

COMMISSION ON TEACHER CREDENTIALING

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OFFICE OF THE EXECUTIVE SECRETARY

91-9114

August 1, 1991

To: Persons Interested in Guidelines for Professional Administrative Services Credential Programs

From:  Philip A. Fitch, Ed. D., Executive Secretary

Re: Change in the Use of Private School Experience for the Meeting of Requirements in the Professional Administrative Services Credential Programs

On July 19, 1991, the Commission approved the following wording changes in the Guidelines for the Professional Administrative Services Credential effective for all Professional Administrative Services credential training programs as of September, 1991. The wording changes were necessary to achieve consistency across the Education Code, Administrative Code Title 5 regulations, and Commission on Teacher Credentialing Program Guidelines.

Category B-1.1 (b) of the Guidelines for Professional Administrative Services credential should now read:

A minimum of two years of successful, full-time school administrative experience in the public schools, in a position requiring the preliminary administrative services credential, as attested to by the employing school district or agency, including, but not limited to, the State Department of Education, in the case of state school administrators, and county offices of education, in the case of county school administrators.

Category B-1.1 (c) should now read:

Completion of a Commission-approved program for the Professional Administrative Services Credential, at least one-half of which shall have been engaged in by the candidate while being employed in a position requiring the Preliminary Administrative Services Credential.

Persons currently enrolled in a Professional Administrative Services program and employed as an administrator in a private school under the current CTC Guidelines shall be able to use private school administrative experience to fulfill the

requirements for the Professional Administrative Services Credential until September 1, 1992. Please inform all current and newly admitted students of this ruling as soon as possible.

Background

Staff Counsel issued a legal opinion on June 27, 1991, on the use of private school experience for credential requirements. The question presented was:

May the Commission allow field experience in private schools to be used to meet requirements for administration and pupil personnel services credentials?

The specific concern related to the Professional Administrative Services Credential is the requirement that the candidate must have a minimum of two years of successful experience in a position requiring the Preliminary Administrative Services Credential, as attested to by the employing school district or agency.

Education Code Section 44270.1(a)(2) pertaining to field experience requirements for the Professional Administrative Services Credential states:

A minimum of two years of successful full time experience in a position requiring the preliminary administrative services credential, as attested to by the employing school district or agency, including, but not limited to, the State Department of Education, in the case of state school administrators, and county offices of education, in the case of county school administrators.

Education Code Section 44270.1(a)(3) requires:

Completion of a commission-approved program of advanced study and appropriate field experiences or internship, at least one-half of which shall have been engaged in while being employed in a position requiring the preliminary administrative services credential.

Counsel determined that as a general rule of statutory construction, the term "requirement" means required by law and positions which require a Preliminary Administrative Services Credential are positions in the public school system.

Title 5 regulations section 80097, pertaining to approval of programs leading to the Professional Administrative Services Credential, further support the interpretation as it continually refers to the "employing school district" in the description of a program plan. A "school district" legally includes only those public entities created under the provisions of Education Code Section 4000 *et seq.* Private schools, by definition, are not part of a school district. Therefore, the two years of full time administrative experience required for the Professional Administrative Services credential must be obtained in the public school system and half of the second tier program must be completed while employed in a public school administrative position.

However, the wording used in Category B-1.1 of the Guidelines for Professional Administrative Services Credential is in conflict with the Education Code sections quoted above. This has caused some confusion in the field. The Professional Administrative Services Credential Guidelines currently state that a candidate must possess a valid Preliminary Administrative credential and in addition, meet the following requirement:

(b) A minimum of two years of successful, full-time school administrative experience in the public schools, or private schools of equivalent status.

(c) Completion of a Commission-approved program for the Professional Administrative Services Credential, at least one-half of which shall have been enrolled in by the candidate while employed in a full-time school administrative position.

This legal opinion and subsequent Commission action now have made the guidelines and the Education Code consistent with each other. The Commission is sorry about confusion the earlier guidelines may have caused and feels that this action will clarify the issue.

If you have any questions about the implementation of the revised guidelines, please contact Dr. Larry Birch, Consultant in Program Evaluation and Research at the Commission (916) 327-2967.

Note:

Nothing in this Coded Correspondence or Commission action changes the requirements for the Preliminary Administrative Services Credential. For that credential, "three years of successful, full-time classroom teaching experience in public schools or private schools of equivalent status" is still a requirement. Service in a private school may be used to meet the requirement.