

**Recommendations by the Accreditation Team and Report of Findings of the
Accreditation Visit for Professional Preparation Programs at
Kings County Office of Education**

Professional Services Division

May 2020

Overview of this Report

This agenda report includes the findings of the accreditation visit conducted at **Kings County Office of Education**. The report of the team presents the findings based upon a thorough review of all available and relevant institutional and program documentation as well as all supporting evidence including interviews with representative constituencies. On the basis of the report, a recommendation of **Accreditation** is made for the institution.

**Common Standards and Program Standard Decisions
For All Commission Approved Programs Offered by the Institution**

Common Standards	Status
1) Institutional Infrastructure to Support Educator Preparation	Met
2) Candidate Recruitment and Support	Met
3) Course of Study, Fieldwork and Clinical Practice	Met
4) Continuous Improvement	Met
5) Program Impact	Met

Program Standards

Programs	Total Program Standards	Met	Met with Concerns	Not Met
Induction	6	6	0	0

The site visit was completed in accordance with the procedures approved by the Committee on Accreditation regarding the activities of the site visit:

- Preparation for the Accreditation Visit
- Preparation of the Institutional Documentation and Evidence
- Selection and Composition of the Accreditation Team
- Intensive Evaluation of Program Data
- Preparation of the Accreditation Team Report

**California Commission on Teacher Credentialing
Committee on Accreditation
Accreditation Team Report**

Institution: Kings County Office of Education

Dates of Visit: April 27-29, 2020

Accreditation Team Recommendation: Accreditation

Previous History of Accreditation Status

Accreditation Reports	Accreditation Status
April 2011 Accreditation Report	Accreditation with Probationary Stipulations
June 2012 Accreditation Report	Accreditation

Rationale:

The unanimous recommendation of Accreditation was based on a thorough review of all institutional and programmatic information and materials available prior to and during the accreditation site visit including interviews with administrators, faculty, candidates, graduates, and local school personnel. The team obtained sufficient and consistent information that led to a high degree of confidence in making overall and programmatic judgments about the professional education unit’s operation. The decision pertaining to the accreditation status of the institution was based upon the following:

Preconditions

After review of all relevant preconditions for this institution, all preconditions have been found to be aligned for Kings County Office of Education.

Program Standards

After review of the institutional report, supporting documentation, completion of interviews with candidates, completers, staff, employers, mentors, and Advisory Board Members, the team determined that all program standards are **Met** for the Teacher Induction Program of Kings County Office of Education.

Common Standards

After review of the institutional report, supporting documentation, completion of interviews with candidates, completers, staff, employers, mentors, and Advisory Board Members, the team determined that all common standards are **Met** for the Teacher Induction Program of Kings County Office of Education.

Overall Recommendation

Based on the fact that the team found that all standards for the Teacher Induction Program were met and that all Common Standards were met, the team recommends Accreditation.

On the basis of this recommendation, the institution is authorized to offer the following credential program and to recommend candidates for the appropriate and related credentials upon satisfactorily completing all requirements.

Teacher Induction

Clear Administrative Services Credential (Approved November 2018)

In addition, staff recommends that:

- The institutions response to the preconditions be accepted
- Kings County Office of Education be permitted to propose new educator preparation programs for approval by the Committee on Accreditation.
- Kings County Office of Education continue in its assigned cohort on the schedule of accreditation activities, subject to the continuation of the present schedule of accreditation activities by the Commission on Teacher Credentialing.

Accreditation Team

Team Lead:

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Programs Reviewers:

Susan Kelleher Holtz
Anaheim Elementary School District

Common Standards:

Beth Littrell
San Mateo Foster City School District

Staff to the Visit:

Bob Loux
Commission on Teacher Credentialing

Documents Reviewed

Common Standards Submission
Program Review Submission
Common Standards Addendum
Common Standards Feedback
Program Review Addendum
Course of Study
Candidate Advisement Materials
Accreditation Website
Faculty Vitae
Program Organizational Charts
KCOE Employee Agreements
Candidate File
Assessment Materials
Candidate Handbooks

Budget Reports
Survey Results
Performance Expectation Materials
Precondition Responses
Program Agreements-MOU
Fieldwork Logs
Candidate Expectation Materials
Job Descriptions
Advisory Board Agendas
PDSA Documents
Accreditation Data Dashboard
Program Evaluations
Completed ILPs

Interviews Conducted

Stakeholders	TOTAL
Candidates Year 1	23
Candidates Year 2	31
Completers	14
ECO Candidates	2
Employers/Administrators	14
Institutional Administration	4
Program Coordinators	3
Mentors	52
Credential Analysts and Staff	3
Advisory Board Members	12
TOTAL	158

Note: In some cases, individuals were interviewed by more than one cluster because of multiple roles. Thus, the number of interviews conducted exceeds the actual number of individuals interviewed.

