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Action

Public Hearing

Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to Designated Subjects Special Subjects Teaching Credentials

Executive Summary: This agenda item proposes adoption of amendments to Title 5 of the California Code of Regulations §80037 to establish a Special Teaching Authorization in Physical Education for holders of Designated Subjects Special Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps. The proposed amendments also include general clean-up of outdated language in the existing regulation.

Recommended Action: Staff recommends that the Commission adopt the proposed regulations pertaining to Designated Subjects Special Subjects Teaching Credentials.

Presenter: Tammy A. Duggan, Consultant,
Certification Division

Strategic Plan Goal

I. Educator Quality

- ◆ Develop, maintain, and promote high quality authentic, consistent educator assessments and examinations that support development and certification of educators who have demonstrated the capacity to be effective practitioners.

February 2014

Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to Designated Subjects Special Subjects Teaching Credentials

Introduction

This rulemaking action proposes the Commission on Teacher Credentialing adopt amendments to Title 5 California Code of Regulations (CCR) §80037 to establish a Special Teaching Authorization in Physical Education for holders of Designated Subjects Special Subjects Teaching Credentials in Basic Military Drill (BMD) and Reserve Officer Training Corps (ROTC). The proposed amendments also include general clean-up of outdated language in the existing regulation.

Background

Education Code (EC) §33352 establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. Specifically, subsection (b)(7) of EC §33352 requires a Local Education Agency (LEA) to provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- 1) the effects of physical activity upon dynamic health;
- 2) the mechanics of body movement;
- 3) aquatics;
- 4) gymnastics and tumbling;
- 5) individual and dual sports;
- 6) rhythms and dance;
- 7) team sports; and
- 8) combatives.

Current basic military drill and physical fitness training activities associated with BMD and ROTC courses may include instruction in some or all of the listed areas.

Although a special subjects teaching credential authorizes the holder to provide instruction in grades 12 and below, and in classes organized primarily for adults, the majority of individuals who hold special subjects teaching credentials in BMD and ROTC are employed at the high school level. One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

Some LEAs grant high school graduation credit in physical education for BMD and ROTC courses under the provisions of EC §51225.3 while others do not. Although physical education is an integral component in all branches of the military, BMD and ROTC special subjects teaching credentials do not currently include a specific physical education teaching authorization. LEAs

that are willing to allow BMD or ROTC courses to satisfy high school graduation requirements often require these classes to be taught by individuals who hold a Single Subject Teaching Credential in Physical Education. Since many instructors in BMD and ROTC programs do not have a bachelor's degree, they do not meet the basic requirements for earning the Single Subject teaching credential. Pupils attending schools that do not grant high school graduation credit in physical education for BMD and ROTC courses are required to enroll in traditional physical education courses in order to meet statutory graduation requirements, thereby creating the potential for enrollment declines in the BMD and ROTC programs.

A review of high school graduation requirements in the other 49 states revealed that there are currently nine states that allow ROTC courses to count toward satisfying the physical education graduation requirement. The nine states are identified in Table 1 along with information explaining the conditions (if any) under which high school graduation credit may be awarded in physical education for Junior ROTC (JROTC) or ROTC courses.

Table 1: States that Award Physical Education High School Graduation Credit for ROTC

State	Statute or Regulation	Graduation Requirement
Alabama	Alabama Administrative Code §290-3-1-.02(8)(c)	ROTC content standards approved as substitute for physical education credit in 2006. LEAs have flexibility to grant physical education credit for JROTC courses.
Arkansas	Arkansas Department of Education Rules Governing PE Course Credit §8.00	Two semesters of JROTC satisfies the ½ unit of physical education and the ½ unit of health and safety education requirements.
Florida	Florida Education Code §1003.428(2)(a)(6)	Two years of JROTC satisfies the one-credit requirement in physical education and the one-credit requirement in performing arts
Georgia	Georgia Education Code §160-4-2-.48(3)(b)5.(ii)(VI)	LEAs have flexibility to grant physical education credit for JROTC courses. Three credits in JROTC are required to satisfy the one-credit physical education requirement.
Illinois	Illinois Compiled Statute §27-6(b)	LEAs may excuse pupils enrolled in JROTC program from engaging in physical education courses.
Ohio	Ohio Administrative Code §3313.603(L)	LEAs may excuse pupils who complete two years of JROTC from the required physical education credit.
South Carolina	South Carolina Regulation No. R43-234	One credit of “PE or JROTC” is required for high school graduation.
Texas	Texas Administrative Code §74.11(d)(7)(A)	LEAs may substitute JROTC for the required one and one-half credits of physical education.
Washington	Revised Code of Washington §28A.230.050	Pupils who participate in military science and tactics may be excused from physical education requirement.

The reticence of some LEAs to recognize BMD and ROTC courses taught by holders of special subjects credentials as meeting some portion of the physical education graduation requirements

may be due to the fact that these individuals have not satisfied the subject-matter knowledge requirement in physical education and, therefore, are perceived as not adequately prepared to provide instruction in the content area. The proposed Special Teaching Authorization in Physical Education, that an individual will be able to add to a preliminary or clear special subjects credential in BMD or ROTC, will provide the holder with a distinct physical education authorization that will be based on satisfaction of California’s basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education.

The Special Teaching Authorization in Physical Education will be limited to the areas of basic military drill and physical fitness training because: 1) a minimum of four years of military experience that emphasized training in these areas is required for issuance of a special subjects teaching credential in BMD or ROTC; and 2) an authorization equivalent to the authorization of a Single Subject credential in Physical Education is not warranted since individuals who hold special subjects credentials in BMD or ROTC may not have a bachelor’s or higher degree and the program required for issuance of a clear special subjects credential is not as extensive as the teacher preparation program required for a general education teaching credential.

The proposed minimum requirements for the Special Teaching Authorization in Physical Education are possession of a preliminary (which requires a minimum of four years of military experience) or clear (which requires, in addition to the requirements for the preliminary credential, completion of a Commission-approved program of personalized preparation) Designated Subjects Special Subjects Teaching Credential in BMD or ROTC; satisfaction of California’s basic skills requirement; and verification of subject-matter knowledge in Physical Education.

It is important to note that the Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education. The Commission has determined the Special Teaching Authorization in Physical Education is necessary to strengthen the decisions of LEAs that choose to recognize the authorization in order to utilize the option provided in EC §51225.3(b) due to the basic skills and subject-matter knowledge in physical education requirements. Table 2 displays the numbers of Designated Subjects Special Subjects Teaching Credentials with BMD and ROTC authorizations issued over the past five school years.

Table 2: Basic Military Drill and Reserve Officer Training Corps Credential Numbers

Year	BMD	ROTC	Total
2008	11	157	168
2009	9	147	156
2010	13	125	138
2011	11	135	146
2012	12	149	161
Total	56	713	769

The amendments to 5 CCR §80037 to establish a Special Teaching Credential in Physical Education for individuals who hold Preliminary or Clear Designated Subjects Special Subjects

Teaching Credentials in BMD or ROTC are proposed under the authority granted to the Commission in the following subsections of EC §44225 (emphasis added):

*(b) **Reduce and streamline the credential system to ensure teacher competence in the subject field or fields, while allowing greater flexibility in staffing local schools.** The commission shall award the following types of credentials to applicants whose preparation and competence satisfy its standards:*

- (1) Basic teaching credentials for teaching in kindergarten, or any of the grades 1 to 12, inclusive, in public schools in this state.*
- (2) Credentials for teaching adult education classes and vocational education classes.*
- (3) Credentials for teaching specialties, including, but not necessarily limited to, bilingual education, early childhood education, and special education. The commission may grant credentials to any candidate who concurrently meets the commission's standards of preparation and competence for the preliminary basic teaching credential and the preliminary specialty credential.*
- (4) Credentials for school services, for positions including, but not limited to, administrators, school counselors, speech-language therapists, audiologists, school psychologists, library media teachers, supervisors of attendance, and school nurses.*

The commission may establish standards and requirements for preliminary and professional credentials of each type.

*(e) **Determine the scope and authorization of credentials, to ensure competence in teaching and other educational services,** and establish sanctions for the misuse of credentials and the misassignment of credential holders. The commission may grant an added or supplementary authorization to a credential holder who has met the requirements and standards of the commission for the added or supplementary authorization. The commission shall exempt the holder of a teaching credential obtained prior to January 1, 1974, who adds an authorization by successfully completing a commission-approved subject matter examination, from the requirements of subdivision (e) of Section 44259 and Sections 44261, 44261.5, and 44261.7.*

*(g) **Establish alternative methods for entry into the teaching profession, and into other certificated roles in the schools, by persons in varying circumstances,** including persons who have been educated outside of California, provided that each applicant satisfies all of the requirements established by the commission. One alternative method shall be the successful completion of at least two years of classroom instruction under a district intern certificate, pursuant to Article 7.5 (commencing with Section 44325). In establishing alternative methods for entry into the teaching profession, the commission shall develop strategies to encourage classroom aides to become credentialed teachers.*

In addition to establishing a Special Teaching Authorization in Physical Education, the proposed amendments include general clean-up of the current, outdated language in 5 CCR §80037 as follows:

- 1) Move the requirement for a driving transcript from the Department of Motor Vehicles for the Limited Driver Training subject area to the subsection that clarifies the experience and/or education required for a special subjects credential;
- 2) Align the basic skills requirement language with current statute;

- 3) Amend the application form and fingerprint clearance language to align with other 5 CCR sections;
- 4) Clarify that recommendation for preliminary and clear special subjects credentials must be made by Commission-approved programs of personalized preparation (not an employing school district) to align with the requirements associated with designated subjects adult education and career technical education (CTE) credentials;
- 5) Provide the definition for “two years of successful teaching” required for a clear special subjects credential;
- 6) Incorporate the CTE program standards by reference, which is the program that must be completed for issuance of a clear special subjects credential;
- 7) Amend the health education requirement language to align with current statute and program requirements; and
- 8) Clarify that a clear special subjects credential will be issued with the Specially Designed Academic Instruction in English (SDAIE) authorization due to completion of an approved CTE program, since SDAIE components are embedded in the CTE programs.

Objectives and Anticipated Benefits of the Proposed Regulations

The objectives of the proposed amendments are to clarify and make specific the following as related to Designated Subjects Special Subjects Teaching Credentials:

- establish a Special Teaching Authorization in Physical Education for holders of Designated Subjects Special Subjects Teaching Credentials in BMD and ROTC;
- amend the current, outdated language related to the basic skills, application, fingerprint, and health education requirements;
- specify the type of program that must be completed for the clear credential and incorporate those program standards by reference;
- clarify the recommendation process for the preliminary and clear credential;
- define the teaching experience requirement for the clear credential;
- amend the clear credential authorization to include a SDAIE authorization; and
- move the driving transcript requirement for the Limited Driver Training subject to the appropriate subsection.

The Commission anticipates that the proposed amendments will benefit the welfare of students attending public schools in the State of California by creating a Special Teaching Authorization in Physical Education that LEAs may potentially use in conjunction with EC §51225.3 to grant physical education high school graduation credit for basic military drill and physical fitness training courses taught by holders of Designated Subjects Special Subjects Credentials in BMD and ROTC, thereby increasing the students’ course options.

The proposed regulations will promote fairness and prevent discrimination by aligning 5 CCR §80037 pertaining to the requirements for Designated Subjects Special Subjects Teaching Credentials with other 5 CCR sections pertaining to Designated Subjects Adult Education and CTE Teaching Credentials. The Commission does not anticipate that the proposed regulations will result in an increase in openness and transparency in government, the protection of public health and safety, worker safety, or the environment, the prevention of social inequity, or an increase in openness and transparency in business.

Summary of Proposed Amendments to Regulations

§80037. Specific Requirements for and Authorization of the Designated Subjects Preliminary and Clear Special Subjects Teaching Credential

(a)(1)(B) and (a)(1)(C): Proposes deletion of “or” at the end of these subsections, as each subsection pertains to a specific special subjects credential area.

(a)(1)(D): Proposes changing the period (.) at the end of this subsection to a semicolon (;) due to the proposed addition of subsection (a)(1)(E).

(a)(1)(E): Subsection (a)(1) clarifies the experience and/or education required for issuance of a preliminary special subjects teaching credential, but it does not currently include language clarifying the experience and/or education requirement for the special subject of Limited Driver Training. The proposed amendments add subsection (a)(1)(E) to clarify that driving experience must be verified by submission of a current driving record from the Department of Motor Vehicles. This language was moved from subsection (a)(2)(E) that pertains to licenses, recommendations, and coursework requirements.

(a)(2)(E): Proposes deletion of the language requiring submission of a current driving transcript from this subsection and the addition of the language to subsection (a)(1)(E). Subsection (a)(2) specifies the license, recommendation, or coursework required for issuance of a Designated Subjects Teaching Credential. The current driving transcript requirement for the Limited Driver Training subject area should be listed in subsection (a)(1), since that subsection specifies the experience and/or education required for issuance of a preliminary special subjects teaching credential.

(a)(5): EC §44252 allows for additional options to passage of the California Basic Educational Skills Test (CBEST) to satisfy California’s basic skills requirement. Subsection (d) of EC §44252 specifically exempts applicants for a special subjects credential from the basic skills requirement unless a bachelor’s degree is required for the special subject area. Driver Education and Training is the only special subject area that requires a bachelor’s degree for initial issuance of a preliminary special subjects teaching credential. The proposed amendments to this subsection update the basic skills requirement language to match and align with statute and add language clarifying that only applicants for the special subject area of Driver Education and Training must satisfy the requirement for initial issuance of a preliminary special subjects teaching credential. Also changes the period (.) at the end of the subsection to a semicolon (;) for consistency with other subsections.

(a)(6): Proposed amendments delete reference to “Employing School District (ESD)” and “Commission-approved Local Education Agency (LEA)”. Prior amendments to the Title 5 sections pertaining to Designated Subjects Adult and CTE (reference 5 CCR §§80034.2, 80035, 80035.1, 80036, 80036.1, and 80036.4) deleted the authority of ESDs to advise individuals regarding designated subjects teaching credential programs. Only Commission-approved programs of personalized preparation now have the authority to recommend individuals for preliminary and clear designated subjects credentials and the advisement will be provided by the program sponsor prior to submission of the preliminary credential application. The term ‘LEA’ pertains to a ‘Local Education Agency,’ which does not accurately reflect all the types of

agencies that are allowed to develop and implement designated subjects teaching credential programs. The program sponsor recommendation requirement is a proposed addition in subsection (a)(8).

(a)(7): Proposed amendments clarify the application name and add the reference to §80001, which provides definitions for applications used for certification purposes. In addition, proposes addition of the subsection that specifies the application fee; deletion of the LEA or ESD recommendation language that will be clarified in subsection (a)(8); deletion of the redundant language requiring “verification of the requirements listed in (a)(1) through (a)(6)” [subsection (a) states the minimum requirements for the preliminary credential “...shall include all of the following:”]; and changes the period (.) at the end of the subsection to a semicolon (;) due to the proposed addition of subsection (a)(8) .

Additional proposed amendments clarify that the requirement in EC §44340 to include fingerprints when filing an application is met with the submission of fingerprints via Livescan (electronic process) as required by the Department of Justice. Penal Code §11077.1 as amended by Senate Bill 970 (Chap. 470, Stats. 2003) now requires submission of fingerprints via Livescan and no longer accepts fingerprint cards. Specifically, the proposed amendments delete the language pertaining to fingerprint cards and replace it with language requiring completion of Livescan and clearance by the Commission if fingerprint clearance is not already on file at the Commission (reference 5 CCR §80442).

(a)(8): Commission-approved programs of personalized preparation are required to recommend individuals for preliminary and clear designated subjects credentials [reference EC §44227(a)]. The proposed addition of this subsection is to require recommendation for a preliminary special subjects teaching credential by a Commission-approved program.

Although the requirements to qualify for a preliminary designated subjects CTE teaching credential differ slightly from the requirements for a preliminary designated subjects special subjects teaching credential, the CTE program standards for the clear credential are appropriate to both credential types. Therefore, the proposed language includes a cross-reference to §80034.1(a) that provides the definition for “Commission-approved program of personalized preparation” as related to CTE programs.

(b)(2): Proposes the deletion of the language requiring the ESD to verify the two years of teaching experience required for issuance of a clear special subjects teaching credential. The Commission-approved program sponsor will verify the teaching experience prior to recommending the individual for the clear credential.

Due to prior amendments, §80034 now provides the definitions and terms related to designated subjects adult education teaching credentials, only. Therefore, additional proposed amendments to this subsection delete the reference to subsection §80034(f); delete “or the equivalent;” and add the definition for “two years of successful teaching” as related to special subjects teaching credentials, which is consistent with the teaching experience requirement for adult education teaching credentials [reference 5 CCR §80034(e)] and CTE teaching credentials [reference 5 CCR §80034.1(c)].

(b)(3): Designated subjects programs were previously approved by the Commission but not accredited by the Committee on Accreditation. Since October 2008, designated subjects programs require approval by the Commission and accreditation by the Committee on Accreditation. The proposed amendments to this subsection delete the outdated language describing the requirements for the previous programs.

Although the requirements to qualify for a preliminary designated subjects CTE teaching credential differ slightly from the requirements for a preliminary designated subjects special subjects teaching credential, the CTE program standards are appropriate to both clear credential types. Therefore, the proposed amendments add language requiring completion of a program of personalized preparation based on the CTE program standards to qualify for the clear special subjects teaching credential and incorporates the program standards by reference.

(b)(4): Proposes clarification of the language pertaining to the health education requirement and includes the appropriate EC citation. EC §44261 that is currently included in this subsection refers to the minimum requirements for multiple subject and single subject teaching credentials and is not an appropriate reference for special subjects credentials. Also proposes deletion of the reference to §80421, as this regulation section includes an EC reference that is no longer related to the health education requirement.

(b)(5): Proposed amendments clarify the application name and add the reference to §80001, which now provides definitions for applications used for certification purposes. In addition, proposes addition of the subsection that specifies the application fee; deletion of the LEA or ESD recommendation language that will be clarified in subsection (b)(6); deletion of the redundant language requiring “verifications as specified for requirements (b)(2), (b)(3) and (b)(4)” [subsection (b) states the minimum requirements for the clear credential “...shall include all of the following:”]. Lastly, the proposed amendments delete the semicolon (;) after the application form and add the word “and” between the application form and fee since there will be only two requirements listed in this subsection.

(b)(6): Commission-approved programs of personalized preparation are required to recommend individuals for preliminary and clear designated subjects credentials [reference EC §44227(a)]. The proposed addition of this subsection is to require recommendation for a clear special subjects teaching credential by a Commission-approved program.

Although the requirements to qualify for a preliminary designated subjects CTE teaching credential differ slightly from the requirements for a preliminary designated subjects special subjects teaching credential, the CTE program standards for the clear credential are appropriate to both credential types. Therefore, the proposed language includes a cross-reference to §80034.1(a) that provides the definition for “Commission-approved program of personalized preparation” as related to CTE programs.

(c): Proposed new subsection to establish the minimum requirements for the Special Teaching Authorization in Physical Education.

(c)(1): Proposed new subsection to clarify that possession of a preliminary or clear special subjects teaching credential in BMD or ROTC is required for the Special Teaching Authorization in Physical Education because:

- qualifying for a preliminary credential in BMD or ROTC requires experience in the areas covered by the proposed Special Teaching Authorization; and
- BMD and ROTC courses are the special subjects credential areas most likely to include instruction in the physical education areas of basic military drill and physical fitness training

(c)(2): Proposed new subsection to require satisfaction of California’s basic skills requirement for consistency with other similar authorizations [reference 5 CCR §80050(c)(3) pertaining to the Special Teaching Authorization in Health and 5 CCR §80048.9.4(a)(3) pertaining to the Special Class Authorization].

