
4A

Information/Action

Credentialing and Certificated Assignments Committee

Declaration of Need for Emergency and Limited Assignment Permits

Executive Summary: This agenda item provides data collected on the Declaration of Need from employing agencies for emergency and limited assignment permits. Staff recommendations are included for possible changes to the information collected as well as overall improvements in the collection, analysis, reporting, and quality assurance of Commission maintained credential data.

Policy Question: Do the proposed recommendations for improvements and modifications serve the objectives of the Commission?

Recommended Action: That the Commission provide direction to staff for implementation of the proposed recommendations related to improvements in the collection, analysis, reporting and quality assurance of Commission maintained credential data.

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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.

Declaration of Need for Emergency and Limited Assignment Permits

Introduction

This agenda item provides data collected on the Declaration of Need from employing agencies for emergency and limited assignment permits. Staff recommendations are included for possible changes to the information collected as well as possible improvements in the collection, analysis, reporting, and quality assurance of Commission maintained credential data.

Background

Employment of Certificated Individuals

Educators who serve in public schools are required to hold an appropriate credential and/or authorization for their teaching or service assignment. When a credentialed educator is not fully prepared or otherwise legally authorized for their particular assignment, many Local Education Agencies (LEAs) seek a legal authorization that includes a structured pathway toward full preparation in the new authorization area by using one of the emergency or limited assignment permits discussed in this item. The permits discussed in this item do not include the Short-Term Staff Permits (STSP) or Provisional Internship Permits (PIP) for individuals who have not completed preparation for a teaching credential.¹

Education Code (EC) § 44300 authorizes the Commission to approve a school district's request for the assignment of credentialed individuals who are less than fully prepared if the school district certifies it has implemented in policy and procedures a process for conducting a diligent search for a fully credentialed educator. By annual resolution of the governing board the board must verify that it has made diligent efforts to recruit a fully prepared suitable teacher for the assignment.

The Declaration of Need for Fully Qualified Educators (DON) is an annual form submitted to the Commission by California employing agencies as required by statute. The DON form contains the estimated number of emergency and limited assignment teaching permits that will be requested during the school year. In addition, the DON requires verification by the LEA that policies for conducting diligent searches to recruit fully credentialed individuals have been implemented. A copy of the *Declaration of Need for Fully Qualified Educators* form (CL-500) is provided in Appendix B.

EC §44225.7 is commonly referred to as the hiring priority. If a suitable fully prepared teacher is not available, this section of statute also requires a school district to make reasonable efforts to recruit an individual for the assignment in the following order:

- 1) A candidate who is qualified to participate and enrolls in an approved internship program in the region of the school district.

¹ STSPs and PIPs are issued to individuals in the areas of Multiple Subject, Single Subject, and Education Specialist. Additional information and data were presented on these teaching permits in Item 5B during the December 2012 Commission Meeting: <http://www.ctc.ca.gov/commission/agendas/2012-12/2012-12-5B.pdf>.

- 2) A candidate who is scheduled to complete preliminary credential requirements within six months. (The statute requires the Commission to assure that the employer will provide orientation, guidance, and assistance to the candidate.)

When a suitable individual who meets the priorities listed is not available to the employing agency, EC §44225.7 authorizes the employing agency, as a last resort, to request approval for the assignment of a person who does not meet the criteria.

While the purpose of the DON is to enable the Commission to determine whether to approve or deny the justification for the emergency or limited assignment permits requested by the school district, it is important to note that the Commission does not have jurisdiction over employment issues, including the classification of certificated persons as temporary or probationary. Fully prepared educators or those serving on a permit may be employed in temporary positions. EC §44916 authorizes school districts to employ certificated staff as a temporary employee:

The classification shall be made at the time of employment and thereafter in the month of July of each school year. At the time of initial employment during each academic year, each new certificated employee of the school district shall receive a written statement indicating his employment status and the salary that he is to be paid. If a school district hires a certificated person as a temporary employee, the written statement shall clearly indicate the temporary nature of the employment and the length of time for which the person is being employed. If a written statement does not indicate the temporary nature of the employment, the certificated employee shall be deemed to be a probationary employee of the school district, unless employed with permanent status.

Under Education Code section 44300(b) the Commission may deny a request for an emergency permit if the district does not provide sufficient justification and documentation showing it has made a diligent effort to recruit fully credentialed educators.

Emergency and Limited Assignment Permits

Issuance of emergency and limited assignment permits requires that the applicants hold non-emergency prerequisite teaching documents. The authorizations associated with the permits currently issued by the Commission are not necessarily tied to the employment status of the permit holders. A tenured teacher may need an emergency permit to cover a new assignment (i.e. a special education teacher who is assigned to a Resource Specialist Permit (RSP) position or a general education teacher who has been assigned to a Teacher Librarian position) or to serve students with specific instructional needs (i.e. a teacher who did not previously have English learners in his/her classroom).

Emergency Teaching and Services Permits

Under current statute and regulations, the Commission issues four types of emergency permits:

- Emergency Crosscultural Language and Academic Development (CLAD) Permit;
- Emergency Bilingual Permit;
- Emergency Resource Specialist Permit; and
- Emergency Teacher Librarian Services Permit.

Emergency permits are available at the request of, and restricted to service with, California public school employers. Emergency permits are issued in one year increments and may be reissued a maximum of two times (effective October 1, 2013 under the recently approved regulation amendments). The chart in Appendix A displays the minimum requirements for initial issuance and reissuance of emergency permits.

Emergency Permit Employing Agency Responsibilities

The district/county superintendent, personnel administrator, non-public school or agency administrator, charter school director, or his/her designee must adhere to the following in order to employ individuals on the basis of emergency permits:

- File an annual DON - charter schools are exempt from this requirement;
- Assign an educator with at least three years of full-time experience to guide and assist the individual; and
- Provide orientation (initial permit), guidance, and assistance to an individual serving on an emergency permit.