Background Information

Kings County is located in the Central Valley, in a rich agricultural region. The county seat is Hanford. Kings County Office of Education consists of 28,000 students in 13 different districts. The demographics of Kings County include 54% White/Hispanic, 7% African American, 3% Asian, and 36% from other races. The Kings County Office of Education’s vision is to “Empower educators to effectively implement California’s standards and frameworks so that all students reach their full potential by providing support through the collaboration of KCOE, program mentors and coaches, school and district administrators, and teachers.” The mission of the organization is to enhance educator knowledge, develop educator proficiency and increase educator effectiveness.

The Induction program serves 107 new teachers in their first and second years of induction, supported by 71 coaches/mentors. The KCOE Induction program follows the models of typical Induction programs across the State of California with an emphasis on coaching/mentoring that guides new teachers through their first two years of job embedded experiences. The program is guided by an Advisory Board consisting of 16 members representing both K-12 and higher education.

Table 1: Program Review Status

Program Name	Number of Program Completers (2018-19)	Number of Candidates Enrolled (2019-20)
Induction	47	107

The Visit

The Clear Administrative Services Credential was not reviewed because it was only approved in November of 2018, and had not had a completing cohort.

While the entire site visit took place online, it proceeded in accordance with all normal accreditation protocols, including documents reviewed and interviews conducted online. Documents were reviewed through a well-developed program website, as well as the program’s public website. All interviews took place via Zoom.

PRECONDITION FINDINGS

After review of all relevant preconditions for this institution, all have been determined to be met.

PROGRAM REPORTS

Teacher Induction

Program Design

The Kings County Office of Education New Teacher Induction program has a team which includes: New Teacher Induction Director, Curriculum Consultant, Training and Development Technician, and 2 part-time consultants for General Education and Special Education. There is also one Credential Analyst and one Credential Technician.

The program serves 107 candidates, 71 Mentors, and partners with 13 school districts throughout the Central Valley. This also includes the participation of IHEs: California State University, Fresno, Fresno Pacific University, Brandman University, and University of Phoenix.

The New Teacher Induction Program team oversees the Induction Program and participates in all Induction related meetings, trainings, check-ins, and school site visits. During interviews with mentors and candidates the following statements were made to describe the program leadership and the overall experience of the KCOE New Teacher Induction Program.

“The NTI is personalized, flexible, supportive, well organized, and individualized.”

“I never felt like a number, I was treated as a person, and the Induction Leaders really wanted to get to know me on a professional and personal level.”

“They would visit me, and see me in my home, my classroom, and get to know me as a teacher and a person.”

“The PDSA actually connected and correlated to what I was already doing in my classroom and my learning was significant.”

“At Mentor meetings we have fun and participate in many ice breaker activities.”

Kings County Office of Education selects mentors based on the CTC standards and mentors are recommended and submitted by individual site Administrators and Districts. Once recommendations are submitted, pairing of candidates and mentors occurs by Induction staff. Recommended mentors then complete an interest form and take a personality test to ensure appropriate candidate and mentor matches occur. If changes throughout the year need to be made between a mentor and a candidate, Induction staff is notified and a mentor/candidate change process occurs.

New mentors attend a full-day orientation and returning mentors attend half-day training. Mentors are also trained once a month during mentor meetings. These trainings include:

Cognitive Coaching, Paula Rutherford, Milestones database and Individual Learning Plan navigation and implementation. Mentors also select one goal per year from the Continuum of Mentoring Practice and may attend optional trainings to support their own personal growth and learning. There are currently 71 full time mentors from the 13 Districts in the consortium.

Mentors conduct observations of their candidates. Mentors also complete candidate meeting logs to document weekly hour-long meetings as well as give program feedback through Mid-Year and End of Year Surveys. The Induction Program team monitors these logs and if deficiencies occur or weekly mentor/candidate meetings are not taking place steps are taken to communicate with mentors and candidates to individually address concerns.