(c)(3): Proposed new subsection to require verification of subject-matter knowledge in Physical Education by passage of an examination(s) or completion of a subject-matter program. The proposed language includes references to the relevant EC sections pertaining to subject-matter examinations and programs. This subject-matter knowledge requirement is the same subject-matter knowledge requirement that must be satisfied by individuals seeking a Single Subject Teaching Credential in Physical Education [reference 5 CCR 80413(a)(5)(B)].

(c)(4): An application form (reference 5 CCR §80433) and processing fee (reference EC §44235) are required for each credential issued by the Commission. The language proposed in this new subsection specifies the aforementioned requirements for issuance of the Special Teaching Authorization in Physical Education and references the relevant 5 CCR sections that define each requirement.

(d): Proposes re-lettering to subsection (d) due to the proposed addition of subsection (c). Also proposes moving the authorization language pertaining to special subjects teaching credentials to subsection (d)(1) due to the proposed addition of subsections (d)(2) and (d)(3).

(d)(1): Proposed new subsection to clarify the authorization of a preliminary special subjects teaching credential. Deletes “clear” from the language previously provided in subsection (c) [re-lettered to subsection (d)]. The authorization for the clear credential will be provided in the proposed subsection (d)(2). Changes the period (.) at the end of the subsection to a semicolon (;) due to the proposed addition of subsections (d)(2) and (d)(3).

(d)(2): The CTE program standards, upon which the program individuals must complete to qualify for a clear special subjects credential as proposed in (b)(3) is based, include training that results in a Specially Designed Academic Instruction in English (SDAIE) authorization to serve English learners. The SDAIE authorization is earned upon program completion and issuance of a clear special subjects teaching credential (the SDAIE authorization is not listed on the preliminary credential). This proposed new subsection for the clear credential includes the same authorization language as for the preliminary credential and language specifying the SDAIE authorization.

(d)(3): Proposed new subsection to clarify the authorization of the Special Teaching Authorization in Physical Education. Individuals who hold designated subjects special subjects

teaching credentials in BMD and ROTC may have a bachelor's or higher degree, but verification of a degree is not a requirement for the subject areas. In addition, the program required for issuance of a clear special subjects credential is not as extensive as the teacher preparation program required for a preliminary or clear general education teaching credential. For these reasons, the Special Teaching Authorization in Physical Education will be limited to the instruction of Physical Education courses in basic military drill and physical fitness training as determined by the Commission.

Although special subjects teaching credentials in BMD and ROTC already authorize instruction in basic military drill and physical fitness training, possession of the Special Teaching Authorization verifies that the holder has satisfied the basic skills requirement and verified his/her subject-matter knowledge in Physical Education. The basic skills requirement, verification subject-matter knowledge equivalent to the subject-matter knowledge requirement met by holders of Single Subject Teaching Credentials in Physical Education, and a minimum of four years of military service (required to qualify for the special subjects credential in BMD or ROTC) that included extensive training in the areas of basic military drill and physical fitness training are the justification for issuance of the Special Teaching Authorization in Physical Education.

(e): Proposes re-lettering to subsection (e) from (d) due to the proposed addition of subsection (c).

Note: Proposes amendments to add additional relevant EC references.

Documents Incorporated by Reference:

Standards of Quality and Effectiveness for Career/Technical Education Teachers (rev. 5/09):
<http://www.ctc.ca.gov/educator-prep/standards/CTE-Handbook.pdf>

The Commission on Teacher Credentialing awards credentials and certificates on the basis of completion of programs that meet Standards for Educator Preparation and Educator Competence. For each type of professional credential in education, the Commission has developed and adopted standards which are based upon recent research and the expert advice of many professional educators. Each standard specifies a level of quality and effectiveness that the Commission requires from programs offering academic and professional preparation in education. There are different types of program standards.

Preconditions

Preconditions are requirements that must be met in order for an accrediting association or licensing agency to consider accrediting a program sponsor or approving its programs or schools. Some preconditions are based on state laws, while other preconditions are established by Commission policy. Preconditions can be found within each program's standards document.

Common Standards

The Common Standards deal with aspects of program quality that cross all approved educator preparation programs. The institution responds to each Common Standard by providing pertinent information, including information about individual programs. When a

new program is proposed, the institution submits a Common Standards Addendum to address how the new program will integrate with the already approved programs.

Educator Preparation Program Standards

Program standards address aspects of program quality and effectiveness that apply to each type of educator preparation program offered by a program sponsor. Program standards contain statements describing the nature and purpose of each standard and language that details the requirements that all approved programs must meet. Program sponsors must meet all applicable program standards before the program application may be approved by the Commission.

Documents Relied Upon in Preparing Regulations: None.

Disclosures Regarding the Proposed Actions

The Commission has made the following initial determinations:

Mandate to local agencies or school districts: None.

Other non-discretionary costs or savings imposed upon local agencies: None.

Cost or savings to any state agency: None.

Cost or savings in federal funding to the state: None.

Significant effect on housing costs: None.

Significant statewide adverse economic impact directly affecting businesses including the ability of California businesses to compete with businesses in other states: None.

These proposed regulations will not impose a mandate on local agencies or school districts that must be reimbursed in accordance with Part 7 (commencing with section 17500) of the Government Code.

Cost impacts on a representative private person or business: The Commission is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

Statement of the Results of the Economic Impact Assessment [Govt. Code § 11346.5(a)(10)]: The Commission concludes that it is (1) unlikely that the proposal will create any jobs within the State of California; 2) unlikely that the proposal will eliminate any jobs within the State of California; 3) unlikely that the proposal will create any new businesses within the State of California; 4) unlikely that the proposal will eliminate any existing businesses within the State of California; and 5) unlikely the proposal would cause the expansion of businesses currently doing business within the State of California.

Benefits of the Proposed Action: The Commission anticipates that the proposed amendments will benefit the welfare of students attending public schools in the State of California by

creating a Special Teaching Authorization in Physical Education that employers may potentially use in conjunction with EC §51225.3 to grant physical education high school graduation credit for basic military drill and physical fitness activity courses taught by holders of Designated Subjects Special Subjects Credentials in BMD and ROTC, thereby increasing the students' course options.

Effect on small businesses: The proposed regulations will not have a significant adverse economic impact upon business. The proposed regulations apply only to individuals who hold or seek Designated Subjects Special Subjects Teaching Credentials that authorize service in California's public schools.

Notice of Proposed Rulemaking Mailing List and Responses

Mailing List

- Members of the Commission on Teacher Credentialing
- California County Superintendents of Schools
- Credential Analysts at the California County Superintendents of Schools Offices
- Superintendents of Selected California School Districts
- Deans and Directors at the California Institutions of Higher Education with Commission-approved programs
- Credential Analysts at the California Institutions of Higher Education with Commission-approved programs
- Presidents of Selected Professional Educational Associations

Also placed on the Internet at <http://www.ctc.ca.gov>.

Tally of Responses

As of Wednesday, January 29, 2014 the Commission had received the following response(s) to the public announcement:

<i>Support</i>	<i>Opposition</i>
0 organizational opinions	5 organizational opinions
204 personal opinions	166 personal opinions
Total Responses: 375	

Written Responses Representing Organizations in Support: None.

Written Responses Representing Individuals in Support:

1. Ruby Aispuro, Citizen
2. Susana Albanes, Citizen
3. Keith P. Alexander, Citizen
4. Carlos Alvarez, Citizen
5. Carina Amezcua, Citizen
6. Ceilia Amezcua, Citizen
7. Ernesto Amezcua, Citizen

8. Lelani Amezcua, Citizen
9. Roberto Amezcua, Citizen
10. Kelly Anderlik, Citizen
11. Pahola Angeles, Citizen
12. David Anguiano, Citizen
13. Domingo Anguiano, Citizen
14. Jonathan Anguiano, Citizen
15. Andrea Arellano
16. Lorina Avalos, Student
17. Ermando Barajos, Citizen
18. Destanee Barbely, Citizen
19. Michelle Barbely, Citizen
20. Carlos Caballeno, Citizen
21. Ismael Campos, Citizen
22. Jessica Campos, Citizen
23. Alex Carcamo, Citizen
24. Cecilia Cazares, Citizen
25. Elisa Cazares, Citizen
26. Gilberto Cazares, Jr., Citizen
27. Jose Cazares, Citizen
28. Luis Cazares, Citizen
29. Rosalind Cazares, Citizen
30. Stephanie Cazares, Citizen
31. Tanya Cazares, Citizen
32. Jeremy Chavez, Citizen
33. Jesus Christ, Citizen
34. Liane Cismowski, Principal, Mt. Diablo Unified School District
Comment: See Attachment A
35. Dion Clark, Citizen/San Bernardino City Unified School District
36. Karen Contreras, Citizen
37. Jose Antonio Cornelio, Citizen
38. Kimberly Cornide, Citizen
39. Chris Cottone, Citizen

40. Megan Crilly, Citizen
41. Rob Cutbirth, Citizen
42. Kichion Darby
43. Brittney Davis Fox, Citizen
44. Shawn De Jesus, Citizen
45. Bertha Del Rio, Citizen
46. June Del Rio, Citizen
47. Raeline De Maio, Citizen
48. Trishauna Doering, Teacher, The Charter School of San Diego
49. Rachel Esparanza, Citizen
50. Alexander Espinoza
51. Alexis Espinoza
52. Miguel Esquivel
53. Ginselda Flores, Citizen
54. Mariza Flores, Citizen
55. James Franco, Citizen
56. Adam Garcia, Citizen
57. Andrea Garcia, Citizen
58. Gabriela Garcia, Citizen
59. Jonathan Garcia, Citizen
60. Nicole Garcia, Citizen
61. Roger Garcia, Citizen
62. Jose Garibay, Citizen
63. Rariela Garibay, Citizen
64. Corine Gillum, Citizen
65. Courtney Gillum, Citizen
66. Jeff Gillum, Citizen
67. Lorie Gillum, Citizen
68. Marley Gillum, Citizen
69. Reyando Gomez, Citizen
70. Bianca Gonzalez, Citizen
71. Francisco, Gonzalez, Citizen
72. Eduardo Gracio, Citizen

73. Robert Grant, Citizen
74. Candace Grantham
Comment: Please accept my opinion that as a Veteran and a California Credentialed teacher, I disagree with the CTA opposing the PE endorsement on the JROTC credential. I believe and have experienced that any student who enters JROTC is interested in the Military way, and is benefited by focusing on military rather than CCSS in PE. The state of California needs diversify the approach to all curriculum to better meet the needs of our students. Please move forward with the new endorsement.
75. Alexis Guerra, Citizen
76. Marisol Guerrero, Citizen
77. Travis Gutierrez, Citizen
78. Emilio Julian Guzman, Citizen
79. Enrique Hernandez, Citizen
80. Israel Hernandez, Citizen
81. Ivan Hernandez, Citizen
82. Deysi Hernandez, Citizen
83. Maria Hernandez
84. Skylar Higgins, Citizen
85. Margarita Hipolito, Citizen
86. Jennifer Hunt, Citizen
87. John Jackson, Citizen
88. Vickie Jarvis, Citizen
89. Daniel Jimenez, Citizen
90. Hwa Dam Jo, Citizen
91. Antijuan Johnson, Citizen
92. Jake Johnson, Citizen
93. William G. Jones, Citizen
94. Emanuel Juarez, San Gorgonia High School
95. Nathan Juarez, San Gorgonia High School
96. Shannon King
97. Luis Kosoney, Citizen
98. Jared Lewis, Citizen
99. Brianna Linares, Citizen
100. Mizaël Lizarraga, Citizen
101. Geovanni Lopez, Citizen

102. Jose Antonio Lopez, Citizen
103. Josephine Lopez, Citizen
104. Luis Lopez, Citizen
105. George Lucas, Citizen
106. Airyana Rubie Luna, Citizen
107. Alexander Luna, Citizen
108. Lori Lundblad, Citizen
109. Iris Madariaga, Citizen
110. Elizabeth Martinez, Citizen
111. Alejandro Maya, Citizen
112. Maria G. Maya, Citizen
113. Christopher Mayorga, Citizen
114. Steven Mayorga
115. Jazmine Mc Coy, citizen
116. Aiden Mears, Citizen
117. Marian Mears, Citizen
118. Giovanni Mendez, Citizen
119. Jennifer Mercacals, Citizen
120. Toni L. Miller, Principal, San Bernardino City Unified School District, Cajon High School
121. Luis Monarrez
122. Gerardo Monreal, Citizen
123. Violeta Montes, Citizen
124. Miguel Morales, Citizen
125. Heather Morelli, Student Services Coordinator, Mt. Diablo High School
Comment: Good Morning, I have been working at Mt. Diablo High School this year and I have observed the ROTC program extensively. I support the amendment to California Code Regulation 80037 to allow our ROTC instructors the opportunity to earn a credential in Physical Education based on the rigor of the program. Students are actively completing physical training to meet military standards as well as accomplish skills in drills for competitions. Our instructors maintain an excellent program that I fully support so that students may earn physical education credits as an option if needed. Thank you for your consideration.
126. Lilian Mulato, Citizen
127. Liliana Mulato, Citizen
128. Christopher L. Nelson, Citizen

129. Richie Nguyen, Citizen
130. Kenya Norwood, Citizen
131. Jonathan Ortiz, Citizen
132. Mark Otele
133. Andrew Pena, Citizen
134. Cecilia Pena, Citizen
135. Ivan Pena, Citizen
136. Jocelyn Pena, Citizen
137. Reymundo Pena, Jr., Citizen
138. Veronica Perez, Citizen
139. Trevor Philips, Citizen
140. Charles B. Pister, Citizen
141. Jesse Portillo, Citizen
142. Guillermo Post, Citizen
143. Rosemary Preciado, Citizen
144. Elisbeth Ramirez, Citizen
145. Monica Ramirez, Citizen
146. Valeria Ramirez, Citizen
147. Virginia Ramirez, Citizen
148. Karina Ramos, Citizen
149. Adrian Reyes, Citizen
150. Alberto Reyes, Citizen
151. Alejandro Reyes, Citizen
152. Hector Reyes, Citizen
153. Leslie Reyes, Citizen
154. Lizbeth Reyes, Citizen
155. Roberto Reyes, Citizen
156. Rosalinda Reyes, Citizen
157. Veronica Reyes, Citizen
158. Wendy Reyes, Citizen
159. Michelle Reygoza, Citizen
160. Ariana Rivera, Citizen
161. Edgardo Rodriguez, Citizen

162. Nikkie Rodriguez, Citizen
163. Manuel Romero, Citizen
164. Elizabeth Ruiz, Citizen
165. Michael G. Russ, Citizen
166. Jesus Sanchez
167. Mario Sanchez, Jr., Citizen
168. Breanna Sanderson, Citizen
169. Michael Sanderson, Citizen
170. Roxane L. Sanderson, Citizen
171. Indelisa Sandoval, Citizen
172. Maria V. Santos, Citizen
173. Sonya Scheffer, Citizen
174. Johanna Seigal, Citizen
175. Matthew Shadoan, Citizen
176. Joshua Slough, Citizen
177. Sandie Sluka, Citizen
178. Cassandra Smith, Parent/Social Worker, California Cadet Corps
179. Jim O. Smith, Citizen
180. Michael J. Smith, Parent/Fire Chief, California Cadet Corps
181. Yasmeen Smith, Citizen
182. Eric Sosa, Citizen
183. Katlyn Sosa, Citizen
184. Shannon Sosa, Citizen
185. Mark Sprague, Citizen
186. Adrianna Stacy, Citizen
187. Irene Sumanpour, Citizen
188. Christian D. Taddeo, Sr. Army Instructor
Comment: See Attachment B
189. Katherine Teo, Citizen
190. Odalys Tomes, Citizen
191. Yvannah Torres Reyes, Citizen
192. Michael Townly, Citizen
193. German Valdes, Citizen

194. Jose Valdez, Citizen
195. Kenia Valencia, Citizen
196. Gabriel Vega, Citizen
197. Xittelly Vega, Citizen
198. Vanessa Villa, Citizen
199. Juanita Vixie, Citizen
200. Cyairra White, Citizen
201. Dennis Whittaker, Citizen
202. Tanzinia Willis, Citizen
203. Matt Wooding, Citizen
204. Ben Yanez, Citizen

Written Responses Representing Organizations in Opposition

1. Nancy Carr, Secretary/Board Member, California Center for Excellence in Physical Education

Comment: See Attachment C

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth, motor development, the sociology and psychology of human movement, knowledge of evaluation methods used for the various domains of learning in physical education (e.g., physical, psychomotor, cognitive, social, affective), basic strategies of test construction, evaluation and administration, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

An undergraduate degree in science is not required for the holder of a Single Subject Credential in Physical Education. Because a bachelor's degree is not a requirement for the ROTC or BMD Credential, it is unclear how many may hold a bachelor's degree.

Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- | | |
|--|--|
| <ol style="list-style-type: none"> 1) <i>the effects of physical activity upon dynamic health;</i> 2) <i>the mechanics of body movement;</i> | <ol style="list-style-type: none"> 3) <i>aquatics;</i> 4) <i>gymnastics and tumbling;</i> 5) <i>individual and dual sports;</i> |
|--|--|

- 6) *rhythms and dance;*
- 7) *team sports; and*

- 8) *combatives.*

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. This is a permissive section of the Education Code. The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

- 2. Rick Jahnkow, Project on Youth and Non-military Opportunities, Project Coordinator
Comment: See Attachment D

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth, motor development, the sociology and psychology of human movement, knowledge of evaluation methods used for the various domains of learning in physical education (e.g., physical, psychomotor, cognitive, social, affective), basic strategies of test construction, evaluation and administration, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school

physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- 1) the effects of physical activity upon dynamic health;*
- 2) the mechanics of body movement;*
- 3) aquatics;*
- 4) gymnastics and tumbling;*
- 5) individual and dual sports;*
- 6) rhythms and dance;*
- 7) team sports; and*
- 8) combatives.*

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

3. Stephen McNeil, American Friends Service Committee-West Regional Office, Director
Comment: See Attachment E

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- | | |
|---|---------------------------------------|
| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight

areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

4. Normandie Nigh, A World Fit For Kids, CEO/A World Fit For Kids!
Comment: See Attachment F

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- | | |
|--|--------------------------------|
| 1) the effects of physical activity upon dynamic health; | 4) gymnastics and tumbling; |
| 2) the mechanics of body movement; | 5) individual and dual sports; |
| 3) aquatics; | 6) rhythms and dance; |
| | 7) team sports; and |
| | 8) combatives. |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will

not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

5. Gale Wideow, PH.D., American Alliance for Health, Physical Education, Recreation, and Dance, President
Comment: See Attachment G

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth, motor development, the sociology and psychology of human movement, knowledge of evaluation methods used for the various domains of learning in physical education (e.g., physical, psychomotor, cognitive, social, affective), basic strategies of test construction, evaluation and administration, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The decision by a Local Education Agency (LEA) to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

There is currently no statutory renewal requirement for professional growth for teaching and services credentials. That responsibility is left to the local employing agency.

