

California Commission on Teacher Credentialing

*Meeting of
August 13-14, 2003*

AGENDA ITEM NUMBER: GS – 10 - A

COMMITTEE: Commission Committee of the Whole

TITLE: Proposed Revision of Multiple Subject
Credentialing Requirements to Align with
Requirements of State Board of Education's NCLB
Plan

 x Action

 x Information

 Report

Strategic Plan Goal(s):

- Goal 1:** Promote educational excellence through the preparation and certification of professional educators
- Sustain high quality standards for the preparation of professional educators

Presented By: Amy Jackson

Prepared By:

_____ **Date:** _____
Amy Jackson
Administrator, Professional Services Division

Approved By:

_____ **Date:** _____
Mary C. Armstrong
General Counsel

Approved By:

_____ **Date:** _____
Beth Graybill
Interim Director, Professional Services Division

Authorized By:

_____ **Date:** _____
Dr. Sam W. Swofford
Executive Director

Proposed Revision of Multiple Subject Credentialing Requirements to Align with Requirements of State Board of Education's NCLB Plan

Professional Services Division

August 13-14, 2003

Executive Summary

Senate Bill 2042 (Alpert and Mazzoni, Chapter 548, Statutes of 1998) calls for the Commission to ensure that teacher preparation and assessment is fully aligned to the K-12 student academic content standards (Education Code Section 44259 (b)(5) and Section 60605). In September 2001, the Commission adopted the *Standards of Program Quality and Effectiveness for the Subject Matter Requirement for the Multiple Subject Teaching Credential*. Program Standard 6: *Assessment of Subject Matter Competence* requiring the subject matter program to include a summative assessment of the subject matter competence of each prospective multiple subject teacher during one or more program capstone experiences. This standard requires that the assessment be consistent with the requirements of program *Standard 1: Program Philosophy and Purpose*.

Policy(s) Issue to be Considered

Should the Commission align requirements for a Multiple Subject Teaching Credential to conform to the requirements of Public Law 107-110: No Child Left Behind Act (NCLB), the state plan, and proposed regulations adopted by the State Board of Education (SBE)? If so, how should this requirement be implemented?

Fiscal Impact Statement

The Commission budget supports the costs of these activities, and no budget augmentation is needed to continue program activities.

Options

Four options are presented for the Commission's consideration to conform to the requirements for a Multiple Subject Teaching Credential to conform to the requirements of Public Law 107-110: No Child Left Behind Act (NCLB). They are:

- Option 1: Revise multiple subject matter program *Standard 6: Assessment of Subject Matter Competence*
- Option 2: Find current approved programs not eligible for the examination waiver
- Option 3: Adopt a combination of Options 1 and 2
- Option 4: Continue current credential requirements

Proposed Revision of Multiple Subject Credentialing Requirements to Align with Requirements of State Board of Education's NCLB Plan

Professional Services Division

August 13-14, 2003

Should the Commission align requirements for a Multiple Subject Teaching Credential to conform to the requirements of Public Law 107-110: No Child Left Behind Act (NCLB), the state plan, and proposed regulations adopted by the State Board of Education (SBE)? If so, how should this requirement be implemented?

Background

California's teacher preparation and credentialing system provides those seeking to enter the teaching profession two means by which to demonstrate their subject matter competency:

- passing a subject matter examination *California Subject Examinations for Teachers (CSET)*, *Multiple Subject Assessment for Teachers (MSAT)* pursuant to Education Code Section 44280, or
- completing a Commission-approved subject matter program with embedded culminating assessments.

Currently, 60% of multiple subject credentials are granted to applicants who pass the subject matter test. The remainder of applicants demonstrate subject matter competency by completing an approved program pursuant to Education Code Section 44310. For those individuals, the subject matter examination requirement has been waived by the Commission pursuant to Education Code Sections 44280 and 44310. In order to meet the NCLB "rigorous State test" requirement, elementary multiple subject credential candidates would need to pass either (1) a state approved validated multiple subject matter test or (2) a validated statewide culminating exam.

The current *Standards of Program Quality and Effectiveness for the Subject Matter Requirement for the Multiple Subjects Teaching Credential* were adopted by the California Commission on Teacher Credentialing (CCTC) in September 2001. Multiple subject matter *Program Standard 6: Assessment of Subject Matter Competence* was originally adopted in 1988 and revised as a result of SB 2042. This standard governs the culminating assessment required of all prospective teaching candidates completing an approved undergraduate subject matter preparation program (e.g., liberal studies program). The current standard allows a wide variety of approaches to assessment, including projects and portfolios.