All stakeholders have ample opportunities to give feedback to the Induction Program. All stakeholders complete a Mid-Year Survey as well as an End of the Year Survey. Stakeholders have also had the opportunity to give feedback using Peardeck and at informal check-ins during Induction meetings.

Most changes to the program are as result of stakeholder feedback, surveys and evaluations. It was shared by the Advisory Board that professional development was offered in the past at inopportune times. Due to this feedback PD is now offered after school hours and attended by many more participants. Another example of how feedback has impacted choices and changes made by the KCOE Induction Program is the decision to transition from action research to the Plan-Do- Study-Act (PDSA) cycle of inquiry. During interviews Year 1 and Year 2 candidates consistently shared how the PDSA was much more valuable to their individual learning and growth than the previous course of study.

Course of Study (Curriculum and Field Experience)

KCOE New Teacher Induction Program is designed to meet the individual needs of each candidate and assist them in growing as a professional educator. California Standards for the Teaching Profession (CSTP), Induction Program Standards (IPS), and Academic Content Standards serve as the foundation for the program. Candidates receive a minimum of 40 hours of support from trained, district selected, program approved mentors, and the KCOE Induction Leadership Team as they self-assess, identify areas of needed growth, collaborate, use data, and participate in ongoing reflection. All experiences are designed to encourage professional growth and improve student learning. All Candidates begin their Induction experience with an exploration of the CSTP. Mentors discuss the CSTPs with their candidates and use the Continuum of Teaching Practice (CTP) to support candidates in identifying their current levels of development and areas for growth. The Continuum is a tool the Candidate and Mentor return to and reflect upon repeatedly throughout the two year program.

The CTP self-assessment drives the candidate's development of their Individualized Learning Plan (ILP) goals. All candidates begin the program in collaboration with their mentors, administrators, and New Teacher Induction program staff to create an annual ILP based on self-

identified areas of growth as indicated on the CTP. A collaborative meeting is held with the site administrator and mentor after goals are written. Discussions are focused on support each candidate needs to achieve these goals. Goals are fluid and as candidates develop as educators they have the option to reflect on and revise their goals. Once goals are written and shared with site administrators, the candidate is ready to begin selecting four observation experiences that support growth and meet the candidate's needs. Candidates may select any combination of peer, candidate, or self-observation (video). Each observation cycle includes a reflective follow-up conversation with the mentor. Additionally, candidates are expected to discuss and reflect upon a conversation with a veteran educator based on CSTP 5.

ILP growth goals also play a role in the creation of a focus question that will be explored through a 6 week cycle of Plan-Do-Study-Act (PDSA) cycle of inquiry. Mentors and the KCOE Leadership Team support candidates as they use PDSA to impact student learning and classroom effectiveness. Candidates with mentor support, meet with the site administrator to reflect upon data, results, and the overall experience. Year 1 candidates present their data and results to other candidates and mentors during the Colloquium. Year 2 and ECO candidates participate in Exit Presentations during which their PDSA is shared with a panel of county-wide administrators and/or leaders in education. Both culminating experiences provide feedback opportunities. In addition to program requirements, candidates are encouraged to participate in optional trainings offered by KCOE, including a Professional Learning Series for Teachers (math, science, technology, ELA, ELD) and Positive Discipline in the Classroom series.

The New Teacher Induction Program provides a wide variety of workshops, training, and network opportunities targeted for different audiences involved in all levels of the program. Program directors, site and district administrators, mentors, and new teacher candidates engage in local and/or state-level professional learning according to their individual and/or group needs. Support and professional learning opportunities for candidates are locally designed and implemented within their context and according to program standards and credential requirements.

Assessment of Candidates

Candidates are ensured a high quality Induction experience through an extensive peer program review process. Program stakeholders and leaders use a structured, data-based process to assess and improve the quality of the program and in order to assure alignment with Induction Program standards. Each year, program staff engages in a rigorous self-study and review of documents and evidence for quality assurance. Program accountability is further monitored through the CCTC Accreditation system.

