
3A

Action

Credentialing and Certificated Assignments Committee

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

Executive Summary: This agenda item details modifications to the proposed amendments to 5 California Code of Regulations §80037 following action taken by the Commission at the public hearing.

Recommended Action: Determine the action to be taken on the modifications to the proposed amendments.

Presenter: Terri H. Fesperman, Director, and Tammy A. Duggan, Consultant, Certification Division and Teri Clark, Director, Professional Services Division

Strategic Plan Goal

I. Educator Quality

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

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

Introduction

This item details modifications to the proposed amendments to 5 California Code of Regulations (CCR) §80037 following action taken by the Commission at the public hearing on February 14, 2014. During the 15-day notice period, all responses received by the Commission requested that the Commission restore the originally proposed language concerning the Special Teaching Authorization in Physical Education. These comments are what generated this agenda item. Background on this issue is provided below.

Background

An Information/Action item was presented to the Commission in September 2013 that proposed amendments to 5 CCR §80037 (<http://www.ctc.ca.gov/commission/agendas/2013-09/2013-09-5A.pdf>). The proposed amendments were to add a Special Teaching Authorization in Physical Education for holders of Designated Subjects Special Subjects Teaching Credentials in Basic Military Drill (BMD) and Reserve Officer Training Corps (ROTC) and for general clean-up of outdated language.

One of the prescribed requirements for high school graduation in Education Code (EC) §51225.3 is completion of two courses in physical education. Subsection (b) of EC §51225.3 currently affords governing boards, with the active involvement of parents, administrators, teachers, and pupils, the flexibility to adopt alternative means to satisfy the prescribed course of study for high school graduation in any content area. For physical education, it is the obligation of the local employing agency to determine how each particular class supports the course of study that is aligned with EC §§33352 and 51220(d).

The proposed addition of the Special Teaching Authorization would not have affected the flexibility currently available to local employing agencies when establishing alternatives for granting high school graduation credit in physical education for BMD and ROTC courses. Pupils enrolled in a course taught by an individual with the Special Teaching Authorization would not automatically have been awarded high school graduation credit for physical education. A local employing agency would still have been required to verify that the course included the required content to be designated as “physical education” and the governing board would have been required to approve the granting of high school graduation credit.

The authorization of the Special Teaching Authorization in the originally proposed regulation amendments would have been limited to BMD and physical fitness training offered within BMD and ROTC courses of study. The authorization would not have been a full physical education authorization used to teach traditional, general K-12 physical education classes.

The requirements to qualify for the Special Teaching Authorization in the original version of the proposed regulation amendments were satisfaction of California's basic skills requirement and verification of subject-matter knowledge in Physical Education. The subject-matter knowledge requirement is the same requirement that must be verified by individuals who are issued Single Subject Teaching Credentials in Physical Education and is aligned with California K-12 physical education content standards. The Special Teaching Authorization in Physical Education would have served as recognition that the credential holder has met this subject matter requirement, and represented another option for employers considering granting high school graduation credit for BMD or ROTC.

The Commission approved the proposed amendments to 5 CCR §80037 at the September 2013 meeting, thereby directing staff to begin the rulemaking process with the Office of Administrative Law (OAL) and to schedule a public hearing. The Commission conducted a public hearing on February 14, 2014 regarding the proposed amendments to Title 5 of the CCR pertaining to Designated Subjects Special Subjects Teaching Credentials. The majority of the written responses received during the 45-day comment period prior to the public hearing and all of the oral comments presented at the public hearing were directed at the addition of the Special Teaching Authorization in Physical Education. No comments were received about the proposed technical, general clean-up amendments. Following the public hearing and discussion by the Commission, the Commission voted six to four to not adopt the proposed regulation amendments.

In order to enact the non-controversial general clean-up language in the proposed regulation amendments, staff recommended the Commission consider deletion of all proposed language related to the Special Teaching Authorization in Physical Education and approval of the remaining proposed clean-up amendments. The Commission voted in support of the staff recommendation after staff clarified that the change would require a 15-day notice to be given and that the matter would return to the Commission. Pursuant to the requirements of Government Code §11346.8(c), Commission staff sent a 15-day notice detailing the modifications to the proposed amendments. The 15-day notice was sent on February 26, 2014 and the written comment period ended on March 13, 2014.