Summary of Stakeholder Meeting on Program *Standard 6: Assessment of Subject Matter Competence*

A stakeholder meeting was held at the CCTC on Wednesday, July 2, 2003 to gather testimony about proposed revisions to multiple subject matter program Standard 6. The meeting was co-chaired by Margaret Fortune, Commission Chair and Rae Belisle, Executive Director, State Board of Education (SBE). Attended by 51 people, the meeting allowed for testimony from stakeholders, followed by comments from the official representatives. Stakeholders raised key issues and concerns. The following list of questions and comments summarizes the range of issues raised.

- If all multiple subject candidates are required to pass CSET, the level of diversity of new teachers will decline.
- Since some new teachers may already be at risk of having to take a new and unexpected exam, it is important that what will be required of them be both determined and communicated to them as quickly as possible. The same concern was expressed relative to candidates already enrolled in blended or traditional preparation programs based upon completing subject matter programs.
- The field needs to know how NCLB will impact those in Special Education, Vocational Education and alternative school settings as quickly as possible.
- The restriction of Supplementary Authorizations may impact the assignment of middle school teachers, given California's goal of creating core classes at the middle school level.
- Could simple academic majors suffice for subject matter competence for single subject credentials or will California continue to hold to its higher standard of an approved subject matter program?
- Could teachers hired on permits rather than credentials before July 1, 2002, be included in the SBE definition of veteran teachers, and therefore have the opportunity to be subject to the alternative evaluation process (HOUSE)?
- Does the California Commission on Teacher Credentialing (CCTC) have the legal authority to respond to NCLB requirements through its own administrative authority or is new legislative action needed?
- Could the CCTC identified subject matter examination be offered more frequently than six times per year? If so, how frequently could it be offered and at how many California sites?
- Could CSET be restructured into seven components so that a candidate could take one subject matter area -- or any configuration of the seven areas -- at a time? If this were feasible, candidates could focus their preparation for the examination.

- Could the completion of a teacher preparation program be added as an element of the definition of a highly qualified teacher in California?
- Would the subject matter exam requirement in the SBE's NCLB proposal impact the reciprocity agreements the CCTC has already adopted for out-of-state teachers?

Additional written comments were submitted and are included in Appendix A.

At the conclusion of the meeting, SBE Executive Director Belisle offered several points of clarification and intent. The first is that the federal law, NCLB, mandates a rigorous, uniform examination of subject matter for multiple subject teachers. The second is that the SBE will submit a plan that requires an examination for employment. The CCTC has the authority to determine which examinations can meet this requirement and also, simultaneously, fulfill part of the state credentialing requirement.

Additionally, Ms. Belisle shared information that a transition period for "new" teachers (i.e., teachers credentialed as of July 1, 2002) will not be allowed. She noted that the SBE had attempted to gain permission from the federal government, however, the State Board of Education was told that the law does not allow for transition time. NCLB took effect nationwide on July 1, 2002. The federal position to date is that all teachers credentialed after July 1, 2002, are considered "new." The SBE request for an extension of the California implementation date to June 2004 has been rejected. An appeal is being considered.

NCLB Implementation Options for Commission Consideration

Four options are presented below for Commission consideration. Each option offers a different solution; however, please note that, Options 1 and 2 are combined in Option 3. Option 4 maintains the current credentialing routes of approved course work or examination.

Option 1: Revise Multiple Subject Matter Program *Standard 6: Assessment of Subject Matter Competence*

To be consistent with the recent decision by the SBE to propose a subject matter examination requirement for all multiple subject candidates to meet Public Law 107-110: No Child Left Behind Act (NCLB), program *Standard 6: Assessment of Subject Competence* could be revised as follows. (A more detailed version of the revision to what is now proposed as *Standard 6: Culminating Assessment of Subject Competence* is in Appendix B.)

Proposed *Standard 6: Culminating Assessment of Subject Matter Competence*

The subject matter program includes a rigorous, uniform, culminating summative assessment. Each prospective multiple subject candidate is required to demonstrate compliance with Public Law 107-110: No Child Left Behind Act (NCLB), through passage of a subject matter examination as certified by the Commission on Teacher Credentialing.