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

Written Responses Representing Individuals in Opposition:

1. Farnaz Bakhshi
2. Marianne Cadiz, Resident of Los Angeles
3. Linda Cameron, Resident of Los Angeles
4. Laura Chandler
5. Monica Chang, Resident of Los Angeles
6. Debra Cram, Resident of Los Angeles
7. Kelly A. Dumke, Resident of Los Angeles
8. Sean E.
9. Jocelyn Estiandan, Resident of Cerritos
10. Chad Fenwick, Resident of Chatsworth
11. Vanesa D. Garcia, Resident of Los Angeles

12. M. Ryan Hardy, Resident of Los Angeles
13. Melissa T. Hardy, Resident of San Diego
14. Denise Hoppal, Resident of Porter Ranch
15. Jasmine L. Klintong, Resident of Los Angeles
16. Josefina Mendoza, Parent
17. Lindsay Obello
18. Leigh Poirier, Resident of Irvine
19. Andy C. Remedios, Resident of Los Angeles
20. Carol Sun
21. Stephanie Tafoya
22. Grace E. Tan, Resident of Los Angeles
23. John Paul M. Tan, Resident of San Diego
24. Raymond Tan, Resident of Porter Ranch
25. Sora Park Tanjasiri, Resident of Irvine
26. Rose Veneracion, Resident of Los Angeles
27. Victoria Williams, Resident of Los Angeles
28. Amanda L. Wilson, Resident of San Diego

Comment: See Attachment H

Response: 1. Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- | | |
|---|---|
| <p><i>9) the effects of physical activity upon dynamic health;</i></p> <p><i>10) the mechanics of body movement;</i></p> <p><i>11) aquatics;</i></p> <p><i>12) gymnastics and tumbling;</i></p> | <p><i>13) individual and dual sports;</i></p> <p><i>14) rhythms and dance;</i></p> <p><i>15) team sports; and</i></p> <p><i>16) combatives.</i></p> |
|---|---|

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is

the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

2. *One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.*

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

3. *An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject matter knowledge requirement includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.*

29. Suzanne M. Acampora, Adapted Physical Education Specialist
30. Michael S. Adler, Physical Education Teacher
31. Michelle Agius, Physical Education Teacher
32. Paul Alvarez, Professor of Kinesiology, University of La Verne
33. Christina Amoroso, Physical Education Teacher
34. Lindsey Barber, Education Specialist
35. Patricia L. Beall, Physical Education Teacher
36. Mary Blackman, Retired Physical Education Coordinator
37. Mary Boston, Physical Educator
38. Heather Brabo, Physical Education Teacher
39. Jeannette C. Brittain-Smith, Physical Education Teacher

40. Kevin Butler, Teacher and Concerned Citizen
41. Brandon Chrest, Physical Education Student
42. Michelle Cohen, Teacher
43. Sharon Cohen, Retired Teacher
44. Brian Collins, Physical Education Teacher and Coach
45. Mark Cordano, Physical Education Teacher
46. Jesus De Rosas, Physical Education Teacher
47. Howard Edelman, Physical Education Instructor
48. Ron Ehrhard, Adapted Physical Education Specialist
49. Patricia Fegan, Teacher
50. Maani Fenwick, Parent
51. Carrie Flint, Elementary and Adapted Physical Education Specialist
52. Joshua Garza, Resident of Madera
53. Amy Gazzaniga, Physical Education Program Specialist
54. Gary Ghirardi, Resident of Poway
55. Michael A. Godfrey, Resident of Granada Hills
56. Zachary E. Groothuyzen, Kinesiology Student
57. Dawn Gustafson, Adapted Physical Education Specialist
58. Jennifer Harris, Physical Education Teacher
59. Heather Harrison, Physical Education Teacher
60. Betty Hennessy, Retired Director, Los Angeles County Office of Education
61. Samantha Hernandez, Kinesiology Student
62. Patricia P. Huato
63. Cassie Inglis, Chief Operations Officer, Coreva Health Science
64. Grant Kapigian, Kinesiology Student
65. Nick Kaprelian
66. Tami Kittle, Physical Educator
67. Dianne Laderas, Resident of San Jose
68. Kelly Lapachet
69. Mickey Leiding, Adapted Physical Education Specialist
70. Haley Marcoux, Physical Education Teacher
71. Gina Mitskus, Physical Education Teacher and Coach
72. Ursula Ng, Nutrition Specialist, Nutrition Education Obesity Prevention

73. Stacie Nixon, Physical Education Specialist
74. Dustin Nygaard, Physical Education Teacher
75. Holli J. Omori, Physical Education Teacher
76. Christina Owens, Adapted Physical Education Specialist
77. Donna Pattillo, Physical Education Teacher and Dept. Chair
78. William E. Perkins, Resident of Pacific Palisades
79. Tom Reed, Resident of Waterford, CA
80. Alicia Reyes-Flores, Physical Education Major
81. Michael Riggs, Teacher/Athletic Director
82. Josh Santiesteban, Resident of Campbell
83. Nathan Severin, Physical Education Teacher
84. Kevin Slauson, Physical Education Teacher
85. Frank Solis, Physical Education Teacher
86. Wendy Stratton, Physical Education Teacher
87. Brian E. Sturges
88. Tami Taylor, Physical Education Teacher
89. Adair Louise Tench, Retired Physical Education and English Teacher
90. Jean Varden, Health Educator and Director of School Age Programs
91. Joanie Verderber, Physical Education, Recreation, and Dance
92. Dr. Perky Vetter, Chair, Dept. of Kinesiology and Health Promotion, Cal Poly University, Pomona
93. Kelly A. Walters, Physical Education Teacher
94. Keith Wells, Physical Education Teacher
95. Mary White, Physical Education Teacher
96. Emyr Williams, Professor of Physical Education Teacher Education, Kinesiology Dept., CSU, Long Beach
97. Sandra Sunshine Williams
98. BJ Williston, The SPARKS Program
99. Terry A. With, Physical Education Teacher
Comment: See Attachment I

Response: 1. Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course

of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- 1) the effects of physical activity upon dynamic health;*
- 2) the mechanics of body movement;*
- 3) aquatics;*
- 4) gymnastics and tumbling;*
- 5) individual and dual sports;*
- 6) rhythms and dance;*
- 7) team sports; and*
- 8) combatives.*

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

2. One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

3. An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject matter knowledge requirement includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

100. Brandon Acutt, Bryan Katz, Kathy Navarro, Physical Education Option, Kinesiology Department, CSU Northridge

Comment: See attachment J

Response: Subsection (b) of EC §44225 requires the Commission to reduce and streamline the credential system to ensure teacher competence in the subject field or fields while allowing greater flexibility in staffing local schools and subsection (g) to establish alternative methods for entry into the teaching profession and into other certificated roles in the schools by persons in varying circumstances.

Education Code (EC) §33352, under the authority of the California Department of Education (CDE), establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- 1) the effects of physical activity upon dynamic health;
- 2) the mechanics of body movement;
- 3) aquatics;
- 4) gymnastics and tumbling;
- 5) individual and dual sports;
- 6) rhythms and dance;
- 7) team sports; and
- 8) combatives.

The employing agency must ensure that the physical education course taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will be limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

The Commission has issued 779 Reserve Officer Training Corps (ROTC) and Basic Military Drill (BMD) in the last five years. One of the prescribed conditions for high

school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. The decision by the Local Education Agency (LEA) to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

101. Evelyn Avidla, Sevag Zakarian, and Ronald Villar, Physical Education Option Students, Department of Kinesiology, CSU Northridge

Comment: To Whom It May Concern: Please vote NO on the proposal to allow JROTC to teach physical education in schools. Although these individuals have specific skills they do not have the proper academic foundation or meet the standards of the degree(s) needed as required by the requirements established by the California and National Standards for beginning teachers. There should be no exception to this, regardless of an individual's previously held position in a different line of work. Doing so would only set a precedence for other unqualified individuals to teach any subject in schools, affecting the education of students due to a decrease in the quality of teaching.

Physical Education is more than seeing how many push-ups someone can do or how fast s/he can run from point A to point B. It teaches students the necessary skills needed to participate in a variety of activities and the benefits that come with being active, which in turn leads them to not only enjoy physical activity, but value it enough to incorporate it into their everyday lives. Physical Education allows every student to be creative and integrated in a victimless environment; it is not a cookie cutter program that fits every student, each of who have different needs and motives.

Allowing JROTC to teach in schools will turn away more students from daily exercise than it will bring in, in addition to missing out on the education portion of physical activity. Instead students will be taught in a boot camp style classroom that forces them to perform certain exercises or movements that they may not know how to do or do so correctly, putting them in an uncomfortable and vulnerable position where they may not want to continue any further. More so, this would take away the jobs of more qualified individuals, those who have received the proper education and tools they need to be effective physical educators. The next wave of talented physical educators is soon to graduate, but if this proposal passes they will be out of jobs before they even have the opportunity to show what they know and can teach.

Vote NO on this proposal and keep quality teachers teaching Physical Education to be fun, educational, and core to a child's public school education.

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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|---|---------------------------------------|
| 1) <i>the effects of physical activity upon dynamic health;</i> | 4) <i>gymnastics and tumbling;</i> |
| 2) <i>the mechanics of body movement;</i> | 5) <i>individual and dual sports;</i> |
| 3) <i>aquatics;</i> | 6) <i>rhythms and dance;</i> |
| | 7) <i>team sports; and</i> |
| | 8) <i>combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

102. Diane Baker

Comment: Dear Commission on Teacher Credentialing, I urge you not to approve new regulations that would sanction the teaching of physical education by JROTC instructors. I am certain that the JROTC staff is physically fit and eager to impart beliefs and dedication to physical training to students enrolled in JROTC classes in high school. I am equally certain that these instructors will not know the depth and breadth of physical education. Various academic disciplines underlie physical education. These include: motor learning, kinesiology, biomechanics, the psychology of motivation, theory of group dynamics, and human growth and development. In addition, preparation for teaching physical education requires teachers to know fundamental motor skills, specific sport skills and the tactics and strategies involved in invasion (example – soccer), court (example – volleyball) and field (example – softball) games.

I applaud the JROTC instructors for their knowledge of fitness and military skills. This knowledge does not qualify them to be physical education teachers in California, unless they complete the required coursework, or demonstrate their knowledge of the disciplines of physical education by passing a rigorous exam.

I write this as a retired elementary physical education teacher, who is still learning from new research in my field.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in EC §33352(b)(7). The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

103. John Bartelt, Professor of Education, University of La Verne

Comment: Dear Dr. Darling-Hammond, PLEASE DO NOT amend Title 5 to establish a special Physical Education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.

First of all, the JROTC's drills *do not in any way equate* to the Physical Education Content Standards.

Of equal importance to me personally, *military-related activity has NO business in K-12 schools*, and this amendment would constitute an indirect opening for military recruitment. It's bad enough that NCLB contained a provision to share student contact information with military recruiters. Please do not make the mistake of allowing the military (which I served in) to be *any part* of our education system.

Thanks for your thoughtful consideration to preserve the integrity of both CCTC and CCSS.

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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| 1) <i>the effects of physical activity upon dynamic health;</i> | 4) <i>gymnastics and tumbling;</i> |
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| 3) <i>aquatics;</i> | 6) <i>rhythms and dance;</i> |
| | 7) <i>team sports; and</i> |
| | 8) <i>combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7).

104. Robin Branch

Comment: To Whom It May Concern:

I'm writing to express my concern to allowing JROTC to have the ability to teach PE w/o a Physical Education credential. I had to work full time and attend school full time in order to complete my PE credential. I'm pleased to have my credential and full time employment in Los Angeles. I believe we still have displaced PE teachers, in our district who are already fully credential and ready for employment.

Response: The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

105. Lee Brown, Professor- Strength and Conditioning, Director, Center for Sport Performance, CSU Fullerton, Department of Kinesiology
Comment: To Whom It May Concern: I urge you to vote NO on amendments to Title 5 of the California Code of Regulations pertaining to Designated Subjects Special Subjects Teaching Credentials. The amendment would establish a Special Teaching Authorization in Physical Education for holders of Designated Subjects Special Subjects Teaching Credentials (JROTC and Basic Military Drill).

Response: No comment.

106. Craig Buschner, Professor of Kinesiology, CSU Chico, Former President of the National Association of Sport & Physical Education (NASPE)
Comment: See Attachment K

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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|---|---------------------------------------|
| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of Reserve Officer Training Corps (ROTC) and Basic Military Drill

(BMD). The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve. A student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

107. Virginia Foster Chadwick, Professor Emerita of Kinesiology, CSU Fresno

Comment: Dear T. Duggan, I am appalled that the Commission on Teacher Credentialing is considering approving JROTC as physical education. The goals of Military Drill and the National and State Standards for Physical Education are diametrically opposed.

Physical education directs students toward a lifetime of physical activity and health related outcomes. Military drill's purpose is to create soldiers fit for combat. While there is some vague overlap in the area of health related fitness, the methods used to obtain fitness by the military involve, domination, and the use of exercise as punishment. Clearly this is not an instructional method that promotes lifetime activity. When the drill instructor is removed from the individual's life, many individuals do not have the knowledge or motivation to continue a lifetime of physical activity.

The most disturbing part of this potential to add JROTC drill instructors to the ranks of physical educators is the US Military's record on sexual harassment. Recent evidence shows that women, and homosexual individuals suffer psychological humiliation, physical duress, and non-consensual sexual violence from their fellow service members and officers. These crimes against one's person need to be prevented. To begin this horrendous practice in our schools does not protect our children from harm. This is utterly inconsistent with educational goals.

Physical Educators are trained in child development, age appropriate fitness, and the conscientious ones are lifetime learners that attend relevant conferences such as the American and California Association for Health Physical Education Recreation and Dance to keep up on best practices. The proposal lacks the proper training and follow up required to promote our children's health and welfare.

As a 38 year physical educator and teacher trainer, **I VEHEMENTLY OPPOSE APPROVING THIS ACTION!**

Thank you for your consideration in this matter.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

Comments concerning the military and sexual harassment do not pertain to this public hearing.

108. Janet Clark, Physical Education Teacher, Abraham Lincoln High School

*Comment: Dear Dr. Darling-Hammond, I'm writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special Physical Education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps **should not be approved** for the following reasons:*

Over the last several years, I have had many amazing Physical Education Student Teachers. These new teachers go through 4 years of college and then a year of observation/teaching at various schools. They spend their time and hard earned money to earn their degrees and credential. After getting their degrees, they look for work in their subject area of Physical Education and have a hard time being placed in schools (mostly due to budget cuts eliminating positions in California districts). Most of these new teachers take out loans and by the end of their schooling, many of them owe thousands of dollars for their education to become teachers.

Is it really fair to hand out a free authorization to others who haven't done their educational requirements for a different subject area? Is it fair to us Physical Education teachers who have fought over the years to keep quality Physical Education in the schools? If it were the reverse, would Physical Education teachers be allowed a special authorization to teach ROTC? To be completely honest, I would not be qualified.

The situation with JROTC has been going on for more than 4 years; involving the PE Independent Study program, having JROTC instructors credentialed, allowing only 1 JROTC supervisor to supervise two school sites with up to 200 students. Every year, it's something new. More exceptions, amendments continue to be made. It's not right.

I'm hopeful that the Credentialing Commission can whole-heartedly agree that the right thing to do is to not approved this special authorization

I appreciate your consideration of what I have said here and hope that it is read. Thank you.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD). One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

109. Bruce Coulter, Professor Emeritus, Cal Poly Pomona, Instructor, CSUSB

Comment: ROTC instructors should not received a teaching credential that would allow them to teach Physical Education. They are trained to lead "physical exercises" that improve fitness and that's all. Physical Education is not the same as physical fitness. Read the Calif. Framework and Model Content Standards. ROTC does not meet the goals and objectives of Physical Education.

Please do not allow ROTC instructors to teach Physical Education. P.E. is NOT physical training!! It's physical education; emphasis on students obtaining SKILLS, KNOWLEDGE AND ATTITUDES about the value of physical activity as it relates to one's health. ROTC understands fitness "training" not "education".

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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|---|--|
| <ul style="list-style-type: none"> 1) <i>the effects of physical activity upon dynamic health;</i> 2) <i>the mechanics of body movement;</i> 3) <i>aquatics;</i> | <ul style="list-style-type: none"> 4) <i>gymnastics and tumbling;</i> 5) <i>individual and dual sports;</i> 6) <i>rhythms and dance;</i> 7) <i>team sports; and</i> 8) <i>combatives.</i> |
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The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

110. Nancy Cruz

Comment: Dear Dr. Darling-Hammond, I'm writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The **proposal to amend Title 5** to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps **should not be approved** for the following reasons:

The Physical Education Content Standards for California Public Schools, K-12 affirm that participation in physical activity is not the same as education. JROTC has different goals and outcomes than physical education and is focused on participation in physical activity rather than learning the content of physical education.

The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will not prepare our students to achieve their highest potential.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

111. Kenneth Dyar, Director of Physical Education and After School Programs, Delano Union School District

Comment: Dear Dr. Darling-Hammond, I'm writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

The Physical Education Content Standards for California Public Schools, K-12 affirm that participation in physical activity is not the same as education. JROTC has different goals and outcomes than physical education and is focused on participation in physical activity rather than learning the content of physical education.

Approving the physical education authorization would in essence, give CTC's "blessing" for a blended course that cannot be delivered with fidelity. The content and learning outcomes for physical education and JROTC are not the same. Sufficient time must be devoted to the learning process for students to learn the content of physical education.

Physical education is a science based academic discipline. Effective teachers of physical education have strong undergraduate foundations in biological and physical sciences. This proposal does not require that foundation for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.

As a veteran California Teacher of the Year (2006), I have dedicated myself to developing quality physical education programs within my own district, city, and across the state. The research connecting quality movement education experiences and increased student academic achievement is clear. With that in mind, the CCTC should dedicate itself to strengthening the quality of physical educators employed in our schools, thereby strengthening the quality of the Physical Education experience for our young people who are in desperate need of such learning.

The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will not prepare our students to achieve their highest potential.

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

112. Rusmir Dzidic and Jacob Mailes, Concerned Education Supporters and Future Physical Education Teachers

Comment: To: California Commission on Teacher Credentialing, If this proposal gets passed as a state we will be headed in a destructive direction. This would do more harm, than good, that is why we are against passing this amendment. Not only would this be detrimental to our children having individuals not trained in appropriate standards based physical education content and pedagogical skills, it also take away jobs and is disrespectful to current and future physical educators. Current physical education option students are studying hundreds of hours going to school to get the proper knowledge and education to be better prepared to help our children thrive. In general, when people love what they do, they tend to do a better job than others. This would be taking away from those who have sacrificed so much to be able to give the children superior physical education content, and be giving it to people who specialize in military training. Physical Education is not military training and it is more than an emphasis on calisthenics and a limited focus on physical fitness.

Every student should have the opportunity to be a part of quality physical education programs. It is the role of these programs to help students develop health-related fitness, physical competence in movement activities, cognitive understanding, and positive attitudes toward physical activity so that they can adopt healthy and physically active lifestyles. How are children supposed to get adequate education when their teachers are being replaced with people who specialize in military training and drills? The Answer is simple, Vote "No".

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The Commission has issued 779 Reserve Officer Training Corps (ROTC) and Basic Military Drill (BMD) in the last five years. The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

113. Morgan Elizabeth

Comment: Dear Dr. Darling-Hammond, I'm writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

- JROTC has different goals and outcomes than physical education and is focused on participation in physical activity rather than learning the content of physical education. The instructors who hold Designated Subjects teacher credentials, do not have any academic background, nor pedagogy training to support their success in physical education.
- The military approach to physical activity is based on military task readiness rather than a lifetime of physical activity for all phases of good health. As a senior citizen, I know first-hand of the benefits of knowing how to plan and carry out ones physical activity program at all stages of life. The military does not address this important need.

The people of California depend on governmental agencies such as the CCTC to make decisions that will provide our children with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC does not accomplish this goal. Please do not approve these proposed regulations.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

114. Jenelle N. Gilbert, Ph.D., CC-AASP, Professor, Graduate Program Coordinator, CSU Fresno, Department of Kinesiology

Comment: Dear Dr. Darling-Hammond: I'm writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should NOT be approved.

