

# CLOCK HOUR SYSTEM REPORT

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Dr. Jeffrey Youde, Director, Educator Credentialing, PESB

Christine Nguyen, Program Manager, System Transformation, PESB

Jayne Rossman, Program Coordinator, Educator Credentialing, PESB

Mia Munoz, Program Associate, Educator Credentialing, PESB

Timothy York, Director, Certification Office, OSPI



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# AGENCY OVERVIEW

## Who we are and what we do

### **The Professional Educator Standards Board (PESB)**

Created in 2000, PESB ensures that Washington’s educator workforce is composed of highly effective, professional educators who meet the diverse needs of schools and districts. PESB works towards this vision by creating innovative policies that improve and support educator quality, workforce development, and diversity.

### **The Paraeducator Board**

Created in 2017, the Paraeducator Board establishes requirements and policies for paraeducator professional development certificates, and makes policy recommendations that will increase opportunities for paraeducator advancement through education, professional learning, and increased instructional responsibility.

### **A collaborative approach**

PESB and the Paraeducator Board recognize that high standards for all educators are essential to student success and achievement. To support our students, we must support our educators.

# EXECUTIVE SUMMARY

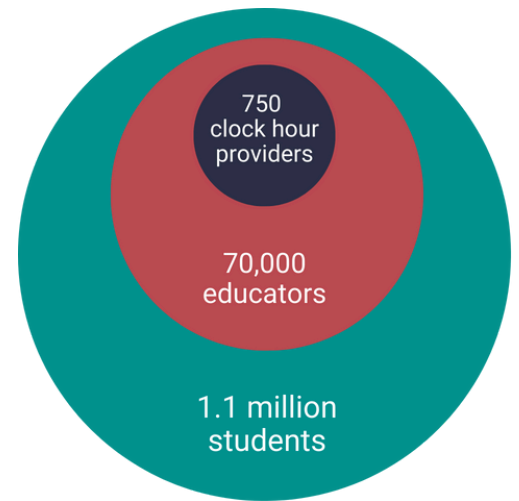
Washington's clock hour system is extensive and vital to the operation of P-12 schools. It includes over 750 organizations offering continuing education to more than 70,000 certificated educators, who serve over 1.1 million students. Because educators must earn clock hours to renew their certificates—necessary for employment in schools—any changes to this system could significantly impact both educators and school districts.

After completing pre-service preparation and obtaining a certificate, Washington educators must renew their certification regularly. This renewal requires clock hours, or continuing education units, which are designed to enhance educator effectiveness and improve student outcomes. **Each hour of professional development through clock hour courses should contribute to the educator's effectiveness.** Clock hours are offered by providers approved by the Professional Educator Standards Board.

Historically, oversight of Washington's clock hour system has focused on ensuring that clock hour providers maintain accurate records to facilitate the certification renewal process for educators. Data collection has been limited to provider applications and self-reported clock hours from individual educators. This fragmented data environment presents significant barriers to designing and implementing meaningful changes within the system. To drive improvements in the clock hour system, more robust data is essential. Accurate data would not only facilitate better oversight and accountability but also ensure that the system evolves in response to the changing needs of educators and students.

To create and implement a comprehensive and effective audit system that ensures standards are met, PESB recommends the following actions:

- **Conduct a landscape analysis:** Perform an analysis and systems assessment to identify the strengths and weaknesses of Washington's current clock hour system. This should include an exploration of continuing education regulations in other states and professions.
- **Engage stakeholders:** Undertake stakeholder outreach to ensure that proposed changes are grounded in the needs of educators and providers. This outreach will also serve to educate them about upcoming changes.





- **Implement an audit process:** Establish an audit process that incorporates best practices identified during the analysis, assessment, and outreach phases. This process should adopt a phased approach and include iterative feedback loops for continuous improvement.

In addition to the audit process, PESB recommends further enhancements to the clock hour system:

- **Expand the complaint process:** Broaden the complaint process to include all clock hour providers, not just those focused on equity, leadership, and government-to-government courses.
- **Update the application process:** Introduce a software application that enables PESB staff to efficiently manage integrated systems for application, approval, auditing, and complaints.

By adopting these recommendations, PESB aims to foster a more robust clock hour system that supports educators and improves student outcomes.

## CONTEXT AND BACKGROUND

In 2024, the Legislature passed [HB 1377](#), charging the Professional Educator Standards Board (PESB), in consultation with the Office of the Superintendent of Public Instruction (OSPI), with submitting a report “on how to implement an auditing system of continuing education providers and other recommendations for improving the clock hour system.”

The purpose of clock hours is to provide educators with ongoing opportunities to grow professionally. In order for this growth to occur, the courses offered to educators must be of high quality. This report seeks to explore how changes required by HB 1377 can be implemented to ensure that Washington educators have access to high quality and relevant professional learning, with the goal of ensuring that all of Washington’s P-12 students have access to the highly skilled educators that they deserve.

## EDUCATOR STANDARDS

To ensure that every student in Washington is taught by a skilled educator, PESB establishes standards for educators across their career continuum, from newly certified first-year teachers to experienced veterans. These policies emphasize two critical phases of an educator’s career: pre-service preparation and in-service growth opportunities. These in-service professional growth opportunities are commonly referred to as “continuing education” or “clock hours.”

### Pre-service preparation

The pre-service preparation phase encompasses the higher education courses completed by educator candidates at PESB-approved educator preparation programs (EPPs). For the purposes of this report, “**teachers**” refers to those holding teacher or Career and Technical Education (CTE) teacher certificates, while “**administrators**” includes individuals with one or more of the following certificates: principal, program administrator, CTE director, or superintendent.

In addition to completing a preparation program, teacher candidates must demonstrate content knowledge by passing a content knowledge assessment in one or more endorsement areas. Teachers who are already certified in other states can apply for equivalent Washington teacher certificates and endorsements.

## In-service growth opportunities (clock hours)

Once a Washington educator has completed their pre-service preparation and received a certificate, they must renew that certificate at regular intervals. To do so, educators must meet continuing education requirements. These continuing education requirements are known as “clock hours” because educators receive one clock hour per hour of continuing education. The organizations that offer such courses are referred to as “clock hour providers.”