Required Elements for proposed *Standard 6: Culminating Assessment of Subject Matter Competence*:

- 6.1 Each candidate is required to demonstrate subject matter competence to a comparable statewide standard across the range of subject matter required by Education Code Section 51210 and incorporated in the *Content Standards for California Public Schools, Kindergarten Through Grade Twelve* and state *Curriculum Frameworks*, focusing on grades K through 8. Areas of study include reading, language and literature; history and social science; mathematics; science; visual and performing arts; physical education; and human development.
- 6.2 The culminating summative assessment is rigorous and appropriately covers the range of subject matter defined in Program Standard 2 and the content specifications for the *Subject Matter Requirement for the Multiple Subject Teaching Credential*.
- 6.3 The uniform, systematic procedures that govern the culminating summative assessment includes a defensible process for evaluating performance (according to the *Standards for Educational and Psychological Testing, 1999*), an assessment score appeal process, and a procedure for prospective teachers to repeat portions of the subject matter assessment.
- 6.4 The sponsoring institution ensures that each teacher candidate is notified of the culminating assessment requirement and that thorough records are maintained of each prospective teacher's summative assessment scores.
- 6.5 The sponsoring institution acts on assessment evaluation findings, ensuring a uniform and equitable assessment of prospective candidates' subject matter competence. Where indicated by the findings of the evaluation, the sponsoring institution makes changes to curriculum programs, processes, or procedures to assist students in meeting the passing standard of the culminating subject matter assessment.

If the Commission chooses to adopt this option, there would be no change in policy concerning CCTC approval of subject matter programs. The Commission's approved program process assures that the curriculum offered at institutions is aligned with the *Content Standards for California Public Schools, Kindergarten Through Grade Twelve*. Candidates who choose to attend approved subject matter programs that are aligned to the K-12 academic standards for students should experience a higher probability of success on a required subject matter exam.

Currently, the CSET is the only subject matter examination certified by the Commission. Under this option, colleges and universities could also choose to develop or identify additional rigorous, uniform, valid, and reliable examinations to meet the requirements of Standard 6. Working together or individually, they could decide to:

- identify CSET or another state or national subject matter examination approved by the CCTC, or

- develop an examination and submit it to the CCTC for approval (until new examinations are approved, Institutions of Higher Education (IHEs) would use an exam approved previously by CCTC, currently CSET).

If the choice is an examination that is developed by a college or university (or a consortium), the examination could be administered on each campus at regular intervals. All requirements set forth in the "Required Elements" section of the standard would need to be met, including giving candidates multiple opportunities to take and pass the examination. An appeal process would need to be established as well as evaluation processes to oversee the equity and consistency of the exam administration and the scoring process.

Although CSET is currently the only test available, it is not specifically named in the proposed revision. This allows maximum flexibility to add other examinations when developed and approved. It also ensures that candidates who have taken and passed a previous CCTC certified examination (such as MSAT) have met the requirement. In addition, it would allow the CCTC to certify examinations given by other states, thus assuring portability to teachers trained out of state.

All IHEs will be required to resubmit to Standard 6. An expedited standard review and approval process will be conducted by CCTC staff. A coded correspondence would be released by the Commission describing the process and the timeline for submission as soon as a decision has been made by the Commission.

It is important to note that this option conflicts in part with the current statutory examination waiver provided in Education Code Sections 44280 and 44310 in that it precludes such an option without an express repeal of Education Code Section 44310. As a result, it is subject to challenge without a possible statutory change.

<i>Option 1: Multiple Subject Candidate Alternatives to meet NCLB Subject Matter Requirement</i>

- | |
|---|
| <ul style="list-style-type: none"> • Approved Program with Subject Matter Examination (currently CSET) |
|---|

OR

- | |
|---|
| <ul style="list-style-type: none"> • Examination Only (currently CSET) |
|---|

Option 2: Find current approved programs not eligible for the examination waiver

As a result of the decisions made in the SBE's NCLB concept paper (see Agenda item 10), staff has examined current statutory requirements for a viable solution to bring elementary subject matter programs into compliance with the new federal law and the state plan. Education Code Section 44312 provides as follows:

A finding by the commission of the inadequacy or inappropriateness of such program as the basis for waiving the subject matter examination shall cause persons completing such programs to be ineligible for the examination waiver.