The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will NOT prepare our students to achieve their highest potential. This will result in negative outcomes for everyone.

Again, please vote NO. Thank you.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and

other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

115. Marilyn Goodman

Comment: I wish to urge you NOT to amend Title 5 to authorize JROTC instructors to teach P.E. This action makes a mockery of physical education, an area vital to our youth today.

As a former language teacher, the health of our too sedentary youngsters is vital, and physical education is often the only real exercise they get. Don't approve JROTC teachers, who are interested in military activities not the physical health of our young people, teaching what they are not trained for.

Response: *The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.*

116. Morgan Graham

Comment: I'm writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

- The *Physical Education Content Standards for California Public Schools, K-12* present the learning that is to take place in physical education, not just participation in physical activity. JROTC has different goals and outcomes than physical education and is focused on participation in physical activity rather than learning the content of physical education. As a young professional, I've found that what I learned in physical education is significantly important in helping me with my physical activity program as an adult. The "do it because I said to" approach of participating in physical activity is not helpful to people. JROTC is a valuable course for some students; it is not the same as physical education.

- Effective teachers of physical education have strong undergraduate foundations in biological and physical sciences. This rulemaking action before you does not require the holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps even hold an undergraduate degree. The only teachers in our state that do not. How can we allow that kind of policy

The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will not prepare our high school students to achieve their highest potential.

Response: Because a bachelor's degree is not a requirement for the ROTC or BMD Credential, it is unclear how many may hold a bachelor's degree. The American Indian Languages Credential issued by the Commission does not require a bachelor's degree. An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

117. Corey Hamashita, Evan Stanoff, Lucy Ekmekchian, CSU Northridge, Kinesiology Department, Physical Education Option Students
Comment: See Attachment L

Response: Subsection (b) of EC §44225 requires the Commission to reduce and streamline the credential system to ensure teacher competence in the subject field or fields while allowing greater flexibility in staffing local schools and subsection (g) to establish alternative methods for entry into the teaching profession, and into other certificated roles in the schools, by persons in varying circumstances.

Education Code (EC) §33352, under the authority of the California Department of Education (CDE), establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- | | |
|---|---|
| <i>1) the effects of physical activity upon dynamic health;</i> | <i>2) the mechanics of body movement;</i> |
| | <i>3) aquatics;</i> |

- 4) gymnastics and tumbling;
- 5) individual and dual sports;
- 6) rhythms and dance;
- 7) team sports; and
- 8) combatives.

The employing agency must ensure that the physical education course taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will be limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. The decision by the Local Education Agency (LEA) to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

118. Tim Hamel

Comment: JROTC and Physical Education ...this is a total slap in the face for those students who invest in the process of obtaining a specific degree in Physical Education. Physical Education does not need a military mentality.

Response: A degree in physical education is not required for the Single Subject Credential in physical education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical

education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

119. Lori Harrison, Coach, Yucaipa High School Physical Education

Comment: Dear Dr. Darling-Hammond: I'm writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should NOT BE APPROVED for the following reasons:

The Physical Education Content Standards for California Public Schools, K-12 affirm that participation in physical activity is not the same as education. JROTC has different goals and outcomes than physical education and is focused on participation in physical activity rather than learning the content of physical education.

Approving the physical education authorization would in essence, give CTC's "blessing" for a blended course that cannot be delivered with fidelity. The content and learning outcomes for physical education and JROTC are not the same. Sufficient time must be devoted to the learning process for students to learn the content of physical education.

Physical education is a science based academic discipline. Effective teachers of physical education have strong undergraduate foundations in biological and physical sciences. This proposal does not require that foundation for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.

The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will not prepare our students to achieve their highest potential.

Current basic military drill and physical fitness training activities associated with Basic Military Drill and JROTC courses may include instruction in some or all of the required eight content areas.

Basic Military Drill and JROTC courses have objectives that are vastly different than the objectives for physical education. While physical fitness is indeed a component of JROTC coursework, the learning of skills, knowledge, and dispositions required to be physically active across the lifespan are absent in the JROTC curriculum. We have never seen a course that meets the objectives of JROTC AND physical education and includes all eight content areas.

Alternate ways of meeting the requirements for physical education as outlined in EC51225.3 JROTC is NOT an alternate way of meeting the requirements for physical education as outlined in EC 51225.3. This section of the code does not provide for an exchange of content, rather a modification in instructional strategies. JROTC does not

provide students the opportunity to learn the content in the Physical Education Content Standards for California Public Schools.

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- 1) *the effects of physical activity upon dynamic health;*
- 2) *the mechanics of body movement;*
- 3) *aquatics;*
- 4) *gymnastics and tumbling;*
- 5) *individual and dual sports;*
- 6) *rhythms and dance;*
- 7) *team sports; and*
- 8) *combatives.*

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching

Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

120. Janice L. Herring, M.S., full-time lecturer, CSU Stanislaus

Comment: See Attachment M

Response: 1, 3, 4 and 5) An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

2) Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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|---|---------------------------------------|
| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical

education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

121. Joseph E. Herzog

Comment: Dear Sir: As an educator of nearly fifty years and the father of three children, I wish to tell you that I am unalterably opposed to the proposal which would allow JR ROTC instructors to teach Physical Education. With all due respect to JR ROTC instructors they are simply not qualified to deliver instruction in a varied and diverse curriculum in which they have not properly been trained. The proposed training is wholly inadequate for them to deliver proper quality instruction. Such an action would do a serious dis-service to the children we serve.

JR ROTC focuses almost exclusively on physical fitness which makes up only 17% of the physical education curriculum. The California Education Code provides for a wealth of specific areas in which instruction in physical education is to be delivered. You and I know, in reality, that JR ROTC will NOT meet these requirements and that our children will be short changed in their education in a most serious fashion.

I urge you and the CTC to reject the proposal that would allow for JR ROTC instructors to teach physical education.. Doing so is in the best interest of the students of the State of California.

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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|---|---------------------------------------|
| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight

areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

122. Pat Howell, Senior Vice President-Financial Advisor, The Howell/Contrestano Group, RBC Wealth Management, LLC, Consulting Group

Comment: Please stop trying to put Jr. ROTC teachers in the PE Dept. in schools. They only teach 17% of the PE curriculum standards. There are teachers that are much more in tune with teaching students in PE.

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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| 1) the effects of physical activity upon dynamic health; | 4) gymnastics and tumbling; |
| 2) the mechanics of body movement; | 5) individual and dual sports; |
| 3) aquatics; | 6) rhythms and dance; |
| | 7) team sports; and |
| | 8) combatives. |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is

the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

123. Arlene Inouye, Speech Therapist, LAUSD

Comment: PE standards must be upheld, JROTC must meet these qualifications uniformly across the state. Thank you

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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|---|---------------------------------------|
| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for

completion of the prescribed course of study. The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

124. Barbara Johannes, Retired Career Education

Comment: Dear California Commission on Teacher Credentialing; I urge a 'NO' vote on the changes in Title 5 Regulations, allowing JROTC military instructors this special credential because it is against the best interest of the students in California, please check the data from Dr. Thomas McKenzie and others showing that JROTC only meets a small portion of any regular physical education class. The read Dr. John Ratey's book SPARK to show how physical education can improve all of a schools scores. He reports on a Learning Readiness Physical Education class to improve the schools, Turning any portion of physical education over to JROTC is heading in the wrong direction.

Thank you,

Response: The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. The LEA has full discretion of how their course of study is presented over the four year to include the eight areas of EC section 33352(b)(7).

125. Keith Johannes-Cahir, CAHPERD Legislative Committee

Comment: See Attachment N

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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|---|---------------------------------------|
| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an

educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

126. Birger L. Johnson, educator

Comment: It is nonsense for the Teacher Commission to allow military cadets to teach Physical Education. That action should be severely opposed.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and

other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

127. Bev Junginger, Retired Teacher, Administrator

Comment: Please vote NO on the new JROTC credential.

Response: No comment.

128. Margaret L. Kidd, Associate Professor of Mathematics, CSU, Fullerton, Single Subject Credential Coordinator, Mathematics, President CAMTE

Comment: Dear Ms. Duggan, Please vote NO on this issue. PE is extremely important for the well-being of today's teens in light of the obesity epidemic. These classes should be taught by an instructor with a background in kinesiology. It is much different than just doing a set number of calisthenics which the proposed candidates will be doing. In addition, without a well-rounded education received through a university, schools are opening themselves up to numerous lawsuits. This sounds like another quick fix which we all know will cause more harm than good.

Response: *The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.*

129. Donna A. Kimura, Physical Education Teacher - Coach, Retired

Comment: Dear Dr. Darling-Hammond, I'm writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing.

DO NOT APPROVE the proposal to amend Title 5.

- JROTC & Military based drill programs have different goals and outcomes than Physical Education.

- JROTC & Designated Subjects Teaching Credentials in Basic Drill

LACK the foundations in biological and physical sciences required in the undergraduate training for well prepared and qualified Physical Education teachers to provide exceptional educational experiences for California children and youth to prepare them to achieve their highest potential throughout their lifetime.

Thank you for your consideration to keep qualified and well trained physical education teachers teaching Physical Education.

Response: An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

130. Torrey Kylander and Germaine Parco, Physical Education Option Students , Department of Kinesiology, CSU, Northridge

Comment: As prospective Physical Education teachers, we ask that the commission vote “NO” on this proposal of allowing the JROTC in teaching K-12 students in California public schools. “Blessing” the JROTC to teach in the public school setting without proper educational training and teaching credentials is insensitive to us and many others, who have spent years in obtaining formal training in teaching children. It is reckless to allow such a proposal to be passed and permit someone with no proper training or experience to teach Physical Education.

Additionally, authorizing this proposal would render our training and education useless when those who have no formal qualifications are being permitted to teach our children. Moreover, Physical Education is more than just running laps and performing push-ups. To scrape the surface of Physical Education it is giving proper tools to young children in leading a healthy lifestyle in a fun and positive manner. If you back up a couple of decades Physical Education consisted of; running the mile, push-ups, sit-ups, rope climb and dodge ball. Currently, Physical Education is filled with creative games to raise children’s heart rates without them knowing they completed a mile run with smiles on their faces.

Please consider what message you would be sending to current and future teachers; "your education of 4 years plus 36 more units in an approved credential program is equivalent to a person with no teaching experience, does not have a degree in teaching and yet they are stealing your career". Would you like the JROTC taking your career simply because they need a job without having any qualifications? Would you like your child doing military drills during Physical Education or would you prefer them having fun and be given the tools to leading a healthy movement oriented life? It is unethical for unqualified people to be hired when many well-qualified physical education professionals are ready to teach developmentally appropriate physical education based upon California State Standards.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and

other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

Adding the proposed Special Teaching Authorization in Physical Education to the Designated Subjects Teaching Credential will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. The LEA has full discretion of how their course of study is presented over the four year to include the eight areas of EC section 33352(b)(7). This is the option of the employing agency.

131. Dr. Patricia Laguna, Undergraduate Program Coordinator, Department of Kinesiology, CSU, Fullerton

Comment: What I really want to know is what the underlying reason(s) for this proposed law? Is it a way to provide jobs to military personnel? Is it a way to not have to pay these individuals the salary of a credentialed teacher? This law is so far out in left field that the reason(s) for the law needs to be fully disclosed before any action is taken.

There are two major reasons why a Single Subject Physical Education Credential being given to JROTC Instructors should not be allowed. First, the state has been in the fore front of the nation in identifying standards to ensure that physical education is taught as part of the Physical Education Model Content Standards for California Schools. This academic perspective provides students with a consistent K-12 program throughout their elementary, middle school and high school years. Second, is the dangerous precedence set by handing out credentials to uneducated and untrained individuals. Basically this law would state that K-12 teacher preparation for physical education today and any subject in the future is unnecessary.

Response: The Commission anticipates that the proposed amendments will benefit the welfare of students attending public schools in the State of California by creating a Special Teaching Authorization in Physical Education that employers may potentially use in conjunction with EC §51225.3 to grant physical education high school graduation credit for basic military drill and physical fitness activity courses taught by holders of Designated Subjects Special Subjects Credentials in BMD and ROTC, thereby increasing the students' course options.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards

and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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|---|---------------------------------------|
| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. This is the option of the employing agency.

132. Dr. Anne Larson, professor, school of kinesiology and nutritional science, coordinator, physical education teaching preparation, director, youth agency administration studies certificate, director, intercultural proficiency certificate

Comment: hello - this email is to voice my concern about rotc instructors being granted physical education teaching eligibility. the last thing our state needs is more unqualified physical education professionals delivering instruction to our students. deficient content knowledge leads to deficient student learning. motor skill proficiency forays lifelong physical activity engagement - we are motivated to that in which we feel competent.

quality k-12 physical education fosters the motor skill proficiency required to sustain motivation to engage in activity. motor skills are developed through developmentally-appropriate, prescriptive practice, not simply providing equipment and space. delivery requires the content knowledge that preparation programs provide.

our students deserve better than to be subjected to deficient instruction. it really is a matter of life and death considering the dire health consequences of under-activity. allowing anyone less than qualified to deliver quality instruction is a travesty.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

133. Martha G. Lujan, Respiratory Therapist Retired

Comment: JROTC Teachers should not receive Physical Education authorization in California. The goals of a Physical Education class and JROTC class are not the same.

As a concerned parent I demand that JROTC Teachers not be allowed to teach PE class.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

134. Efrain Macedo and Luis Solis, Kinesiology Majors/Physical Education Option, CSU, Northridge

Comment: We, Efrain Macedo and Luis Solis are current undergraduates at California State University of Northridge seeking a career in Physical Education. We have worked without ceasing many years to graduate with a Bachelors of Science emphasis Physical Education degree. We recently found out that there is a possibility that there might be an amendment that will allow non-credentialed people and Physical Educators to teach the youth in California's public schools. This is absurd to put unqualified individuals from military science and JROTC or anyone without a physical education credential from an accredited higher institution to teach our youth. These drastic measures should be carefully looked upon by the whole community. In our honest opinion putting individuals with military interests to teach students physical education is not an educated choice. People who joined the military learn and are taught to teach others how to protect the United States of America. Also, if you put military service women/men in the role to teach Physical Education you are taking away work from true professionals trained to teach developmentally appropriate physical education to K-12 students. These credential teachers have experience working with youth from K-12 and an accredited certificate from a higher institution to teach Physical Education. It would not be wise to put someone who has no prior knowledge of children, or classroom management, or experience with physical education content as developed based on California's state standards for K-12 students. It just does not make sense. We implore you to reconsider your reform and take the perspective of all the educated and experienced young adults wanting and needing to be a positive influential physical educator in California's public school. Thank you for your time.

Response: *The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.*

An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. Adding the proposed Special Teaching Authorization in Physical Education to the Designated Subjects Teaching Credential will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

135. Dave Matuszak

Comment: Do not grant PE credit for JROTC !!

Support the PE state standards.

I have observed JROTC classes for 40 years at many high schools. It is not P.E. It is only physical fitness and it is not based on sound exercise science. It is based on boot camp.

PE is much more than physical fitness. Please read the PE standards and it will be clear to you why JROTC should not count as PE.

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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|---|---------------------------------------|
| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

136. Kristen Mattox, Dedicated Physical Educator

Comment: It is appalling that the Commission on Teacher Credentialing is even considering to allow Jr. ROTC teachers to teach PE. Physical Education should only be taught by qualified, properly credentialed teachers. It is a slap in the face of the entire profession of physical educators who are dedicated to their profession and understand the value and importance of a well-developed and implicated PE program.

If the commissions proposal goes through, I will fight to replace the math and English teachers for all cheerleaders as they learn to count and make posters through their cheerleading experiences, and that should be enough. I am qualified to teach math because I passed my math facts in elementary school, like to do math in my spare time, and I own a calculator. I am also qualified to teach English because, well, I am English speaking, speak it all the time, and like to write emails to people who bash my profession.

It is my request that the Commission on Teacher Credentialing please refrain from go through with the proposal to allow Jr. ROTC teachers to teach PE without the proper education, credential, or experience.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

Adding the proposed Special Teaching Authorization in Physical Education to the Designated Subjects Teaching Credential will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The decision by LEAs to choose to recognize the Special Teaching Authorization

in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

137. Justine J. McAlpine, Faculty member, Department of Kinesiology, CSU Fresno

Comment: I am writing this to urge you to NOT authorize JROTC instructors to teach physical education! These instructors are no doubt very good at teaching in their area of expertise, just as well-prepared physical educators excel at providing quality physical education classes to their students. However, that does not mean that either group is prepared or capable of offering comprehensive quality instruction to the others' students, especially instruction that meets rigorous state standards.

I am a faculty member at CSU Fresno in Kinesiology and I help train our future physical educators. We spend an incredible amount of time creating learning experiences that will best prepare these future teachers. Our students put in a ton of work and time to become the best educators they can be. To belittle this by offering a teaching authorization for our subject matter to a group without proper training/education is a travesty. JROTC instructors may know about military-style fitness; but that does not mean they are prepared to teach the remaining 83% or so of what is included in the state standards, or that military-style fitness is appropriate for the vast majority of children in our schools.

Please do not endorse this! The kids of California deserve to have the highest quality of teachers in all of their subject areas, including physical education. Our future physical educators deserve to have teaching jobs to come to when they complete their credentialing. We have made so much progress in improving physical education programs...please do not destroy what we have created!

Thank you for your time

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for

completion of the prescribed course of study. The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

138. Thomas L. McKenzie, P.H.D., Professor Emeritus, School of Exercise and Nutritional Sciences, San Diego State University
Comment: See Attachment O

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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|---|---------------------------------------|
| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical

education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

139. Andrew Mena and Randy Myles, Graduating Seniors, Physical Education Option, CSU, Northridge

Comment: We had very discouraging announcement while attending one of my Kinesiology courses at California State University, Northridge this week. We were informed by our professor that the California Commission on Teaching Credential considering allowing Physical Education job opportunities in California to individuals in Junior Reserve Officers' Training Corps and Basic Military Drill even though they are not education in the content or pedagogy of Physical Education. While JROTC is a great program in itself, you need to understand that not all of our students are bound to join the military so there is a greater need to educate our students in physical education rather than just drill them to be physically fit.

One main issue that we have with this consideration, these individuals are not required to hold a bachelor's degree in the subject of Physical Education. They would be the only "teachers" that will not have the important academic foundation that is needed to develop our students into becoming physically literate individuals. We feel that if this amendment is passed, our students will not be provided with all the content that is needed in physical education and addressed through the CA Physical Education Content Standards.

We spent four to five years in college to learn how to be a teacher of physical education, we have spent our money and time to learn the information to effectively teach developmentally appropriate lessons through the psychomotor, cognitive and affective domains. We future educators have worked diligently to be where we are and if this amendment is passed, this will be an insult to all current and future physical educators.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

Because a bachelor's degree is not a requirement for the ROTC or BMD Credential, it is unclear how many may hold a bachelor's degree. The American Indian Languages Credential issued by the Commission does not require a bachelor's degree. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to

determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

140. Jerie Morrison

Comment: I oppose amending Title 5. Ed. Code should not be changed to allow non-credential people to teach course for HS credit.

Response: Adding the proposed Special Teaching Authorization in Physical Education to the Designated Subjects Teaching Credential will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

141. Dr. Joan Neide, Chair, Department of Kinesiology and Health Science, CSU Sacramento

Comment: See Attachment P

Response: The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of Reserve Officer Training Corps (ROTC) and Basic Military Drill (BMD).