Emergency CLAD Permits

An applicant must hold a non-emergency prerequisite teaching document to qualify for an Emergency CLAD Permit. An Emergency CLAD Permit authorizes the holder to provide the following instruction:

- English language development (ELD) in preschool, graded K-12, and in classes organized primarily for adults, except when the prerequisite document is a Designated Subjects Adult Education Teaching Credential or a Children's Center/Child Development Permit, in which case instruction for ELD is limited to the programs authorized by the prerequisite credential or permit; and
- Specially designed academic instruction delivered in English (SDAIE) in the subjects and at the levels authorized by the prerequisite credential or permit.

Although child development permits and designated subjects teaching credentials are appropriate prerequisite teaching documents for an Emergency CLAD Permit, many individuals holding those document types do not qualify for the permit due to lack of a bachelor's degree and/or satisfaction of California's basic skills requirement. The majority of individuals issued Emergency CLAD Permits hold general education (i.e. Multiple Subject, Single Subject, and Standard or General Teaching Credentials) or Education Specialist Instruction Credentials.

Since July 1, 2002, California-prepared general education teachers have been required to complete the requirements for an English learner authorization for issuance of a preliminary credential. In addition, California prepared individuals recommended for Education Specialist Instruction Credentials on or after July 1, 2007 must also complete the requirements for an English learner authorization for issuance of a Level I or preliminary credential. Therefore, the Emergency CLAD Permit is only required by the following individuals when assigned to instruct English learners in California's public schools before earning a CLAD Certificate or English learner authorization:

- Admitted to a California program before July 1, 2002 and earned a preliminary or clear Multiple/Single Subject Teaching Credential without an English learner authorization;
- Earned an Education Specialist Instruction Credential prior to July 1, 2007 without an English learner authorization;
- Out-of-state and out-of-country prepared teachers;

- Holds a services credential with a special class authorization, designated subjects teaching credential, or other type of permit that serves as a prerequisite for the emergency permit.

The Emergency CLAD Permit is used in conjunction with a non-emergency prerequisite teaching document to allow the holder to provide instruction to English learners while completing the requirements for a CLAD Certificate or English learner authorization. Table 1 provides a breakdown of the 2011-12 Emergency CLAD Permits by initial issuance/reissuance and employer type.

Table 1: Emergency CLAD Permits for 2011-12 School Year

Employer Type	Initial Issuance	Reissuance	Total
Charter School	91	11	102
County Office	60	37	97
School District	1,018	520	1,538
Total	1,169	568	1,737

Emergency Bilingual Permits

An Emergency Bilingual Permit authorizes the holder to provide the same services as an Emergency CLAD Permit plus content instruction delivered in the language of emphasis in the subjects and at the levels authorized by the prerequisite credential or permit. An Emergency Bilingual Permit is appropriate for individuals assigned to positions requiring content instruction delivered in the language of emphasis who do not yet hold an English learner authorization or who need to upgrade their English learner authorization to a bilingual authorization. The prerequisite documents required for issuance of an Emergency Bilingual Permit are the same as the prerequisite documents for the Emergency CLAD Permit. In addition to the other emergency permit requirements, an individual must verify target language proficiency to qualify for an Emergency Bilingual Permit. The need for Emergency Bilingual Permits is similar to the list on page 3 for the Emergency CLAD Permit with the addition of educators who hold a CLAD Certificate or English Learner Authorization and are providing bilingual instructional services to students.

The Emergency Bilingual Permit is used in conjunction with the non-emergency prerequisite teaching document to allow the holder to provide instruction delivered in the language of emphasis while completing the requirements for a Bilingual Authorization. Table 2 provides a breakdown of the 2011-12 Emergency Bilingual Authorization Permits by initial issuance/reissuance and employer type.

Table 2: Emergency Bilingual Authorization Permits for 2011-12 School Year

Employer Type	Initial Issuance	Reissuance	Total
Charter School	8	1	9
County Office	2	0	2
School District	46	18	64
Total	56	19	75

Emergency Resource Specialist Permit

An Emergency Resource Specialist (RSP) Permit authorizes the holder to provide services as a Resource Specialist while completing a Commission-approved RSP Added Authorization in Special Education (AASE) program. A three-year Preliminary RSP Added Authorization is also available to individuals who hold a valid prerequisite special education teaching credential, have

at least three years of full-time teaching experience, and have an offer of employment as a RSP teacher.

Since 1997, Education Specialist Instruction Credentials in all specialty areas include an RSP authorization, whether an individual completes a program in California, another state, or outside the United States. Therefore, only individuals issued special education teaching credentials under previous regulations or who do not hold a special education teaching credential may apply for an Emergency RSP Permit through a California public school employer. As time passes and individuals with older special education teaching credentials retire, the Emergency RSP Permit will only be available to individuals who do not yet hold an Education Specialist Instruction Credential.

Table 3 provides a breakdown of the 2011-12 Emergency RSP Permits by initial issuance/reissuance and employer type.

Table 3: Emergency RSP Permits for 2011-12 School Year

Employer Type	Initial Issuance	Reissuance	Total
Charter School	2	0	2
County Office	1	0	1
School District	11	1	12
Total	14	1	15

Emergency Teacher Librarian Services Permit

An Emergency Teacher Librarian Services (TLS) Permit authorizes the holder to provide services as a school or district librarian. An applicant for the Emergency TLS Permit must hold a valid California teaching credential issued on the basis of a bachelor’s or higher degree and completion of a teacher preparation program that included student teaching or verify possession of or eligibility for an out-of-state school librarian credential.

Table 4 provides a breakdown of the 2011-12 Emergency Teacher Librarian Permits by initial issuance/reissuance and employer type.

