor: Mathematics	David Carroll	Chair: ELED		<p><i>It has been my perception that any attempts to lessen the literacy impacts on the edTPA have only made the impacts worse. They have attempted to move things early in the quarter, which has made it impossible for the teacher candidates to explore their edTPA content in depth and begin meaningful planning of their edTPA content and lessons. So, I would argue that something in particular has changed. <u>I know that they are working to try something different for next year, but I don't think that this challenge will be resolved until this course is moved out of the second quarter of student teaching.</u> [Emphasis added.]</i></p> <p><i>One of my students this past winter suggested tying the practicum hours to Math 491, which would make it a 4-credit course, I assume. I told her that there would be challenges associated with that, but most of the class seemed to think that this was an extraordinary idea and an opportunity to get some feedback on teaching math prior to the edTPA teaching segments. All LLC majors thought the literacy course was redundant to what they had already done in their majors.</i></p>

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									<i>Thank you for saying that you're willing to co-plan these issues. However, I haven't been invited to the table in almost two years. So, I'm not sure how I would be a part of that conversation.</i>
4	05/23/16	11:52:00 AM	FW: Math 491 Fall	David Carroll	Chair: ELED	Tracy Coskie	Professor: ELED		<i>Hi Tracy — When you have a chance, please review this email chain. It seems that adjustments you all have been trying to make to ease interns' work in 492 have had some impact on the Math 491 course. I've rarely found Kim Markworth to be as upset as she sounds around this issue. I'm not sure what, if anything, we can do, but at the very least, we should consult with her before making any other changes. I wasn't aware of the impact she reports, based upon interns' comments, of the change in timing for 492 assignments.</i>
5	06/03/16	11-12 AM	492 Meeting - David's Office	Tracy Coskie	Professor: ELED	Matthew Miller	Professor: ELED		Meeting sent 5/27/16 @ 1:23 PM
6	06/09/16	1:30-2:30 PM	ELED 492 - OFE Conference Room	Tracy Coskie	Professor: ELED	Laura Wellington	Director, OFE		Meeting sent 6/3/16 @ 12:35 PM



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7	07/10/16	8:46:00 PM	492	Matthew Miller	Professor: ELED	David Carroll	Chair: ELED		<p><i>Hi David – have you been able to follow up with Laura about any remaining concerns about moving 492 to third-quarter? It would be good to let both the instructors and students know soon if the course isn't going to meet in the fall.</i></p> <p><i>Thanks for an update!</i></p>
8	07/11/16	8:35:00 AM	Re: 492	David Carroll	Chair: ELED	Matthew Miller	Professor: ELED		<p><i>I haven't heard from her – I'll follow up.</i></p>
9	07/14/16	9:55:00 AM	Moving EIEd 492 to 3rd Quarter	David Carroll	Chair: ELED	Matthew Miller Tracy Coskie	Professor: ELED	Margaret Gegenhuber Program Mgr. OFE	<p><i>Hi Everyone -- <b><u>I just got the go ahead on our plan to move EIEd 492 from 2nd to 3rd quarter of the internship.</u></b> [Emphasis added.] I've also confirmed with Gail Coulter that we don't need a curriculum review process to make this change.</i></p> <p><i><b><u>We will need to inform our second quarter interns and presumably, they'll need to register for internship credits instead of 492.</u></b> [Emphasis added.] We need to look at the course assignments for faculty for fall who would have been teaching 492 and see what we can do to cover those individuals. Am I overlooking anything else we need to do?</i></p>