Most educators need to earn 100 clock hours every five years in order to renew their certificate. The legislature has furthermore designated specific types and amounts of clock hours that each educator needs to complete to renew their certificate.

Required professional learning is intended to improve educator effectiveness along a career continuum, leading to better outcomes and learning for students. Professional learning clock hour offerings should:

- Be useful, applicable, and relevant to an educator’s role(s)
- Represent engaging, substantive, and quality adult learning
- Reflect foundational skills and practices rooted in current research

Each individual who completes in-service professional learning via clock hour offerings should accumulate expertise with every hour of professional development.

## CLOCK HOURS

### Types of clock hours

Certificated educators are required to complete different types of clock hours depending on their specific role ([WAC 181-85](#)).

**Teachers** must complete 100 clock hours for certificate renewal, 15 of which must be focused on equity-based school practices. Teachers who hold STEM-related endorsements must also complete 15 clock hours in STEM integration. The remaining clock hours not designated by the Legislature are determined by individual teachers.

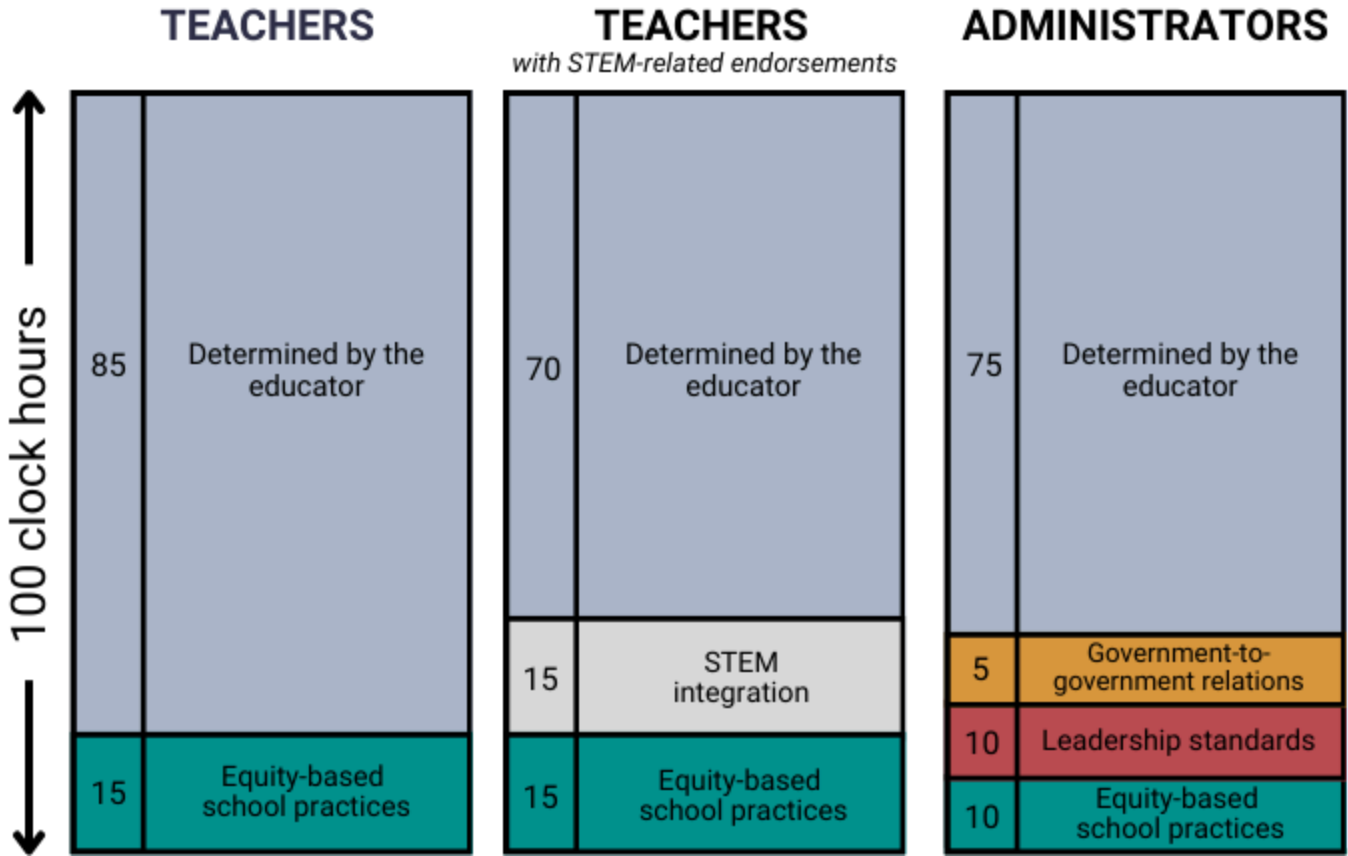
**Administrators** must complete 100 clock hours for certificate renewal, which must include:

- Ten clock hours on equity-based school practices
- Ten clock hours on national educational leadership standards
- Five clock hours on government-to-government relations with Tribal nations
- The remaining 75 clock hours are chosen by individual administrators

Equity-based school practices, national educational leadership standards, and government-to-government relations clock hours may only be offered by [legislatively designated providers](#). To read more about these types of clock hours and certificate renewal requirements, see [Appendix A: Clock hour types](#).

**Note:** This report focuses on clock hours for teachers and administrators. OSPI also issues certificates for other educator roles, including nine [educational staff associate](#) (ESA) roles, such as school nurse, school social worker, etc. Each of these roles has certificate-specific renewal requirements.

## CLOCK HOUR REQUIREMENTS BY EDUCATOR TYPE



### Clock hour providers

There are over 750 providers within the clock hour system. PESB approves approximately 450 clock hour providers annually. These providers include Educational Support Districts (ESDs), private schools, universities, and nonprofit and not-for-profit organizations. Additionally, school districts and Tribal compact schools are automatically approved to provide clock hours according to [WAC 181-85-045](#). There are approximately 300 automatically-approved providers.

Approved providers may offer one course or multiple courses on different topics. Some clock hours, such as government-to-government trainings, may only be offered by providers who have specifically been approved to offer those courses. Other types of clock hour courses may be offered by any approved provider.