Table 4: Emergency Teacher Librarian Permits for 2011-12 School Year

Employer Type	Initial Issuance	Reissuance	Total
County Office	1	0	1
School District	39	70	109
Total	40	70	110

Limited Assignment Teaching Permits

Limited assignment teaching permits were designed to allow fully credentialed teachers to teach outside their authorized areas while completing the requirements to earn an added authorization, supplementary authorization, or subject matter authorization. Limited assignment teaching permits are issued at the request of, and are restricted to service with, a California public school employer to fill vacancies. These permits allow employing agencies flexibility, especially in rural and remote areas of the state, to assign individuals to teach in more than one subject area. Limited assignment teaching permits are issued in one year increments and may be reissued a maximum of two times in each subject or specialty area.

Limited Assignment Teaching Permit Employing Agency Responsibilities

The district/county superintendent, personnel administrator, non-public school or agency administrator, charter school director, or his/her designee must adhere to the following in order to employ individuals on the basis of emergency permits:

- File an annual Declaration of Need for Fully Qualified Educators (DON) - charter schools are exempt from this requirement; and
- Assign an educator with at least three years of full-time classroom teaching experience to guide and assist the permit holder who does not yet have permanent status.

General Education Limited Assignment Teaching Permit

The Commission issues Single Subject General Education Limited Assignment Teaching Permits (GELAP) in any statutory content area available on Single Subject Teaching Credentials and Multiple Subject GELAPs. The Single Subject GELAP may be reissued twice in each statutory subject area requested as long as the reissuance requirements are met. The Multiple Subject GELAP may also be reissued twice provided the reissuance requirements are met. An individual must hold a valid California general education teaching credential to qualify for a GELAP.

California has many provisions within the EC that provide avenues for the assignment of certificated employees outside their general education teaching credential authorization. These EC options allow local school districts the flexibility to assign teachers to provide instruction in subjects other than those already authorized by the credential(s) they hold. In most cases, teaching assignments made under these options require the agreement of the school site administrator, the affected teacher and the governing board. As required by statute, the Commission collects information on the most frequently used options.

EC §44258.9 requires the Commission to report assignment monitoring data to the Legislature provided by the county offices of education. County superintendents of schools must submit an annual report to the Commission summarizing the results of approximately one-quarter of the certificated staff in the school districts within each county that are reviewed. In the 2007-2012 *Assignment Monitoring Report* to the Legislature presented to the Commission in September 2012 (<http://www.ctc.ca.gov/commission/agendas/2012-09/2012-09-5B.pdf>), there were 10,176 general education teaching assignments by subject area made under the EC sections listed below in one-fourth of the school districts in California.

While the Commission has authority to collect information for the purpose of analysis and reporting to the Legislature, it does not have authority to conduct a qualitative review of the assignments made in local school districts using EC provisions. For example, the Commission does not have data such as subject content area or curriculum/methods classes taken at a college or university or the grades received for the courses used to accumulate the 18 or 9 units required under EC §44263 or the 12 or 6 units required under EC §§44256(b) or 44258.2. The local teaching assignment options do not result in the issuance of a credential or authorization by the Commission and yearly progress toward issuance of a credential or authorization is not required. Individuals employed on the basis of a GELAP are working on a track to earn a supplementary authorization, subject matter authorization or adding a teaching or content area to their general education teaching credential by making yearly progress (coursework or examination) before another GELAP is issued.

Most Frequently Used Local EC Teaching Assignment Options

- **§44256(b)** allows the elementary credentialed teacher to teach subjects in departmentalized classes grades 8 and below if the teacher has completed twelve semester units, or six upper division or graduate semester units, in the subject area to be taught.
- **§44258.2** allows the secondary credentialed teacher to teach classes in grades 5 through 8, provided that the teacher has a minimum of twelve semester units, or six upper division or graduate semester units, in the subject to be taught.
- **§44258.3** allows local school districts to assign credentialed teachers to teach departmentalized classes in grades K-12 as long as the teacher’s subject-matter competence is verified according to policy and procedures approved by the governing board.
- **§44258.7(c) and (d)** allows a full-time teacher with special skills and preparation outside his or her credential authorization to be assigned to teach in an “elective” area (defined as other than English, math, science, or social science) of his or her special skills, provided the assignment is approved by the local Committee on Assignments prior to the beginning of the assignment.
- **§44263** allows the credential holder to teach in a departmentalized class at any grade level if the teacher has completed eighteen semester units of course work, or nine semester units of upper division or graduate course work, in the subject to be taught.

Table 5 provides a breakdown of the 2011-12 GELAPs by permit area, initial issuance/reissuance, and employer type.

Table 5: General Education Limited Assignment Permits for 2011-12 School Year

Permit Type	Employer Type	Initial Issuance	Reissuance	Total
Multiple Subject	Charter School	5	0	5
	County Office	5	2	7
	School District	23	8	31
	Multiple Subject Total	33	10	43
Single Subject	Charter School	59	5	64
	County Office	19	3	22
	School District	630	119	749
	Single Subject Total	708	127	835
Total		741	137	878

Special Education Limited Assignment Teaching Permit

The Special Education Limited Assignment Teaching Permit (SELAP) was added to the Title 5 Regulations effective July 3, 2009. A SELAP may be issued in any of the seven Education Specialist Instruction Credential specialty areas while the holder completes the requirements for an AASE or a full authorization in one of the Education Specialist specialty areas. The SELAP may be reissued twice in each specialty area as long as the reissuance requirements are met. An applicant for the SELAP must hold a valid California special education teaching credential or a clear or life Speech-Language Pathology or Clinical or Rehabilitative Services Credential with a Special Class Authorization. In addition, the applicant must verify completion of three semester (or four quarter) units of coursework or one year of successful full-time classroom experience with a favorable evaluation or recommendation by the employing agency in the requested specialty area to qualify for a SELAP.

The SELAP is appropriate for a fully credentialed special education teacher who is reassigned to a new classroom in a different specialty area or who needs an additional authorization to provide

services to students with specific instructional needs. Individuals employed on the basis of a SELAP are working on a track to earn an AASE or add a new specialty area to their special education credential by making yearly progress (coursework) before another GELAP is issued.