Formative assessment occurs through observation (Mid-Year Chats, Colloquium/Exit Presentations), mentor conversation and review of documents housed within InductionSupport.com. The New Teacher Induction Leadership Team monitors progress, provides feedback and uses this information to guide and assist candidates in attainment of

program requirements. Candidates are informed of New Teacher Induction formative assessments through meetings (orientation and one on one individual training/meetings), due date calendar, handbook, and newsletters. Progress monitoring comes via comments within InductionSupport.com, email, phone conversations, contact made during meetings, and site support visits. The following items are used as formative assessments: Continuum of Teaching Practice (ongoing use at meetings), Action Research/PDSA (uploaded by candidate into InductionSupport.com) (Inquiry), Mid-Year Chats, Colloquium (Year 1) and Exit Presentation (Year 2/ECO).

Upon completion of Exit Presentations, approved candidates immediately meet with the Credential Analyst and New Teacher Induction Team and review the necessary paperwork to apply for a Clear Credential. The Credentials Analyst explicitly explains the process to each candidate and credential applications are closely monitored by the New Teacher Induction Team until each candidate has applied for their credential and payment has been submitted.

Findings on Standards

After review of all available information including interviews with candidates, program completers, program personnel, mentors, coaches, and other stakeholders, the team determined that all program standards are **Met** for the Kings County Office of Education Induction program.

COMMON STANDARDS FINDINGS

Common Standard 1: Institutional Infrastructure to Support Educator Preparation	Team Finding
Each Commission-approved institution has the infrastructure in place to operate effective educator preparation programs. Within this overall infrastructure:	<i>No response needed</i>
The institution and education unit create and articulate a research-based vision of teaching and learning that fosters coherence among, and is clearly represented in all educator preparation programs. This vision is consistent with preparing educators for California public schools and the effective implementation of California’s adopted standards and curricular frameworks.	Consistently
The institution actively involves faculty, instructional personnel, and relevant stakeholders in the organization, coordination, and decision making for all educator preparation programs.	Consistently
The education unit ensures that faculty and instructional personnel regularly and systematically collaborate with colleagues in P-12 settings, college and university units and members of the broader educational community to improve educator preparation.	Consistently
The institution provides the unit with sufficient resources for the effective operation of each educator preparation program, including, but not limited to, coordination, admission, advisement, curriculum, professional development/instruction, field based supervision and clinical experiences.	Consistently
The Unit Leadership has the authority and institutional support required to address the needs of all educator preparation programs and considers the interests of each program within the institution.	Consistently
Recruitment and faculty development efforts support hiring and retention of faculty who represent and support diversity and excellence.	Consistently
The institution employs, assigns and retains only qualified persons to teach courses, provide professional development, and supervise field-based and clinical experiences. Qualifications of faculty and other instructional personnel must include, but are not limited to: a) current knowledge of the content; b) knowledge of the current context of public schooling including the California adopted P-12 content standards, frameworks, and accountability systems; c) knowledge of diversity in society, including diverse abilities, culture, language, ethnicity, and gender orientation; and d) demonstration of effective professional practices in teaching and learning, scholarship, and service.	Consistently
The education unit monitors a credential recommendation process that ensures that candidates recommended for a credential have met all requirements.	Consistently

Finding on Common Standard 1: Met

Summary of information applicable to the standard

The Kings County Office of Education has an articulate vision to empower educators so that all students reach full potential. A strong leadership team consisting of two program directors, a Training and Development Technician, and three consultants implement this vision with the active involvement of participating districts, mentors, candidates, and other stakeholders. Mentors, candidates, and Advisory Board members noted that the team was approachable, organized, and had systems of support that ensured candidate success. Each candidate is matched with a mentor recommended by the site administrator based on criteria consistent with Commission standards. One member of the advisory noted that the program leadership across the county is inclusive, open-minded, and accepting. That advisory member concluded, “This is a safe place for people to be and express themselves.” Several stakeholders commented on the responsiveness of the team to make changes that meet candidate needs. A dedicated Technician monitors and tracks ILP entries and mentor logs to ensure that all candidates have met the defined requirements.