Because current approved programs do not require a rigorous, uniform, valid, and reliable examination of candidates as provided by NCLB and the SBE plan, the Commission could issue a finding pursuant to Education Code Section 44312 that approved programs do not meet the SBE plan and, therefore, are no longer eligible for a waiver as defined in Education Code Section 44310¹. The result of such a finding would be that all currently approved multiple subject programs would no longer have approved status and candidates in these programs would not meet the subject matter requirement for acceptance into an approved teacher preparation program. All candidates would then be required to demonstrate subject matter competency through an examination process as required by Education Code Section 44280.

Under this option, the CCTC would make a finding pursuant to Education Code Section 44312 that the current approved programs are ineligible for the examination waiver in light of the passage of NCLB and the proposed regulations of the State Board. This option triggers an end to the examination waiver provided in Education Code Section 44310.

Option 2: Multiple Subject Candidate Alternatives to meet NCLB Subject Matter Requirement

- a. Examination Only (currently CSET)

Option 3: Adopt a combination of Options 1 and 2

Revise Standard 6 to require an embedded, culminating examination approved by the Commission (see Option 1 above). However, unless and until any such examinations were approved by the Commission, the approved program would be found by the Commission to be ineligible for the examination waiver requirement of Education Code Sections 44280 and 44310 pursuant to Section 44312. All multiple subject candidates would therefore be required to take a multiple subject examination pursuant to Education Code Section 44280. For current programs to meet the requirement of Section 44280 and 44310, they would be required to submit a new response to Standard 6 and identify the examination that candidates would be required to pass as part of the program.

¹ Education Code Section 44310:

The commission shall waive the subject matter examination requirement of graduates of accredited public and private institutions of higher education who successfully complete subject matter programs specified by the commission.

Eligibility for an examination waiver can only be achieved when the subject matter program is one which is listed by the commission on Section 44282, and the program has been successfully completed in an approved institution of higher learning.

The commission may require that the approved examination be taken by candidates, who are otherwise eligible for an examination waiver, for information purpose only. (Stats.1976, c.1010, 2, operative April 30, 1997)

This option provides the most flexibility to institutions of higher education and allows the potential for the development of a culminating assessment or adoption of a state or national examination by these institutions. It also allows for the requirement of a multiple subject examination in the interim until such assessments are chosen and approved in order to comply with the requirements of NCLB and the state plan.

All IHEs will be required to resubmit to Standard 6. An expedited standard review and approval process will be conducted by CCTC staff. A coded correspondence would be released by the Commission describing the process and the timeline for submission as soon as a decision has been made by the Commission.

Option 3: Multiple Subject Candidate Alternatives to meet NCLB Subject Matter Requirement

- a. Approved Program with Subject Matter Examination (currently CSET)
- OR**
- b. Examination Only (currently CSET)

Option 4: Continue current credential requirements

This action would have the effect of leaving those credential candidates who had completed approved programs not compliant with NCLB requirements.

Option 4: Multiple Subject Candidate Alternatives to meet NCLB Subject Matter Requirement

- a. Existing Approved Program
- OR**
- b. Examination Only (CSET)

Additional Discussion

If the CCTC takes action on an option that requires the revision of Title 5 regulations, commission staff could be directed to bring back language for consideration at the October 2003 commission meeting. Staff would conduct a thorough review of all related education codes, including SB 2042, blended programs (44259.1), and types and content of examinations (44282), and subsequently bring revisions forward for consideration and action.

Blended Programs

Candidates who enter an approved multiple subject blended program will have to take and pass an examination. Programs will need to advise candidates when to take the examination. Candidates need to be prepared for the content in the exam and be offered support if they do not pass a section of the exam. Candidates will want to take the examination early enough in their

program to allow for time to retake the examination if necessary. Programs may need to resubmit to Standard 6 depending on which option in this item is adopted.

Commission staff will, upon direction of the Commission, bring forward technical guidelines for currently approved blended programs and for new blended programs. If subject matter programs no longer required Commission approval, then new blended programs would only need to submit responses to the six blended standards and the new SB 2042 teacher preparation standards. Programs would be required to explain how subject matter and pedagogy are "blended." Candidates would need to obtain a bachelor's degree, complete teacher preparation, complete student teaching and pass a subject matter examination.