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10	07/14/16	10:07:00 AM	RE: Moving EIEd 492 to 3rd Quarter	Matthew Miller	Professor: ELED	David Carroll Tracy Coskie	Chair: ELED Professor: ELED	Margaret Gegenhuber Program Mgr. OFE	<p><i>This is outstanding. I'm seriously thrilled!</i></p> <p><i>This will also allow a task force to continue working on the course in the fall.</i></p> <p><i>I believe we may need 1 section for those "teaching abroad" in the Winter for their 3rd quarter. Yes? Would likely be a small section, but need to take 492 before leaving.</i></p> <p><i>We'll need to articulate a specific policy for those teaching abroad so it's a clear requirement to take it in 2nd quarter if they go elsewhere.</i></p> <p><i>And finally, we'll need to get some clear #s of candidates taking 492 in Winter, to make sure we have the right # of instructors assigned.</i></p> <p><i>That's all I can think of.</i></p>
11	07/14/16	10:23:00 AM	RE: Moving EIEd 492 to 3rd Quarter	Matthew Miller	Professor: ELED	David Carroll Tracy Coskie	Chair: ELED Professor: ELED	Margaret Gegenhuber Program Mgr. OFE	<p><i>Other considerations:</i></p> <ul style="list-style-type: none"> <li>- <i>Sending a note out from David about the change, it's reasons (why it will be super-helpful to them), and the specific procedure to change their fall schedules (drop 492, add internship credits)</i></li> <li>- <i>Making sure the internship credits are ready in the system to replace 492 prior to sending the notice.</i></li> </ul>
12	07/14/16	1:32:00 PM	RE: Moving EIEd 492 to 3rd Quarter	Tracy Coskie	Professor: ELED	David Carroll Matthew Miller	Chair: ELED Professor: ELED	Margaret Gegenhuber Program Mgr. OFE	<p><i>I think we solved the issue of too many credits for LLC's in 3rd quarter as long as someone helps Laura W understand the idea of variable credits. We use them all the time in graduate programs.</i></p>

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13	07/14/16	3:44:00 PM	RE: Moving E1Ed 492 to 3rd Quarter	Matthew Miller	Professor: ELED	Tracy Coskie	Professor: ELED	Margaret Gegenhuber Program Mgr. OFE, David Carroll, Chair ELED	<i>Want to lead [SIC] Jen Green know that's the direction we're going? She had those concerns...</i>

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14	07/20/16	8:58:00 AM	EIEd 494	David Carroll	Chair: ELED	Laura Wellington	Director, OFE	Margaret Gegenhuber Program Mgr. OFE	<p><i>Hi Laura – I forgot to follow up with my request to Margaret about sorting out our new configuration for 494. She just told me that you’d been wanting to touch base. I’m here today and available between now and 10:00 and between 12:00-1:00 if you want to meet. Here’s what I was figuring for what I think we need.</i></p> <p><b><i>Quarter 1:</i></b>  <i>EIEd 470 (5 cr.)</i>  <i>EIEd 425 (5 cr.)</i>  <i>EIEd 491 (2 credits if fall quarter)</i>  <u><b><i>Some students are completing major requirements or need to do a PE course or something like that that gets them to the minimum of 12 for full time status/financial aid eligibility.</i></b></u>  <u><b><i>Occasionally, there are students who need to add credits to make the full time status, and they have taken EIEd 494 for 2 credits.</i></b></u> [Emphasis added]</p> <p><b><i>Quarter 2:</i></b>  <i>EIEd 471 (5 cr.)</i>  <i>Math 491 (2 cr.)</i>  <i>EIEd 491 (2 cr.) – only if fall quarter – this is the September Experience</i>  <i>EIEd 494 (5 cr.) – this enables full time status if Sept. Exp. is not included</i></p> <p><i>Total: 13 or 15 credits which qualifies for financial aid. This should be the same for all majors. <b><u>They need the 494 credit to justify the 2 full days in schools. Part of that comes from EIEd 471 which is a 5 credit</u></b></i></p>

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									<p><b><u>course that meets for 3 hours/week, with 2 hours (1 day) going to practicum time.</u></b> [Emphasis added]  <i>NOTE: Interns opting to go out of the area for Quarter 3 would have to take ELED 492 during Quarter 2 and would not need the 494 credit. They could take it in Quarter 3 if that would be required to keep everyone having the same expectations.</i></p> <p><b>Quarter 3:</b>  <i>Non-LLC Majors:</i>            ELED 492 (4 cr.)            ELED 494 (12 cr.) (Interns who are out of the area and took 492 during Quarter 2 would need a 16 cr. version of 494)</p> <p><i>LLC Majors</i>            ELED 492 (4 cr.)            ELL 436 (4 cr.)            ELED 494 (10 cr.) (Interns who are out of the area and took 492 during Quarter 2 would need a 14 cr. version of 494)</p> <p><b><u>Setting 494 at 10 cr. avoids the extra fee for totals above 18 cr.</u></b>[Emphasis added]</p> <p><i>I think this all works, but you know more than I do at this point about what university guidelines we may have to navigate.</i></p>
15	07/20/16	2:06:00 PM	FW: ELED 494	Laura Wellington	Director, OFE	Bow Jerns	Admin. Svc. Mgr., ELED		<i>FYI – I realize that this was something that you were going to address once in your new position.</i>

