

CLOCK HOURS COMPLAINT POLICY AND PROCEDURES

*For Equity, Leadership, and Government-to-Government
Clock Hour Courses*

September 2025



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INTRODUCTION

The Professional Educator Standards Board (PESB) oversees educator credentialing, including the continuing education credits (“clock hours”) required to maintain credentials.

In 2024, the legislature passed [HB 1377](#), which directed PESB to create a process to receive and resolve complaints about equity, leadership, and government-to-government clock hour providers.

[WAC 181.85.220](#) (“noncompliance - substantial compliance rule”) and [WAC 181.85.222](#) (“temporary or permanent revocation to continuing education provider status”) operationalize PESB’s responsibilities.

The complaint process is designed to ensure that equity, leadership, and government-to-government clock hour providers are held accountable to applicable standards so educators, students, and families benefit from high-quality continuing education. PESB staff will work collaboratively with clock hour providers throughout the complaint and revocation process to encourage resolution at the lowest level of intervention.

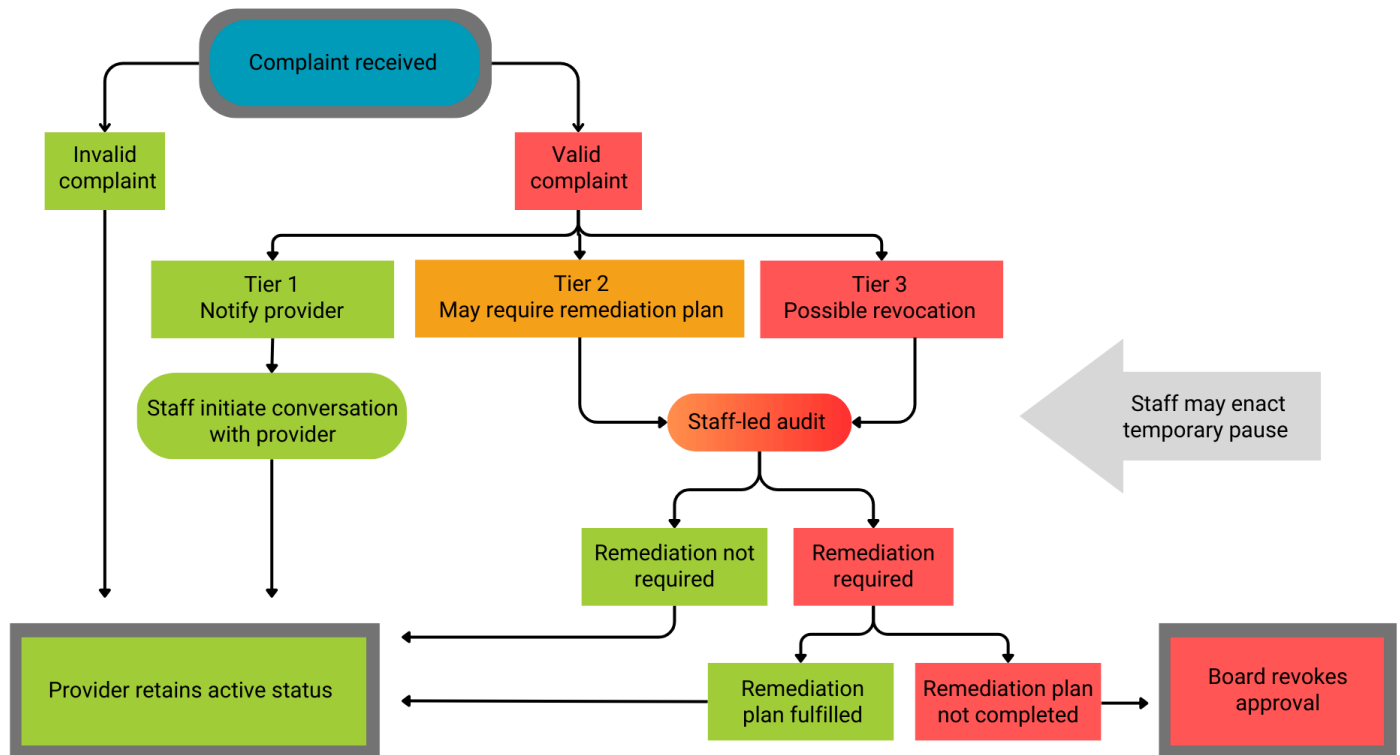
COMPLAINT PROCESS OVERVIEW

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.