Effective Date of Adopted Option

Should the Commission decide to adopt option 1, 2, or 3 above, the effective date of the change needs to be determined. Factors to consider include anticipation of increased numbers of multiple subject test takers; the number of administrations planned for the examination; and how to notice multiple subject candidates who recently completed an approved subject matter program or who are currently enrolled in an approved program.

Staff anticipate a large increase in the volume of test takers. The increase in volume may begin with the fall administration of the CSET: Multiple Subjects. At this time, potential "new" test takers include:

- Emergency Permit teachers
- Pre-Interns
- Candidates who completed an approved program as of July 1, 2002
- Candidates who are newly enrolled in approved programs, including blended program candidates
- Education Specialists
- Veteran teachers who did not take an examination and do not want to go through the embedded HOUSE option.

Volume could increase by the thousands as soon as fall 2003, certainly over the next academic year, and into the following years, as candidates and teachers attempt to meet the 2005-2006 requirement that all elementary teachers take and pass a subject matter examination.

Staff is in contact with the CSET contractor, National Evaluation Systems (NES), to begin planning for a potential increase in test volume. Two additional administrations are planned for the fall of 2003. The administrations will be held in September and November at multiple sites across the state. Under the current contract, NES is obligated to offer the examination six times a year. Under the new test structure, first administered in January 2003, candidates take three sections: Language Arts and Social Science; Mathematics and Science; and Visual Arts, Physical Education and Human Development. Candidates may take one, two, or all three sections of the test at an administration. Staff is exploring options with the contractor for additional

administrations, additional sites, and the potential of returning test results to candidates in an expedited manner.

Potential Implementation Alternatives for an Adopted Option

Any decision regarding implementation of the adopted option must necessarily balance the requirements of NCLB and its implementation date of July 1, 2002, with the needs of the Commission's stakeholders, particularly IHEs, credential candidates, and school districts. In addition, it is necessary to note that although the requirement of a test may be postponed for purposes of qualifying for a credential, after July 1, 2002, all multiple subject candidates will be required to pass a multiple subject examination for employment purposes.

Five possible implementation alternatives for the NCLB Options presented above are offered for the Commission's consideration. They are as follows:

- A. – The adopted NCLB Option is effective immediately subject to regulatory timeliness, if necessary;
- B. - The adopted NCLB Option is effective January 2004;
- C. - Require the examination immediately for information purposes pursuant to Education Code Section 44310 with a full implementation of the adopted Option by July 1, 2006 (this date is subject to change); or
- D. - The adopted NCLB Option is effective July 1, 2005 (date based on the anticipated completion date for the current cohort of candidates in approved programs).
- E. – The adopted NCLB Option is effective January 1, 2005 in order to allow time for the Commission to seek legislative changes when necessary.

The five selections above offer a range of implementation alternatives, including making the adopted NCLB Option (A) effective immediately as of August 14, 2003, or making the adopted NCLB Option (B) effective when the Title 5 regulations are approved by the Office of Administrative Law, which could happen as soon as January 2004.

Implementation alternative (C) allows for a transition period wherein candidates would take the examination for "informational purposes" only. Candidates could complete an approved subject matter program, enter and successfully complete a teacher preparation program and be recommended for a credential. A candidate who completes the approved subject matter program and a teacher preparation program but does not pass a subject matter examination would still receive a credential up until a specified date, July 2006. However, candidates who seek employment as teachers would be required to eventually pass a subject matter test (July 1, 2006). Test scores collected for "informational purposes only" would be used along with all other examinees scores to study the results of the examination strictly for development purposes and to conduct additional standard setting studies. This would ensure the ongoing process of

documenting the validity of the examination. In addition, it would give currently enrolled candidates the opportunity to complete an approved program and obtain a teaching credential.

The fourth alternative (D) makes the adopted NCLB Option effective by July 1, 2005. This date is based on the anticipated completion date for the cohort of candidates enrolled currently in approved programs.

The fifth alternative (E) allows time for the CCTC to seek legislative changes to revise current statutory mandates relative to the options, timing and placement of the subject-matter examination requirement. For example, this could result in a precondition that requires all multiple subject candidates to pass a Commission-approved subject matter examination prior to entering a teacher preparation program.