Summary of Modifications to 5 CCR §80037

(c) and (c)(1) through (c)(4):

The modifications to subsections (c) and (c)(1) through (c)(4) delete the proposed minimum requirements for the Special Teaching Authorization in Physical Education.

(d): This subsection was initially re-lettered from (c) to (d) due to the proposed addition of the minimum requirements for the Special Teaching Authorization in Physical Education. Subsection (d) will now be subsection (c) due to the deletion of the language related to the proposed minimum requirements for the Special Teaching Authorization in Physical Education.

(e): This subsection was initially re-lettered from (d) to (e) due to the proposed addition of the minimum requirements for the Special Teaching Authorization in Physical Education in subsection (c). Subsection (e) will now be subsection (d) due to the deletion of the language from

subsection (c) that was related to the proposed minimum requirements for the Special Teaching Authorization in Physical Education.

(e)(3): The modifications to this subsection delete the proposed authorization for the Special Teaching Authorization in Physical Education.

Note: Education Code §§44280, 44281, 44282, and 44310 are related to the proposed subject-matter knowledge requirement referenced in subsection (c)(3) of the originally proposed regulation amendments. Due to the deletion of the originally proposed language in subsections (c) and (c)(1) through (c)(4) pertaining to the minimum requirements for the Special Teaching Authorization in Physical Education, the modifications delete the Education Code references related to the subject-matter knowledge requirement. The proposed amendments to the Note also delete reference to Education Code §44261, as this section of the code pertains to the minimum requirements for Multiple and Single Subject Teaching Credentials (this deletion was not explained in the Initial Statement of Reasons).

15-Day Notice Mailing List and Responses

The 15-day notice detailing the modifications to 5 CCR §80037 was mailed to all individuals who responded to the proposed amendments during the initial 45-day written comment period prior to the public hearing on February 14, 2014 and to the individuals who presented oral comments at the public hearing. The 15-day notice was also posted on the Commission's website at <http://www.ctc.ca.gov>.

Tally of Responses

As of Wednesday, March 13, 2014, the Commission had received the following written responses in opposition of the proposed modifications to 5 CCR §80037 detailed in the 15-day notice:

Opposition

4 organizational opinions

5 personal opinions

Total Responses: 9

Responses Representing Organizations in Opposition of the Modifications:

1. Teri Burns, Senior Director, Policy & Programs, California School Boards Association
2. Sherry Skelly Griffith, Director, Governmental Relations, Association of California School Administrators
3. Dr. John Snavely, Superintendent, Porterville Unified School District
4. Richard B. Wallis, Principal/Commandant, California Military Institute

Responses Representing Individuals in Opposition of the Modifications:

1. Major General David S. Baldwin, Office of the Adjutant General, California Military Department
2. Liane Cismowski, Principal, Mount Diablo High School

3. Colonel Larry K. Morden, Executive Officer, California Cadet Corps
4. Dr. Mark Ryan, Superintendent, North Valley Military Institute and Assistant Executive Officer, California Cadet Corps
5. Lieutenant Colonel Christian D. Taddeo, Senior Army Instructor, Mount Diablo High School, Junior Reserve Officer Training Corps

Copies of the nine letters in opposition to the modifications of the proposed amendments are provided in Appendix A.

Staff Recommendation

Staff requests direction from the Commission as to the action to be taken on the proposed amendments to 5 CCR §80037. The following are two possible actions for Commission consideration:

A. Approval of the Modifications to the Proposed Regulation Amendments

If the Commission wishes to confirm its prior action and make only the clean-up amendments, then approval of the modifications to the proposed regulations as presented in the 15-day notice will result in submission of the regulations to the OAL for final review without the language pertaining to the Special Teaching Authorization in Physical Education. The OAL will have thirty business days to review and approve or deny the proposed general clean-up regulation amendments.

B. Restore the Language Pertaining to the Special Teaching Authorization

All comments received during the 15-day notice period urge the Commission to restore the language pertaining to the proposed Special Teaching Authorization in Physical Education. If the Commission elects to take this action, staff will send another 15-day notice to all individuals who submitted written and oral comments during the 45-day comment period, at the public hearing, during the initial 15-day notice period, and at this meeting. All interested members of the public may file comments during the 15-day notice period.