Fig. 1: Complaint process flow chart



Filing a complaint

When possible, **complainants should contact the clock hour provider directly to resolve issues** prior to filing a complaint.

Complaints must be submitted to PESB **no more than 90 days** after the date of the alleged infraction. **PESB staff may extend this deadline if the complainant was in direct communication with the provider** regarding the complaint during that time.

Complaints can be filed by [downloading the complaint form](#) and emailing a completed version to clockhoursPESB@k12.wa.us. Complaints may only be submitted by:

- Washington state educators
- Local education agencies
- The Office of the Superintendent of Public Instruction (OSPI)
- Organizations representing principals
- Organizations representing school board members
- Organizations representing school administrators
- Labor organizations representing classified instructional staff, and
- Labor organizations representing teachers

Complaints may only be filed against equity, leadership, and government-to-government clock hour providers. The Legislature has designated the following organizations as eligible to offer professional learning in equity-based school practices and educational leadership:

- [Association of Washington School Principals](#) (AWSP);
- [Office of the Superintendent of Public Instruction](#) (OSPI);
- PESB-approved [teacher or administrator preparation program providers](#);
- [Washington Education Association](#) (WEA);
- Washington State [Educational Service Districts](#) (ESDs); or
- Washington State school districts, tribal compact schools, approved charter schools, Washington school for the Deaf, Washington school for the Blind

This list will be updated if PESB approves any additional equity or leadership providers in the future.

Continuing education related to government-to-government relationships with federally recognized tribes may only be provided by subject matter experts approved by the [Governor's Office on Indian Affairs](#) (GOIA) in collaboration with the Tribal Leaders Congress on Education (TLCE) and the [OSPI Office of Native Education](#) (ONE).

PESB will not accept anonymous complaints or complaints that are currently in litigation. Complainants are advised that copies of complaints will be made available, without personally identifiable information, to the provider and their clock hour committee. Additionally, per state law, it is possible that all information from a complaint may be discovered via [public records request](#).

Determining validity

In order to be considered for review, a complaint must be valid.

Valid complaints:

1. Are received from an educator or group who is *eligible to file a complaint* under [WAC 181.85.222](#)
AND
2. Are about a provider that has been *approved by PESB to offer equity, government-to-government, or leadership clock hours*
AND
3. *Allege specific actions that fail to meet current standards*

Invalid complaints:

1. Are received from a person or organization who is *not eligible to file a complaint* under WAC 181.85.222 **OR**
2. Allege actions that *do not fall under PESB's scope of authority* **OR**
3. Make allegations that *aren't credible*

Valid complaints will move forward to a determination of severity. If a complaint is invalid, staff will inform the complainant.

Determining severity: Tiers 1, 2, and 3

Responses to complaints will depend on the severity of the allegation. The *type, effect, or number* of complaints will determine which of the following three tiers it is placed into. PESB staff will review the complaint to determine the tier level. The complaint scoring form is available in the appendix.

Tier 1 complaints

Tier 1 complaints are resolved at the PESB staff level. The Board does not review Tier 1 complaints.

Examples of Tier 1 complaints:

- Ineffective facilitator
- Session(s) did not address expected content and/or meet stated goals
- A minor component of the training did not meet standards
- Training did not incorporate adult learning best practices

Tier 1 complaint resolution processes:

- Staff will inform the provider and their clock hour committee about the complaint
- Staff will note any areas that need to be remediated and request that the provider respond when the issue has been resolved

Tier 2 complaints

Tier 2 complaints will frequently be resolved at the staff level but may require Board involvement.