Appendix A NCLB Letter

July 9, 2003

Margaret Fortune
Chair
California Commission on Teacher Credentialing

Rae Belisle
Executive Director
State Board of Education

Dear Margaret and Rae:

Thank you for the opportunity to participate in the July 2, 2003 meeting to discuss revisions to Standard 6 as part of the highly qualified teacher provisions in California's No Child Left Behind (NCLB) plan. As you know, our institutions have been actively engaged in a consortium to develop an alternative Teacher Performance Assessment – Performance Assessment for California Teachers (PACT) – to fulfill the requirements outlined in 2042. The lead institutions in the PACT Consortium welcome the opportunity to work in partnership with the State Board of Education (SBE) and our K-12 colleagues on implementing the NCLB provisions in support of the State's efforts to expand the supply of well-prepared teachers to meet the needs of all students while, at the same time, ensuring that teachers meet rigorous standards of content knowledge and teaching skills.

This letter summarizes the comments presented by UC's representative, Randall Souviney (UC San Diego), at the July 2 meeting. By way of follow-up to that presentation, we are offering some additional details and specific recommendations for the State Board to consider including in California's definition of a highly qualified teacher.

1) The ascertainment of subject matter competence. The State Board's current proposal mentions by name two tests that may qualify elementary school teachers as "highly qualified": the CSET and the MSAT, which are listed as examples of "validated statewide subject matter examinations" (p. 7). Given the reliance in California on the recruitment and hiring of many teachers from out of state, we believe it is critical for the state to authorize the use of other well-established, already validated examinations of subject matter knowledge used in other states, such as the Praxis II, which will have been taken by teachers prepared in other states who enter California. It is also important that a reasonable transition period be established for Multiple Subject credential recipients who completed their programs after 1 July 2002. Under the proposed definition, several thousand new California credential holders may not be considered Highly Qualified Teachers under NCLB and will therefore not be qualified to teach in Title 1 schools even though they have completed all current CCTC requirements for subject matter and professional preparation. The same principle ought to pertain to middle and high school teachers.

In addition, we note that in the chart on page 4 of the Board's proposal, passage of a subject matter test is not listed as a criterion for meeting NCLB requirements for middle and high school teachers, although that option is clearly included in the law. We also note that the law's provision for the "equivalent" of a subject matter major, which we presume would include the state's approved subject matter preparation programs for middle and high school teachers, are missing from that chart. [These options are also missing from the description of supplemental authorizations on p. 11 of the draft.] We recommend that the California plan clearly include the three options available under the federal law: a test, a major, or a subject matter preparation program (the equivalent of a major). We assume these are oversights that will be corrected in the final version of the proposal. While aiming to ensure high standards, it is also a goal of the state to ensure adequate supply of qualified teachers.

Finally, we urge the state to examine and clarify alternatives that will allow multiple subjects teachers in the middle grades means for demonstrating subject matter competence that are less onerous than the completion of multiple subject matter tests or multiple college degrees as the requirements currently seem to anticipate.

2) The ascertainment of adequate preparation and teaching skills. The Board's June proposal appeared to ignore some portions of the law and regulations intended to ensure preparation and adequate teaching skills on the part of teachers designated as "highly qualified." First, the requirement for new elementary teachers in the law and regulations addresses both "subject knowledge *and teaching skills* in reading/language arts, writing, mathematics, and other areas of the basic elementary school curriculum." The ascertainment of teaching skills is nowhere mentioned in the Board's June, 2003 proposal. We believe that this should be addressed through measures that include evaluation of teaching skills during the clinical portion of a teacher education program, such as the successful completion of a teacher performance assessment that evaluates teaching skills through actual classroom performance. This is already provided through SB 2042 in the requirements for a teacher performance assessment developed by the state or through validated university alternatives.

Second, the commentary on the categories of teachers who do not meet NCLB teacher requirements on p. 11 of the Board's draft states, inaccurately, that "the reason the above (categories of teachers) do not constitute compliance with the NCLB teacher requirements is because teachers with such licenses or authorization have not yet demonstrated subject matter competency." With respect to the listed categories of emergency permit, waiver, and pre-intern teachers, the statement should read "and lack the preparation for a full credential" which requirement is also part of the law. The law clearly states that a teacher is not to be considered "highly qualified" if s/he is not fully certified or if s/he has had credentialing requirements waived on an emergency, temporary, or provisional basis. We understand that the Board has already undertaken to correct this oversight in its upcoming proposal.