The proposed amendments would return as an Action Item at the June Commission meeting with responses received during the second 15-day notice period. The Commission would then have the opportunity to approve the proposed regulations or direct staff to make additional modifications. If approved at the June Commission meeting, including the language pertaining to the Special Teaching Authorization in Physical Education, the regulations will be submitted to the OAL for final review. The OAL will have thirty business days to review and approve or deny the proposed regulation amendments.

Proposed Text of Regulation Amendments

The following is the entire text of the proposed amendments to 5 CCR §80037, clearly showing the deleted text in ~~double strike through~~. Single underline and ~~strikeout~~ is text previously noticed for the 45-day written comment period that closed on January 27, 2014.

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

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

(a) The minimum requirements for the preliminary special subjects teaching credential shall include all of the following:

(1) Experience, or experience and education, or education in each special subject to be named on the credential, which totals four years. One year of the required experience shall be within the three-year period immediately preceding the issuance of the credential. This requirement shall be verified in one of the following ways:

(A) for the special subject: Aviation Flight and/or Aviation Ground Instruction, experience is to be verified by the Federal Aviation Agency;

(B) for the special subject: Basic Military Drill, experience is to be verified by the adjutant general of the State of California; ~~or~~

(C) for the special subject: Reserve Officers Training Corp (R.O.T.C.), experience is to be verified by the branch of military service sponsoring the program in the employing school district; ~~or~~

(D) for the special subject: Driver Education and Training, a baccalaureate degree from a regionally accredited college or university and a valid California Driver's License; ~~;~~

(E) for the special subject: Limited Driver Training, submission of a current transcript of driving record from the Department of Motor Vehicles.

(2) License, or recommendation, or course work shall meet one of the following criteria:

(A) for the special subject: Aviation Flight and/or Aviation Ground Instruction, possession of a properly rated valid certificate, issued by the Federal Aviation Agency;

(B) for the special subject: Basic Military Drill, a recommendation from the adjutant general of the State of California;

- (C) for the special subject: R.O.T.C., a recommendation from the branch of military service sponsoring the program in the employing school districts;
- (D) for the special subject: Driver Education and Training, twelve semester hours of subject-matter course work in driver education;
- (E) for the special subject: Limited Driver Training, a valid California driver's license; ~~submission of a current transcript of driving record from the Department of Motor Vehicles;~~ possession of a written statement from the prospective employing school district attesting to the applicant's ability to actually perform behind-the-wheel driver instruction; and possession of written assurance, from the prospective employing school district, that adequate supervision and appropriate staff development will be provided for the individual receiving the limited driver training authorization.
- (3) Verification of a high school diploma or the equivalent;
- (4) Verification of knowledge of the Constitution of the United States, as specified in Education Code Section 44335, by one of the means described in Section 80415;
- (5) ~~Verification of passage of~~ Satisfy the California Basic Education Skills Test basic skills requirement for the special subjects credential in Driver Education and Training, as specified in Education Code Section 44252;
- (6) ~~Verification by the Employing School District (ESD) or a Commission approved Local Education Agency (LEA) that the applicant is aware of the requirements for the clear credential, including the program of personalized preparation;~~
- (7) Submission of a completed ~~a~~ Application for Credential Authorizing Public School Serviceform as specified in Section 80001; a recommendation signed by a Commission-approved LEA or the ESD on a form approved by the Commission; the fee as specified in Section 80487(a)(1); ~~verification as specified for requirements (a)(1) through (a)(6); and personal identification on duplicate fingerprint cards~~ verification of completion of livescan and clearance by the Commission, unless clearance is already on file with the Commission;
- (8) Recommendation from a Commission-approved program of personalized preparation as defined in §80034.1(a).
- (b) The minimum requirements for the clear special subjects teaching credential shall include all of the following:
- (1) A valid preliminary special subjects teaching credential;
- (2) ~~Verification by the ESD of t~~ Two years, or the equivalent, of successful teaching as defined in subsection 80034(f) and as authorized by the preliminary special subjects

teaching credential. “Two years of successful teaching” means teaching for a minimum of one course in each of four terms;