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16	07/25/16	5:04:00 PM	RE: EIEd 494	Bow Jerns	Admin. Svc. Mgr., ELED	Laura Wellington	Director, OFE		<p><i>Thanks for sending this Laura.</i></p> <p><i>David's outline below correctly communicates how he would like to move/distribute the courses.</i></p> <p><i>In Q2, we would need a 5 credit load for ELED 494. <b><u>It is currently a 2 credit course, but only LLC majors take it for financial aid purposes.</u></b>[Emphasis added.] If ELED 491 was moved, most students would need this to reach full time status.</i></p> <p><i>Quarter 3 requires a variable ELED 494 credit to help the student achieve fulltime status and/or not go into an overload. It would be a 10 – 12 variable credit load for ELED 494.</i></p> <p><i>You would be responsible for giving all grades associated with these different ELED 494 courses. We talked about that a bit before.</i></p> <p><i>I think the Registrar holds the final say on this plan.</i></p>
17	07/26/16	8:01:00 AM	RE: EIEd 494	Laura Wellington	Director, OFE	Bow Jerns	Admin. Svc. Mgr., ELED		<p><i>I emailed David's outline to Peter and David B. (Registration) – <b><u>My only concern is the variable credits to get students up to full time status.</u></b></i> [Emphasis added.] <i>Not sure if registration will allow this method of madness.</i></p>



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18	07/25/16	4:20:00 PM	FW: EIEd 494	Laura Wellington	Director, OFE	David Brunnermer	Registrar		<p><i>My name is Laura Wellington and I oversee the Teacher Education Admissions and Field Experiences within Woodring. I've been in this position for less than a year and I'm still learning quite a bit on the process and procedures of 'all things' Woodring. The ELED Dept. Chair, David Carroll, wants to change the course sequence of ELED 494 and place this course in Q3 of the student internship versus Q2. He has this change delineated below...</i></p> <p><b><u>My worry is that he has students taking ELED 494 for varying credits just to satisfy the necessary credit load. This is esp. noted in Q2 with an ELED 494 for 5 credits.</u></b> [Emphasis added]</p> <p><i>I wanted to get your thoughts (if any) on the arrangement below. I welcome your feedback.</i></p>
19	07/26/16	9:31:00 AM	RE: EIEd 494	David Brunnermer	Registrar	Laura Wellington	Director, OFE		<p><i>Hi Laura,</i></p> <p><i>494 is listed as a "supervised teaching experience to develop and demonstrate..." <b><u>therefore the expectation from a Registrar's point of view is the course has separately identified learning outcomes/objectives, and therefore stands alone contributing to the degree.</u></b>[Emphasis added.] How it is positioned and in what sequence is always for the faculty to determine since faculty control all aspects of the curriculum. Referencing its value to financial aid is becoming a normal practice these days because of the complex satisfactory academic progress requirements now in place by the DoE. It does look and sound as if the curriculum is secondary to financial aid qualification</i></p>

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									<i>and yet historically Woodring students can unexpectedly hurt their financial aid eligibility by scheduling fewer credits than planned for so I can see why the two contexts overlap each other in advising. Feel free to give me a call at x7732 if this doesn't directly answer your concerns.</i>
20	07/26/16	1:45:00 PM	ELED 494 Feedback	Laura Wellington	Director, OFE	Bow Jerns	Admin. Svc. Mgr., ELED		Laura forwarded David's response to Bow Jerns.
21	07/26/16	2:00:00 PM	RE: ELED 494 Feedback	Bow Jerns	Admin. Svc. Mgr., ELED	Laura Wellington	Director, OFE		<i>Thanks for sending that Laura.</i>  <i>Sounds like David is ok with it? I read it a few times, but let me know if you get the opposite. Seems like he is putting the responsibility back on us.</i>  <i>Has Peter had a chance to give certifications view on it?</i>
22	07/26/16	2:16:00 PM	RE: ELED 494 Feedback	Laura Wellington	Director, OFE	Bow Jerns	Admin. Svc. Mgr., ELED		<i>I sent this to David Carroll and I stated something similar, "It looks like David B. is putting the ownership back on us and is ok with it, essentially." Sent it to Peter and asked this morning if he has had a chance to view it and give some feedback - He is going to look at it closer today.</i> <i>I think it would be wise to have Jennifer Green weigh in on this – When does she get back from Mexico?</i>

