

COMMISSION ON TEACHER CREDENTIALING

1812 9TH STREET
SACRAMENTO, CA 95814-7000

93-9314



July 2, 1993

To: All Individuals and Groups Interested in the Activities of
the Commission on Teacher Credentialing

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

Subject: Proposed Amendment of Section 80487 of Title 5, California
Code of Regulations, Pertaining to the CBEST Fee

The Commission on Teacher Credentialing is considering a proposal to increase by five dollars (\$5.00) the fee for taking the California Basic Educational Skills Test (CBEST). The Commission will consider all comments, objections or recommendations regarding the proposed action. The enclosed *Notice of Proposed Rulemaking* includes an informative digest of the proposed action (page 1), and a detailed analysis of it (pp. 2-20). The regulation amendment that is under consideration appears on page 21 of the *Notice*. Response options for public comment are described on page 23.

Statement of Reasons

The Commission is proposing to amend Title 5, Section 80487 of the California Code of Regulations to increase the CBEST fee to \$40.00. This increase will enable the Commission to maintain the quality of the CBEST examination and to protect the Commission from a projected deficiency in the Test Development and Administration Account in the near future. If such a deficiency occurred, the Commission would be in violation of the law.

Written Comment Period

Any interested person, or his or her authorized representative, may submit written comments on the proposed action. For written comments, the Commission urges citizens to use the form that is enclosed with the *Notice*. Written comments may be submitted in any format, however.

The written comment period closes at 5:00 p.m. on August 18, 1993. Comments must be received by that time at the Commission on Teacher Credentialing, 1812 9th Street, Sacramento, CA 95814-7000.

All written comments received 14 days prior to the public hearing will be reproduced by the Commission's staff for each Commissioner as a courtesy to the person submitting the comments, and will be included in the written agenda prepared for and presented to the full Commission at the public hearing.

Notice of Public Hearing

The public hearing is scheduled on:

August 19, 1993
1:30 p.m.
Clarion Hotel
700 16th Street
Sacramento, California

If you would like to testify at the hearing, please notify the Commission (preferably by August 5, 1993) so sufficient time can be scheduled for public comments at the hearing. Please contact the Office of the Executive Director at (916) 445-0184.

If you would like to submit written comments at the public hearing, please provide twenty-five copies. All written statements submitted at the hearing will be given full consideration by the Commission, regardless of the number of copies submitted.

Modification of Proposed Action

If the Commission decides to modify the action described in this notice, the modifications (other than nonsubstantial or solely grammatical modifications) will be made available for public comment for at least 15 days before they are adopted.

Contact Person for Further Information

Inquiries concerning the proposed action may be directed to Dr. Patricia Brinlee, Consultant in Examinations and Research, Commission on Teacher Credentialing, 1812 Ninth Street, Sacramento, California 95814-7000 (telephone 916-445-5865).

COMMISSION ON TEACHER CREDENTIALING12 9TH STREET
SACRAMENTO, CA 95814-7000**NOTICE OF PROPOSED RULEMAKING**

**Proposed Amendment of Section 80487
Pertaining to the Fee for the
California Basic Educational Skills Test (CBEST)**

**Division VIII of Title 5
California Code of Regulations**

The Commission on Teacher Credentialing is considering a proposal to increase the CBEST registration fee from \$35.00 to \$40.00, effective January 1, 1994. The Commission will consider all comments about this proposed action at the following public hearing:

**August 19, 1993
1:30 p.m.
Clarion Hotel
700 Sixteenth Street
Sacramento, California**

**Commission on Teacher Credentialing
State of California
June 22, 1993**

NOTICE OF PROPOSED RULEMAKING

Proposed Amendment of Section 80487 Pertaining to the Fee for the California Basic Educational Skills Test (CBEST)

Division VIII of Title 5 California Code of Regulations

Commission on Teacher Credentialing June 22, 1993

The Commission on Teacher Credentialing is considering a proposal to increase by five dollars (\$5.00) the fee for taking the California Basic Educational Skills Test (CBEST). The Commission will consider all comments, objections or recommendations regarding the proposed action. This document includes an informative digest of the proposed action (below), and a detailed analysis of it (pp. 2-20). The regulatory action under consideration appears on page 21. Response options for public comment are described on page 23.