Examples of Tier 2 complaints:

- A significant, but minority, portion of the content doesn't achieve standards
- Multiple minor complaints received across different courses offered by the same provider
- Provider fails to address one or more Tier 1 complaints

Tier 2 complaint resolution process:

- PESB staff will request additional information and conduct an investigation
- A PESB staff committee will review the information to determine whether the course meets all applicable standards
- If the course does not meet applicable standards, PESB will create a remediation plan that supports the provider in resolving any harm from the incident and aligning their offerings with the standards moving forward
- PESB staff will communicate the outcome of the investigation, including remediation plan requirements and timelines, to the provider and their clock hour committee
- The Board may review a summary of a Tier 2 complaint and remediation.

Tier 3 complaints

Tier 3 complaints will usually require both staff and Board involvement. A Tier 3 complaint may require a pause in the provider's ability to offer clock hours during the investigation and remediation process. The Board may revoke approval of the organization as a clock hour provider.

Examples of Tier 3 complaints:

- Significant portions of content do not achieve standards
- Content is antithetical to standards
- Overall negligence
- Refusal to collaborate on remediation process
- Provider fails to address Tier 2 problems within deadlines

Tier 3 complaint resolution process:

- The Tier 3 process will include all of the same components as the Tier 2 process
- PESB staff may require the provider to pause clock hour courses during the investigation and remediation process
- The Board may decide to revoke approval of the organization as a clock hour provider
- Revocation may be for the remainder of the approval cycle, or on an indefinite basis
- If temporary or indefinite revocation is determined, all efforts will be made to ensure that educators' professional development progress will be minimally impacted

INVESTIGATION

Investigations into complaints will be led by PESB staff. Staff will request information from the provider, to include some or all of the following:

- | | |
|---|---|
| <input type="checkbox"/> Course description and/or marketing materials
<input type="checkbox"/> Recorded presentations
<input type="checkbox"/> Participant evaluations and/or evaluation summaries
<input type="checkbox"/> Clock hour committee meeting minutes for pre-approval of the clock hour course
<input type="checkbox"/> Clock hour committee meeting minutes for review of evaluation summary
<input type="checkbox"/> Narrative statement of how the training addresses relevant standards | <input type="checkbox"/> Participant sign-in log
<input type="checkbox"/> Training materials (slides, hand-outs, assigned reading, etc)
<input type="checkbox"/> Presenter experience (resume, CV, etc)
<input type="checkbox"/> Interviews with providers, participants, or others.
<input type="checkbox"/> Any other documents the provider deems relevant |
|---|---|

Applicable standards for review

Clock hour providers' work will be compared to applicable standards for their specific course, including:

- PESB cultural competency, diversity, equity, and inclusion ([CCDEI\) standards](#))
- Leadership standards ([PSEL standards](#))

Note: Government-to-government relations courses have requirements that are different from set standards. [WAC 181-79A-244](#) (3)(b) states that, "professional learning related to government-to-government relationships with federally recognized tribes must be provided by one or more subject matter experts approved by the governor's office on Indian affairs in collaboration with the tribal leaders congress on education and the office of native education in the office of the superintendent of public instruction." For this reason, complaints regarding government-to-government providers will be handled on a case-by-case basis via communication with the appropriate partners.

REMEDIATION

Remediation plan specifics will vary based on the nature of the problem requiring remediation. However, all remediation plans will include the following components:

1. A brief overview of the complaint process and link to this document.
2. Contact information for the staff responsible for overseeing the remediation plan.
3. Description of the investigation findings as well as the specific standards and/or requirements that the course is not in alignment with.
4. A list of requirements that must be met for the problem to be considered remediated, including:
 - a. Specific evidence of change required to prove the requirements have been met. This will vary depending on the problem(s) but could include such items as: copies of emails, updated course descriptions and materials, new trainer information, etc.
 - b. A timeline for *when* the evidence must be received and *how* to present the evidence (email, meeting, etc.)

5. A description of steps that the provider may take to request amendments to the remediation process and a brief overview of the appeal process.

Collaboration between PESB and providers

PESB will make efforts to engage with the provider in a collaborative process when creating remediation plans. In complex or uncertain cases, PESB may conduct interviews with the provider to help determine the best options for remediation, timelines, and required evidence of change. In all cases, providers will be encouraged to respond to the initial remediation plan with questions and/or requests for amendments. PESB staff will take all such requests under consideration.