Clock hour providers may provide courses via different delivery methods, including in-person, hybrid, or online synchronously or asynchronously. See [Appendix B: Clock hour delivery methods](#) for details on these modalities.

## REGULATORY OVERSIGHT OF CLOCK HOUR PROVIDERS

PESB and OSPI regulate clock hour offerings through standards setting and guidance, the clock hour provider approval process, and a complaint system.

Within the clock hour system, the role of the Professional Educator Standards is to establish policies to oversee the approval of clock hour providers and to set standards for clock hour providers. PESB creates policies with the goal of improving and supporting educator quality.

While PESB is responsible for setting standards and measuring the effectiveness of those standards, OSPI is responsible for the implementation of Board policy as it relates to educator certification. In the current clock hour system, OSPI collects clock hour provider applications, submits clock hour provider applications to the PESB board for approval, conducts audits of clock hour providers, provides guidance to clock hour providers on how to issue clock hours based on PESB policies, and issues renewed certificates based on educator-submitted clock hours.

### History of clock hour system and regulatory changes

Clock hours have been a part of a broader system of professional development for decades. They have taken on a more significant role in educator development since the elimination of both the ProTeach program and the elimination of the state requirement to obtain a second-tier certificate. Now, more than ever, educators rely on quality clock hour courses as the main source of professional development in their careers.

Over the past decade, the Legislature has added targeted professional development to certificate renewal requirements to enhance educator learning in STEM, equity, leadership, and government-to-government relations.

In the past, rules governing the regulation and oversight of clock hour providers and the courses they delivered gave wide latitude regarding the topics and delivery methods of those courses. As this form of professional development has taken on a greater significance in educators' careers and influence in their educational practice, there is greater interest in evaluating the value and impact these courses deliver to our state's educators.

Benefits of the current system	Challenges of the current system
<ul style="list-style-type: none"> <li>• Lower administrative burden for OSPI and PESB</li> <li>• Few barriers to entry for clock hour providers</li> <li>• Numerous options for educators to receive clock hours in a timely manner</li> </ul>	<ul style="list-style-type: none"> <li>• Limited oversight and accountability for clock hour providers</li> <li>• Educator expertise may not accumulate over time if the clock hours do not align with changing student learning needs</li> <li>• Lack of alignment between clock hour courses and content standards may lead to lower quality clock hour offerings</li> <li>• Exclusion of national organizations who are not aware of the clock hour list</li> <li>• Limited resources and guidance given to approved providers on how to facilitate committees and keep records</li> </ul>

## Current audit processes

There are several references to the current audit processes in WAC.

According to [WAC 181-85-215](#), OSPI shall audit clock hour providers on a selective basis, which may be guided by complaints or other evidence of potential noncompliance with clock hour provider requirements. The number of annual audits is at OSPI’s discretion. [WAC 181-85-109](#) stipulates that OSPI shall also audit clock hour provider compliance forms on a selective basis. In addition, [WAC 181-85-220](#) states that if an audit finds that a clock hour provider is not in substantial compliance with the WAC chapter, OSPI shall document regulatory non-compliance and notify the provider of steps for corrective action to come into compliance with WAC.

In practice, OSPI currently receives complaints about clock hour providers, assesses whether they fall within the purview of their statutory authority, and follows up with the provider and/or complainant as necessary. They do not conduct random or regular audits of clock hour providers. This is mostly due to limited resource allocation and the costly administrative burden of this particular work.

The rules currently in place for audits of clock hour providers have not generally aligned with the types of complaints received by OSPI. Complaints have come from both districts and individual educators. Most

complaints received by OSPI consist of perceived questionable content delivered as part of a course. These complaints have then triggered investigations of providers by OSPI; however, most investigations have resulted in no adverse action being taken toward a provider due to the latitude currently allowed in WAC.

OSPI has received, on average, two or fewer complaints resulting in investigations per year over the past ten years. During that time, only one approved clock hour provider had their approval revoked.

## CHANGES TO OVERSIGHT PROCESSES: 2024-2026

With the passage of HB 1377, PESB was charged with creating and updating several oversight mechanisms for equity, leadership, and government-to-government relations clock hour providers. These include a more extensive provider application process, a complaint/revocation process, and an audit process.

### Provider application process

PESB is revising the application process to more thoroughly ensure the quality of clock hour providers in accordance with HB 1377. Previously, clock hour providers submitted an application to OSPI, who then forwarded a list of providers with completed applications to PESB, which approved the providers on the list. However, with guidance from the legislature in HB 1377, PESB is updating the application process to require more information from applicants. Additionally, PESB is researching a software application solution to manage the provider application process. See [Recommendation #2](#) for more details on this software solution.

An updated application for clock hour providers will include:

- Organizational mission and vision
- Experience and expertise in providing professional development to educators generally, as well as specific experience and expertise in the topics they will be offering
- Possible subject matter topics
- Pricing
- Transcript and/or records processes
- Specific nonprofit status

The updated application process will be in place for the 2025-26 school year.

### Equity, leadership, and government-to-government clock hour provider approval process

Prior to the passage of HB 1377, [RCW 28A.410.277](#) prescribed that clock hours focused on equity-based school practices may only be offered by the following organizations:

- The Office of the Superintendent of Public Instruction

- A school district
- An educational service district
- A Washington Professional Educator Standards Board-approved administrator or teacher preparation program
- The Association of Washington School Principals
- The Washington Education Association

Further, clock hours focused on government-to-government training with federally recognized tribes must be offered by one or more subject matter experts that are approved by the Governor's Office of Indian Affairs in collaboration with the Tribal Leaders Congress on Education and the Office of Native Education, which is housed within the Office of the Superintendent of Public Instruction.

HB 1377 maintains the same list of approved providers of equity-based school practice clock hours and gives PESB the authority to approve additional providers of equity-based school practices. PESB is not permitted to add to the list of approved providers for government-to-government training.

Since the passage of HB 1377, PESB has received inquiries from a broad group of clock hour providers who are not already approved to provide equity-based continuing education. Several factors will be used to determine the approval of additional equity-based clock hour providers including, but not limited to, the need for additional providers and individual providers' ability to provide high-quality continuing education.