Table 6 provides a breakdown of the 2011-12 SELAPs by specialty area, initial issuance/reissuance, and employer type.

Table 6: Special Education Limited Assignment Permits for 2011-12 School Year

Specialty Area	Employer Type	Initial Issuance	Reissuance	Total
Deaf and Hard-of-Hearing	School District	2	2	4
Early Childhood Special Education	County Office	20	5	25
	School District	31	13	44
Language and Academic Development	Charter School	0	1	1
Mild/Moderate Disabilities	County Office	6	1	7
	School District	20	3	23
Moderate/Severe Disabilities	Charter School	2	0	2
	County Office	17	3	20
	Non-Public School/Agency	3	1	4
	School District	158	18	176
Physical and Health Impairment	County Office	4	10	14
	School District	31	0	31
Visual Impairment	County Office	1	1	2
	Non-Public School/Agency	0	1	1
Total		295	59	354

Notwithstanding necessary policy questions addressed later in this item, it is important to note that LEAs have made tremendous progress in reducing the number of individuals serving on emergency permits across all types. As a point of comparison, the Commission initially issued 10,043 Emergency CLAD Permits during the 2006-2007 school year as opposed to the 1,169 initially issued during the 2011-2012 school year. This represented a reduction of more than 88% over the six year period.²

Declaration of Need

The DON is an annual form submitted to the Commission by California employing agencies to justify the need for emergency and limited assignment permit requests. In 1994, the DON replaced the “Statement of Need” form previously required with each emergency permit application. As noted above, the DON form contains the estimated number of emergency and limited assignment teaching permits that will be requested during the school year and provides verification that the employing agency has implemented policies for conducting diligent searches to recruit fully credentialed individuals.

² Data on the various permits issued over time may be accessed in Agenda Item 5B from the December Commission Meeting: <http://www.ctc.ca.gov/commission/agendas/2012-12/2012-12-5B.pdf>.

EC §44300(a)(3) sets forth the requirements for the DON and requires the annual justification to include all of the following:

- (A) *Annual documentation that the district has implemented in policy and practices a process for conducting a diligent search that shall include, but is not limited to, distributing job announcements, contacting college and university placement centers, advertising in local newspapers, exploring the incentives included in the Teaching As A Priority Block Grant established pursuant to Section 44735, participating in the state and regional recruitment centers established pursuant to Sections 44751, as it read prior to May 5, 2003, and 90530, and participating in job fairs in this state, but has been unable to recruit a sufficient number of certificated teachers, including teacher candidates pursuing full certification through internship, district internship, or other alternative routes established by the commission.*
- (B) *A declaration of need for fully qualified educators based on the documentation set forth in subparagraph (A) and made in the form of a motion adopted by the governing board of the district or the county board of education at a regularly scheduled meeting of the governing board or the county board of education. The motion may not be part of the consent agenda and shall be entered in the minutes of the meeting.*

The DON requirement is further clarified in 5 California Code of Regulations §80026:

Submission of a Declaration of Need for Fully Qualified Educators by the employing agency shall be a prerequisite to the issuance of any emergency permit and/or limited assignment permit for that agency. Charter schools as defined in Education Code Section 47600 shall be exempt from submitting a Declaration of Need for Fully Qualified Educators. The Declaration of Need for Fully Qualified Educators by an employing agency shall be valid for no more than twelve months, and shall expire on the June 30 following its submission to the Commission. The Declaration of Need for Fully Qualified Educators shall be submitted to the Commission on a form to be provided by the Commission, and shall include all of the following information:

- (a) *Estimated Need: This shall include the title(s) and number of each type of emergency permit and limited assignment permit which the employing agency estimates, based on previous year actual needs and projections of enrollment, it will need during the year covered by the Declaration. In addition, it shall include each subject to be listed on Emergency Single Subject and Limited Assignment Single Subject Teaching Permits and the target language on Emergency Multiple Subject or Single Subject Teaching Permits with a Bilingual, Crosscultural, Language and Academic Development (BCLAD) Emphasis or on Emergency BCLAD Permits. The Declaration of Need for Fully Qualified Educators shall be revised, when the number of emergency permits and limited assignment permits needed exceeds the estimate by ten percent, by the governing board or superintendent/administrator of the employing agency, as specified in subsection (e) below.*
- (b) *Efforts to Recruit Certified Personnel. This shall include a brief description of efforts that the employing agency has undertaken to locate and recruit individuals who hold the needed credentials, such as dated copies of written announcements of its vacancy or vacancies which were mailed to college or university placement centers.*
- (c) *Efforts to Establish Alternative Training Options. The Declaration shall:*
 - (1) *identify the names of institutions of higher education co-sponsoring internships or other certification programs with the employing agency or, if no such programs exist, briefly explain why;*

- (2) if the employing agency participates in internship programs, estimate the number which the employing agency reasonably expects to employ during the year covered by the Declaration.*
- (d) Stipulation of Insufficiency of Suitable Applicants. The employing agency shall certify that there is an insufficient number of certificated persons who meet the employing agency's specified employment criteria to fill necessary positions.*
- (e) Adoption of the Declaration. The Declaration of Need for Fully Qualified Educators shall be adopted by the governing board of a school district, or by the superintendent of a county office of education or by the administrator of a state school or nonpublic, nonsectarian school or agency.*
 - (1) A Declaration of Need for Fully Qualified Educators by a school district shall be adopted by the governing board in a regularly-scheduled, public meeting of the board. The entire Declaration of Need for Fully Qualified Educators shall be included in the board agenda, and shall not be adopted by the board as part of a consent calendar.*
 - (2) A superintendent of a county office or the administrator of a state school or nonpublic, nonsectarian school or agency shall publicly announce his or her intent to adopt a Declaration of Need for Fully Qualified Educators at least 72 hours prior to adopting the Statement. The adopted Statement shall be signed by the superintendent or administrator.*

As stated in statute and regulations, the DON must be adopted by school district governing boards during regularly scheduled public meetings. The DON must be included in the agenda and may not be adopted as part of a consent calendar. The DON also includes limited information concerning intern credentials, but not estimated intern numbers. While the DON requires employing agencies to verify their recruitment efforts, the Commission does not require supporting documentation for those efforts or consider the sufficiency of those efforts when granting these emergency or limited assignment permits.