PAUSING OR REVOKING PROVIDER STATUS

Pausing provider approval during process

If a provider's clock hour courses need to be paused during the investigation and/or remediation process, PESB staff will:

1. Inform the provider and their clock hour committee of the pause, expected length of pause, and reason for pause. **It is the provider's responsibility to inform any ongoing clock hour participants of the pause.**
2. PESB staff will work with the OSPI Certification office to ensure that clock hours are not awarded for courses during the time of the pause.

Revoking approval

Staff will present a summary of the process and outcomes to the Board.

If PESB staff recommend revocation, the provider will be offered the opportunity to include a written letter and/or a short presentation to the Board in their defense. This is separate from the appeals process, which is covered in the Appeals section of this document.

The Board will determine whether to:

- A. Continue with an additional attempt at remediation
- B. Retain approval as a clock hour provider
- C. Revoke approval as a clock hour provider
 - a. Revoke for the remainder of the current approval period
 - b. Revoke for the remainder of current approval period *and* for a specific or indefinite period in the future.

Staff will communicate the Board's decision to the provider and their clock hour committee in the week following the Board meeting.

TIMELINES AND COMMUNICATION

The following timelines are suggested. Particularly complex allegations or remediation plans may require additional time, while simpler ones may require less.

Initial review:

- PESB staff aim to complete an initial response to the complainant within 3-5 business days
- Within 28 calendar days of the complaint submittal, PESB will:
 - complete the initial validity review and tiering of complaint,
 - inform provider and clock hour committee of
 - the complaint,
 - an overview of the investigation process and timeline
 - specific evidence that is requested for the investigation
- Once the provider has received the above information, they have 14 calendar days to provide the requested documentation.

Investigation:

- Once PESB has received the requested evidence, the clock hour staff committee will complete a review of evidence and determine next steps within 14 days. Possible outcomes include:
 - Determine that no remediation is needed
 - Request additional documentation
 - Inform the provider that a remediation plan will be required
 - Require a pause of the provider's clock hour offerings

Remediation plan and process completion:

- After PESB has made a determination on whether a remediation plan is required, staff have up to 21 calendar days to create and provide the remediation plan to the provider.
- The amount of time that the provider has to complete the remediation plan will depend on the steps within the plan; the timeline will be clearly laid out in the plan.
- After the provider submits sufficient evidence of change, staff will provide a summary of the completed process and/or further recommendations at the next available Board meeting.

APPEALS POLICY

Clock hour providers have the option to appeal a decision made by the PESB staff or Board related to their clock hour provider status. There must be a basis for the appeal, such as *incomplete or inaccurate information*, *new evidence that was not presented during the initial review of the complaint*, or if *the complaint and revocation process was not appropriately followed*. An appeal is ineligible for review if there is no grounding basis.

Decisions that are eligible for appeal:

- Remediation requirements
- Temporary revocation of approval put in place by PESB staff

Appeals process

1. PESB staff makes a decision which the clock hour provider would like to appeal.
2. The clock hour provider follows the steps to file an initial appeal to PESB staff.
3. The initial appeal is reviewed and the decision is upheld, amended, or reversed by PESB staff.
4. If upheld, the clock hour provider may follow steps to file a final appeal to the PESB Board.
5. The appeal is reviewed and the initial appeal decision is upheld, amended, or reversed by PESB board.
6. If upheld, the clock hour provider must act in accordance with the initial decision. If clock hour provider status was not permanently revoked, the provider will be eligible to apply for clock hour provider status in the following application cycle.
7. If the initial decision is reversed, the PESB board will issue a decision outlining the details about when and how the clock hour provider status will be reinstated.