## Clock hour complaint process

PESB has developed a new complaint and revocation process as prescribed by HB 1377. This system is distinct and separate from the proposed audit system; the complaint process investigation is triggered by a complaint and results in an investigation specific to the complaint, whereas audits would be comprehensive and occur on a regular schedule.

As mentioned earlier, the updated application process for clock hour providers will take effect in the 2025-26 school year. Although the complaint and revocation process has been established, PESB does not plan to implement it until after the current clock hour provider list's approval period ends. Therefore, the new complaint process will apply to providers beginning in the 2025-26 school year.

By aligning the launch of the complaint and application processes, newly approved clock hour providers will be aware of the new complaint system at the time of their application. This approach helps minimize the risk of negatively impacting approved providers by ensuring they receive adequate notice of the new system.

## Complaint process overview

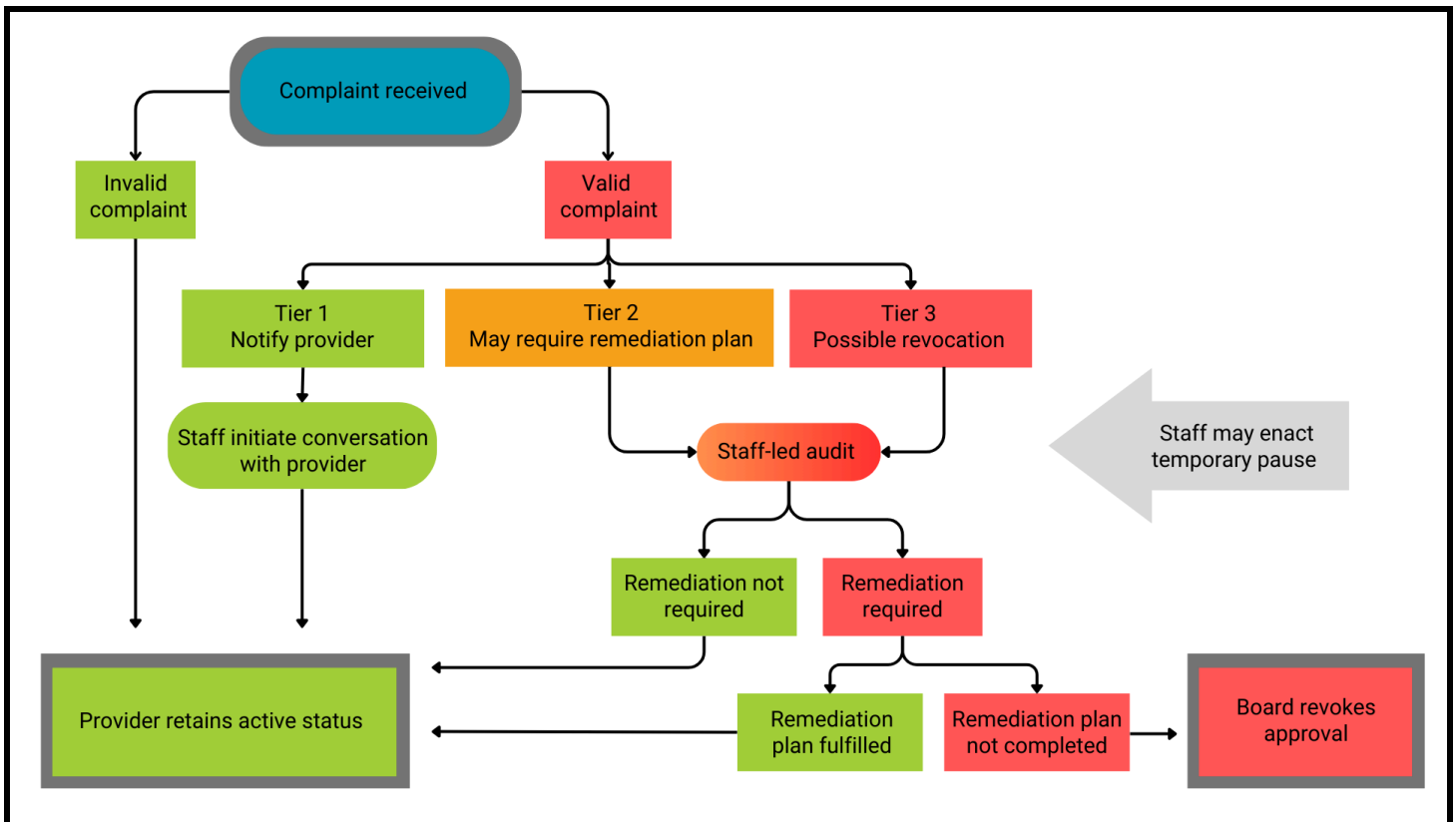
The new complaint process allows certain individuals and organizations approved by the Legislature to submit complaints about clock hour providers and course offerings.

The complaint process has four parts:

1. **Determining validity.** Once a complaint is received, PESB staff must determine whether the complaint meets the minimum requirements of a valid complaint. For instance, it must be made by an educator or educational group as listed in [WAC 181-85-222](#).
2. **Determining severity.** Valid complaints are sorted into three tiers based on the severity of the allegation. These tiers determine whether a remediation plan is likely to be needed as well as whether the provider must pause its clock hour course(s) during the investigation.
3. **Investigation:** PESB staff will review evidence provided by the complainant and the clock hour provider to determine whether the provider is meeting applicable standards.
4. **Remediation:** If the provider is not meeting standards, PESB staff will create a remediation plan. Providers who fulfill the remediation plan will retain their approval status.

Clock hour providers who believe errors have been made during the process will have the option to file an appeal.

### Clock hour complaint process flow chart



# CLOCK HOUR SYSTEM IMPROVEMENTS

The Professional Educator Standards Board (PESB) believes in applying the following tenets when managing change:

1. **Planning:** Transformation of systems requires strategic planning.
2. **Stakeholder collaboration:** Collaboration with stakeholders leads to more effective policy.
3. **Clear communication:** Providing clear communication and education in advance of change improves outcomes and relationships.