Informative Digest of the Proposed Action

Currently the Commission on Teacher Credentialing is authorized by Education Code Section 44298 to charge fees to cover the costs of examinations that are used for credentialing purposes. Section 44298 requires that these fees "shall be sufficient" to cover the full cost of the examination system. The Commission deposits examination fees into the Test Development and Administration Account that was established by Education Code Section 44235.1. Section 44235 requires that the Commission maintain a prudent reserve in this account.

The Commission is also required by Education Code Section 44252.5(a) to administer a basic skills proficiency test, which is a requirement for obtaining numerous teaching and service credentials and permits. To implement this statute, the Commission administers the California Basic Educational Skills Test (CBEST). Section 44252.5(a) also directs the Commission to establish a fee to be charged to each examinee, which must "cover the costs of the test, including the costs of developing, administering, and grading the test." Pursuant to this section, the Commission has had statutory authority to set the examination fee at an amount not to exceed \$40.00 since 1984. The current CBEST fee is \$35.00, as authorized by the Commission in 1989. Title 5 Section 80487 (a)(5), California Code of Regulations, references the CBEST fee prior to 1989 (\$32.00).

The primary reason for the proposed action is to maintain a prudent reserve in the Test Development and Administration Account. Contract costs for developing, administering and grading the CBEST are continuing to increase, but the CBEST registration fee has not increased as rapidly. As a result, CBEST revenues are not sufficient to maintain a prudent reserve in the TDAA, which will have a deficit condition within the next twelve months, unless the CBEST fee is increased by \$5.00.

Detailed Analysis of the Proposed Action

Pages 2-20 provide detailed information regarding the proposed action. Additional information can be obtained by writing to CBEST Fee Information, Commission on Teacher Credentialing, 1812 Ninth Street, Sacramento, California, 95814.

Purpose and Intended Effect of the Proposed Action

The Commission is proposing to amend Title 5, Section 80487 of the California Code of Regulations to increase the CBEST fee to \$40.00. This increase will enable the Commission to maintain the quality of the CBEST examination and to avoid a projected deficiency in the Test Development and Administration (TDA) Account in the near future. If such a deficiency occurred, the Commission would be in violation of the law.

The Commission on Teacher Credentialing is responsible for the ongoing administration of the state basic skills proficiency test, and is required by law to use this test to assess basic academic skills in reading, writing, and mathematics in the English language. State laws also require the Commission to charge examination fees that are "sufficient to furnish the full cost of the examination system," and to conclude each year with a prudent balance in the TDA Account.

An examination used for certification purposes must meet standards promulgated by professional organizations in the field of educational measurement so the exam is technically, psychometrically and legally defensible. For this reason and because the necessary services cannot feasibly be provided directly by the Commission's staff or by other state agencies, the Commission has awarded external contracts to obtain the services needed to administer the California Basic Educational Skills Test (CBEST). The Commission has periodically solicited competitive bids in a process that is governed by the Public Contract Code and the State Administrative Manual. These competitions have led to a series of three-year contracts. The Commission awarded the current contract for CBEST administration to Educational Testing Service (ETS) in June of 1992. This contract will expire on December 31, 1994. At that time, a new contract will commence, after being awarded on the basis of another public competitive bidding procedure.

The Commission periodically analyzes revenues and costs of its testing programs, including the CBEST. In 1991, it became clear that projected cost increases would soon deplete the reserve in the Test Development and Administration Account. As a result, the Commission acted in June of 1991 to authorize its staff to initiate the rulemaking process and hold a public hearing on the prospect of increasing the CBEST fee from \$35.00 to \$40.00. This plan was not carried out because it became even more urgent for the Commission to increase the Credential Application Fee. Not wanting to increase two fees at the same time, the Commission temporarily put the CBEST fee increase "on hold."

The most recent analyses of CBEST revenues and expenditures indicate that continuation of the \$35.00 fee will lead to a deficit condition in the Test Development and Administration Account, placing the Commission in violation of the law. This deficit could occur during the next twelve months. It will certainly occur soon after the current contract expires at the end of 1994.