Appendix C provides the County Office data from the DON and number of documents issued for the 2010-11 school year. Appendix D includes the School District data from the DON and the number of documents issued for the 2010-11 school year. Appendix D may be found at: <http://www.ctc.ca.gov/commission/agendas/2013-08/2013-08-4A-appendix.pdf>.

Included in this data are the estimated numbers for each emergency and limited assignment permit listed on the DON and the actual number of permits issued for all employing agencies that submitted a 2010-2011 DON. County offices of education reported an anticipated need for 654 emergency and limited assignment permits during the 2010-11 school year, but only 208 permits were actually issued (a 68% over-estimation). School districts reported an anticipated need for 10,668 permits, but only 3,865 permits were actually issued (a 73% over-estimation). Although the majority of the employers over-estimated their anticipated need for permits in the 2010-11 school year, the data also shows that several employers under-estimated their anticipated need, mainly for Emergency CLAD Permits. Regulations require employing agencies to submit a revised DON if they exceed their estimated numbers by ten percent. However, this has not been closely monitored by the Commission.

Developing a Quality Assurance System

The Commission, Legislature, program providers, employers, parents, and the general public have a strong interest in ensuring that to the greatest extent possible all California public school

students are taught by fully prepared and highly qualified teachers. Accurate and comprehensive data related to educator supply and demand supports the effective use of resources, identifies capacity needs, and enables appropriate monitoring at the state and local levels. Current data collection and reporting activities, however, limit the ability of the Commission to provide policy makers and the public with thorough and accurate information related to educator supply and demand.

Improving the quality and accuracy of data the Commission is required to collect and analyze would necessitate the development of a comprehensive quality assurance system. Such a system could enable the agency to be more effective in its monitoring of credentials and permits issued and provide stronger projections of educator supply and demand. Developing a quality assurance system could enhance the Commission's ability to:

- Strengthen quality control and assurance for the online submission and issuance of credentials and permits;
- Improve the integrity of Commission credentialing databases;
- Inform the public and policy community regarding the use of emergency permits, teaching permits, limited assignment permits, internships, and Variable Term Waivers including distribution by type, LEA and region;
- Enable the Commission to provide longitudinal analysis of educator supply data for identifying trends over time;
- Identify current and anticipated educator shortages in California;
- Identify employment patterns and trends for educators;
- Allow for the longitudinal analysis of assignment and misassignment trends over time; and
- Strengthen oversight and compliance activities related to assignment practices and the issuance of emergency permits.

These activities are connected by the same primary purpose – ensuring access to fully prepared educators for all students in California. More comprehensive analysis of Commission data and quality assurance processes could both inform our progress in meeting this goal and improve our ability to provide sufficient oversight in both the issuance of documents to educators that are not fully prepared and compliance activities for educator misassignments.

Recommendations for Improvements and Modifications

The DON was established nineteen years ago and has undergone several changes. Originally emergency teaching permits for multiple subject, single subject, and education specialist were included on the DON. These were removed in 2005 with the development of the Provisional Internship Permit (PIP) and Short-Term Staff Permit (STP).

Staff presents the following recommendations for possible changes related to the DON to improve the data that is collected and the monitoring of the number of emergency and limited assignment permits that are issued and asks the Commission to direct staff to explore options for establishing a comprehensive quality assurance system:

1. *Expand the current information collected on the DON concerning intern credentials*
The estimated number of interns is not currently collected on the DON. Modifications to the DON could require employing agencies to respond to current and additional

questions, including estimated numbers in all content/specialty areas. This action would require a statutory change.

Further, the Commission could require each school district to include in its annual declaration, documentation of their process for conducting a diligent search as required by EC § 44300 (3) (A). This action is supported by current statute but would need to be further delineated in regulations. The regulations would also need to include the standards for denying the authority to hire under the DON and procedures for ensuring the any denial meets due process requirements.

2. *Seek legislation so the Commission may Request Additional Information on the DON*
Additional information could be requested on the DON in regard to the estimated numbers such as detailed information regarding the type of position (full- or part-time), if in a geographically isolated area, number of layoffs and retirements in type or content/specialty area, remedial or advanced placement position, increase in number of students, etc. This would require a statutory change. A meeting with stakeholders could assist the Commission in defining areas where additional information would be helpful to policy development.
3. *Improve Tracking System for Estimated Numbers on DON and Change the Need for a Revised DON*

Improvements could be made to the Commission's current data system to allow for tracking of the number of permits issued by type and content/specialty area for each employing agency that submits a DON. Developing a mechanism to contact an employing agency if the estimated number on the DON is exceeded for each type and content/specialty would be part of the improvements. These improvements would result in the automatic need for a revision to the DON if the employing agency exceeds the number of estimated emergency permits or limited assignment permits.

For example, District A estimates it will need 7 Emergency CLAD Permits, 3 GELAPs; one in Mathematics, 1 in Art, and 1 Multiple Subject, and 4 SELAPs; one in Mild/Moderate Disabilities, 2 in Visual Impairments, and 1 in Early Childhood Special Education. The database would be programmed to allow for only these numbers in the specific content/specialty areas and would not allow District A to request more than the 7 CLAD Permits estimated on the DON. District A would be required to submit a revised DON before additional emergency or limited assignment permits would be issued.

If an employing agency overestimates the number of permits during the one year time period of the DON, the following year the employing agency could be required to submit the actual or fewer number of permits issued the previous year as their estimated number for each specific type and content/specialty area.