When implementing new initiatives, PESB's approach includes convening stakeholder workgroups, requesting substantive input on draft documents and policies, and incorporating iterative feedback during post-implementation phases to continue improving systems.

PESB used this approach when developing the [Curriculum and Instruction \(C&I\) program review](#) process for educator preparation programs. The C&I program review development process included a two-year period in which programs engaged in a collective learning process to both understand the new standards and co-create review rubrics. Feedback from educator preparation programs on this co-development process has been positive. As a result, preparation programs across the state have deepened their understanding of multiple sets of standards and requirements to improve program outcomes. Preparation programs have requested that PESB continue to use professional learning networks for new initiatives and requirements in the future. Partnerships like these are critical in leading change that produces sustainable, positive learning outcomes for educators and students while avoiding the perils of poor implementation. By applying similar tenets of change management in the case of clock hour system transformation, PESB strives for similarly positive outcomes.

The changes and recommendations in this report incorporate best practices such as collaborative policy design, phased implementation plans, and designated learning periods.

# AUDIT SYSTEM

Washington's clock hour system is large, complex, and essential to the functioning of our P-12 schools. It comprises over 750 organizations that provide continuing education to over 70,000 certificated educators, who in turn serve over 1.1 million students. Because educators are required to obtain clock hours in order to renew their certificates and certificates are required to continue working in schools, changes to this system could have significant ramifications for educators and school districts. For this reason, we recommend the following steps to create an effective, targeted audit system.

## A. Landscape analysis and system assessment

As PESB plans to implement legislatively mandated changes to the professional learning landscape, including consideration of a comprehensive audit system, a detailed examination of clock hour policy and practice is needed. Previous clock hour regulatory practices and data collection do not provide an adequate foundation for understanding the strengths and limitations of our provider ecosystem. PESB must not only develop a plan for new policy; it must also understand how to shift previous behaviors to new practices. Understanding the nature of current habits and work is necessary to create new habits of mind and practice for the work.

### Current data constraints

Today's clock hour tracking system was designed to monitor educators' certification renewal; its purpose is to appropriately record and tally educator-reported clock hours. The available data in this system is from two sources: a provider application (containing elements required by [WAC 181-85-045](#)), and the clock hours that educators self-report. This data is complicated by differing timelines: educators have up to five years to self-report the courses they complete, while the provider list changes annually. Additionally, clock hour course completion data may be incomplete because educators do not necessarily record all clock hour courses they attend (for instance, if they complete more than the 100 hours required for certification renewal). One notable data gap is the lack of information on the total clock hours each provider offers annually, as well as the number of educators who received the training.

## Assessment inquiry

It is important to know who clock hour providers are, including their strengths, weaknesses, and capacities, and how they interact within Washington's certification landscape. The professional development needs and experiences of both educators and school districts must also be understood.

The audit system and other updates must ensure both the quality and quantity of clock hour offerings. A robust assessment of the current clock hour system would serve as foundational understanding for the design of an audit system and other improvements, along with research into other states' systems, other professions with continuing education requirements, and other agencies that conduct investigations or audits. This assessment inquiry should address the following guiding questions:

What are the **strengths and weaknesses** of our current clock hour provider system?

What are the **profiles of Washington's current clock hour providers** (Including size, location, type and number of clock hour courses offered)?

Are there types of **providers who offer higher-quality or lower-quality courses**?

Are there types of **courses that are generally higher or lower quality** (for instance, in person vs. asynchronous online)?

Which aspects of the audit system should be the purview of **OSPI**, and which should be the purview of **PESB**?

## Research overview

Research considerations for the landscape analysis and assessment inquiry would likely include:

- Analyzing information available in our current systems, including approved provider data and information on clock hours logged by educators
- Investigating how continuing education is regulated in other states or in other professions that require continuing education (including medical, legal, and other professional areas)
- Researching current investigation and audit processes in other Washington state agencies, such as the Office of Professional Practice and the Office of the Education Ombuds
- Researching current usage and effectiveness of delivery modalities, including synchronous, asynchronous, and hybrid models
- Understanding best practices/policies to strengthen future professional learning for educators
- Conducting statewide surveys targeted to:



- **Clock hour providers and associated clock hour committees** to determine what courses are being offered, how they are being offered (in person, online, interactive or solo, etc.), and organizational characteristics (such as size, staffing, etc.)
- **Schools and school districts** to determine met and unmet needs, including clock hour content that is harder to find, use of outside providers, supports needed for districts to provide high-quality clock hours, etc.
- **Educators** to determine how educators receive clock hours, barriers to accessing high-quality clock hours, and experiences (positive and negative) with the clock hour system
- **Equity, leadership, and government-to-government clock hour providers** on an ongoing basis during the first year of implementation of the clock hour complaint system, to understand the complaint process and develop solutions for improvement.

The results of a landscape analysis and system assessment would guide the design and implementation of the audit system and other changes to the clock hour system. It would also be shared with stakeholders via a collaborative process for providers to both improve and understand new processes.

### External research contractor or increased PESB staffing

PESB aims to ensure that the landscape analysis and system assessment are conducted comprehensively and within an appropriate timeframe. Given current staffing capacities, this effort would require either temporarily increasing PESB staff or contracting an external third-party provider with the expertise to execute this work effectively. Since the landscape analysis and system assessment represent a one-time initiative, contracting with a third-party provider may be a more practical and efficient solution, avoiding the complexities associated with hiring temporary staff for the agency. Estimated costs of each option are included in the “estimated agency impact” section below.