- (3) ~~Verification by a Commission-approved LEA of completion of nine semester units, or 135 clock hours, in a Commission-approved program(s) of personalized preparation~~Completion of a Commission-approved program of personalized preparation based on the *Standards of Quality and Effectiveness for Career/Technical Education Teachers* (rev. 5/09), available on the Commission’s website and hereby incorporated by reference, accredited by the Committee on Accreditation as specified in Education Code Section 44373(c) ;
 - (4) ~~Verification of completion of~~The study of health-unit requirement education as specified in Education Code Section 4426144259(c)(4)(A), by one of the means specified in Section 80421;
 - (5) ~~Submission of a completed a~~Application Authorizing Public School Service~~form as specified in Section 80001; a recommendation signed by a Commission-approved LEA and/or the ESD on a form approved by the Commission; and the fee as specified in Section 80487(a)(1); and verifications as specified for requirements (b)(2), (b)(3) and (b)(4).~~
 - (6) Recommendation from a Commission-approved program of personalized preparation as defined in §80034.1.
- ~~(c) The minimum requirements for the Special Teaching Authorization in Physical Education shall include all of the following:~~
- ~~(1) Possession of a valid preliminary or clear special subjects teaching credential in Basic Military Drill or R.O.T.C.;~~
 - ~~(2) Satisfy the basic skills requirement as specified in Education Code Section 44252;~~
 - ~~(3) Verification of Physical Education subject matter knowledge by passage of an examination(s) as provided in Education Code Sections 44280, 44281, and 44282 or by completion of a subject matter program as provided in Education Code Section 44310;~~
 - ~~(4) Submission of a completed Application Authorizing Public School Service as specified in Section 80001 and the fee as specified in Section 80487(a)(1).~~
- ~~(c)~~ Authorization.
- (1) The preliminary ~~or clear~~ Special Subjects teaching credential authorizes the holder to teach the subject, named on the credential, in grades 12 and below, and classes organized primarily for adults.;

(2) The clear Special Subjects teaching credential authorizes the holder to teach the subject, named on the credential, in grades 12 and below, and classes organized primarily for adults, including services to English learners in specially designed content instruction delivered in English;

~~(3) The Special Teaching Authorization in Physical Education authorizes the holder to teach physical education courses in basic military drill and physical fitness training in grades 12 and below, and classes organized primarily for adults.~~

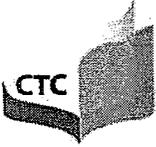
(de) Period of Validity. The period of validity of the preliminary and clear special subjects teaching credentials shall be as follows:

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

(2) A preliminary special subjects teaching credential issued on the basis of the applicant's satisfaction of all requirements specified in subsection (a) shall be valid for five years;

(3) A clear special subjects education teaching credential issued on the basis of the applicant's satisfaction of all requirements specified in subsection (b) shall be valid for five years and is renewable on the basis of an application and payment of a fee.

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



Commission on Teacher Credentialing

1900 Capitol Avenue Sacramento, CA 95811 (916) 323-5354 Fax (916) 322-0048 www.ctc.ca.gov

Attn: Tammy A. Duggan, Consultant
Certification Division

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

Section: 80037

Response to the Modifications to the Proposed Amendments

If you disagree with the modifications to the proposed amendments, please return this response form to the Commission office, attention Tammy A. Duggan, at the above address postmarked no later than March 13, 2014.

No, I do not agree with the modifications to the proposed amendments for the following reasons:

We urge the Commission on Teacher Credentialing to add a special teaching authorization in physical education for holders of Designated Subjects Special Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corp in this section. We support the regulations as originally promulgated and urge the Commission to adopt the regulations as initially proposed. The proposed regulations will help ensure that military drill and JROTC instructors meet the higher standard of content knowledge required for physical education and enable local educational agencies to continue to exercise discretion regarding the assignment of physical education credits for these courses.