Appeals procedure

Initial appeal

1. The provider must submit a written appeal to clockhoursPESB@k12.wa.gov **within 21 calendar days** of the decision by PESB staff.
 - a. The written appeal must include the following information:
 - i. The provider/organization name as listed on the approved clock hour provider list
 - ii. A phone number and email address for the provider
 - iii. The names, phone numbers, and email addresses of the provider's clock hour committee
 - iv. A description or list of the clock hours offered by the provider, which could include information such as:
 1. Number and frequency of offerings
 2. Clock hour format (online, in person, hybrid, synchronous or asynchronous, etc.)
 3. Clock hour type (equity, leadership, or government-to-government)
 4. Number of Washington state educators who completed clock hour training with the provider in the previous and/or current academic year

- v. A full description of the decision and the basis for the provider's appeal for reconsideration
 - vi. A narrative statement describing the resolution the provider is seeking
 - vii. Any supporting documents, including documents or descriptions of information that were unavailable or not considered in the original decision
2. PESB staff will respond within seven calendar days acknowledging receipt of the written appeal.
 3. Based on its initial review, PESB staff may return an appeal to the provider for further information or clarification. If the appeal is returned with a request for further information, the provider must submit the additional information or documentation within 10 calendar days for the appeal to proceed.
 4. Upon review of the appeal, PESB staff may determine the original decision is upheld, amended, or reversed. PESB staff will conduct a review and the provider will be sent written notification of the outcome within 21 calendar days.

Final appeal

1. Upon receipt of an unfavorable outcome to the initial appeal, a clock hour provider may submit a final appeal to the PESB Board within 21 days of receiving written notice of the initial appeal outcome.
 - a. The written appeal must include the following information:
 - i. The provider/organization name as listed on the approved clock hour provider list
 - ii. A phone number and email address for the provider
 - iii. The names, phone numbers, and email addresses of the provider's clock hour committee
 - iv. A description or list of the clock hours offered by the provider, which could include information such as:
 1. Number and frequency of offerings
 2. Clock hour format (online, in person, hybrid, synchronous or asynchronous, etc.)
 3. Clock hour type (equity, leadership, or government-to-government)
 4. Number of Washington state educators who completed clock hour training with the provider in the previous and/or current academic year
 - v. A full description of the decision and the basis for the provider's appeal for reconsideration,
 - vi. A narrative statement describing the resolution the provider is seeking,
 - vii. Any supporting documents, including documents or descriptions of information that was unavailable or not considered in the original decision
2. PESB staff will work with the provider to determine the next available Board meeting where a final appeal can be considered as an action item on the Board meeting agenda. Board meeting information is published on the [PESB website](#).
3. The provider may prepare a presentation for the Board meeting, and all required Board materials must be submitted to PESB staff in accordance with Board meeting submission deadlines. The provider may present to the Board in person or virtually, based on which options are available for that particular Board meeting.
4. The Board will vote to render a decision on the final appeal.
5. The Board's decision at this point in the appeal process shall be final.

- a. If upheld, the clock hour provider must act in accordance with the initial decision. If clock hour provider status was not permanently revoked, the provider will be eligible to apply for clock hour provider status in the following application cycle.
 - b. If reversed, PESB board will issue a decision outlining the details about when and how the clock hour provider status will be reinstated.
- 6. A provider's status will not change during the appeal process.

APPENDIX

Complaint review forms

Tier 1	Tier 2	Tier 3
May include up to two “needs improvement”	One “unmet” score Two or more “needs improvement” scores	One or more “contradicted” scores Two or more “unmet” scores Any single incident if it is severe enough to warrant immediate response

CCDEI Standards

	Met: Training and materials are in alignment with the standard	Needs improvement: Almost all training and/or materials are in alignment with the standard	Unmet: Training and/or materials includes multiple aspects that are not in alignment with the standard	Contradicted: Training and/or materials includes concepts antithetical to the standard
Understanding self and others				
Student, family, and community engagement				
Learning partnerships				
Leading for educational equity				

PSEL Standards

	Met: Training and materials are in alignment with the standard	Needs improvement: Almost all training and/or materials are in alignment with the standard	Unmet: Training and/or materials includes multiple aspects that are not in alignment with the standard	Contradicted: Training and/or materials includes concepts antithetical to the standard
S1: Mission, vision, and core values				
S2: Ethics and professional norms				
S3: Equity and cultural responsiveness				
S4: Curriculum, instruction, and assessment				
S5: Community of care and support for students				
S6: Professional capacity of school personnel				
S7: Professional community for teachers and staff				
S8: Meaningful engagement of families and community				
S9: Operations and management				
S10: School improvement				

The Professional Educator Standards Board

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Washington State

**PROFESSIONAL EDUCATOR
STANDARDS BOARD**