Common Standard 2: Candidate Recruitment and Support	Team Finding
Candidates are recruited and supported in all educator preparation programs to ensure their success.	<i>No Response Needed</i>
The education unit accepts applicants for its educator preparation programs based on clear criteria that include multiple measures of candidate qualifications.	Consistently
The education unit purposefully recruits and admits candidates to diversify the educator pool in California and provides the support, advice, and assistance to promote their successful entry and retention in the profession.	Consistently
Appropriate information and personnel are clearly identified and accessible to guide each candidate’s attainment of program requirements.	Consistently
Evidence regarding progress in meeting competency and performance expectations is consistently used to guide advisement and candidate support efforts. A clearly defined process is in place to identify and support candidates who need additional assistance to meet competencies.	Consistently

Finding on Common Standard 2: Met

Summary of information applicable to the standard

Candidates who hold a preliminary credential are eligible for this program, and all eligible candidates receive service in the first year. Demographic data shows significant diversity in the

educator pool for this county. Mentors guide candidates' completion and document at least one hour per week of individualized support in a weekly log that is monitored by the institution. This consortium supports many local school districts in the county, and interviews with candidates, mentors, and administrators revealed that each candidate is mentored individually and with respect. "We are not a number or a statistic to 'the ladies.'" The criteria for early completion are clearly established and applied across all districts in the consortium, and the program technician carefully tracks the progress of each candidate, communicating individually with the candidate and mentor about progress toward mastery of their ILP and other program requirements, called Milestones. While the program does provide a recommended timeline for candidates, those are recommendations instead of absolute dates, and accommodations are made for individual circumstances so that all candidates are complete by the end-of-year activity where they share their success.

Common Standard 3: Fieldwork and Clinical Practice	Team Finding
The unit designs and implements a planned sequence of coursework and clinical experiences for candidates to develop and demonstrate the knowledge and skills to educate and support P-12 students in meeting state-adopted content standards.	Consistently
The unit and its programs offer a high-quality course of study focused on the knowledge and skills expected of beginning educators and grounded in current research on effective practice. Coursework is integrated closely with field experiences to provide candidates with a cohesive and comprehensive program that allows candidates to learn, practice, and demonstrate competencies required of the credential they seek.	Consistently
The unit and all programs collaborate with their partners regarding the criteria and selection of clinical personnel, site-based supervisors and school sites, as appropriate to the program.	Consistently
Through site-based work and clinical experiences, programs offered by the unit provide candidates with opportunities to both experience issues of diversity that affect school climate and to effectively implement research-based strategies for improving teaching and student learning.	Inconsistently
Site-based supervisors must be certified and experienced in teaching the specified content or performing the services authorized by the credential.	Consistently
The process and criteria result in the selection of site-based supervisors who provide effective and knowledgeable support for candidates.	Consistently
Site-based supervisors are trained in supervision, oriented to the supervisory role, evaluated and recognized in a systematic manner.	Consistently
All programs effectively implement and evaluate fieldwork and clinical practice.	Consistently
For each program the unit offers, candidates have significant experience in school settings where the curriculum aligns with California’s adopted content standards and frameworks, and the school reflects the diversity of California’s student and the opportunity to work with the range of students identified in the program standards.	Consistently

Finding on Common Standard 3: Met

Summary of information applicable to the standard

KCOE documented a continuous assessment cycle for the two years of teacher induction that was verified in interviews with program leadership, mentors, and candidates. The ILP includes

goals, resources, and measurable outcomes from the CSTP that were collaboratively planned with the mentor and site administrator. Program leadership monitors the ILP development, and often re-directs a mentor or candidate to focus more specifically on a measurable outcome. Documentation of candidate placement and the mentor nomination forms provide evidence of mentors that are certified and experienced in teaching the specific content of the candidate’s credential. Candidates, mentors, and administrators appreciated the outstanding opportunities for professional development that are offered free of charge to Induction candidates. Many districts provide extensive on-campus resources to help candidates implement research-based strategies for improving teaching and learning among a diverse group of students. The program director told the team that this was an expectation of the districts, and the team suggested that the program add something to **ensure** that **every** candidate addresses the unique needs of English Language Learners, students with an IEP, and other diverse populations named in the standards. Evidence presented, supported with interviews of candidates, mentors, administrators, an advisory that included a member from an IHE, and program completers verify that candidates in this program have significant experience in standards-aligned content and frameworks. Demographic data confirms the diversity in the classroom settings consistent with the range of students described in the standards.