Personal opinion of the undersigned

Organizational opinion representing: (Circle One)

School District, County Schools, College/University, Professional Organization,
Other _____

Signature: B. Teri Burns Date: 3/12/14

Printed Name: Teri Burns

Title: Sr. Director, Policy & Programs Phone: 916-569-3357

Employer/Organization: California School Boards Association

Mailing Address: 3251 Beacon Blvd, West Sacramento, CA 95691

Route to tad



Commission on Teacher Credentialing

1900 Capitol Avenue Sacramento, CA 95811 (916) 323-5354 Fax (916) 322-0048 www.ctc.ca.gov

Attn: Tammy A. Duggan, Consultant
Certification Division

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

Section: 80037

Response to the Modifications to the Proposed Amendments

If you disagree with the modifications to the proposed amendments, please return this response form to the Commission office, attention Tammy A. Duggan, at the above address postmarked no later than March 13, 2014.

No, I do not agree with the modifications to the proposed amendments for the following reasons:

The Association of California School Administrators (ACSA), representing over 15,000 school, district and county office of education administrators, strongly urges the Commission to add a special teaching authorization in physical education for holders of Designated Subjects Special Subjects Teaching Credentials in Basic Military Drill and Reserve Officer Training Corp. We support the regulations as originally promulgated and urge the Commission to adopt the regulations as initially proposed. The proposed regulations will help ensure that military drill and JROTC instructors meet the higher standard of content knowledge required for physical education and enable local educational agencies to continue to exercise discretion regarding the assignment of physical education credits for these courses.

Personal opinion of the undersigned

Organizational opinion representing: (Circle One)

School District, County Schools, College/University, Professional Organization,
Other ACSA

Signature: Sherry Skelly Griffith Date: March 13, 2014

Printed Name: Sherry Skelly Griffith

Title: Director, Governmental Relations Phone: 916-444-3216

Employer/Organization: Association of California School Administrators (ACSA)

Mailing Address: 1029 J Street, Suite 500, Sacramento, CA 95814

Route to tad

PORTERVILLE UNIFIED SCHOOL DISTRICT

Creating Opportunities: Changing Lives

DISTRICT BOARD OF TRUSTEES

PETE LARA, JR.
President

LILLIAN DURBIN
Vice President

PAT GARCIA CONTRERAS
Clerk

600 West Grand Avenue
Porterville, CA 93257
(559) 793-2400

JOHN SNAVELY, Ed.D.
DISTRICT SUPERINTENDENT
(559) 793-2455
(559) 793-1088 FAX

DISTRICT BOARD OF TRUSTEES

HAYLEY BUETTNER
Member

DAVID DePAOLI
Member

SHARON GILL
Member

RICHARD MORRIS
Member

KEN GIBBS, Ed.D.
Asst. Superintendent
Business Services
(559) 793-2450
(559) 781-8386 FAX

NATE NELSON, Ed.D.
Asst. Superintendent
Human Resources
(559) 793-2480
(559) 791-0401 FAX

MARTHA STUEMKY, Ed.D.
Asst. Superintendent
Instructional Services
(559) 793-2452
(559) 793-1083 FAX

March 12, 2014

Via email to: tduggan@ctc.ca.gov

Dear Dr. Darling-Hammond:

This letter is written in response to the 15-day notice regarding proposed changes to the Designated Subjects Special Subjects teaching credentials. The Porterville Unified School District administration is supportive of the clean-up language relative to these credentials, however, we request the Commission to seriously reconsider the decision not to adopt the proposed creation of a Physical Education supplement to the Designated Subjects Special Subjects Basic Military Drill (DSSSBMD) credential.

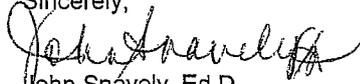
The regulatory changes rejected by the Commission of Teaching Credentialing (CTC) at its February 14, 2014, meeting would have allowed the addition of a DSSSBMD/Physical Education credential for individuals who demonstrated basic skills competence through passage of the CBEST and subject matter competence through passage of all three Physical Education CSET sub-tests.

While we respect the opposition presented by the California Teachers Association regarding the fact that the proposed credential does not require a Bachelor's Degree, the proposed new credential would actually increase the competence of individuals teaching the California Cadet Corps (CACC) program and Physical Education (PE) courses within that program by requiring passage of the CBEST and Physical Education CSET exams.