Finally, the final regulations issued by the US Department of Education clarify that not all individuals who are enrolled in an alternative certification program can be considered "highly qualified." Although the Department has allowed the inclusion of individuals who have not completed such programs, the commentary in the Federal Register notes that "Sec. 200.56 (a)(2)(ii)(A) now contains language that requires teachers in alternative route programs to receive rigorous training before assuming instructional duties and to participate in a teacher mentoring program" (34 CFR 71765). The regulations now require that the State limit the designation of "highly qualified" to individuals in alternative certification programs who receive "high-quality professional development that is sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction, before and while teaching," who "participate in a program of intensive supervision that consists of structured guidance and regular ongoing support for teachers or a teacher mentoring program," and who "demonstrate satisfactory progress toward full certification." This means that only those interns in California who are enrolled in programs that guarantee these features of instruction and mentoring can be designated "highly qualified." The state will need a mechanism to determine which programs meet these requirements and to limit the designation of highly qualified to interns in these programs who are making satisfactory progress.

We appreciate the Board's efforts, along with those of the California Commission on Teacher Credentialing, to create a framework for implementing the federal requirements under No Child Left Behind and look forward to seeing a final proposal that incorporates these points.

Sincerely,

Linda Kroll, Dean of Natural Sciences and Education, Mills College
Robert Polkinghorn, Assistant Vice President, Educational Outreach, University of California, Office of the President
Deborah Stipek, Dean, School of Education, Stanford University

cc: Winston Doby, Vice President-Educational Outreach, University of California Office of the President
Reed Hastings, President, State Board of Education
Sam Swofford, Executive Director, California Commission on Teacher Credentialing

Appendix B

Proposed Revision of Multiple Subject Matter Program Standard 6: Assessment of Subject Matter Competence

Professional Services Division

August 14, 2003

Standard 6: Culminating Assessment of Subject Matter Competence

The subject matter program includes a ~~summative assessment of the subject matter competence of each~~ rigorous, uniform, culminating summative assessment. Each prospective multiple subject teacher during one or more program capstone experiences. ~~The assessment is consistent with the provisions of Program Standards 1 and its scope incorporates the content of Program Standards 2 candidate is required to demonstrate compliance with Public Law 107-110 (No Child Left Behind Act) through passage of a subject matter examination as certified by the and 3, the Content Specifications in Appendix A, and courses completed in the program and previously at other institutions.~~ Commission on Teacher Credentialing.

Required Elements for Standard 6: Culminating Assessment of Subject Matter Competence

6.1 Each candidate is required to demonstrate subject matter competence to a comparable statewide standard across the range of subject matter required by Education Code section 51210 and incorporated in the California Student Academic Content Standards and State Curriculum Framework, focusing on grades K through 8. Areas of study include reading, language and literature; history and social science; mathematics; science; visual and performing arts; physical education; and human development.

~~6.1 In fairness to each prospective teacher in the program, the~~ 6.2 The culminating summative assessment is congruent in scope and content with her or his specific studies in the program and at previously attended institutions. rigorous and appropriately covers the range of subject matter defined in Program Standard 2 and the content specifications for the Subject Matter Requirement for the Multiple Subject Teaching Credential.

~~6.2 The assessment includes two or more assessment methods such as performance, portfolio, presentation, research project, field experience journal, work sample, interview, oral examination, and written examination.~~

6.3 The uniform, systematic procedures that govern the culminating summative assessment includes a defensible process for evaluating ~~performance, an~~ performance (according to the Standards for Educational and Psychological Testing, 1999), an assessment score appeal process, and a procedure for prospective teachers to repeat portions of the assessment as needed. subject matter assessment.

- 6.4 The sponsoring institution ensures that each teacher candidate is notified of the culminating assessment requirement and that the thorough records are maintained of each prospective teacher's ~~performance in the summative assessment~~summative assessment scores.
- 6.5 ~~A program may choose to provide a formal assessment of subject matter competence for prospective multiple subject teachers who hold a baccalaureate degree but have not completed a California-approved program of subject matter preparation. In such cases the evaluation of coursework will be completed by qualified faculty.~~
- 6.6 ~~The program staff periodically evaluates the quality, fairness and effectiveness of the assessment, including its consistency with the requirements and elements of Program Standard 1.~~The sponsoring institution acts on assessment evaluation findings, ensuring a uniform and equitable assessment of prospective candidates' subject matter competence. Where indicated by the findings of the evaluation, the sponsoring institution makes changes to curriculum programs, processes, or procedures to assist students in meeting the passing standard of the culminating subject matter assessment.