Because a bachelor's degree is not a requirement for the ROTC and BMD credential, it is unclear how many may hold a bachelor's degree. The proposed Special Teaching Authorization in Physical Education requires individuals to satisfy California's basic skills requirement and verify subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will be limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by the Local Education Agency (LEA) to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

142. Marc Norton

Comment: Dear Dr. Darling-Hammond: I'm writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved.

I am not going to make a long argument. You know very well that this is about making it easier for JROTC instructors to recruit our children to the military. Shame on anyone who approves this legislation.

Response: No comment.

143. David Nguyen and Allie Soriano

Comment: See Attachment Q

Response: Subsection (b) of EC §44225 requires the Commission to reduce and streamline the credential system to ensure teacher competence in the subject field or fields while allowing greater flexibility in staffing local schools and subsection (g) to establish alternative methods for entry into the teaching profession, and into other certificated roles in the schools, by persons in varying circumstances.

Education Code (EC) §33352, under the authority of the California Department of Education (CDE), establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The employing agency must ensure that the physical education course taught by an educator with the Special Teaching Authorization met the requirements set forth in the

Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will be limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. The decision by the Local Education Agency (LEA) to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

144. Debra L. Patterson

Comment: See Attachment R

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- | | |
|---|---------------------------------------|
| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. The decision by the Local Education Agency (LEA) to recognize the Special Teaching Authorization in Physical Education and use the option.

145. Norma F. Rahl

Comment: I have MANY concerns regarding the regulatory action scheduled for consideration on Feb. 14 , 2014 by the commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

The Physical Education Content Standards for calif. Public Schools, K-12 affirm that participation in physical activity is not the same as education. JROTC has different goals and outcomes that physical education and is focused on participation in physical activity rather than learning the content of physical education.

The content and learning outcomes for physical education and JROTC are not the same. Sufficient time must be devoted to the learning process for students to learn the content of physical education.

Physical Education is a science based on academic discipline. Effective teachers of physical education have strong undergraduate foundations in biological and physical sciences. This proposal does not require that foundation for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.

Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will no prepare our students to achieve their highest potential.

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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| 1) <i>the effects of physical activity upon dynamic health;</i> | 4) <i>gymnastics and tumbling;</i> |
| 2) <i>the mechanics of body movement;</i> | 5) <i>individual and dual sports;</i> |
| 3) <i>aquatics;</i> | 6) <i>rhythms and dance;</i> |
| | 7) <i>team sports; and</i> |
| | 8) <i>combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize

the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

146. Martin Ramirez

Comment: As a current administrator, it is very disappointing to learn that certain former or current military personnel will be allowed to teach P.E. without a teaching credential. As in the military, all citizens should earn the proper credentials or ranks to participate in any institution. Not to mention, we have many credentialed teachers without a job and that in itself is an injustice.

Response: Adding the proposed Special Teaching Authorization in Physical Education to the Designated Subjects Teaching Credential will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

Adding the proposed Special Teaching Authorization in Physical Education to the Designated Subjects Teaching Credential will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

147. Peggy Deal Redman, Ed.D., Director, LaVerne Experience, Professor of Education, La Fetra Family Endowed Chair for Excellence in Teaching and Service

Comment: I add my voice to the effort to NOT amend Title 5 that would allow JROTC instructors to be allowed to teach Physical Education in California Schools. As a longtime professor in Teacher Education I support the professionalism that currently exists, and would like to see it continue.

Thank you for hearing my voice.

Response: No comment.

148. Jacqueline A Relph, Physical Education Specialist, San Bernardino City Unified School District

Comment: I am writing to voice my opinion about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should NOT be approved for several reasons.

First of all, Physical Education is more than being physically fit. Physical Education encompasses motor and cognitive development, nutrition, rhythm, balance and coordination as well as strength, speed, endurance and flexibility. Part of a Physical Education teacher's job is to inspire students to adopt and maintain a healthy lifestyle beyond their school years.

Currently Physical Education teachers must have a strong academic understanding of, Biology, Anatomy, Physiology, Kinesiology, etc. By the time a college grad earns their Bachelors of Science degree, an intrinsic knowledge of what it means to be healthy has been cemented in their brains. This knowledge can then be passed on to the students.

Barking orders to "MOVE" is not the same as teaching about the human body and how and why to keep it healthy. Please do not approve the proposed regulations.

Thank you for reading and considering.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization

limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

149. Chris Reich

Comment: I am strongly opposed to having JR ROTC teach PE. I want trained, credentialed teachers teaching physical education. Please reconsider the proposal to allow JR ROTC to teach PE.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

150. Terry L. Rizzo, Ph.D, Professor and Chair, Emeriti Editor, Adapted Physical Activity Quarterly, Past President California Association of Health, Physical Education, Recreation and Dance, Member, Board of Directors of the American Kinesiology Association, President, National Consortium for Physical Education for Individuals with Disabilities
Comment: See Attachment S

Response: Subsection (b) of EC §44225 requires the Commission to reduce and streamline the credential system to ensure teacher competence in the subject field or fields while allowing greater flexibility in staffing local schools and subsection (g) to establish alternative methods for entry into the teaching profession, and into other certificated roles in the schools, by persons in varying circumstances.

Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and

substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

151. Nani Rowland M.S., R.D., Registered Dietitian, Tulare County Office of Education
Comment: I understand the Commission on Teacher Credentialing is being asked to allow JR ROTC teachers to be given authority to teach Physical Education. Though I believe the JR ROTC teachers may be qualified in certain areas of expertise they are certainly NOT qualified to teach Physical Education. JR ROTC teachers basically do instruction in fitness which is merely 17% of the total physical education curriculum.

Our kids deserve qualified properly trained and educated Physical Education teachers.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and

other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

152. Loren Scott

Comment: Please oppose the change to title 5 changes allowing JROTC to get PE credentials. The opportunity to get the credential is already there. I feel that if they wanted it, they can go through what every other teacher has to do to get it. This would give them an advantage over other legitimately credentialed teachers and should not be passed.

Response: *The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.*

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

153. Dr. Dennis Siebenaler, Music Education Area Coordinator, CSU, Fullerton

Comment: Dear Ms. Duggan, It has come to my attention through a faculty colleague at CSU Fullerton, that the California Commission on Teacher Credentialing is considering an equivalent credential in Physical Education for JROTC instructors. Personally, I do not see the equivalency between someone trained in physical education methods and materials with all the coursework, evaluations, and assessments that entails, with someone trained in military preparedness and marching drills. It would be comparable to say that someone who plays tuba in the military band is equipped to teach music (including vocal music, strings, elementary, etc.) to young people, K-12. That would certainly negate all the coursework, skills, and subject matter preparation that our current credential candidates develop as future professional educators. I would never be willing or able to support any short-cuts in that important process. I trust that this ridiculous idea will come to a quick end when the Commission realizes that its adoption will only jeopardize the physical well-being of the next generation of Californians.

Response: *The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter*

knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

154. Marie Silvio, Citizen, taxpayer, and mother of a physical educator

Comment: Dear Dr. Darling–Hammond: I have just learned from my daughter that the California Commission on Teacher Credentialing is considering amending the Title 5 on February 14, 2014, to establish a special physical education authorization for holders of Designated Subjects Teaching Credential in Basic Military Drill and Reserve Officer Training Corps. This change should not be approved because most of the people conducting these groups are NOT credentialed teachers and are NOT full time employees of the school district. I watched my mom get her teaching credentials and saw how hard she worked to be a good teacher. Physical Education should be taught by highly qualified teachers just like other subjects. High School students should learn how to do a lot of different activities they can do after they graduate. If you pass this change to Title 5, you will be take education away from students and do a disservice to children and youth and you will be discrediting the content area of physical education. Students deserve more from the CCTC who should ensure quality educators for every subject. I oppose this change.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California’s basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

155. Matthew Smit, Leo Garat, and Stephen Deckrow

Comment: See Attachment T

Response: Education Code (EC) §33352, under the authority of the California Department of Education (CDE), establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The employing agency must ensure that the physical education course taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

An undergraduate degree in physical education is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will be limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study. The decision by the Local Education Agency (LEA) to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

Comment: Dear Dr. Darling-Hammond: I'm writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

- As a physical education teacher, I have experience implementing and ensuring that students are successful in achieving National and State Physical Education Standards. Doing so takes every minute allotted to Physical Education. I do not feel that JROTC instructors have the appropriate training to ensure students receive a quality physical education that utilizes each minute of physical education to its fullest.
- As an individual who took 4 years of JROTC in high school I can attest that the JROTC physical experience is vastly different than the physical experience in a physical education class. I do agree that students in JROTC are physically active and the instructors are responsible for this, but they do not achieve the standards put in place at the national and state levels by performing push-ups, sit-ups, and running a mile and a half. I do not doubt the instructors' ability to make students physically active, but there is a difference in being physically active and physically educated.
- Effective physical education teachers have been through thorough undergraduate work that gives foundations in anatomy, biological, and physical science. Along with this, physical education teachers have learned strategies to ensure that students are receiving a well-rounded and balanced physical education experience which cannot be supplied in a dual-subject setting.

Students need highly qualified teachers that will provide them with an exceptional physical education experience that leads to lifelong learning. Adding this authorization will not allow our students to learn to their highest potential.

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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| 3) <i>aquatics;</i> | 6) <i>rhythms and dance;</i> |
| | 7) <i>team sports; and</i> |
| | 8) <i>combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the

Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

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The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

157. Belinda Stillwell, Associate Professor, California State University, Northridge, Department of Kinesiology, Single-Subject Coordinator/Physical Education

Comment: Dear California Commission on Teacher Credentialing (CCTC): I write this letter to you to express my concern over the amendment that would establish a Special Teaching Authorization in Physical Education for holders of Designated Subjects Special Subjects Teaching Credentials (JROTC and Basic Military Drill).

JROTC and Basic Military Drill are programs that promote different interests than those of Physical Education; namely, military preparedness versus physical educators who learn how to plan and deliver physical activity programs in a school setting.

It is with respect that I request you vote no on this amendment.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

158. Craig Tacla, Ph.D., Kinesiology and Health Science, CSU, Sacramento

Comment: Hello Ms. Tammy Duggan and members of the CCTC, Please vote No on the proposal set forth by JROTC. Physical Education is a standards-based subject (not Physical Activity) and allowing the JROTC proposal would simply set a precedence for other subject areas and special interests. Please strongly consider the implications of your potential actions as they pertain to the profession Physical Education.

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

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| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education

courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

159. Michael Verderber, college student

Comment: Dear Dr. Darling –Hammond: I have just learned from my mom that the California Commission on Teacher Credentialing is considering amending the Title 5 on February 14, 2014, to establish a special physical education authorization for holders of Designated Subjects Teaching Credential in Basic Military Drill and Reserve Officer Training Corps. This change should not be approved because most of the people conducting these groups are NOT credentialed teachers. I watched my wife get her teaching credentials and saw how hard she worked to be a good teacher. Physical Education should be taught by highly qualified teachers just like other subjects. High School students should learn how to do a lot of different activities they can do after they graduate. If you pass this change to Title 5, you will taking education away from students. I oppose this change.

Response: *The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.*

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

160. Peter Verderber, parent and business owner

Comment: Dear Dr. Darling-Hammond: I have just learned from my wife that the California Commission on Teacher Credentialing is considering amending the Title 5 on February 14, 2014, to establish a special physical education authorization for holders of

Designated Subjects Teaching Credential in Basic Military Drill and Reserve Officer Training Corps. This change should not be approved because most of the people conducting these groups are NOT credentialed teachers and are NOT full time employees of the school district. I watched my wife get her teaching credentials and saw how hard she worked to be a good teacher. If you pass this change to Title 5, you will do a disservice to children and youth and you will be discrediting the content area of physical education. Our students deserve more from the CCTC who should ensure quality educators for every subject. I oppose this change.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

161. Megan Watanabe, Adapted Physical Education Teacher

Comment: Dear Dr. Darling-Hammond: I'm writing to voice my concerns about the regulatory action scheduled on February 14, 2014. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

- Basic Military Drill and JROTC courses have objectives that are vastly different than the objectives for physical education. While *physical fitness* is indeed a component of JROTC coursework, the learning of skills, knowledge, and dispositions required to be physically active across the lifespan are absent in the JROTC curriculum. We have never seen a course that meets the objectives of JROTC AND physical education and includes all eight content areas.
- The *Physical Education Content Standards for California Public Schools, K-12* affirm that participation in physical activity is not the same as physical education.
- JROTC does not provide students the opportunity to learn the content in the *Physical Education Content Standards for California Public Schools*.

The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in

Basic Military Drill and JROTC will not prepare our students to achieve their highest potential.

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- | | |
|---|---------------------------------------|
| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be

met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

162. Loran Watson MA.ED., Adapted Physical Education Specialist

Comment: I am writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing (CCTC). The proposal to amend Title 5 to establish special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

- The Physical Education Content Standards for California Public Schools, K-12 affirm that participation in physical activity is not the same as education. JROTC has different goals and outcomes than physical education and is focused on participation in physical activity rather than learning the content of physical education.
- A sound physical education program is designed with scientific principles underlying the rationale. If a candidate does not have the courses such as but not limited to: anatomy, exercise physiology, kinesiology, child development, engrained in their education, plus a two year credential programs education which teaches how to teach information to various learners, then they are not capable of teaching a sound physical education program.
- Physical education is science driven. This proposal does not require that foundation for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.

Physical education is more important than ever in this ever changing world of technology. The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will not prepare our students to achieve their highest potential.

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- | | |
|---|---------------------------------------|
| <i>1) the effects of physical activity upon dynamic health;</i> | <i>4) gymnastics and tumbling;</i> |
| <i>2) the mechanics of body movement;</i> | <i>5) individual and dual sports;</i> |
| <i>3) aquatics;</i> | <i>6) rhythms and dance;</i> |
| | <i>7) team sports; and</i> |
| | <i>8) combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

An undergraduate degree in science is not required to earn a Single Subject Teaching Credential in Physical Education. The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

163 and 164. Roland Wendell and Richard Wilson

Comment: Dear Dr. Darling-Hammond: I'm writing with concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps **should not be** approved for the following reasons:

- JROTC is NOT the same as physical education – only JROTC people would tell you that it is. The two courses are not similar; in fact, some might suggest that JROTC should be a history/social science course because of the military history component.
- All California teachers should be required to hold undergraduate degrees, this will not be true if the proposed regulations are adopted.

The students of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will not accomplish this goal and will leave students with gaps in their learning.

Response: The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

Because a bachelor's degree is not a requirement for the ROTC or BMD Credential, it is unclear how many may hold a bachelor's degree. The American Indian Languages Credential issued by the Commission does not require a bachelor's degree.

165. Jamie Wolf

Comment: Hello, I am a veteran credentialed California teacher. As I understand it, you will soon vote on amending Ed Code Title V to allow uncredentialed JROTC instructors to teach physical education. While I have no objection to them obtaining credentials and

teaching PE, I do object to them being allowed to teach in a public school without a credential. Please vote to oppose this amendment.

Response: Adding the proposed Special Teaching Authorization in Physical Education to the Designated Subjects Teaching Credential will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The decision by LEAs to choose to recognize the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

166. James D. Wyant, Ph.D., Assistant Professor, Department of Health, Exercise, and Sport Pedagogy, University of the Pacific

Comment: Dear Dr. Darling-Hammond: I'm writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

* The Physical Education Content Standards for California Public Schools, K-12 affirm that participation in physical activity is not the same as education. JROTC has different goals and outcomes than physical education and is focused on participation in physical activity rather than learning the content of physical education.

* Approving the physical education authorization would in essence, give CTC's "blessing" for a blended course that cannot be delivered with fidelity. The content and learning outcomes for physical education and JROTC are not the same. Sufficient time must be devoted to the learning process for students to learn the content of physical education.

* Pre-service teachers at Pacific and other California campuses work through Physical Education Teacher Education programs that provide them with differentiated, theory driven learning experiences that equip them with the knowledge and skills to deliver quality physical education. This proposal does not require that foundation for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.

The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will not prepare our students to achieve their highest potential. This proposal is particularly concerning when the national trend is to strengthen physical education's role in the K-12 context. Please see the recent policy Chicago Public Schools passed relative to physical education's role throughout the K-12 years. California should be in line with other states and school districts in valuing physical education's role in the K-12 context.

Response: Education Code (EC) §33352, under the authority of the California Department of Education, establishes the type and required instructional minutes of physical education instruction to be provided in the public schools. EC §51220(d) and EC §33352(b)(7) together require that a Local Education Agency (LEA) provide a course of study for high school physical education that includes a developmentally appropriate sequence of instruction in the following eight areas:

- | | |
|---|---------------------------------------|
| 1) <i>the effects of physical activity upon dynamic health;</i> | 4) <i>gymnastics and tumbling;</i> |
| 2) <i>the mechanics of body movement;</i> | 5) <i>individual and dual sports;</i> |
| 3) <i>aquatics;</i> | 6) <i>rhythms and dance;</i> |
| | 7) <i>team sports; and</i> |
| | 8) <i>combatives.</i> |

The statute does not specify that every class must include instruction in all eight areas but rather it speaks to a course of study over grades nine through twelve that includes all eight areas. The employing agency must ensure that the physical education courses taught by an educator with the Special Teaching Authorization met the requirements set forth in the Education Code. The student's course of study must include the eight areas and substantially meet the objectives and criteria of EC §33352(b)(7) over the four years. It is the obligation of the LEA to determine how each particular physical education class in their district supports its course of study for grades nine through twelve.

The proposed Special Teaching Authorization in Physical Education will provide the holder with a distinct physical education authorization limited to the areas of basic military drill and physical fitness training and will not authorize service in any physical education courses outside of ROTC and BMD. The Special Teaching Authorization in Physical Education will not compel LEAs to grant high school graduation credit in physical education for BMD and ROTC courses; it is an option for the employing agencies to apply at their discretion.

One of the prescribed conditions for high school graduation in subsection (a)(1)(F) of EC §51225.3 is completion of two courses in physical education (unless the pupil has been exempted). Subsection (b) of EC §51225.3 allows governing boards, with the active involvement of parents, administrators, teachers, and pupils, to adopt alternative means for completion of the prescribed course of study.

The LEA has full discretion of how their course of study is presented over the four years to include the eight areas in EC §33352(b)(7). The decision by LEAs to choose to recognize

the Special Teaching Authorization in Physical Education and use the option provided in EC §51225.3(b) is a local level decision.

The ROTC and BMD Credentials require four years of experience or education in their respective field. The proposed Special Teaching Authorization in Physical Education requires satisfaction of the California's basic skills requirement and verification of subject-matter knowledge in physical education equivalent to the subject-matter knowledge requirement that must be met by holders of Single Subject Teaching Credentials in Physical Education. The subject-matter knowledge requirement aligns with the K-12 physical education content standards and includes content in kinesiology, the science of human movement, growth/motor development, and knowledge of connections between physical education and other subject areas such as the life and physical sciences, health, mathematics, and the visual and performing arts.

Staff Recommendation

Staff recommends that the Commission adopt the proposed amendments to §80037 of the 5 California Code of Regulations pertaining to Designated Subjects Special Subjects Teaching Credentials.

CALIFORNIA CODE OF REGULATIONS TITLE 5. EDUCATION DIVISION 8. COMMISSION ON TEACHER CREDENTIALING

§ 80037. Specific Requirements for and Authorization of the Designated Subjects Preliminary and Clear Special Subjects Teaching Credential.