The other major point of contention articulated at the CTC meeting was the difference between physical activity and physical education. Those who spoke against the Junior Reserve Officers' Training Corps and CACC programs said they did physical activity but not physical education. That is simply untrue. The CACC curriculum has been designed to teach to the California Physical Education Framework. At present, candidates for the DSSSBMD credential are required to complete a rigorous eighty-hour Basic Commandant Training Academy, which includes explicit instruction in the California Physical Education Framework and Content Standards, as well as designing and implementing a rigorous, standards-aligned PE program. Simply, the argument that the CACC curriculum is merely physical activity and not physical education is an argument not rooted in fact.

We strongly encourage the CTC to reopen the discussion about the creation of this new credential. We need this credential as a means to provide school districts with another tool to verify PE subject matter competence by California Cadet Corps teachers. School districts continue to have the sole discretion in whether, or not, to allow PE credit for the CACC course, but his proposed credential would allow teachers to demonstrate PE subject matter competence to their governing boards, and, therefore, make a more compelling argument to those governing boards about their suitability to offer a course for which Physical Education credit might be granted.

Thank you and the Commission in advance for considering these comments.

Sincerely,

John Snavely, Ed.D.
Superintendent

JS/ff
C: Karen Stapf Wallers - KStapfWallers@cde.ca.gov
Lt. Col. Denver Tate - denver@ocsnet.net
Corros.
Lit. of Support-CTC-DSSSBMD



Commission on Teacher Credentialing

1900 Capitol Avenue Sacramento, CA 95811 (916) 323-5354 Fax (916) 322-0048 www.ctc.ca.gov

Attn: Tammy A. Duggan, Consultant
Certification Division

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

Section: 80037

Response to the Modifications to the Proposed Amendments

If you disagree with the modifications to the proposed amendments, please return this response form to the Commission office, attention Tammy A. Duggan, at the above address postmarked no later than March 13, 2014.

No, I do not agree with the modifications to the proposed amendments for the following reasons:

Failing to allow the Special Authorization in Physical Education for Military Drill Credential will have a devastating effect on JROTC and California Cadet Corps programs throughout the state. I urge the Commission to re-consider this action.

Personal opinion of the undersigned

Organizational opinion representing: (Circle One)

School District, County Schools, College/University, Professional Organization,

Other CALIFORNIA MILITARY INSTITUTE, A PUBLIC CHARTER SCHOOL.

Signature: *Richard B. Wallis*

Date: 3/13/14

Printed Name: RICHARD B. WALLIS

Title: PRINCIPAL / COMMANDANT

Phone: (951) 443-2731

Employer/Organization: CALIFORNIA MILITARY INSTITUTE

Mailing Address: 755 No. A Street, Perris, CA 92570

Route to tad

MILITARY DEPARTMENT
OFFICE OF THE ADJUTANT GENERAL
9800 Goethe Road - P.O. Box 269101
Sacramento, California 95826-9101



March 7, 2014

Dear Dr. Darling-Hammond,

I am writing in response to the 15-day notice regarding proposed changes to the Designated Subjects Special Subjects teaching credentials. While the California Military Department is supportive of the clean up language relative to these credentials, I would request the Commission reconsider the decision not to adopt the proposed creation of a physical education supplement to the Designated Subjects Special Subjects Basic Military Drill (DSSSBMD) credential.

The regulatory changes rejected by the CTC at its February 14 meeting would have allowed the addition of a Designated Subjects Special Subjects Basic Military Drill/PE credential for individuals who demonstrated basic skills competence through passage of the CBEST and subject matter competence through passage of all three Physical Education CSET subtests.

While I respect the opposition presented by the California Teachers Association regarding the fact that the proposed credential does not require a bachelors degree, I am currently the authority responsible in Title 5 regulations for verifying both experience and competence for individuals recommended for the existing DSSSBMD credential, and much like various vocational education credentials granted by the CTC, possession of a Bachelors Degree is not a requirement. Currently, I verify that individuals possess at least four years of military experience and a minimum competence of military knowledge and skill necessary to teach in the California Cadet Corps (CACC) program. The proposed new credential would actually increase the competence of individuals by requiring passage of the CBEST and PE CSET exams.