For example, County B estimates it will need 40 BCLAD Permits and 90 Moderate/Severe Disabilities SELAPs. At the end of the year only 12 BCLAD Permits and 17 SELAPs were actually issued. The following year if County B needed to submit a DON for BCLAD Permits or Moderate/Severe Disabilities SELAPs, County B could only estimate 12 or fewer BCLAD Permits and 17 or fewer Moderate/Severe Disabilities SELAPs. If County B exceeded these estimated numbers, they would be required to

submit a revised DON before additional emergency or limited assignment permits would be issued.

In addition, the Commission may wish to require a greater level of documentation to support the justification submitted by a district with a poor estimate history.

4. *Implement electronic Submission of DON*

Move the filing of the annual DON from a paper process to an electronic submission process. This will speed up the process and allow the Commission to complete an annual DON report (see recommendation #5). This would allow Commission staff to contact an employing agency regarding their estimated numbers and the need for a revision of the DON before additional emergency or limited assignment permits could be issued by the Commission. Online submission would also allow for on-demand reports of estimated numbers and actual documents issued.

5. *Expand Scope and Content of the Annual DON Report Requested by the Commission*

Currently there is no reporting of data concerning estimated numbers and actual data for the number of permits included on the DON. While the Commission directed staff to provide an annual DON Report, the nature and scope of that report could be expanded to address broader issues of educator supply and demand. Additional and more comprehensive data collection and analysis could serve as a more expansive information source. The proposed report would be in addition to the annual Teacher Supply Report.

Connected to recommendation number five above related to expanding the requested DON report to serve a broader purpose, an additional staff recommendation is provided below in order to address the broader issue of data quality and assurance.

6. *Investigate options for establishing a comprehensive Quality Assurance System*

The Commission may wish to consider directing the Executive Director to explore options with the Administration for the establishment of a comprehensive credential holder employment data system. Such a data system would improve the ability of the Commission to provide accurate and timely information about educator supply and demand and strengthen the Commission's processes related to oversight activities for both the issuance of documents to educators that are not fully prepared and compliance with educator misassignments.

Staff Recommendation

That the Commission adopt any recommendations it deems appropriate and to provide direction to staff for any further action on the proposed recommendations related to improvements in the collection, analysis, reporting and quality assurance of data.

Appendix A

Permit Type					
Applicant Requirements	Emergency Permits	Limited Assignment Teaching Permits		Teaching Permits	
	CLAD, Bilingual, RSP, TLS	General Education (MS/SS)	Special Education (SE)	Short-Term Staff	Provisional Internship
Prerequisite Document	Teaching Credential	General Education Credential	Special Education Credential	N/A	
Bachelor's Degree	Yes			Yes	
Basic Skills	Yes	N/A		Yes	
Satisfy Subject-Matter	CLAD/RSP/TLS - No Bilingual – Target Language Proficiency	No	3.0 semester units or 1 year experience	MS = 10 semester units in 4 academic areas SS = 18 semester units in subject area SE = one of the above, or 3.0 semester units, or 1 year experience	
Offer of Employment	Yes			Yes	
Fingerprint Clearance	Yes			Yes	
Reissuances Available	Four *	Two		None	One *
Reissuance Requirements	CLAD and Bilingual, passage of 2 subtests Others-6 semester units	6 semester units or passage of 2 subtests	6 semester units	N/A	Attempt (but not pass) all associated subject-matter subtests
Employer Requirements	Emergency Permits	Limited Assignment Teaching Permits		Teaching Permits	
Conduct Diligent Search	Yes			Yes	
Declaration of Need	Yes			No	
Orientation to Teaching	Yes	No		Yes	
Provide Mentor	Yes			Yes	
Ongoing Guidance	Yes			Yes	
Assist with Exams	No			No	Yes

- Regulations effective October 1, 2013 make changes to the number of reissuances

Appendix B



State of California
Commission on Teacher Credentialing
Certification, Assignment and Waivers Division
1900 Capitol Avenue
Sacramento, CA 95811-4213

E-mail: credentials@ctc.ca.gov
Website: www.ctc.ca.gov

DECLARATION OF NEED FOR FULLY QUALIFIED EDUCATORS

Original Declaration of Need for year: _____

Revised Declaration of Need for year: _____

FOR SERVICE IN A SCHOOL DISTRICT

Name of District: _____ District CDS Code: _____

Name of County: _____ County CDS Code: _____

By submitting this annual declaration, the district is certifying the following:

- A diligent search, as defined below, to recruit a fully prepared teacher for the assignment(s) was made
- If a suitable fully prepared teacher is not available to the school district, the district will make a reasonable effort to recruit based on the priority stated below

The governing board of the school district specified above adopted a declaration at a regularly scheduled public meeting held on ___/___/___ certifying that there is an insufficient number of certificated persons who meet the district's specified employment criteria for the position(s) listed on the attached form. The attached form was part of the agenda, and the declaration did NOT appear as part of a consent calendar.

► **Enclose a copy of the board agenda item**

With my signature below, I verify that the item was acted upon favorably by the board. The declaration shall remain in force until June 30, _____.

Submitted by (Superintendent, Board Secretary, or Designee):

_____	_____	_____
<i>Name</i>	<i>Signature</i>	<i>Title</i>
_____	_____	_____
<i>Fax Number</i>	<i>Telephone Number</i>	<i>Date</i>

<i>Mailing Address</i>		

<i>E-Mail Address</i>		

FOR SERVICE IN A COUNTY OFFICE OF EDUCATION, STATE AGENCY OR NONPUBLIC SCHOOL OR AGENCY

Name of County _____ County CDS Code _____

Name of State Agency _____

Name of NPS/NPA _____ County of Location _____

The Superintendent of the County Office of Education or the Director of the State Agency or the Director of the NPS/NPA specified above adopted a declaration on ___/___/___, at least 72 hours following his or her public announcement that such a declaration would be made, certifying that there is an insufficient number of certificated persons who meet the county's, agency's or school's specified employment criteria for the position(s) listed on the attached form.