### Estimated agency impact

LANDSCAPE ANALYSIS AND SYSTEMS ASSESSMENT	
<b>Duration</b>	Ten months estimated.
<b>Timing</b>	Landscape analysis and systems assessment would begin upon staff capacity increase being identified or contract execution with a third-party organization.
<b>Cost</b>	<p><i>Option 1:</i> PESB to contract with an external organization to complete landscape analysis and systems assessment. Estimated cost: \$130,000 as a one-time investment to conduct the landscape analysis and system assessment as described above.</p> <p><i>Option 2:</i> PESB is granted additional staffing in the amount of 1.5 FTE for one fiscal year.</p>

<b>Updates</b>	PESB staff to provide periodic updates at Board meetings. PESB to provide updates to the field via external communications (email, webinars, office hours).
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**Benefits and challenges of external vs. PESB-staffed research process**

	<b>Option 1: External contractor</b>	<b>Option 2: PESB-staffed research</b>
<b>Benefits</b>	<ul style="list-style-type: none"> <li>Identifying a contractor with quantitative and qualitative research background could result in higher quality assessment of the field</li> <li>Providers might be more candid in their responses to an external organization’s inquiries rather than with the state regulatory body</li> <li>Contractors are hired for a specific duration and cost and typically would have their own equipment (laptop, phone, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Increase agency familiarity with the details of the clock hours system</li> <li>Build relationships with organizations contacted as part of the research</li> </ul>
<b>Challenges</b>	<ul style="list-style-type: none"> <li>Concern about an unknown third party completing this work</li> <li>Higher cost</li> </ul>	<ul style="list-style-type: none"> <li>Potential difficulty finding quality candidates to hire for a temporary 10-month position</li> <li>Time and effort required to ensure a new hire has an agency-issued laptop, phone, K-12 email address, etc. and completes new employee training for a 10-month position</li> </ul>

## B. Stakeholder outreach and education

Using the data collected from the landscape analysis and assessment phase, PESB will conduct stakeholder outreach to gather feedback that informs the audit process, as well as to educate stakeholders about changes to the system. Such outreach would include one or more of the following components:

### Listening sessions

Host listening sessions for clock hour providers, educators, districts, and community members to learn about the most pressing challenges of the current clock hour system as well as solicit feedback and ideas for system improvement. Potential questions include: How does the current clock hour system affect educators? Do educators feel that the offerings are making them better educators? What do they see as areas for growth?

## Workgroup meetings

Convene a workgroup to consider the best approaches to clock hour system improvements, including consideration of a phased audit process. The workgroup should be comprised of a variety of stakeholders, such as clock hour providers, school districts, Tribal compact schools, OSPI, and educators.

## Webinars

Host webinars for clock hour providers and educators to provide information on upcoming changes to the system, including the complaint process, the new application process, and the audit system.

PESB recommends conducting stakeholder outreach and education using current PESB staff. No additional costs are anticipated to complete this work.

## Estimated agency impact

STAKEHOLDER OUTREACH	
<b>Duration</b>	Eight months estimated for design and implementation of workgroups. Other stakeholder outreach (webinars, listening sessions, and surveys) would be completed during the landscape analysis and systems assessment phase.
<b>Timing</b>	Outreach workgroups will begin once the landscape analysis and systems assessment is complete. Other elements of outreach (webinars, listening sessions and surveys) may occur during the landscape analysis and systems assessment phase.
<b>Cost</b>	Current PESB staff to conduct outreach; no additional cost anticipated.
<b>Updates</b>	Staff to provide periodic updates at Board meetings. PESB to provide updates to the field via external communications (email, webinars, office hours).

## C. Implement an audit process

After completing a comprehensive landscape analysis and feedback from various stakeholders, PESB recommends developing and implementing the new audit system for clock hour providers, either as a staff-based function or by contracting with a third party contractor. *The specific requirements of this system will be determined by the information gathered from the landscape analysis and feedback.*

Historically, PESB has focused on regulation, standards, and policymaking. Currently, PESB does not yet have the necessary expertise to implement a comprehensive audit system. If the audit system is implemented as a staff-based function, additional training and staff FTEs would be required to build PESB staff capacity to maintain an audit system.

If contracting with a third party auditor, the implementation of a new audit system would be co-created with PESB staff input, utilizing the contractor’s previous knowledge and experience with other audit systems. This

recommendation takes into account PESB’s lack of historical experience conducting audits and the fact that OSPI, as an approved clock hour provider, would not be available for a self-audit. Contracting with an outside auditor would require additional research and staff time related to the contract process.

## Considerations for developing an audit process

There are a variety of possible components that could be included in an audit process, depending on the needs determined by the landscape analysis and stakeholder outreach. For example:

- **Annual reports and self-assessments:** Require providers to submit annual reports and self-assessments to complement the audit system. These reports could include information such as the number of courses offered, number of educators served, course names, content areas, and reflective narratives.
- **Phased approach and iterative feedback loops:** Implement a phased approach with iterative feedback loops to support continuous improvement for providers.
- **Provider selection for audit:** Providers could be selected for audits through various methods, such as random selection, a risk-based approach, or other criteria.
- **Peer auditing participation:** The system could allow providers to participate in auditing their peers, similar to the PESB program review process.
- **Evidence of compliance:** Audited providers would be required to show evidence of meeting standards, such as agendas, attendance records, instructor qualifications, participant evaluations, alignment with state standards, and budget reports.
- **Audit levels:**
  - **Asynchronous, low-touch audit:** A review of self-assessments, evidence documents, and reported data, primarily conducted through asynchronous communication (e.g., email).
  - **Synchronous, higher-intervention audit:** A more involved audit with a virtual meeting between the provider and clock hour committee members.
- **Audit scale based on provider size:** The audit process could vary based on the size and scale of the provider. For instance, providers offering above or below a certain threshold of courses each year may be subject to different levels of audit.
- **Consequences of audit outcomes:** There would be various levels of consequences depending on the audit findings.

## PESB-based process or third-party contractor

The development and implementation of a new audit process could be accomplished either with increased in-agency staffing or by contracting with a third-party auditor. The decision as to which option is optimal will depend, in part, on the results of the landscape analysis and the specific requirements of the audit system. Estimated costs of each option are included in the “estimated agency impact” section.