Common Standard 4: Continuous Improvement	Team Finding
The education unit develops and implements a comprehensive continuous improvement process at both the unit level and within each of its programs that identifies program and unit effectiveness and makes appropriate modifications based on findings.	Consistently
The education unit and its programs regularly assess their effectiveness in relation to the course of study offered, fieldwork and clinical practice, and support services for candidates.	Consistently
Both the unit and its programs regularly and systematically collect, analyze, and use candidate and program completer data.	Consistently
The continuous improvement process includes multiple sources of data including 1) the extent to which candidates are prepared to enter professional practice; and 2) feedback from key stakeholders such as employers and community partners about the quality of the preparation.	Consistently

Finding on Common Standard 4: Met

Summary of information applicable to the standard

Candidates, Mentors, Advisory, and Program Leadership described a comprehensive continuous improvement process. In program meetings, stakeholders share strengths and areas of need, and then place colored dots next to the areas of most urgent need. When asked to define one example of a significant change, year two candidates and mentors cited the change from a six-week Action Research to the PDSA (Plan, Do, Study, Act) cycle of inquiry. The majority of

people who have been in the program for two years commented on the effectiveness of a specific action plan aimed at changing student outcomes. One mentor commented, “I love how the program takes suggestions to make this program better and better every year.” At the heart of the mentor-candidate collaboration, candidates complete an Individual Learning Plan in which they assess themselves on the Continuum of Teaching Practice related to the California Standards for the Teaching Profession (CSTP). Progress toward mastery of the CSTP is documented in that process, and is shared in a mid-year and end-of-year interview activity where teachers share the findings of their inquiry, which is based on a professional goal set in the ILP.

Common Standard 5: Program Impact	Team Finding
The institution ensures that candidates preparing to serve as professional school personnel know and demonstrate knowledge and skills necessary to educate and support effectively all students in meeting state adopted academic standards. Assessments indicate that candidates meet the Commission adopted competency requirements as specified in the program standards.	Consistently
The unit and its programs evaluate and demonstrate that they are having a positive impact on candidate learning and competence and on teaching and learning in schools that serve California’s students.	Consistently

Finding on Common Standard 5: Met

Summary of information applicable to the standard

Candidates are matched with a mentor that is recommended by each district’s site administrators. With that mentor, the candidate self-assesses on the Continuum of Teacher Practice, and then engages in two Plan-Do-Study-Act (PDSA) cycles of inquiry. Mentors present weekly logs that describe the activities of the week, and candidates defend the findings of their cycle of inquiry in a mid-year and end-of-year forum. Interviews with candidates, mentors, site administrators, and program leadership confirm that the candidate experience is making a positive impact on students in Kings County. One candidate said, “I attended several KCOE Professional Development Teacher Sessions. I now feel more confident in incorporating a variety of strategies within a single lesson to differentiate instruction.” Another said that the Positive Discipline work created positive rapport with the students. It is clear from the evidence presented and interviews with all stakeholders that the structures and people in this program work tirelessly to meet teacher needs so that they can better serve California’s students.

INSTITUTION SUMMARY

Data from candidates and mentors consistently show that this is a very strong program centered on individualized, job-embedded mentoring of candidates. Two directors, one categorical staff, and three coordinators at Kings County Office of Education manage the

program that coordinates with thirteen (13) districts in the county. This program currently serves 107 candidates in a county with approximately 28,000 students. Although this is a large program geographically spread across a wide area, the program staff takes the time to individualize the experience for each candidate. Candidates, mentors, and program leadership all spoke from different perspectives about the enormous impact made by a personal visit to each candidate during the year to answer questions, offer support, and create a personal connection. These personal connections drive a review process in which program leadership individually responds to mentor logs, Individual Learning Plans, and PDSA cycles of inquiry. Stakeholders were extremely pleased that the KCOE Induction program provides, free-of-charge to Induction Candidates, a wide menu of professional learning opportunities to support them in meeting the needs of their diverse student populations.

The program clearly engages in an ongoing cycle of continuous improvement. An Advisory Board with administrators from both K-12 and higher education, receives information about the program and any recommended changes, based on data provided in the form of surveys or face-to-face meetings, and then contributes ideas for future iterations of the induction program. Because the leadership of this program and other site leaders work together on standards-based curriculum, frameworks, and elements of the California Standards for the Teaching Profession (CSTP), they share common goals and a collaborative team approach. “We are friends here, and we know and are known personally by the people in this program, so Induction is intertwined with everything.”