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23	07/27/16	4:14:00 PM	ELED 494 & Internship credits	Bow Jerns	Admin. Svc. Mgr., ELED	Laura Wellington Davic Carroll	Director, OFE Chair: ELED	Margaret Gegenhuber Program Mgr. OFE	<p><i>Hi David &amp; Laura,</i></p> <p><i>I've attached a spreadsheet to show how the credits for ELED 494 would be redistributed if ELED 492 was moved into quarter 3. The quarters are in horizontal sequence with the September Experience being moved to represent different internship sequences. It is also separated out by LLC majors and non-LLC majors.</i></p> <p><b><u>A 9 credit ELED 494 in Q3 seems to be the magic number since we are moving 3 credits from Q3 into Q2. So far, all ELED internships have been 14 credits</u></b>[Emphasis added.], <i>except for Educators Abroad, which is 16 credits. Educator Abroad courses are currently automatically created at 16 credits.</i></p> <p><i>The non-LLC majors have less credits in Q1 &amp; Q2, but this could give them room to finish up any major or even GUR courses.</i></p> <p><i>Advising on our part would be needed to insure the students get into the right courses. Some heavier advising would need to be given to students who planned on going out of area for Q3.</i></p> <p><i>If this went into effect in fall, it would most impact the students who are doing Q3 in winter. This is the distribution of majors for fulltime Q3. The majority are LLC majors.</i></p>

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24	08/03/16	9:56:00 AM	Draft message for 2nd quarter interns	David Carroll	Chair: ELED	Bow Jerns Margaret Gegenhuber	Admin. Svc. Mgr., ELED Program Mgr. OFE		<p><i>Hi Sarah and Margaret -- Can you please review this message and advise me if you think it needs additions or changes. I'm thinking that I can leave it kind of general like this, and that you can provide specific details on the exact registration information when you contact them, but let me know if you think differently please.</i></p> <p><i>Thanks, David</i></p> <p><i>Hello Second Quarter Interns -- I'm writing to alert you to a change in the internship course sequence that will affect you for fall and winter quarters.</i></p> <p><i>For some time, we have recognized that having ELED 492 Literacy Practicum coinciding with completing the edTPA during the second quarter of the internship results in extra stress and a compromised ability to genuinely engage in the literacy practices critical to ELED 492.</i></p> <p><i>Accordingly, we have engaged in an extended conversation with staff in the Office of Field Experience, Certification, and the Registrar to explore alternatives. We have also conferred with previous interns about these issues. Recently, we reached agreement. Beginning with your experience in the coming 2 quarters we will be implementing a new plan.</i></p>

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									<p><i>Instead of having you complete Eled 492 during fall quarter, you will instead complete it in winter, during your full time internship. The expectations for the course will also be concentrated around assessing, planning, and implementing literacy instruction with the support of Eled faculty serving as "literacy coaches." <b><u>For fall quarter, instead of taking Eled 492, you will register for additional internship credits (Eled 494) to insure your two full days per week in your classroom and to maintain full-time student status for financial aid purposes.</u></b> [Emphasis added.]</i></p> <p><i>One small exception to this will be for those of you who are expecting to complete your final internship quarter away from Bellingham/main campus. In that case, you will continue with the old plan and complete Eled 492 during fall quarter. Our department staff will be contacting each of you with details on how to adjust your registration status.</i></p> <p><i>I will also be working with all of you in September Experience and can respond to questions as I come to visit. You should also feel free to email me at any time with further questions.</i></p>
25	08/03/16	10:33:00 AM	RE: Draft message for 2nd quarter interns	Bow Jerns	Admin. Svc. Mgr., ELED	David Carroll	Chair: ELED	Margaret Gegenhuber Program Mgr. OFE	<p><i>Thanks David.</i></p> <p><i>I think that is a great way to explain the change. I like being general at first and then following up with specifics when we contact them about registration.</i></p>