## Estimated agency impact

IMPLEMENTATION OF AUDIT PROCESS		
<b>Duration</b>	Ten months estimated.	
<b>Timing</b>	Audit process design to begin once completion of landscape analysis and system assessment are complete.	
<b>Cost</b>	<p><i>Option 1:</i> PESB to contract with an external organization to design and implement an audit process for clock hour providers. The estimated cost of a third-party contract is unknown.</p> <p><i>Option 2:</i> Increase PESB staffing to successfully design, implement, and maintain a comprehensive audit system. Anticipated need for additional 2.0 - 3.0 FTE permanent PESB staff to manage the audit system.</p>	
<b>Updates</b>	Staff to provide periodic updates at Board meetings. PESB to provide updates to the field via external communications (email, webinars, office hours).	
Benefits and challenges of external auditor vs. PESB-staffed audits		
	<i>Option 1: Contracted auditor</i>	<i>Option 2: PESB-staffed audits</i>
<b>Benefits</b>	<ul style="list-style-type: none"> <li>• Larger capacity: could perform more frequent in-depth audits of providers</li> <li>• Lower potential for being subject to litigation risk</li> <li>• Higher likelihood that stakeholders see the process as neutral and fair</li> </ul>	<ul style="list-style-type: none"> <li>• Possible shorter implementation time without the search for a contracted specialist</li> <li>• Potentially lower cost</li> </ul>
<b>Challenges</b>	<ul style="list-style-type: none"> <li>• Contract cost</li> <li>• Time needed for contractor selection and contract execution</li> </ul>	<ul style="list-style-type: none"> <li>• Limited staff capacity would mean fewer audits performed</li> <li>• Need for additional staff research</li> <li>• Need for additional FTEs</li> <li>• Extra time needed to hire additional staff</li> </ul>

## OTHER RECOMMENDATIONS FOR IMPROVEMENT OF THE CLOCK HOUR SYSTEM

### Recommendation #1: Expand complaint process to all providers

Using the knowledge gained from building the new complaint and revocation process for equity, leadership, and government-to-government clock hour providers, expand the system to apply to all clock hour providers.

PESB recognizes the importance of improving the quality and relevance of all clock hours, not just those pertaining to equity-based school practices, school leadership, and government-to-government relations. Therefore, PESB recommends expanding the complaint process to all clock hour providers. By starting these system improvements at a limited level, PESB will have a better idea of: 1) the number of complaints to expect with an expanded policy; 2) the workload associated with investigating complaints; and 3) the impact of this new system on the field.

The new complaint process for equity, leadership, and government-to-government clock hour providers will be implemented in the 2025-26 school year; a revised and potentially expanded complaint system would be implemented after receiving feedback on the initial, smaller system.

Introducing the complaint process in two stages will allow a staggered implementation of these system improvements, creating less confusion within the field. Providers and educators will have time to learn and adjust to the new policies, creating space for clock hour providers to align their practices with updated policies and strengthening the clock hour system as a whole.

To allow for a smooth transition to this expanded process, this recommendation entails four steps:

1. **Gather implementation feedback** from the field
2. **Make adjustments** as needed to build out complaint system capacity
3. **Build out PESB staff's capacity** to support an expanded complaint process
4. **Expand the complaint system** to apply to all clock hour providers

## Estimated agency impact

EXPAND COMPLAINT PROCESS TO ALL PROVIDERS	
<b>Duration</b>	To be determined.
<b>Timing</b>	Implementation of an expanded complaint process for all providers would take place after sufficient information is gathered about the complaint process for equity and leadership clock hour providers, which would inform adjustments and expansion.
<b>Cost</b>	Once PESB gains a clearer idea of the number of complaints and associated workload expected within an expanded complaint system, additional costs, if any, can be determined.
<b>Updates</b>	Staff to provide periodic updates at Board meetings. PESB to provide updates to the field via external communications (email, webinars, office hours).

## Recommendation #2: Clock hour provider software

In order for PESB to begin accepting provider applications directly, collect more application information, track complaints, and monitor audits, PESB recommends deploying a comprehensive software application, such as Customer Relationship Management (CRM) software or similar.

### Changes to provider applications

Each year, PESB approves approximately 450 clock hour providers, not including local education agencies (LEAs) such as school districts.

Previously, OSPI’s Certification Office received and reviewed applications. OSPI collected applications through Alchemer, an online survey software, then forwarded to PESB lists of providers whose applications were complete and incomplete. At the annual September Board meeting, PESB approved the list of clock hour providers who submitted complete applications, with provider approval status effective from October 1 through September 30 of the following year. The application ensured that organizations met the requirements of [WAC 181-85-045](#) (i.e. it was a type of organization legislatively allowed to provide clock hours with a clock hour committee to oversee their work).

[HB 1377](#) made important changes to the clock hour provider application process. Elements of the updated application include: (a) a mission and vision statement; (b) the entity’s experience and expertise in providing professional development to educators generally as well as specific experience and expertise in equity-based

practices; (c) possible subject matter topics of continuing education to be provided by the entity; (d) information on clock hour pricing; and (e) transcript processes. ([WAC 181-85-045](#)).

Also, beginning with the 2025-26 school year, HB 1377 states that “entities must submit an application to the professional educator standards board.” Locating the provider application process within PESB creates a more thorough vetting process and enables streamlined communication with providers. However, as PESB begins accepting and processing applications, updated infrastructure is required.

## Application software options

In order to collect, review, and respond to applications from potential clock hour providers, PESB will select and deploy an integrated software application. Benefits of such a system include:

- Efficient processing of a high volume of provider applications in a timely manner
- Ability to utilize a searchable database of clock hour provider profiles
- Integrated email communication with applicants and providers
- Ability to track progress on annual applications, complaints, and audit processes
- Ability to link complaint and audit findings to specific providers
- Development of a more robust data system to better understand the clock hour landscape

Selected software must be: user-friendly; customizable; include ongoing software support; and conform to Washington state requirements for data retention, public records requests, and cybersecurity.

Once the new application system is complete, PESB staff will create recorded training sessions and schedule open Zoom office hours to ensure all applicants are able to navigate the new software.

## Estimated agency impact

CLOCK HOUR PROVIDER APPLICATION: SOFTWARE	
<b>Duration</b>	Six months for software selection, customization, training, and deployment.
<b>Timing</b>	Upon software selection and available funding
<b>Cost</b>	<ul style="list-style-type: none"> <li>• Software design, training and startup: TBD (one time expense)</li> <li>• Software subscription and service costs: TBD (ongoing, yearly)</li> </ul>
<b>Updates</b>	Staff to provide periodic updates at Board meetings. PESB to provide updates to the field via external communications (email, webinars, application office hours).