- (a) The minimum requirements for the preliminary special subjects teaching credential shall include all of the following:
- (1) Experience, or experience and education, or education in each special subject to be named on the credential, which totals four years. One year of the required experience shall be within the three-year period immediately preceding the issuance of the credential. This requirement shall be verified in one of the following ways:
 - (A) for the special subject: Aviation Flight and/or Aviation Ground Instruction, experience is to be verified by the Federal Aviation Agency;
 - (B) for the special subject: Basic Military Drill, experience is to be verified by the adjutant general of the State of California; ~~or~~
 - (C) for the special subject: Reserve Officers Training Corp (R.O.T.C.), experience is to be verified by the branch of military service sponsoring the program in the employing school district; ~~or~~

- (D) for the special subject: Driver Education and Training, a baccalaureate degree from a regionally accredited college or university and a valid California Driver's License;
- (E) for the special subject: Limited Driver Training, submission of a current transcript of driving record from the Department of Motor Vehicles.
- (2) License, or recommendation, or course work shall meet one of the following criteria:
- (A) for the special subject: Aviation Flight and/or Aviation Ground Instruction, possession of a properly rated valid certificate, issued by the Federal Aviation Agency;
- (B) for the special subject: Basic Military Drill, a recommendation from the adjutant general of the State of California;
- (C) for the special subject: R.O.T.C., a recommendation from the branch of military service sponsoring the program in the employing school districts;
- (D) for the special subject: Driver Education and Training, twelve semester hours of subject-matter course work in driver education;
- (E) for the special subject: Limited Driver Training, a valid California driver's license; ~~submission of a current transcript of driving record from the Department of Motor Vehicles;~~ possession of a written statement from the prospective employing school district attesting to the applicant's ability to actually perform behind-the-wheel driver instruction; and possession of written assurance, from the prospective employing school district, that adequate supervision and appropriate staff development will be provided for the individual receiving the limited driver training authorization.
- (3) Verification of a high school diploma or the equivalent;
- (4) Verification of knowledge of the Constitution of the United States, as specified in Education Code Section 44335, by one of the means described in Section 80415;
- (5) ~~Verification of passage of~~ Satisfy the California Basic Education Skills Test basic skills requirement for the special subjects credential in Driver Education and Training, as specified in Education Code Section 44252;
- (6) ~~Verification by the Employing School District (ESD) or a Commission approved Local Education Agency (LEA)~~ that the applicant is aware of the requirements for the clear credential, including the program of personalized preparation;
- (7) Submission of a completed ~~a~~ Application for Credential Authorizing Public School Service ~~form as specified in Section 80001; a recommendation signed by a Commission approved LEA or the ESD on a form approved by the Commission;~~ the fee as specified in Section 80487(a)(1); ~~verification as specified for requirements (a)(1) through (a)(6);~~

and personal identification on duplicate fingerprint cards verification of completion of livescan and clearance by the Commission, unless clearance is already on file with the Commission;-

- (8) Recommendation from a Commission-approved program of personalized preparation as defined in §80034.1(a).
- (b) The minimum requirements for the clear special subjects teaching credential shall include all of the following:
- (1) A valid preliminary special subjects teaching credential;
 - (2) ~~Verification by the ESD of~~ Two years, or the equivalent, of successful teaching as defined in subsection 80034(f) and as authorized by the preliminary special subjects teaching credential. “Two years of successful teaching” means teaching for a minimum of one course in each of four terms;
 - (3) ~~Verification by a Commission approved LEA of completion of nine semester units, or 135 clock hours, in a Commission approved program(s) of personalized preparation~~ Completion of a Commission-approved program of personalized preparation based on the *Standards of Quality and Effectiveness for Career/Technical Education Teachers* (rev. 5/09), available on the Commission’s website and hereby incorporated by reference, accredited by the Committee on Accreditation as specified in Education Code Section 44373(c) ;
 - (4) ~~Verification of completion of~~ The study of health-unit requirement education as specified in Education Code Section 4426144259(c)(4)(A), by one of the means specified in Section 80421;
 - (5) Submission of a completed ~~a~~ Application Authorizing Public School Service form as specified in Section 80001; ~~a recommendation signed by a Commission approved LEA and/or the ESD on a form approved by the Commission; and the fee as specified in Section 80487(a)(1); and verifications as specified for requirements (b)(2), (b)(3) and (b)(4).~~
 - (6) Recommendation from a Commission-approved program of personalized preparation as defined in §80034.1.
- (c) The minimum requirements for the Special Teaching Authorization in Physical Education shall include all of the following:
- (1) Possession of a valid preliminary or clear special subjects teaching credential in Basic Military Drill or R.O.T.C.;
 - (2) Satisfy the basic skills requirement as specified in Education Code Section 44252;

- (3) Verification of Physical Education subject-matter knowledge by passage of an examination(s) as provided in Education Code Sections 44280, 44281, and 44282 or by completion of a subject-matter program as provided in Education Code Section 44310;
- (4) Submission of a completed Application Authorizing Public School Service as specified in Section 80001 and the fee as specified in Section 80487(a)(1).

(ed) Authorization.

- (1) The preliminary ~~or clear~~ Special Subjects teaching credential authorizes the holder to teach the subject, named on the credential, in grades 12 and below, and classes organized primarily for adults;
- (2) The clear Special Subjects teaching credential authorizes the holder to teach the subject, named on the credential, in grades 12 and below, and classes organized primarily for adults, including services to English learners in specially designed content instruction delivered in English;
- (3) The Special Teaching Authorization in Physical Education authorizes the holder to teach physical education courses in basic military drill and physical fitness training in grades 12 and below, and classes organized primarily for adults.

(de) Period of Validity. The period of validity of the preliminary and clear special subjects teaching credentials shall be as follows:

- (1) A preliminary special subjects teaching credential issued on the basis of the applicant's satisfaction of all requirements excepting (a)(4) shall be valid for one year. The one-year preliminary special subjects teaching credential shall be extended to the full five-year preliminary period upon verification of satisfaction of requirement (a)(4) and submission of a completed application form and the fee, as specified in Section 80487;
- (2) A preliminary special subjects teaching credential issued on the basis of the applicant's satisfaction of all requirements specified in subsection (a) shall be valid for five years;
- (3) A clear special subjects education teaching credential issued on the basis of the applicant's satisfaction of all requirements specified in subsection (b) shall be valid for five years and is renewable on the basis of an application and payment of a fee.

Note: Authority cited: Section 44225, Education Code. Reference: Sections 44252, 44259(c)(4)(A), 44260.4, ~~44261~~44280, 44281, 44282, 44310, ~~and 44335,~~ and 44373(c), Education Code.



MT. DIABLO UNIFIED SCHOOL DISTRICT
MT. DIABLO HIGH SCHOOL
2450 Grant Street
Concord, California 94520-2297
(925) 682-4030

OFFICE OF THE
PRINCIPAL

January 27, 2014

Ms. Tammy A. Duggan
Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento, CA 95811

Greetings, Ms. Duggan:

As the principal of a comprehensive high school, I strongly support the CTC proposed amendment to Title Five of the California Code of Regulations pertaining to designated subjects special subjects teaching credential EC51225.3 to establish a Special Teaching Authorization in Physical Education for credentialed teachers of Basic Military Drill (BMD) and Junior Reserve Officer Training Corps (ROTC.)

The JROTC program provides an excellent alternative to traditional physical education programs. It is a proven successful model with many schools and school districts throughout the nation and the state of California already granting PE credit for JROTC classes. Because JROTC meets the same physical activity requirements mandated by the state for a PE program, the Commission's decision to grant a special PE teaching authorization to JROTC credentialed teachers will further legitimize this already-accepted practice.

The special PE teaching authorization will give our academy students more options in their high school experience. We are a wall-to-wall academy model school, which limits the number and type of electives a student can take. If JROTC counts for PE credits, it will provide flexibility in the schedules of students who want to take JROTC but cannot due to state- and academy-mandated graduation requirements. Another constraint is that a large majority of our students are required to take remedial classes in order to pass the High School Exit Exam and their requisite math and English classes. An additional benefit will be to help alleviate overcrowding in traditional PE classes.

Thank you for your proposal to recognize the experience, training, and qualifications of BMD and ROTC teachers. I would like to register my enthusiastic support of this amendment.

Sincerely,

A handwritten signature in cursive script that reads "Liane Cismowski".

Liane Cismowski, NBCT
Principal
cismowskil@mdusd.org

GS 1H-94

February 2014



Attachment B

MOUNT DIABLO HIGH SCHOOL
JUNIOR RESERVE OFFICER TRAINING CORPS (JROTC)
2450 GRANT STREET, CONCORD, CALIFORNIA 94520-2297
TELEPHONE: (925) 682-4030 Ext: 3489 FAX: (925) 687-9658



January 24, 2014

Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento, California 95811

To Whom It May Concern:

I strongly support the CTC proposal to establish a Special Teaching Authorization in Physical Education for credentialed teachers of Basic Military Drill (BMD) and Junior Reserve Officer Training Corps (JROTC.)

The JROTC program provides an excellent alternative to traditional physical education programs. It's a proven successful model with many schools and school districts throughout the nation and the state of California already granting PE credit for JROTC classes. Because JROTC meets the same physical activity requirements mandated by the State for PE programs, the Commission's decision to grant a special PE teaching authorization to JROTC credentialed teachers will further legitimize this already-accepted practice.

The most important impact the special PE teaching authorization will have is to give academy students more options in their high school class schedules. Today, the all-academy high school model severely limits the number and type of electives a student can take. If JROTC counts for PE credits, it will provide flexibility in the schedules of students who want to take JROTC but can't due to state- and academy-mandated graduation requirements. An additional benefit will be to help alleviate overcrowding in traditional PE classes.

Thank you for your proposal to recognize the experience, training, and qualifications of BMD and JROTC teachers; it will give us the authorization we need to help students get the most out of their high school experience.

Sincerely,

Christian D. Taddeo
Lt. Colonel, U.S. Army (Ret.)
Senior Army Instructor

CCEPE California Center for Excellence in Physical Education

January 27, 2014

Linda Darling-Hammond, Ed.D.
Chair, California Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento, CA 95811

Dear Dr. Darling-Hammond:

I write in reference to the Public Hearing scheduled on the February 14, 2014 California Commission on Teacher Credentialing Meeting.

This rulemaking proposes to establish a special teaching authorization in physical education for those holding the Designated Subjects Special Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.

We urge your careful consideration of this proposal and a “no” vote based on the following:

Physical Education and JROTC Are Not Equivalent Courses

The *Physical Education Content Standards for California Public Schools K-12* communicate the academic rigor of physical education, articulate rich learning expectations, and provide guidance in the development of high school physical education courses that fulfill both the expectations and the requirements of California public policy. Additionally, physical education has embraced its role in the shared responsibility for student literacy in the Common Core State Standards

JROTC course content is often specific to the sponsoring branch of the military and instructor background and experience, rather than State Board of Education adopted content standards. Programs typically provide students with specialized learning opportunities in military history, basic military training, citizenship, leadership, physical fitness, survival skills, and first aid.

The only link between physical education and JROTC may be with physical activity. However, when the stated outcomes are examined, the similarities are so distant and the differences so overt that nearly any K-12 content area would find a similar number of connections.

107 N. Reino Road, #112 Thousand Oaks, CA 91320

Pre Service Preparation is Essential for High Quality Instruction

The content of physical education is based in exercise physiology, biomechanics, motor development, motor learning, motor control, and the psychology and sociology of physical activity. Firmly founded in the sciences, effective instruction in physical education is dependent on the teachers content knowledge in both biological and physical sciences. This rule making action seeks to grant authorization to individuals who are not required to have a science based background or even an undergraduate degree. Should this proposal be accepted, I believe holders of the Designated Subjects Special Subjects Teaching Credentials would be the only teachers of mandated K-12 courses in California without university degrees. Unacceptable!

Historical and Current Perspectives

Supporters of JROTC have long sought a home in schools, and in recent years have made numerous, unsuccessful attempts to have JROTC courses classified as physical education courses. Their efforts include: changes to the Education Code via the legislative process, meetings with key leadership staff at the California Department of Education; applications for waivers from the State Board of Education, and now, they seek to have credentialing authorizations changed.

In September 2013, when CCTC first considered this proposal, the public spoke loud and clear, with the greatest majority of letters received by the Commission opposing this action. Further, the rationale provided in the documentation for the rulemaking process includes some rationale that needs clarification for accuracy. These include:

- *Current basic military drill and physical fitness training activities associated with Basic Military Drill and JROTC courses may include instruction in some or all of the required eight content areas.* California statute and regulation require all high school students to receive instruction in each of the eight content areas, not just some. *The Physical Education Model Content Standards for California Public Schools, K-12*, outline a course model to accomplish this and JROTC is not included in the model.
- *Alternate ways of meeting the requirements for physical education as outlined in EC 51225.3.* This section of the Education Code is clear in encouraging local school district stakeholders “to adopt alternate means for pupils to complete the prescribed course of study”. There is no language included in this section of the Education Code that encourages or permits substitutions for the course of study. JROTC is a substitution for physical education as presented here, and as it is currently delivered in schools.
- *Physical Education is an integral component in all branches of the military.* Physical activity and physical fitness are certainly valued by all branches of the military. However, physical education takes place only in schools and is built on the philosophy of motor skill development, knowledge of how one learns movement skills, assessment of personal physical fitness, knowledge of physical fitness, and the psychological and sociological factors related to physical activity.
- *A review of the 49 other states revealed that there are currently 9 states that allow JROTC courses to satisfy the physical education graduation requirement.* Nine of forty nine does not indicate a national trend. Further, of those nine, six states include permissive language, rather than mandated course language. In addition, the question before the Commission is not a question related to course credit policy, rather teacher credentialing. Is course credit within the purview of the Commission?

Attachment C

While we must acknowledge that JROTC courses do serve the interests of many of our students, they are not courses of physical education, nor are they taught by well qualified physical education teachers who can meet our students' significant needs to be physical educated.

A blended course of JROTC and physical education cannot be delivered with fidelity. The challenges presented in allocating instructional time, teacher expertise, and meeting student learning outcomes are always in favor of one content area and do not provide enough of the other to be acceptable.

A decision by the Commission to add the physical education authorization to the Designated Subjects Special Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps would only meet the needs of those interested in increasing the number of JROTC programs in our schools – a worthy goal. However, California students continue to demonstrate their significant needs for high quality physical education opportunities, let's work together to meet those needs.

Sincerely,

Nancy Carr

Nancy Carr
Secretary/Board Member

Project on Youth and Non-Military Opportunities

Project YANO • P.O. Box 230157 • Encinitas, CA 92023
(760) 634-3604; fax (760) 753-7518; www.projectyano.org

January 27, 2014

Linda Darling-Hammond, Ed.D Chair
California Commission on Teacher Credentialing
1900 Capitol Ave.
Sacramento, CA 95811

Re: Public Hearing February 14, 2014

Dear Dr. Darling-Hammond:

We are writing to express several concerns about the proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps. We urge you to either reject the proposal or, at a minimum, delay any action to allow adequate time for the commission to hear further comments and consider aspects of the issue that are not addressed in the commission's statement of reasons for the proposed change.

We would like to raise just two aspects that need full consideration:

1. It appears that the commission did not do a detailed inspection of actual Junior ROTC textbooks and other course material for relevancy. It would be illogical to formally authorize JROTC instructors to teach physical education without first determining whether the curriculum for which they are trained contains the necessary elements required to meet standards for teaching physical education. Our organization has been reviewing JROTC instructional material for the last two decades, and we believe that it contains very little content relevant to the state's standards for teaching physical education.
2. The commission should consider the fact that the JROTC course that is taught by instructors under the Designated Subjects Teaching Credential fails to meet the Education Code's standards for physical activity in PE classes. Substantial JROTC class time is spent delving into topics like history, writing, philosophical issues, social studies, military values and customs, military ranks and insignia, marksmanship training with pellet rifles and other topics that do not relate to physical education and involve no physical activity to speak of. The general standard for the amount of time spent in physical activity in a PE course is specified as 400 minutes every 10 school days, or 40 minutes per day, in the California Education Code (subdivision (a) of section 51222). This would require the entire timespan of an average daily class, which is simply not possible under the JROTC curriculum.

We believe that the commission has not had the benefit of a full analysis that looks at the quality and content of teaching that takes place in physical education versus basic drill and JROTC, and therefore we respectfully ask that the proposed change be rejected.

Sincerely,

Attachment D

A handwritten signature in blue ink that reads "Rick Jahnkow". The signature is fluid and cursive, with the first name "Rick" and last name "Jahnkow" clearly legible.

Rick Jahnkow
Program Coordinator

Attachment E



American Friends Service Committee

West Regional Office

65 Ninth Street, San Francisco, CA 94103 – (415) 565-0201

January 27, 2014

Linda Darling-Hammond, Ed.D Chair
California Commission on Teacher Credentialing
1900 Capitol Ave.
Sacramento, CA 95811 Re: Public Hearing February 14, 2014

Dear Dr. Darling-Hammond:

I'm writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

- The *Physical Education Content Standards for California Public Schools, K-12* affirm that participation in physical activity is not the same as education. JROTC has different goals and outcomes than physical education and is focused on participation in physical activity rather than learning the content of physical education.
- Approving the physical education authorization would in essence, give CTC's "blessing" for a blended course that cannot be delivered with fidelity. The content and learning outcomes for physical education and JROTC are not the same. Sufficient time must be devoted to the learning process for students to learn the content of physical education.
- Physical education is a science based academic discipline. Effective teachers of physical education have strong undergraduate foundations in biological and physical sciences. This proposal does not require that foundation for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.

In addition, in 2009 when discussing this possibility with physical education instructors in San Francisco, those I spoke with could not see that the physical education requirements of the State would be met by JROTC instructors. I see this move as a way to provide cover for continuation of JROTC instruction in the schools, not as a way to meet the physical education requirements of the students.

Sincerely,

A handwritten signature in black ink that reads "Stephen McNeil". The signature is written in a cursive, flowing style.

Stephen McNeil
American Friends Service Committee, San Francisco Wage Peace Director

Attachment F



A World Fit For Kids!

678 S. La Fayette Park Place
Los Angeles, CA 90057

(213) 387-7712 FAX (213) 387-7717

www.worldfitforkids.org

email: info@worldfitforkids.org

January 27, 2014

Dr. Linda Darling-Hammond
Ed.D Chair
California Commission on Teacher Credentialing
1900 Capitol Ave.
Sacramento, CA 95811

Re: Public Hearing February 14, 2014

Dear Dr. Darling-Hammond:

As the CEO of A World Fit For Kids! who has been working closely with elementary through high school students in Los Angeles for the past twenty years, I'm writing in regards to the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps **should not be approved** for the following reasons:

- The *Physical Education Content Standards for California Public Schools, K-12* affirm that participation in physical activity is not the same as education. JROTC has different goals and outcomes than physical education and is focused on participation in physical activity rather than learning the content of physical education.
- Approving the physical education authorization would in essence, give CTC's "blessing" for a blended course that cannot be delivered with fidelity. The content and learning outcomes for physical education and JROTC are not the same. Sufficient time must be devoted to the learning process for students to learn the content of physical education.
- Physical education is a science based academic discipline. Effective physical education teachers have strong undergraduate foundations in biological and physical sciences. This proposal does not require that foundation for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.

The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will not prepare our students to achieve their highest potential.

Yours in good health,

Normandie Nigh
CEO / A World Fit For Kids!



January 24, 2014

Commission on Teacher Credentialing
Attn.: Tammy Duggan (tduggan@ctc.ca.gov)
1900 Capitol Avenue
Sacramento, CA 95811

Dear Ms. Duggan:

On behalf of the children of California, the American Alliance for Health, Physical Education, Recreation and Dance (AAHPERD) urges the California Commission on Teacher Credentialing (CCTC) **NOT** to approve amendments to Title 5 of the California Code of Regulations pertaining to establishing a Special Teaching Authorization in Physical Education for holders of Designated Subjects Special Subjects Teaching Credentials (JROTC and Basic Military Drill).