The primary purpose and intended effect of the proposed fee increase is to prevent an illegal deficit in the Test Development and Administration Account during the 1993-94 and 1994-95 fiscal years. An additional purpose is to raise sufficient revenues to enable the Commission to maintain the quality of the examination, including the validity and fairness of the test and its administration under future contracts.

Relevant Provisions of State Law

Under law, the Commission is responsible for the Teacher Credentials Fund, which includes the Test Development and Administration (TDA) Account. In the TDA Account, the Commission is required by law to deposit and spend funds that are authorized for "the examination system." Examination revenues and expenditures are reviewed and authorized annually by the Legislature, the Governor, the Commission, the Department of Finance, the Department of General Services, and the State Controller.

Several sections of the Education Code govern the Commission's use of examinations, including the collection and expenditure of funds in the TDA Account. The most general provisions of state law are in Education Code Section 44298, which states in part that "fees charged for the examinations shall be sufficient to furnish the full cost of the examination system."

The Commission has historically interpreted this requirement to mean that all costs related to the development, modification and administration of examinations must be funded from revenues collected in the form of examination fees. Funds to support the costs of the examination system cannot be drawn from any source other than examination fees. The Department of Finance accepts this interpretation of Section 44298.

Education Code Section 44235 requires the Commission to conclude each fiscal year with a prudent reserve in the TDA Account, as determined by the Department of Finance. Government Code Section 13324 prohibits the agency from concluding a fiscal year with a "deficit" in the TDA Account. However, because of increasing costs and a CBEST fee that has remained consistently low during a period when the costs associated with testing have risen considerably, revenues being deposited into the TDA Account now fall short of essential expenditures from it. Although the Commission has taken several steps to reduce CBEST-related expenditures, the TDA Account will soon have a deficit condition, which would be in violation of the state laws cited above.

Laws Governing the CBEST Fee

When the Legislature established the basic skills test requirement, the lawmakers also provided for increases in test fees. In fact, the 1981 statute anticipated the potential need for rapid and continuous increases in the CBEST fee, according to the following schedule in Education Code Section 44252.5:

\$30.00	Beginning in 1982-83
\$35.00	Beginning in 1983-84
\$40.00	Beginning in 1984-85

The Commission's has implemented several measures over time to ensure that the CBEST program is administered in the most cost-efficient manner possible. Therefore, it did not become necessary to raise the CBEST fee until 1984, when the Commission increased the fee from \$30.00 to \$32.00, and 1989 when the fee was raised from \$32.00 to \$35.00. The CBEST fee has remained at \$35.00 for five years, although costs in all areas of examination services have increased dramatically and are projected to escalate even more sharply in the near future.

Despite the Commission's desire not to overburden prospective teachers with fees, it is no longer prudent to delay the \$5.00 increase in the CBEST fee, for which the Commission has had statutory authority since 1984. It is interesting to note that if the CBEST fee were to be extrapolated to 1993 at the increments initially anticipated by the Legislature, it would now be \$85.00, which would be 285% greater than the current fee.

Essential Contractor Services that are Supported by Examination Fees

Because of the nature, scope, and importance of CBEST examination results to examinees and the certification decision-making process, most of the required services in this large scale "high stakes" program are procured through contracts with external firms that are experienced in test development and administration. The following subsections describe seven major categories of services that are provided by each test administration contractor. The subsections also indicate the percentage of the CBEST contract costs that are currently expended for each category of contracted services.

- (1) **Test development services** include the creation, development and screening of new test questions to replace items that have previously been used in the testing program. For this purpose, the contractor must identify specialists in mathematics, writing and reading, and must procure their services in developing new test questions. Successive drafts of their work must be subjected to an intensive screening process to ensure that each question is as effective as possible in assessing the skills specified for the program. The contractor also field tests each new question and analyzes its psychometric properties to determine whether it is suitable for use as an operational (scorable) item.

Test development activities were suspended under the 1989-92 contract as a cost-containment measure. Under the terms of the current contract (1992-95), new item development is being progressively phased-in during each year of the contract. Because of the projected status of the item pool (numbers and characteristics of items available for future use) at the conclusion of the present contract, it will be essential that the development of new test questions be expanded substantially during the ensuing contract period (1995-98).

The costs of *test development services* account for approximately nine percent (9%) of the current CBEST contract. Both the proportion and actual dollar costs of this work will need to increase considerably under future contracts, if the CBEST is to remain a defensible, high stakes testing program.