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26	08/03/16	10:44:00 AM	RE: Draft message for 2nd quarter interns	David Carroll	Chair: ELED	Bow Jerns	Admin. Svc. Mgr., ELED		<i>How soon do you anticipate contacting the interns? I'm assuming we just need to contact the Quarter 2 interns at this time -- is that your thinking also? I'd like to get Margaret's thoughts on this too if possible.</i>
27	08/03/16	1:22:00 PM	RE: Draft message for 2nd quarter interns	Bow Jerns	Admin. Svc. Mgr., ELED	David Carroll Margaret Gegenhuber	Chair: ELED Program Mgr. OFE		<i>I bet we can have all interns contact by the middle of next week. I need to do some course changes with the aid of Margaret.</i>  <i>I think it's a good idea to just contact the Q2 interns at this point. We can update everyone else once Western is in session.</i>
28	08/04/16	8:23:00 AM	Setting up new ELED 494s	Bow Jerns	Admin. Svc. Mgr., ELED	David Carroll	Chair: ELED	Margaret Gegenhuber Program Mgr. OFE	<i>Hi David,</i>  <i>Just to check in before we get all the new credit ELED 494 courses set up today – Do you want to move forward with having ELED 494 be 9 credits or 10 credits? 9 credits represents us just shifting 3 credits to quarter 2, but you mentioned you would prefer 10. Let me know. Thank you!</i>
29	08/04/16	8:53:00 AM	Re: Setting up new ELED 494s	David Carroll	Chair: ELED	Bow Jerns	Admin. Svc. Mgr., ELED		<i>I think 9 will be fine. I was concerned that Laura might want it to be 10 or more to assure that it's recognized as a full time internship, but she didn't seem to be concerned about that.</i> <i>So go ahead.</i>



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30	08/04/16	1:25:00 PM	ELED - Change in Program Sequence	Laura Wellington	Director, OFE	David Carroll Bow Jerns Margaret Gegenhuber Nancy Nelson Peter Johnson Susan Cahill			<p><i>Team,</i></p> <p><i>I reached out to Brendan O'Connor, Program Specialist for PESB to verify a few questions surrounding our ELED program sequence changes. More specifically, whether an internship needs to be 'isolated' or a 'stand-alone' course without other courses in direct competition. I was told he was the policy guru regarding student internships. Below is his response:</i></p> <p><i>"Good morning, Laura,</i></p> <p><i>I did receive your phone message, and appreciate this email as well. You are correct that PESB does not have any limitations outlined in WAC stating clinical practice (student teaching/internship) needs to be a "stand-alone" course. That is left to preparation programs to determine as part of their design. We do state clinical practice should be at least 450 hours, but allow for a variety of ways to meet that amount (e.g., some programs split student teaching across two quarters). In some endorsement areas, programs do have additional courses concurrent with student teaching so the connection between content or theory is directly applied in the experience. You may want to visit with your colleagues at other preparation programs to see what they do, or for advice on how to manage this.</i></p> <p><i>You raise a point that I would have cautioned about as</i></p>

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									<p><i>well—what is the tipping point of burden on candidates? Student teaching, completing edTPA, and additional coursework all together may overwhelm some candidates. Advising sessions with candidates may indicate which ones will need additional support or time to complete the program. I don't know about grievance policies at institutions, but maybe the literacy or ELL courses could be taken during a subsequent quarter if trying to complete all the expectations during student teaching becomes problematic for someone? This is just my personal opinion, not an official PESB position.</i></p> <p><i>I'm not sure if that answered your question or not, other than the WAC does not limit courses offered during clinical practice."</i></p>

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31	08/08/16	1:46:00 PM	Internship Course Sequence change	Bow Jerns	Admin. Svc. Mgr., ELED	Student Interns			<p><i>Hello Second Quarter Interns -- I'm writing to alert you to a change in the internship course sequence that will affect you for fall and winter quarters.</i></p> <p><i>For some time, we have recognized that having Eled 492 Literacy Practicum coinciding with completing the edTPA during the second quarter of the internship results in extra stress and a compromised ability to genuinely engage in the literacy practices critical to Eled 492.</i></p> <p><i>Accordingly, we have engaged in an extended conversation with staff in the Office of Field Experience, Certification, and the Registrar to explore alternatives. We have also conferred with previous interns about these issues. Recently, we reached agreement. Beginning with your experience in the coming 2 quarters we will be implementing a new plan.</i></p> <p><i>Instead of having you complete Eled 492 during fall quarter, you will instead complete it in winter, during your full time internship. The expectations for the course will also be concentrated around assessing, planning, and implementing literacy instruction with the support of Eled faculty serving as "literacy coaches." <b><u>For fall quarter, instead of taking Eled 492, you will register for additional internship credits (Eled 494) to insure your two full days per week in your classroom and to maintain full-time student</u></b></i></p>