The declaration shall remain in force until June 30, _____.

► **Enclose a copy of the public announcement**

Appendix B

Submitted by Superintendent, Director, or Designee:

<i>Name</i>	<i>Signature</i>	<i>Title</i>
<i>Fax Number</i>	<i>Telephone Number</i>	<i>Date</i>
<i>Mailing Address</i>		
<i>E-Mail Address</i>		

► *This declaration must be on file with the Commission on Teacher Credentialing before any emergency permits will be issued for service with the employing agency*

AREAS OF ANTICIPATED NEED FOR FULLY QUALIFIED EDUCATORS

Based on the previous year's actual needs and projections of enrollment, please indicate the number of emergency permits the employing agency estimates it will need in each of the identified areas during the valid period of this Declaration of Need for Fully Qualified Educators. This declaration shall be valid only for the type(s) and subjects(s) identified below.

This declaration must be revised by the employing agency when the total number of emergency permits applied for exceeds the estimate by ten percent. Board approval is required for a revision.

Type of Emergency Permit	Estimated Number Needed
CLAD/English Learner Authorization (applicant already holds teaching credential)	_____
Bilingual Authorization (applicant already holds teaching credential)	_____
List target language(s) for bilingual authorization:	

Resource Specialist	_____
Teacher Librarian Services	_____
Visiting Faculty Permit	_____

LIMITED ASSIGNMENT PERMITS

Limited Assignment Permits may only be issued to applicants holding a valid California teaching credential based on a baccalaureate degree and a professional preparation program including student teaching.

Based on the previous year's actual needs and projections of enrollment, please indicate the number of Limited Assignment Permits the employing agency estimates it will need in the following areas:

TYPE OF LIMITED ASSIGNMENT PERMIT	ESTIMATED NUMBER NEEDED
Multiple Subject	
Single Subject	
Special Education	
TOTAL	

Appendix B

EFFORTS TO RECRUIT CERTIFIED PERSONNEL

The employing agency declares that it has implemented in policy and practices a process for conducting a diligent search that includes, but is not limited to, distributing job announcements, contacting college and university placement centers, advertising in local newspapers, exploring incentives included in the Teaching as a Priority Block Grant (refer to www.cde.ca.gov for details), participating in state and regional recruitment centers and participating in job fairs in California.

If a suitable fully prepared teacher is not available to the school district, the district made reasonable efforts to recruit an individual for the assignment, in the following order:

- A candidate who qualifies and agrees to participate in an approved internship program in the region of the school district
- An individual who is scheduled to complete initial preparation requirements within six months

EFFORTS TO CERTIFY, ASSIGN, AND DEVELOP FULLY QUALIFIED PERSONNEL

Has your agency established a District Intern program? Yes No

If no, explain. _____

Does your agency participate in a Commission-approved college or university internship program? Yes No

If yes, how many interns do you expect to have this year? _____

If yes, list each college or university with which you participate in an internship program.

If no, explain why you do not participate in an internship program.

Appendix C

DECLARATION OF NEED - COUNTY INFORMATION			
COUNTY NAME	DOCUMENT TYPE	NEED	ISSUED
ALAMEDA COUNTY OFFICE OF EDUCATION	CLAD Permit	5	0
	Resource Specialist Permit	2	0
AMADOR COUNTY OFFICE OF EDUCATION	CLAD Permit	4	0
BUTTE COUNTY OFFICE OF EDUCATION	CLAD Permit	2	1
	General Education Limited Assignment Multiple Subject Teaching Permit	1	0
	General Education Limited Assignment Single Subject Teaching Permit	1	0
	Special Education Limited Assignment Teaching Permit	3	2
CALAVERAS COUNTY OFFICE OF EDUCATION	BCLAD Permit	2	0
	CLAD Permit	4	5
	General Education Limited Assignment Multiple Subject Teaching Permit	4	0
	General Education Limited Assignment Single Subject Teaching Permit	4	0
	Resource Specialist Permit	3	0
	Special Education Limited Assignment Teaching Permit	4	1
	Visiting Faculty Teaching Permit	1	0
COLUSA COUNTY OFFICE OF EDUCATION	CLAD Permit	2	1
	Resource Specialist Permit	2	0
	Special Education Limited Assignment Teaching Permit	2	0
CONTRA COSTA COUNTY OFFICE OF EDUCATION	CLAD Permit	10	1
	Resource Specialist Permit	1	0
	Special Education Limited Assignment Teaching Permit	5	0
DEL NORTE COUNTY OFFICE OF EDUCATION	Special Education Limited Assignment Teaching Permit	2	0
EL DORADO COUNTY OFFICE OF EDUCATION	CLAD Permit	10	0
	Resource Specialist Permit	2	0
	Special Education Limited Assignment Teaching Permit	5	0
FRESNO COUNTY OFFICE OF EDUCATION	BCLAD Permit	2	0
	CLAD Permit	6	5
	General Education Limited Assignment Multiple Subject Teaching Permit	5	0
	General Education Limited Assignment Single Subject Teaching Permit	5	3
	Resource Specialist Permit	1	0
	Special Education Limited Assignment Teaching Permit	2	0
IMPERIAL COUNTY OFFICE OF EDUCATION	CLAD Permit	5	0