The other major point of contention articulated at the CTC meeting was the difference between physical activity and physical education. Those who spoke out against the JROTC and CACC programs said they did physical activity but not physical education. That is simply not true. The CACC curriculum has been designed to teach to the California Physical Education Framework and we require candidates for the DSSSBMD credential to complete a rigorous 80 hour Basic Commandant Training Academy which includes explicit instruction in the CA PE Framework and Content Standards as well as designing and implementing a rigorous, standards-aligned PE program. The curriculum of the Basic Commandant Academy and the CACC cadet curriculum were developed by one of my staff who holds an earned doctorate in curriculum and instruction from the University of Southern California. Simply put, the argument that the CACC Curriculum is merely physical activity and not physical education is an argument not rooted in fact.

I strongly encourage the CTC to reopen the discussion about the creation of this new credential. We need this credential as a means to provide school districts with another tool to verify PE subject matter competence by California Cadet Corps teachers. School districts continue to have the sole discretion in whether or not to allow PE credit for the CACC course, but this proposed credential would allow teachers to demonstrate PE subject matter competence to their governing boards and therefore make a more compelling argument to those governing boards about their suitability to offer a course for which PE credit might be granted. Thank you and the commission in advance for considering these comments.

Sincerely,


David S. Baldwin
Major General
The Adjutant General

Mount Diablo High School
2450 Grant St.
Concord, CA 94520
925.682.4030

March 11, 2014

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

Greetings, Ms. Duggan:

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

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

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

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

Sincerely,

Liane Cismowski

Liane Cismowski, NBCT
Principal
cismowskil@mdusd.org



STATE OF CALIFORNIA- MILITARY DEPARTMENT
CALIFORNIA CADET CORPS
10 Sonoma Ave, Bldg 1301
Camp San Luis Obispo, California 93405

CACC-HQ

12 March 2014

Dear Dr. Darling-Hammond;

This letter is written in response to the 15-day notice regarding proposed changes to the Designated Subjects Special Subjects teaching credentials. As the Executive Officer and senior member of the California Cadet Corps, I am supportive of the "clean up" language relative to these credentials, but I would request the Commission seriously reconsider the decision not to adopt the proposed creation of a physical education supplement to the Designated Subjects Special Subjects Basic Military Drill (DSSSBMD) credential.

The regulatory changes rejected by the CTC at its February 14 meeting would have allowed the addition of a Designated Subjects Special Subjects Basic Military Drill/PE credential for individuals who demonstrated basic skills competence through passage of the CBEST and subject matter competence through passage of all three Physical Education CSET subtests. The California Cadet Corps teachers who would earn this new credential would be required to demonstrate increased basic and subject matter competence.

While I respect the opposition presented by the California Teachers Association and United Teachers Los Angeles regarding the fact that the proposed credential does not require a bachelors degree, the proposed new credential would actually INCREASE the competence of individuals teaching the CACC program and PE courses within that program by requiring passage of the CBEST and PE CSET exams. For over 30 years, I was a teacher in the Los Angeles Unified School District and while the UTLA and CTA reps claimed to speak for their organizations, I can tell you they did not represent those of us who taught the California Cadet Corps. The CACC teachers in UTLA and CTA are all 100% supportive of the proposed new credential.

The other major point of contention articulated at the CTC meeting was the difference between physical activity and physical education. Those who spoke out against the JROTC and CACC programs said they did physical activity but not physical education. That is simply NOT TRUE. The CACC curriculum has been designed to teach to the California Physical Education Framework. At present, candidates for the DSSSBMD credential are required to complete a rigorous 80 hour Basic Commandant Training Academy which includes explicit instruction in the CA PE Framework and Content Standards as well as designing and implementing a rigorous, standards-aligned PE program. Simply put, the argument that the CACC Curriculum is merely physical activity and not physical education is an argument not rooted in fact.

I strongly encourage the CTC to reopen the discussion about the creation of this new credential. We need this credential as a means to provide school districts with another tool to verify PE subject matter competence by California Cadet Corps teachers. School districts continue to have the sole discretion in whether or not to allow PE credit for the CACC course, but this proposed credential would allow teachers to demonstrate PE subject matter competence to their governing boards and therefore make a more compelling argument to those governing boards about their suitability to offer a course for which PE credit might be granted. Thank you and the commission in advance for considering these comments.