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									<p><b><i>status for financial aid purposes.</i></b> [Emphasis added.]  <i>One small exception to this will be for those of you who are expecting to complete your final internship quarter away from Bellingham/main campus. In that case, you will continue with the old plan and complete EEd 492 during fall quarter. Our department staff will be contacting each of you with details on how to adjust your registration status.</i></p> <p><i>I will also be working with all of you in September Experience and can respond to questions as I come to visit. You should also feel free to email me at any time with further questions.</i></p>

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32	08/09/16	8:58:00 AM	FW: ELED - Change in Program Sequence	Kimberly McDaniel	IT Specialist 3, Woodring College of Education	Joseph Koski Cheryl Ricevuto	Professional Educator Standards Board (PESB) Employees		<p><i>Joe and Cheryl—</i></p> <p><i>So, for the purpose of reporting, do we still count “part time” practica and “full time” internships separately? Or, do part time clinical experiences now count toward the 450 hours.</i></p> <p><i>From the discussions of the group on clinical practice, I came away with the idea that what distinguishes other clinical experience (practicum) from internship is that the latter is full time in the classroom and is subject to the 450 hour requirement. By adding courses into the internship quarter it, by definition, is no longer full time.</i></p> <p><i>Also is Brendan suggesting that the internship can be “spread out” over more than one quarter, thus does not have to be full time??</i></p> <p><i>I am setting up our internship and hours logs for fall and am completely stumped. Brenden’s answer below has confused me. We have now some courses intermingled with the internship quarter thus confusing its full-time status. I am thinking that the students need to log these separately so that I can report them separately...</i></p> <p><i>Please help.</i></p>

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33	08/10/16	3:18:00 PM	RE: ELED - Change in Program Sequence	Brendan O'Connor	PESB Program Specialist	Kimberly McDaniel Joheph Koski Cheryl Ricevuto	Amy Vaughn	PESB Employee	<p><i>Hi Kimberly, We have just finished an internal discussion about your question, and I hope to provide some guidance for you. I've included Amy Vaughn on this response since she is taking on the data oversight pieces from Cheryl.</i></p> <p><i>The PESB Data Collections Manual 2016-2017 on page 23 has definitions for different experience types. None of these definitions have a "full-time" or "part-time" designation. So even though WWU is planning on adding some courses during the student teaching experience quarter, the hours spent student teaching still count toward the 450 and wouldn't be dinged because it is now "part-time". I'm not a data guy (which is why the others are cc'd), but I would say rather than trying to track "full-time" and "part-time" hours to just track hours related to clinical practice using the vague language that currently exists in WAC 181-78A-264 which includes student teaching, but may also include experiences just prior to student teaching where candidates are given more and more opportunities to practice teaching. This is distinct from early program field experiences where candidates just sit &amp; observe an elementary, middle level, high school, and maybe a SPED class for a combined total of say 30 hours for ED 101.</i></p> <p><i>The Indicator Model of Program Review does not call out the 450 of clinical practice so a program wouldn't have an indicator go off because of not meeting that</i></p>

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									<p><i>number of hours. However, if edTPA scores (or perhaps another indicator) were to fall below the threshold, then the conversation between PESB and the program might include “how many hours are candidates in student teaching? Is this enough? What is the nature of the student teaching experience?” to see if the structure of that experience and those leading up to it are preparing candidates to be successful.</i></p> <p><i>I hope that helps and doesn't muddy the water even more.</i></p>
34	08/10/16	3:53:00 PM	FW: ELED - Change in Program Sequence	Kimberly McDaniel	IT Specialist 3, Woodring College of Education	Bow Jerns	Admin. Svc. Mgr., ELED		<p><i>So! Looks like we go with MUDDY! This is a good thing. We don't have to track anything intern separately. We can use one log and call it good!!!!</i></p>