DECLARATION OF NEED - COUNTY INFORMATION			
COUNTY NAME	DOCUMENT TYPE	NEED	ISSUED
	Resource Specialist Permit	1	0
	Special Education Limited Assignment Teaching Permit	9	0
INYO COUNTY OFFICE OF EDUCATION	CLAD Permit	3	1
	General Education Limited Assignment Single Subject Teaching Permit	1	0
KERN COUNTY OFFICE OF EDUCATION	Special Education Limited Assignment Teaching Permit	30	30
KINGS COUNTY OFFICE OF EDUCATION	CLAD Permit	2	1
	General Education Limited Assignment Multiple Subject Teaching Permit	1	0
	General Education Limited Assignment Single Subject Teaching Permit	1	0
	Special Education Limited Assignment Teaching Permit	6	0
LASSEN COUNTY OFFICE OF EDUCATION	CLAD Permit	5	0
	Special Education Limited Assignment Teaching Permit	2	1
LOS ANGELES COUNTY OFFICE OF EDUCATION	BCLAD Permit	4	0
	CLAD Permit	10	6
	General Education Limited Assignment Multiple Subject Teaching Permit	5	0
	General Education Limited Assignment Single Subject Teaching Permit	10	0
	Resource Specialist Permit	4	0
	Special Education Limited Assignment Teaching Permit	15	0
MADERA COUNTY OFFICE OF EDUCATION	CLAD Permit	2	1
	General Education Limited Assignment Single Subject Teaching Permit	2	1
	Special Education Limited Assignment Teaching Permit	2	3
MARIN COUNTY OFFICE OF EDUCATION	CLAD Permit	10	4
	Resource Specialist Permit	2	0
	Special Education Limited Assignment Teaching Permit	10	1
MENDOCINO COUNTY OFFICE OF EDUCATION	CLAD Permit	2	3
MERCED COUNTY OFFICE OF EDUCATION	CLAD Permit	10	9
	Special Education Limited Assignment Teaching Permit	5	3
MODOC COUNTY OFFICE OF EDUCATION	CLAD Permit	2	2
MONO COUNTY OFFICE OF EDUCATION	CLAD Permit	1	1
ORANGE COUNTY OFFICE OF EDUCATION	CLAD Permit	5	0
	Special Education Limited Assignment Teaching Permit	1	1
PLACER COUNTY OFFICE OF EDUCATION	CLAD Permit	8	1

DECLARATION OF NEED - COUNTY INFORMATION			
COUNTY NAME	DOCUMENT TYPE	NEED	ISSUED
	Special Education Limited Assignment Teaching Permit	8	3
RIVERSIDE COUNTY OFFICE OF EDUCATION	BCLAD Permit	10	0
	CLAD Permit	20	0
	General Education Limited Assignment Multiple Subject Teaching Permit	5	0
	Resource Specialist Permit	10	0
	Special Education Limited Assignment Teaching Permit	15	2
SACRAMENTO COUNTY OFFICE OF EDUCATION	CLAD Permit	10	2
	Resource Specialist Permit	3	0
	Special Education Limited Assignment Teaching Permit	5	1
SAN BERNARDINO COUNTY OFFICE OF EDUCATION	CLAD Permit	25	12
	General Education Limited Assignment Multiple Subject Teaching Permit	5	0
	General Education Limited Assignment Single Subject Teaching Permit	3	0
	Special Education Limited Assignment Teaching Permit	20	0
SAN DIEGO COUNTY OFFICE OF EDUCATION	BCLAD Permit	5	0
	CLAD Permit	15	11
	General Education Limited Assignment Multiple Subject Teaching Permit	10	0
	General Education Limited Assignment Single Subject Teaching Permit	10	2
	Resource Specialist Permit	5	0
	Special Education Limited Assignment Teaching Permit	15	0
	Teacher Librarian Services Permit	2	0
SAN JOAQUIN COUNTY OFFICE OF EDUCATION	CLAD Permit	15	9
	Resource Specialist Permit	1	0
	Special Education Limited Assignment Teaching Permit	20	0
SAN LUIS OBISPO COUNTY OFFICE OF EDUCATION	CLAD Permit	3	1
	Special Education Limited Assignment Teaching Permit	1	0
SAN MATEO COUNTY OFFICE OF EDUCATION	CLAD Permit	4	5
	Resource Specialist Permit	2	0
	Special Education Limited Assignment Teaching Permit	7	2
SANTA CLARA COUNTY OFFICE OF EDUCATION	BCLAD Permit	5	1
	CLAD Permit	30	35
	Resource Specialist Permit	5	0

DECLARATION OF NEED - COUNTY INFORMATION			
COUNTY NAME	DOCUMENT TYPE	NEED	ISSUED
	Special Education Limited Assignment Teaching Permit	10	8
SANTA CRUZ COUNTY OFFICE OF EDUCATION	CLAD Permit	3	2
	Special Education Limited Assignment Teaching Permit	2	0
SHASTA COUNTY OFFICE OF EDUCATION	CLAD Permit	6	5
	Resource Specialist Permit	1	0
	Special Education Limited Assignment Teaching Permit	3	1
	Teacher Librarian Services Permit	1	0
SIERRA COUNTY OFFICE OF EDUCATION	CLAD Permit	1	0
SOLANO COUNTY OFFICE OF EDUCATION	CLAD Permit	6	3
	Special Education Limited Assignment Teaching Permit	2	0
SONOMA COUNTY OFFICE OF EDUCATION	CLAD Permit	3	2
	Resource Specialist Permit	1	0
	Special Education Limited Assignment Teaching Permit	10	1
STANISLAUS COUNTY OFFICE OF EDUCATION	CLAD Permit	2	4
TRINITY COUNTY OFFICE OF EDUCATION	Resource Specialist Permit	4	0
VENTURA COUNTY OFFICE OF EDUCATION	CLAD Permit	3	0
	General Education Limited Assignment Multiple Subject Teaching Permit	2	0
	General Education Limited Assignment Single Subject Teaching Permit	2	1
	Resource Specialist Permit	1	0
YOLO COUNTY OFFICE OF EDUCATION	BCLAD Permit	1	0
	CLAD Permit	2	3
	General Education Limited Assignment Multiple Subject Teaching Permit	2	0
	General Education Limited Assignment Single Subject Teaching Permit	2	0
	Resource Specialist Permit	1	0
	Special Education Limited Assignment Teaching Permit	4	0
YUBA COUNTY OFFICE OF EDUCATION	CLAD Permit	2	1
	Special Education Limited Assignment Teaching Permit	5	3
Total		654	208