Sincerely,

Larry K. Morden
Colonel, California Cadet Corps
Executive Officer

From: mark@mkus.net [mailto:mark@mkus.net] **On Behalf Of** Mark Ryan
Sent: Friday, February 28, 2014 5:22 PM
To: Duggan, Tammy
Subject: 15 Day Notice

Dear Dr. Darling-Hammond;

This letter is written in response to the 15-day notice regarding proposed changes to the Designated Subjects Special Subjects teaching credentials. I am supportive of the "clean up" language relative to these credentials, but I would request the Commission seriously reconsider the decision not to adopt the proposed creation of a physical education supplement to the Designated Subjects Special Subjects Basic Military Drill (DSSSBMD) credential.

The regulatory changes rejected by the CTC at its February 14 meeting would have allowed the addition of a Designated Subjects Special Subjects Basic Military Drill/PE credential for individuals who demonstrated basic skills competence through passage of the CBEST and subject matter competence through passage of all three Physical Education CSET subtests.

While I respect the opposition presented by the California Teachers Association regarding the fact that the proposed credential does not require a bachelors degree, the proposed new credential would actually INCREASE the competence of individuals teaching the CACC program and PE courses within that program by requiring passage of the CBEST and PE CSET exams.

The other major point of contention articulated at the CTC meeting was the difference between physical activity and physical education. Those who spoke out against the JROTC and CACC programs said they did physical activity but not physical education. That is simply NOT TRUE. The CACC curriculum has been designed to teach to the California Physical Education Framework. At present, candidates for the DSSSBMD credential are required to complete a rigorous 80 hour Basic Commandant Training Academy which includes explicit instruction in the CA PE Framework and Content Standards as well as designing and implementing a rigorous, standards-aligned PE program. Simply put, the argument that the CACC Curriculum is merely physical activity and not physical education is an argument not rooted in fact.

I strongly encourage the CTC to reopen the discussion about the creation of this new credential. We need this credential as a means to provide school districts with another tool to verify PE subject matter competence by California Cadet Corps teachers. School districts continue to have the sole discretion in whether or not to allow PE credit for the CACC course, but this proposed credential would allow teachers to demonstrate PE subject matter competence to their governing boards and therefore make a more compelling argument to those governing boards about their suitability to offer a course for which PE credit might be granted. Thank you and the commission in advance for considering these comments.

Sincerely,

Mark P. Ryan, Ph.D.
Superintendent, North Valley Military Institute
Assistant Executive Officer, California Cadet Corps



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



March 11, 2014

Commission on Teacher Credentialing (CTC)
1900 Capitol Avenue
Sacramento, California 95811

Dear CTC:

I strongly support your proposal to establish a Special Teaching Authorization in Physical Education (PE) for credentialed teachers of Basic Military Drill (BMD) and Junior Reserve Officer Training Corps (JROTC.) A positive decision to grant a special PE teaching authorization to JROTC-credentialed teachers will further legitimize this already-accepted practice. Thank you for reconsidering it after its narrow defeat last month.

I am aware of the opposition to this proposal and would therefore like to offer clarity on this issue from my perspective. The practice of granting PE credit for JROTC classes is *not* about increasing numbers in JROTC; it's also *not* about taking away PE teacher jobs, or about feeding the egos of JROTC instructors. It is certainly *not* about money either. Simply stated, the granting of PE credit for JROTC/BMD gives high school students more options and flexibility to choose the classes they want and make the most of their high school experience.

There are a number of students at my all-academy high school who want to take JROTC but can't because there is no room in their class schedules for it. Between state-mandated graduation requirements and academy-mandated electives, many students who want JROTC can't have it. At Mt. Diablo High School, we've even added a seventh period specifically to accommodate these students, but due to both personal and extracurricular conflicts, it falls short of helping all students who want JROTC. Flexibility in granting PE credit will go a long way to helping this relatively small group of students get the classes they want and deserve.

Granting JROTC instructors a special authorization to teach PE will not mean drastic changes to education in California. JROTC meets the same physical activity requirements mandated by the State, and the use of JROTC as an alternative to traditional PE is already a successful, proven strategy in many schools and school districts across the state of California and the nation. The special authorization will simply make it easier for educators to help a small number of students get the high school classes they desire while maintaining high educational standards.

Thank you for all you do to help the students of California get the best education possible.

Sincerely,

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