<p><b>Benefits</b></p>	<ul style="list-style-type: none"> <li>● Integrated email communication</li> <li>● Ability to track progress on annual applications, complaints, and audit processes</li> <li>● Ability to link complaint and audit findings to a provider profile</li> <li>● Development of a more robust data system to better understand the clock hour landscape</li> <li>● Potential to cross train software to benefit other PESB processes (course review, educator preparation program approval, educator preparation program review, etc.)</li> </ul>
<p><b>Challenges</b></p>	<ul style="list-style-type: none"> <li>● Additional cost</li> <li>● Timeline for implementation</li> </ul>

## CONCLUSION

Washington's clock hour system plays a critical role in supporting over 70,000 educators and 1.1 million students by providing essential continuing education for certification renewal. However, the current system faces significant challenges, particularly due to a lack of comprehensive oversight and data management. The fragmented data environment hinders the ability to evaluate the effectiveness of professional development and make informed decisions on system improvements.

To address these issues, the Professional Educator Standards Board (PESB) recommends the implementation of an audit process and an integrated data collection process to enhance oversight, accountability, and adaptability to the evolving needs of educators. Key actions include conducting a landscape analysis, engaging stakeholders, and adopting best practices for an audit process, along with expanding the complaint process and updating the application system.

By implementing these recommendations, the clock hour system can be transformed into a more efficient and equitable platform, ultimately improving educator effectiveness and student outcomes across the state.

## APPENDIX A: CLOCK HOUR TYPES

### Equity-based school practices ([read more](#))

As part of the 100 clock hours for certificate renewal, teachers and administrators must complete clock hours, professional growth plans (PGPs), or credits focused on equity-based school practices aligned to the cultural competency, diversity, equity, and inclusion (CCDEI) standards. Teachers must complete 15 clock hours or the equivalent for certificate renewal, and administrators need to complete 10 clock hours or the equivalent.

Educators can meet the equity-based school practices certificate renewal requirement by maintaining a valid NBPTS National Board certificate.

Whether or not an educator must meet the equity renewal requirement is dependent upon the certificate(s) they hold, not on their job assignment.

Educators with residency, professional, initial, and continuing certificates in the following certificate roles must meet this requirement:

- Teachers: including teacher and CTE teacher certificates
- Administrator: principal, program administrator, CTE director, superintendent

### Educational leadership ([read more](#))

As part of the 100 clock hours for certificate renewal, administrators must complete 10 clock hours, or the equivalent in credit or PGPs, focused on [national professional standards for education leaders](#).

Whether or not an educator must meet the educational leadership renewal requirement is dependent upon the certificate(s) they hold, not on their job assignment. Educators with residency, professional, initial, and continuing certificates in the following roles must meet this requirement:

- Administrator: principal, program administrator, CTE director, superintendent

### Government-to-government relations ([read more](#))

As part of the 100 clock hours for certificate renewal, administrators must complete five clock hours focused on government-to-government relations with federally recognized tribes. The government-to-government relations requirement cannot be met with a professional growth plan.

Whether or not an educator must meet the government-to-government relations requirement is dependent upon the certificate(s) they hold, not on their job assignment.

Educators with residency, professional, initial, and continuing certificates in the following certificate roles must meet this requirement:

- Administrator: principal, program administrator, CTE director, superintendent

## Science, Technology, Engineering, and Math (STEM) integration ([read more](#))

Educators submitting renewal applications for residency, professional, initial, and continuing teacher and CTE teacher certificates with STEM-related endorsements must document completion of at least 15 clock hours, the equivalent in credit, or at least one goal from an annual professional growth plan (PGP), with an emphasis on STEM integration.

STEM integration is the authentic combination of at least two STEM components (science, technology, engineering, mathematics). Whether or not a teacher needs to meet this requirement depends on their certificate's endorsements, not on their job assignment. Teachers with one or more of the following endorsements must meet this requirement:

- Agriculture Education
- Business and Marketing Education
- Computer Science
- CTE (All Areas)
- Designated Sciences: Biology, Chemistry, Physics, Earth & Space Science
- Early Childhood Education
- Elementary Education
- Family and Consumer Sciences Education
- Mathematics; Middle-Level Mathematics
- Science; Middle-Level Science
- Technology Education

National Board Certified Teachers (NBCTs) meet the STEM certificate renewal requirement by maintaining a valid National Board certificate.

## Other clock hour types

There are other types of clock hours and clock hour equivalents, such as Social Emotional Learning (SEL), State Training and Registry System (STARS), suicide prevention training, Professional Growth Plan (PGP) completion for clock hours, activity-based clock hours, and more. The clock hour types listed above are those that have minimum requirements attached for the educator role types considered in this report (teacher and administrator). Clock hour offerings that do not fall under one of the types listed above may be considered "general" clock hours to count toward certificate renewal.

## APPENDIX B: CLOCK HOUR DELIVERY METHODS

Clock hour courses are offered in various formats. Educators can select the delivery method that works best for them.

Below are the different delivery methods for clock hour courses:

### **Asynchronous courses**

Courses are offered in an online format, and educators engage with the course at their own pace and on their own time. These courses are often completed by an educator alone.

### **Synchronous courses**

Courses are offered in an online format at a set time and pace. Educators complete these courses alongside other educators in the online course.

### **In-person courses**

Courses are offered at a set time and location. Educators complete these courses with a group of educators who are also present.

### **Online courses**

Courses are offered online. They are often held at a set time, and educators complete them with the group of educators attending the course.

### **Hybrid courses**

Courses are offered both online and in person. They are often at a set time and place, and educators complete them with the group of educators attending the course.

The Professional Educator Standards Board

Old Capitol Building  
600 Washington Street SE  
Olympia, WA 98504-7236  
PESB@k12.wa.us  
Paraboard@k12.wa.us  
(360) 725-6275

*This document is available in alternative formats to accommodate persons with disabilities. Copies of this document can be obtained in alternative formats by calling [\(360\) 725-6275](tel:3607256275) or emailing [pesb@k12.wa.us](mailto:pesb@k12.wa.us).*

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