For California's children to become healthy physically active adults, physical education needs to be an essential and integral component of their total education. That necessitates highly qualified physical education teachers who deliver a standards-based curriculum to assist the children in adopting and maintaining healthy lifestyles. Highly qualified physical education teachers possess the skills and knowledge to facilitate improved teaching practices, strengthen the quality of physical education instruction, and empower students to achieve and maintain healthy active lifestyles.

As such AAHPERD acknowledges that highly qualified physical education teachers will be certified to teach by virtue of having completed an accredited physical education teacher education program.

Highly qualified physical education teachers also:

- Understand the importance of meeting the needs of all types of learners
- Establish high expectations for learning within the psychomotor, cognitive and affective domains
- View assessment as an integral component of the teaching-learning process
- Demonstrate professionalism and ethical behaviors
- Constantly seek to update and refine their professional credentials.

California students deserve highly qualified physical education teachers. Again I urge you **NOT** to approve amendments to Title 5. Thank you for your attention.

Sincerely,

Gale Wiedow, Ph.D.

January 26, 2014

Linda Darling-Hammond, Ed.D, Chair
California Commission on Teacher Credentialing
1900 Capitol Ave. Sacramento, CA 95811

Re: **Public Hearing February 14, 2014**

Dear Dr. Darling-Hammond:

I'm writing you to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

1. Physical Activity is not the same as Physical Education, as affirmed in the *Physical Education Content Standards for California Public Schools, K-12*. Physical activity is a small part of the academic subject Physical Education, just as writing the alphabet is a small part of Reading, or adding and subtracting is a small part of Mathematics.
 - o JROTC has different goals and outcomes than Physical Education and is focused on participation in physical activity rather than learning the content of physical education.
 - o Take Driver's Education as an example, not only do youth need to "physically" practice driving on the road and behind the wheel, but youth need to be "educated" on the laws and rules of the road so that they can put that into action when they are driving behind the wheel. A parallel idea goes with youth needing quality standards-based physical education- they can practice these skills learned in physical education and apply them in physical activity opportunities in sports, recess, and in school.
2. Approving the physical education authorization would in essence, give CCTC's "blessing" for a blended course that cannot be delivered with fidelity. The content and learning outcomes for physical education and JROTC are not the same. Sufficient time must be devoted to the learning process for students to learn the content of physical education.
3. Physical education is a science based academic discipline. Effective teachers of physical education have strong undergraduate foundations in biological and physical sciences. This proposal does not require that foundation for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.

The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will not prepare our students to achieve their highest potential.

Sincerely,

January 27, 2014

Linda Darling-Hammond, Ed.D
Chair, California Commission on Teacher Credentialing
1900 Capitol Ave.
Sacramento, CA 95811
Re: Public Hearing February 14, 2014

Dear Dr. Darling-Hammond:

As an educator who in past years served on panels with the California Commission on Teacher Credentialing in order to raise standards for physical education teachers and improve the quality of programs for students, and as an educator who devoted her career to supporting quality educational programs for all students, I am writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

1. The *Physical Education Content Standards for California Public Schools, K-12* affirm that participation in physical activity is not the same as education. JROTC has different goals and outcomes than physical education and is focused on participation in physical activity rather than learning the content of physical education.
2. Approving the physical education authorization would in essence, give CTC's "blessing" for a blended course that cannot be delivered with fidelity. The content and learning outcomes for physical education and JROTC are not the same. Sufficient time must be devoted to the learning process for students to learn the content of physical education.
3. Physical education is a science based academic discipline. Effective teachers of physical education have strong undergraduate foundations in biological and physical sciences. This proposal does not require that foundation for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.

The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will not prepare our students to achieve their highest potential.

Sincerely,

January 24, 2014

Dear to whom it may concern,

We are writing to you today because of the proposal stating that military employees (Military Science and JROTC) would be able to teach physical education without having a physical education degree. All of us being in the physical education program at CSUN feel that this makes no sense. After taking many hours of classes here at CSUN we are still developing the full picture of what it means to be physical education teacher, we feel that military employees would not be suited to teach physical education. There are so many levels to physical education that go beyond the basic level of knowledge that military personal have.

We feel that not only do military personal not have the proper training, but also it is wasting all of the university and credential students' time that are majoring in physical education. Military personal have a different orientation because of the training they have received, and unlike CSUN students who have learned not only to include physical activity to enhance student's health but the cognitive understanding of physical education as well. With guided questioning, students will take a lot more from the physical side and really understand why they are doing physical activities.

It is our passion to shape the lives of our students through physical education. We have dedicated a portion of our lives to learn the proper protocols towards changing the lives of our students. Through various unique techniques we not only have the confidence but the proper knowledge to touch, shape, and change lives in the physical education environment. Military personal do not have the background nor the knowledge when it comes to teaching physical education and have no right to teach a standards based subject which we have worked so hard to learn.

Sincerely,

Brendon Acutt
Bryan Katz
Kathy Navarro

Physical Education Option
Kinesiology Department
California State University, Northridge

California State University, Chico
Chico, California 95929-0330
Department of Kinesiology
530-898-6373 Fax: 530-898-4932
<http://www.csuchico.edu/kine>

January 27, 2014

Linda Darling-Hammond, Chair
CCTC
1900 Capitol Ave.
Sacramento, CA 95811

Dear Dr. Darling-Hammond:

Please consider my point of view regarding CCTC action, scheduled for consideration on February 14, 2014. The proposal to amend Title 5 to authorize for special physical education authorization “**should be rejected**”. My arguments follow:

1. Quality school physical education and JROTC have different short and long-term goals. Physical “education” is designed to help *all children and youth* to become physically active for life. This requires *education* versus *training* and necessitates the achievement of state and national standards for learning that include the cognitive, affective and motor domains (CAHPERD & NASPE). Required school physical education, with certified/credentialed teachers, prepares literate movers for a lifetime of healthy living. JROTC is focused upon physical training and the preparation of future military personnel. These are very different purposes and require different levels of *teacher* versus *drill master* expertise.
2. School physical education is based upon the academic discipline of kinesiology. Credentialed teachers must have a body of knowledge that includes anatomy, physiology, biomechanics, exercise physiology, motor learning, motor development, psych-social aspects of learning, and pedagogy. The proposal fails to insure this foundational knowledge by JROTC instructors that is so essential for children and youth.
3. One-third of children and youth in the United States are inactive and overweight. California’s children (especially urban youth, low SES, and females) are in need of quality physical education learning experiences K-12. We need to educate our youth to learn: motor skills, understand scientific concepts of movement, become physically active on a daily basis, develop personal and social responsibility, and value lifelong participation. Physical education is much more than getting kids physically fit. JROTC is a limited program for a small percentage of youth who desire military training. Physical fitness is only one part of military training and leadership.
4. *Physical education is based on a sequence of learning. Physical education classes focus on physical activity—running, dancing and other movement but physical education also includes health, nutrition, social responsibility and the value of fitness throughout one’s life (SON, 2012).
5. *Research shows a link between quality physical education and present and future physical activity participation. One possible reason for this link is that youth “choose to participate in physical activities if they have skills that enable them to participate. Through physical education courses—instruction and specific, constructive feedback is provided by a certified teacher. (SON, 2012).

6. *Research shows that daily physical education has a positive correlation with academic performance and attitude toward school. This may be simply because physically fit students have better school attendance records and fewer disciplinary referrals. But recent research indicates that physical activity might impact academic performance “through a variety of direct and indirect physiological, cognitive, emotional and learning mechanisms”.

7. *Public Support for Physical Education

■ The American Academy of Pediatrics, NASPE, the AHA, the U.S. Department of Health and Human Services (HHS), the U.S. Department of Education, the President’s Council on Physical Fitness and Sport, and the Centers for Disease Control and Prevention (CDC) all are on record as supporting the need for physical activity for youth and for quality PE.

■ Some 31% of physical education teachers perceive increased interest and support from parents regarding students’ physical activity; and 27% perceive increased interest/support from parents regarding students’ PE.

■ According to one survey, nearly all parents (95%) think that regular daily physical activity helps children do better academically and should be part of a school curriculum for all students in grades K-12.

■ Three out of four parents (76%) think that more school physical education could help control or prevent childhood obesity.

■ The majority of parents believe that physical education is at least as important as other academic subjects. The percentages range from 54% to 84%, depending on the subject being compared.

■ A survey report from the Harvard Health Forum indicates that 91% of parents surveyed feel that there should be more physical education in schools, particularly for fighting obesity.

8. This proposal is misguided and ill conceived. It is not in the “best interests” of children and youth in California or the nation. Please **“do not approve”** the proposal.

Thank you for the opportunity to respond and share the viewpoint of the majority of dedicated professional educators in the nation and in California. If further information is needed please call or e-mail.

Sincerely,

Craig Buschner

Professor of Kinesiology
CSU, Chico

Chico, CA 95929-0330

Former President of the National Association of Sport & Physical Education (NASPE)

Attachment K

Voice Mail: 530-898-6960

E-Mail: cbuschner@csuchico.edu

*Direct Quotes taken from: *The Shape of the Nation Report: The Status of Physical Education in the USA* (SON, 2012). Conducted by the American Heart Association with the National Association for Sport & Physical Education (NASPE), Reston, VA.

Attachment L

Dear California Commission on Teaching Credentialing,

Over the past few days the proposal to amend Title 5 of the California Code of Regulations pertaining to Designated Subjects Special Subjects Teaching Credentials has been brought to the attention of the Kinesiology students at California State Northridge (CSUN). As future physical education teachers we would like to voice our opinion on this proposal in hopes that you reconsider amending Title 5.

Over the past five years we have worked hard towards earning a degree in Kinesiology, Physical Education at CSUN and have taken many core classes in science, kinesiology, and the teaching aspect of physical education. In that time we have come to understand that physical education and the philosophy behind teaching physical education is a core subject, supported by both California and National Physical Education Standards. We feel that these standards in Physical Education must come from trained/certified physical educators such as those of us graduating from an accredited single-subject program at CSUN. At CSUN we have spent time in the classroom, laboratory, and in the field which have helped prepare us for the long journey to not only better physical education but to have an impact on student's lives. We feel our background in science/kinesiology and pedagogy, and the new philosophy on teaching physical education, as well as our understanding of physical education curriculum, our future students will understand why it is important to be healthy and how they themselves can contribute to maintaining a long, healthy life with the skills, knowledge and physical activities found only in effective standards based physical education taught by credentialed physical educators.

Physical education is a core subject that will affect a student's life even after they graduate or move on and we as teachers can change the life expectancy of our students. We feel we must look beyond the traditional methods of just playing sports and running a mile and instead show our students the various types of physical activities that are creative and can be done outside of the school setting. We also believe that we must teach our students how to plan, assess, and analyze physical activity so that they can participate in activities for the rest of their lives not only because they want to, but because they are capable and confident.

Though we have nothing but the up most respect for the military and the physical activities that prepare our soldiers for duty, we feel that military based physical activity should not be a part of physical education but instead its own subject of special interest. Military physical activity helps students and soldiers prepare for the tremendous task of being in the military whereas in physical education we feel it should be about teaching students about the many types of

physical activities and giving students the knowledge to be a competent mover throughout their life.

By allowing men and women to teach physical education with no background in physical education content, kinesiology, and pedagogy you would set back the progress that many physical educators have made in changing the public's and legislator's views of what physical education is. We ask you to give future physical education teachers the opportunity to enhance physical education and help create lifelong skills for our students by making sure that those who are given teaching credentials in physical education are well prepared, have a grasp of the curriculum, and offer more than one type of physical activity.

We thank you for your time.

Sincerely,

Corey Hamashita, Evan Stanoff, Lucy Ekmekchian

CSU, Northridge
Kinesiology Department
Physical Education Option Students



CALIFORNIA STATE UNIVERSITY, STANISLAUS

DEPARTMENT OF KINESIOLOGY

January 23, 2014

Linda Darling-Hammond, Ed.D, Chair
California Commission on Teacher Credentialing
1900 Capitol Ave.
Sacramento, CA 95811

Re: Public Hearing February 14, 2014

Dear Dr. Darling-Hammond:

I'm writing to express my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

1. The *Physical Education Framework* and the *Physical Education Content Standards for California Public Schools, K-12* affirm that participation in physical activity is not the same as education. These documents were created through by the expertise of seasoned physical educators and physical education teacher education faculty. JROTC has different goals and outcomes than physical education and is focused on participation in physical activity rather than learning the content of physical education.
2. Approving the physical education authorization would in essence, give CTC's "blessing" for a blended course that cannot be delivered with fidelity. The content and learning outcomes for physical education and JROTC are not the same. Sufficient time must be devoted to the learning process for students to learn the content of physical education.
3. Physical education is a science based academic discipline. Effective teachers of physical education have strong undergraduate foundations in biological and physical sciences. This proposal does not require that foundation for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.
4. The content of physical education encompasses the integration of four learning domains: psychomotor, health-related physical fitness, affective, and cognitive, in an integrated, developmentally appropriate sequence. Highly qualified physical educators who have completed the subject matter program and multiple or single subject credentialing in the state of California spend a minimum of five years of their lives preparing to offer well-rounded physical education curriculum, with a primary goal of nurturing lifelong health-related fitness, sport participation, and physical activity practices of the students whom they teach. JROTC content has a very narrow focus for military service preparation which does not foster the development of a well-rounded physical educated individual.
5. The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will not prepare our students to achieve their highest potential. Given that many school districts have weakened physical education instruction by allowing class numbers exceeding 45 students, don't further erode the potential for highly qualified physical educators to impact students through this ill-advised authorization.

Sincerely,

A handwritten signature in blue ink that reads "Janice L. Herring".

Janice L. Herring, M.S., full-time lecturer
jherring@csustan.edu, (209) 667-3855

One University Circle • TURLOCK, CALIFORNIA 95382 • WWW.CSUSTAN.EDU • PHONE (209) 667-3325 • FAX (209) 667-3763

THE CALIFORNIA STATE UNIVERSITY • Bakersfield • Channel Islands • Chico • Dominguez Hills • Fresno • Fullerton • East Bay • Humboldt • Long Beach • Los Angeles
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January 23, 2014

Linda Darling-Hammond, Ed.D.
Chair
California Commission on Teacher Credentialing
1900 Capitol Ave.
Sacramento, CA 95811

Re: Public Hearing February 14, 2014

Dear Dr. Darling-Hammond:

I'm writing to voice my concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

- The *Physical Education Content Standards for California Public Schools, K-12* affirm that participation in physical activity is not the same as education. ***This is another devaluation of the field and discipline of physical education.***
- Approving the physical education authorization would in essence, give CTC's "blessing" for a blended course that cannot be delivered with fidelity. ***Great strides have been made the past decade advancing the quality of physical education with a rigorous Framework and Standards, This action would undermine the continuing efforts to enhance the 'health and safety' of California students.***
- Physical education is a science based academic discipline. Effective teachers of physical education have strong undergraduate foundations in biological and physical sciences. This proposal does not require that foundation for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.

The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will not prepare our students to achieve their highest potential.

I do hope you are aware of the anger and frustration of the physical educators, that have been working hard to improve their content knowledge and teaching skills, will experience if this action is continued. What other required course has had their teachers devalued and undermined in this manner?

The legislature has previously rejected the 'end run' facts of JROTC that the CTC is now considering. Please do not move forward with this change that undermines physical education in California.

Sincerely,



Keith Johannes – Chair
CAHPERD Legislative Committee
Dana Point, CA 92629

**Published abstract to be presented at the AAHPERD National Convention in April 2014.
The entire article is currently under review for publication.**

Title: Using SOFIT to Compare High School Physical Education and JROTC

Authors: Monica A.F. Lounsbery, Kathryn A. Holt, Thomas L. McKenzie, & Shannon A. Monnat

Background/Purpose: Physical education (PE) is important for engaging students in health-enhancing physical activity (PA) and for developing physical fitness and movement skills. PE is mandated as a curricular area in all 50 states, but many policy barriers to its effective delivery exist. Among these policy barriers is the practice of allowing alternative programs, such as Junior Officer Reserve Corp (JROTC), to substitute for PE in high schools. Advocates supporting substitution policies typically argue that these alternative programs engage students in substantial amounts of PA and provide the content that meets PE standards. Data supporting these arguments are not yet forthcoming. Therefore, the purpose of this study was to assess the conduct of PE and a commonly substitution program (JROTC) using direct observation.

Method: Two observers, trained via a standardized protocol, employed a validated and frequently used instrument, SOFIT (System for Observing Fitness Instruction Time), to assess student physical activity levels and the lesson contexts of 38 PE and 38 JROTC classes in 4 high schools. The schools were randomly selected from 12 district schools that provided both PE and JROTC. Data were analyzed using two-tailed t-tests.

Analysis/Results: Inter-observer reliabilities exceeded 90% for both student activity and lesson context variables. Students engaged in relatively more time in Walking (49 vs. 19%; $p < .001$), Vigorous (11 vs. 4%; $p < .001$), and Moderate-to-Vigorous PA (61 vs. 23%; $p < .001$) in PE than during JROTC. Conversely, they spent significantly less time Sitting (17 vs. 47%; $p < .001$), Standing, (22 vs. 30%; $p < .05$), and engaged in sedentary behavior (39 vs. 77% $p < .001$). Relative to lesson context, management time for both programs were similar (about 31% of lessons), but PE teachers allocated significantly more time for physical fitness (20 vs. 9%; $p < .05$) and game play (30 vs. 5%; $p < .001$) and teachers of JROTC lessons allocated significantly more time for knowledge (38 vs. 6%; $p < .001$). Knowledge time during PE primarily focused on physical fitness, motor skill development, and game strategy concepts. In contrast, most knowledge time (83%) in JROTC focused on drill, inspections, and military history and strategies.

Conclusions: JROTC and PE provide substantially different content, contexts, and opportunities for students to be physically active, learn movement skills, and become physically fit. Policies and practices for permitting substitutions for PE should be carefully examined. Replications of this study using the direct observation of other programs frequently permitted to substitute for PE (e.g., marching band) are recommended.



SAN DIEGO STATE
UNIVERSITY

School of Exercise and Nutritional Sciences
College of Health and Human Services
San Diego State University
San Diego, CA. 92182-7251

January 23, 2014

Tammy Duggan
California Commission on Teacher Credentialing
1900 Capitol Ave., Sacramento, CA 95811

Dear Ms. Duggan:

I'm writing to voice my concern, and urge the Commission to vote "**NO**" relative to the establishment of a Special Teaching Authorization in Physical Education for holders of Designated Subjects Special Subjects Teaching Credentials (JROTC and Basic Military Drill).

Physical education and JROTC are clearly different entities. They have different goals, provide different activities, produce different outcomes, and to teach them appropriately requires that their instructors clearly have different skills.

My colleagues and I [led by Dr. Monica Lounsbery] have been studying the conduct of physical education lessons and JROTC sessions in high schools for some time. Our manuscript, "JROTC as a Substitute for PE: Really?" is currently being reviewed for publication in a peer-reviewed journal. Meanwhile, an abstract of our study has been published on-line (<http://aahperd.confex.com/aahperd/2014/webprogram/Paper19703.html>) and will be presented at a national meeting on April 3. The results and conclusions are below:

Analysis/Results: Inter-observer reliabilities exceeded 90% for both student activity and lesson context variables. Students engaged in relatively more time in Walking (49 vs. 19%; $p < .001$), Vigorous (11 vs. 4%; $p < .001$), and Moderate-to-Vigorous PA (61 vs. 23%; $p < .001$) in PE than during JROTC. Conversely, they spent significantly less time Sitting (17 vs. 47%; $p < .001$), Standing, (22 vs. 30%; $p < .05$), and engaged in sedentary behavior (39 vs. 77% $p < .001$). PE teachers allocated significantly more time for physical fitness (20 vs. 9%; $p < .05$) and game play (30 vs. 5%; $p < .001$) and teachers of JROTC lessons allocated significantly more time for knowledge (38 vs. 6%; $p < .001$). Knowledge time during PE primarily focused on physical fitness, motor skill development, and game strategy concepts. In contrast, most knowledge time (83%) in JROTC focused on drill, inspections, and military history and strategies.

Conclusions: JROTC and PE provide substantially different content, contexts, and opportunities for students to be physically active, learn movement skills, and become physically fit.

Decisions should be based on data and science, not politics. I urge the commission to vote "**NO**" on this issue.

Sincerely,

A handwritten signature in black ink that reads "Thomas L. McKenzie".

Thomas L. McKenzie, Ph.D.
Professor Emeritus, School of Exercise and Nutritional Sciences
(phone 619-339-9869; tmckenzie@sdsu.edu)

Fesperman, Terri

From: Neide, Joan <neidej@saclink.csus.edu>
Sent: Tuesday, January 21, 2014 2:48 PM
To: Duggan, Tammy
Subject: Title 5 Amendments - Designated Subjects Teaching Credential JROTC and Military Drill



SACRAMENTO STATE

Kinesiology and Health Science

"Those who can, can. Those who can't, teach. Those who can't teach, teach gym." This line from the movie "Annie Hall" released in 1977 created lots laughter in the movie theatre. As a physical educator, when I heard these words, I cringed.

In 2014 the CCTC is again making me cringe as I read the proposal to amend Title V of the California Code of Regulations pertaining to Designated Subjects Special Subjects Teaching Credentials. The proposed amendment will establish a Special Teaching Authorization in Physical Education for holders of Designated Subjects Special Subjects Teaching Credentials (JROTC and Basic Military Drill).

The precedence established by this amendment is astonishing:

1. Individuals without a bachelor's degree would be authorized to teach courses in California public schools.
2. Individuals without multiple or single subject competency can teach an academic subject in California public schools.
3. A required subject area does not have to meet the standards set by the approved California model content standards.
4. A required subject will not be monitored for adhering to the model content standards for California public schools.

I am not writing this memo to defend physical education. In fact I am defending all academic subjects taught in California. Standards-based education encourages educators to apply standards and design specific curricular and instructional strategies that best deliver the content to their students. Standards-based education taught by credentialed instructors helps students achieve at high levels. Passage of this amendment is an insult to all university credential programs and to all current and future credentialed teachers.

Thank you,

Dr. Joan Neide, Chair
Department of Kinesiology and Health Science

January 22, 2014

To Whom It May Concern,

This is David Nguyen and Allie Soriano writing to you regarding JROTC teaching PE in the schools in California. We are seniors at Cal-State Northridge earning our Kinesiology degree with an option in Physical Education. We have gone through required courses such as Biomechanics, Motor Development, and Motor Learning as well as content development courses specific to teaching K-12 Physical Education. Collectively these classes have prepared us as future education teachers to complete effective lesson plans and prepare us teach students in primary grades as well as secondary grades in order to address both CA and National Physical Education Standards. This CA accredited program provided us, the foundation improving kids health as well as the educational foundation to lead a healthy life.

As a physical educator in the making we consider physical education, recreation, physical activity, dance, and sport a very important matter. Our courses and the professionals we have worked with have been such an inspiration and mentored us toward changing the lives of these children. We are tired of the “old fashion” Physical Educator with old habits that does not take this class very serious. We have been fortunate to be a part of the Physical Education option here at Cal State Northridge. Coming into this option, we assume we have it all figured out and think PE is fun and easy. Little did we know we just had an idea of what we thought it meant. We have had the privilege to learn from great professionals who know and care about Physical Education. Our courses have been of great knowledge and expanded our idea of Physical Education.

After hearing that they may grant teaching credentials for JROTC for teaching physical education in our schools this made my colleagues and I very concerned. Allie and I are especially concerned and this is why we came together to be heard. We are concerned for the students that we may be teaching in the future. We believe that knowing how to be fit and active does not qualify someone to correctly teach physical education to students. Physical Education is more than “free play” during school. We strongly believe that as Physical Education teachers in the future we must create a positive learning environment for our students K-12.

We are being taught to move away from traditional physical education as running miles, drills or just playing a sport. We have learned that we need to give students a variety of ways to be physically active by being creative, integrate other subjects into their PE programs and to challenge their minds. We also learn to have a victimless environment where students feel comfortable with physical education and we also learned to make our lessons equitable to all types of students. Physical Education might seem like an easy subject for many people, but we

are telling you from our experiences we have, that if we want to have an effective physical education program a physical education teacher must know what they are doing and why. It cannot just be anyone to do the job, if the amendments are approved anyone would be able to teach, with little to know awareness of required standards, pedagogical skills, scientific theory of child and adolescent development, let alone developmentally appropriate content. The focus will likely be physical drills and running based upon military discipline. That is not sufficient to effectively teach students because physical education is more than “one size fits all” content, every student will be different, therefore a good teacher will know that they must consider other factors and chose a lesson that is developmentally appropriate. We don’t believe anyone will be prepared enough to deal with students if they have not one through an accredited single-subject physical education program.

Thank you for your time.

Sincerely,

David Nguyen

David.nguyen.401@my.csun.edu

Allie Soriano

Alesoriano@ymail.com



CALIFORNIA STATE UNIVERSITY, FULLERTON

Attachment R

College of Health & Human Development

Department of Kinesiology

P.O. Box 6870, Fullerton, CA 92834/92834-6870 / T 657-278-3316 / F 657-278-5317

Monday, January 27, 2014

Commission on Teacher Credentialing
attn: Tammy Duggan
1900 Capitol Avenue
Sacramento, CA 95811

Dear Ms. Tammy Duggan,

As a former Physical Education teacher (currently hold a valid credential) and currently a Professor of Kinesiology in charge of our Teacher Preparation Program, I am very frustrated at the thought of allowing JROTC instructors to teach Physical Education to their students. I am encouraging the Commission to **"VOTE NO"** relative to the establishment of a Special Teaching Authorization in Physical Education for holders of Designated Subjects Special Subjects Teaching Credentials (JROTC and Basic Military Drill).

As one of the original authors with the *Physical Education Model Content Standards for California Public Schools: Kindergarten through grade Twelve (2006)*, I hold a very high value on the content the Department of Education approved that every student should know and be able to do at the end of each grade level. The standards provide teachers the guidelines of what should be taught. As Physical Educators, we don't just teach movement but the "how's & why's" of movement which provides students the evidence to make informed choices about physical activity across their lifespan. Our students learn how to assess and evaluate themselves and use those results to lead healthier and well rounded lives.

Physical education and JROTC are clearly different entities. They have different goals, provide different activities, produce different outcomes, and to teach them appropriately requires that their instructors clearly have different skills.

Recent research identifies that the both the content and context is very different in Physical Education when it is taught by credentialed Physical Educators versus JROTC Instructors. Lounsbury, M. A.F., Holt, K. A., McKenzie, T.L. & Monnat, S.A. (*to be presented 2014 and under review for publication*). Using SOFIT to Compare High School Physical Education and JROTC. (<http://aahperd.confex.com/aahperd/2014/webprogram/Paper19703.html>)

I can only hope for the Commission to consider the facts and future quality of Physical Education in California and **vote NO** on February 14, 2014. Hopefully, this won't just be a political vote but a vote on quality for the future citizens in California.

Sincerely,

Debra L. Patterson, Ph.D.
Professor, Department of Kinesiology
Physical Education Teacher Education, CSU Fullerton
P: (657) 278-8337 dpatterson@fullerton.edu

THE CALIFORNIA STATE UNIVERSITY

Bakersfield / Channel Islands / Chico / Dominguez Hills / East Bay / Fresno / Fullerton / Humboldt / Long Beach / Los Angeles / Maritime Academy
Monterey Bay / Northridge / Pomona / Sacramento / San Bernardino / San Diego / San Francisco / San Jose / San Luis Obispo / San Marcos / Sonoma / Stanislaus



26 January 2014

Linda Darling-Hammond, Ed.D
Chair
California Commission on Teacher Credentialing
1900 Capitol Ave.
Sacramento, CA 95811 Re: Public Hearing February 14, 2014

Dear Dr. Darling-Hammond:

Please accept this letter expressing my strong opposition to the recommendation to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps. This proposal *should not* be approved for the following reasons including, but not limited to:

1. Physical Education Rather than Physical Activity

The terms “physical education” and “physical activity” are often used synonymously but they differ significantly. Physical education instructional programs provide students with the skills and knowledge they need to establish and sustain physical activity as a key component of their lifestyle; as children, adolescents, and adults. Physical education instruction takes place in an educational setting; sequential approaches to content takes place, purposeful teaching and learning is priority, evidence of student learning is determined and gathered using motor assessment instruments, and decisions about program planning, implementation and evaluation grounded in science and student progress toward course goals.

Physical activity is bodily movement of any type and may include, but not be limited to, leisure, recreational, fitness and sport activities such as jumping rope, playing soccer, lifting weights, as well as daily activities such as walking to the store, taking the stairs or raking the leaves. National recommendations urge school-age children accumulate at least 60 minutes and up to several hours of physical activity per day while avoiding prolonged periods of inactivity. The benefits of regular physical activity are many, and are related to physical and mental health, academic success, and economic viability.

2. Outcomes

According to the National Association for Sport and Physical Education (NASPE), the unique goals of physical education are the development of physical competence (movement skills),

health related fitness, cognitive understanding (of the principles of physical activity), and a positive attitude toward physical activity.

Title 10, Section 2031 of the United States Code, outlines the purpose of the Junior Reserve Officers' Training Corps is to instill in students in United States secondary educational institutions the values of citizenship, service to the United States, and personal responsibility and a sense of accomplishment. To supplant JROTC for physical education is tantamount to academic negligence. Let the Pentagon offer after school activities for those who are interested in a career associated with the armed forces in after school programs. Make it an option and not a supplement to physical education. JROTC does not meet the same educational goals as physical education. Indeed it is nothing more than a recruiting mechanism for the military and should occur as an after school alternative like cheerleading and band.

3. Course Content

The *Physical Education Content Standards for California Public Schools* communicates what students need to know and demonstrate in physical education. This content is based on the academic disciplinary content of kinesiology and includes each of the following: motor development, motor learning, motor control, exercise physiology, biomechanics, psychology of physical activity, sport and exercise, and the sociology of sport, physical activity, sport and exercise.

The California State Board of Education has not adopted content standards for JROTC that match up with anything in Kinesiology and its subfield of physical education. Indeed JROTC deals with military leadership, basic military training, military history, policy and customs, physical training for survival in the field, first aid associated with trauma from combat and self-survival skills for warfare. Can you see the historical parallel? Is this something you really want to supplant learning about life-long physical activity?

4. Teacher Education and Credentialing

The pre-service education California's teachers receive reflects the diversity of the subject matter they teach that is associated with the academic discipline of Kinesiology with specialized academic experiences associated with pedagogical Kinesiology. California's future physical educators demonstrate professional competence based on a solid academic learning experience here at the university. The academic experiences are associated with course work in exercise physiology, philosophy, motor development, motor learning, motor control, biomechanics, with professional national standards and assessment in physical education.

The teachers of JROTC courses have specific military background and experience to prepare them for conflicts throughout the world; nothing to do with lifelong physical activity for fan active lifestyle as we age that contributes to fitness, wellness and a healthy lifestyle.

The California Commission on Teacher Credentialing authorizes teachers to provide instruction in physical education, music, and ROTC. These are three very distinct and different credentials. The subject matter requirements for each credential are unique and do not share the same requirements. Why would CCTC ignore the very policies they create for universities to comply to meet subject matter competencies? To include JROTC as a supplement to physical education

is to make a mockery of the very standards CCTC expects of us at the university to develop in young scholars.

5. What Others Say

A high-quality physical education program promotes an active lifestyle and improved health, motor skill development, and better cognitive performance. Daily physical education for all students is recommended by numerous national associations, including the Centers for Disease Control and Prevention, the National Association for Sport and Physical Education, the National Association for State Boards of Education, the American Academy of Pediatrics, and the American Heart Association, and is noted in the *Healthy People 2010* document. In addition, students participating in daily physical education exhibit better attendance, a more positive attitude towards school and superior academic performance. Are there any data to indicate similar outcomes for JROTC? If not, you have professional and philosophical obligations not to consider this proposal. To consider this proposal is a knee-jerk reflex response that is indicative of a ‘quick fix’ to make one powerful group happy. The Commission must not allow the military to recruit or entice our children in middle school for service in the military by promising financial aid for college that may never be available to these children. Instead keep JROTC as an after school elective activity and let physical educators prepare our children for an active lifestyle across their life-span.

It is true that JROTC also offers student’s opportunities to be physically active appropriate for military service (read war time preparation). These elective courses do not prepare students to meet grade- or course-level standards in physical education and do not follow the high school course of study established by *California Code of Regulation*, Title 5, Section 10060. Although these courses may be appropriate for elective course credit, they are absolutely not appropriate for physical education course credit.

“The California Department of Education (CDE) does not support granting physical education credit for single activities such as marching band, drill team, ROTC, or cheerleading. These activities do not meet the requirements within the description of a course in physical education, as specified in the *California Code of Regulations, Title 5, Section 10060*. This section lists criteria by which each school district shall appraise the quality of their high school physical education programs and states that the physical education course of study provides instruction in: aquatics, games, gymnastics, individual and dual sports, team sports, combatives, rhythms and dance, effects of physical activity, and mechanics of body movement.

The opinion of CDE is that marching band, drill team, cheerleading, ROTC, and related activities **do not** meet the physical education goals and objectives, as stated in either the *California Code of Regulations* or the *California Physical Education Framework*; nor do these activities prepare students for the physical performance test. “

Clearly recognizing the health, educational, and economical values of a citizenry that was equipped to engage in an active lifestyle, California’s policy makers made sound decisions to include physical education in the required course of study for all students in grades 1-12. Schools have the exclusive responsibility to provide our students with quality instruction in

physical education. This sub-field of Kinesiology does not occur in our communities; physical activity does, physical education does not take place in after school programs; physical activity does, and physical education is not in our homes, parks, or churches, it occurs *only* in our schools.

Recent educational reform efforts have strengthened the communication of what physical education encompasses and school decision makers, teachers, parents and students now share a universal view of physical education; what it is and why it's important. All stakeholders should be involved in local efforts to develop and implement high quality standards based physical education programs, efforts to do otherwise are not well invested, nor are they in the best interest of our students.

General activity programs that include some physical activity (recess, marching band, JROTC, cheer, etc.) have important but distinctly different goals and objectives than physical education. Any opportunity that provides students opportunity to participate in sustained periods of meaningful physical activity should be encouraged, and provided by our schools when possible. However, these activities do not provide a comprehensive standards-based physical education experience and should not be allowed to supplement the requirement of physical education.

Marching band, JROTC, recess, and other activities may serve the interests and needs of some of our students; simply stated they do not provide a comprehensive approach to the content of physical education, and the outcomes must not be confused nor exchanged for the skills and knowledge required to establish, practice, and value a physically active lifestyle.

Speaking on behalf of Kinesiologists in California I implore you to place your true values in the marketplace and reject the proposal to supplant physical education with JROTC. Make the Pentagon use its vast taxpayer money for volunteer after school activities. This country has spent billions of dollars on the military and recent wars. What cost can you place on the lives of the wonderful Americans that sacrificed their bodies and lives for meaningless wars that we now regret? Indeed CCTC should show its true values and require physical education and drop all the exemptions that are currently allowed to supplant physical education.

Thank you in advance for your consideration.

Sincerely,



Terry L. Rizzo, Ph.D.
Professor and Chair
Emeriti Editor, Adapted Physical Activity Quarterly
Past President California Association of Health, Physical Education, Recreation and Dance
Member, Board of Directors of the American Kinesiology Association
President, National Consortium for Physical Education for Individuals with Disabilities

Attachment T

Dear Commission on Teacher Credentialing,

As members of the California educational community, we ask that you vote NO on the proposal to allow JROTC individuals without a bachelors degree in physical education to teach physical education in our school systems. Physical education is one of the most important elements in education at our schools today. To allow those who bear no education in the field to teach the subject would have a negative impact on our students.

Physical education is not about making every student into a world class athlete or marine. A physical educator's purpose is to give all students an understanding of lifelong fitness and its importance. Students should come to class to enjoy fun ways to exercise not be drilled into fitness. The amount of time that teachers have with their students is very limited. The teacher is not going to make a student "fit" with just the 50 minutes a day in a given class. Credentialed teachers aim to teach students to engage in fun activities that they enjoy enough in class that they take it out of class with them. A drill sergeant type teacher is not going to have the mindset to make creative student interactive games to engage all students.

Consequences of making JROTC individuals certified teachers would include a decrease of enjoyment in class exercise and eventually reduce overall fitness. Many of the physical education curriculum at CSU, Northridge focuses on not only psychomotor learning outcomes but also a cognitive learning outcome. Our credentialed program focuses on engaging the students and analyzing each of their individuals needs rather than treat them all as if they are the same.

Although an instructor from JROTC might be able to get a child to move, they are

Attachment T

not going to help bloom the passion in children to pursue physical activities outside of class. JROTC individuals do not have the same comparable knowledge of someone with a degree in physical education. To have unqualified people teach a subject is absurd. Are we going to allow the cafeteria lady to teach the cooking class or home economics?

On behalf of physical education society, we ask that you vote NO on the ballot to allow for JROTC individuals to teach physical education during one of the most important times in which physical education is needed.

Sincerely,

Matthew Smit

Leo Garat

Stephen Deckrow

Attachment U

January 23, 2014

Linda Darling-Hammond, Ed.D, Chair
California Commission on Teacher Credentialing
1900 Capitol Ave.
Sacramento, CA 95811 Re: Public Hearing February 14, 2014

Dear Dr. Darling-Hammond:

I wrote to you on September 24, 2013, as a former physical educator and administrator, and I am writing again to voice sincere concerns about the regulatory action scheduled for consideration on February 14, 2014 by the Commission on Teacher Credentialing. The proposal to amend Title 5 to establish a special physical education authorization for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps should not be approved for the following reasons:

- The Physical Education Content Standards for California Public Schools, K-12 affirm that participation in physical activity is not the same as education. JROTC has different goals and outcomes than physical education and is focused on participation in physical activity rather than learning the content of physical education.
- Approving the physical education authorization would in essence, give CTC's "blessing" for a blended course that cannot be delivered with fidelity. The content and learning outcomes for physical education and JROTC are not the same. Sufficient time must be devoted to the learning process for students to learn the content of physical education.
- Physical education is a science based academic discipline. Effective teachers of physical education have strong undergraduate foundations in biological and physical sciences. This proposal does not require that foundation for holders of Designated Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corps.

The children and youth of California depend on the CCTC to make decisions that will provide them with well-prepared and exceptionally qualified teachers. Adding an authorization to teach physical education to the Designated Subjects Teaching Credential in Basic Military Drill and JROTC will not prepare our students to for real world challenges associated with physical and health literacy nor will it allow them to achieve their highest potential.

Joanie Verderber, Ph.D.

Project Director III, School Health and Physical Education
2011-2012 President, California Association for Health,
Physical Education, Recreation, and Dance
Glendora, CA 90741