- (2) **Registration services** include the secure electronic processing of confidential information about thousands of examinees. The CBEST contractor processes examinee fees and registration forms, attempts to reconcile any anomalies in the registration process (such as incomplete the submission of incomplete forms), enters extensive examinee data into an automated system, assigns examinees to test sites, makes special accommodations for disabled candidates, and mails admission tickets to registered candidates informing them of their site assignments. The registration data base is then linked to the test result records to provide for the secure compilation of examinee information over time so each examinee's performance can be documented cumulatively and confidentially.

The provision of *registration services* accounts for 15 percent of the current CBEST contract budget. With continued increases in the costs of postage and electronic data processing, the costs of these services will increase proportionately.

- (3) **Publication services** include the extensive dissemination of information about the scope, content and difficulty of each test. The *Information Bulletin* informs candidates about the test schedules, rules that must be followed in order to maintain secure test conditions, procedures for obtaining additional score reports and other specialized services, and so forth. In the case of the CBEST, the 30-page *Information Bulletin* (which is annually updated) includes a description of the skills to be tested, a complete released form of the test, and the criteria used for scoring essays in the Writing Test. The contractor distributes thousands of copies the *Bulletin* to institutions of higher education, county offices of education, and school districts throughout the state, and mails it to individuals on request. Publication costs also include the expense of printing and mailing registration forms and score reports to approximately 65,000 individual examinees per year. All testing documents must also be produced, including newly configured test forms for each exam date, test supervisor's manuals and materials, machine-scorable answer sheets, score interpretation leaflets, and other public information documents.

The *production and dissemination of CBEST materials* currently account for 18 percent of the CBEST contract costs. Expenses in this category of services are likely to escalate in the next few years because of continued increases in the costs of printing, production, postage and telephone services.

- (4) **Test administration services** include the selection and rental of suitable test centers, the hiring and training of test administrators and proctors on an as-needed basis, and the expeditious processing of test booklets and answer sheets under conditions of firm security. Presently the CBEST is administered six times each year at eighty test centers throughout California, fourteen sites in Oregon, and metropolitan centers in eleven other states. Special administrations of the CBEST are also provided as the need arises. The contractor provides explicit directions to test administrators, monitors and evaluates their performance, and supervises the overall test administration process. Test booklets, answer sheets and other materials must be securely shipped between the contractor's offices and the 105 test centers throughout the nation, which requires extensive use of high priority delivery services.

Test administration services represent 26 percent of each annual budget in the current contract. Costs in this category have risen significantly since the last contract period. These costs will remain fixed through 1994 because of the terms of the current contract, but they can be expected to increase during the ensuing contract term. Site rental expenses and test supervisors' wages are rising, and there is a greater need for special administrations of the test, particularly to accommodate candidates with disabilities in accordance with the Americans with Disabilities Act (ADA). Expenses related to providing accommodations for these candidates have already increased considerably. Increasing proportions of CBEST candidates are requesting special accommodations, whose costs are absorbed across the fee base, so the overall cost of providing these services will almost certainly increase in the future.

- (5) **Test security services** include prompt responses by the contractor to reports by test administrators of alleged impersonation and other irregularities. The contractor must develop and implement a comprehensive policy regarding test security, and must train hundreds of individuals in the consistent administration of this policy. The Commission relies on the test contractor to be thorough and sensitive in handling each case of suspected dishonesty, which requires the services of investigators, attorneys and other specialists.

Six percent (6%) of the current contract costs are apportioned to *test security services*. These expenses can be anticipated to increase by an inflationary factor during the next contract period.

- (6) **Scoring and reporting services** include the development and use of computer programs that identify each examinee's correct and incorrect responses to multiple-choice questions, using state-of-the-art equipment that is 100 percent accurate. These services also include the selection and training of highly qualified readers who are hired to grade each examinee's essays. The fairness and credibility of the testing program depend on adherence to strict uniformity in all scoring activities. In the case of the CBEST Writing Test, each candidate's papers are read and scored by a minimum of four trained graders. These readers must be recruited from around the state, and must represent demographic and geographic diversity. Essay scoring activities must be administered by the contractor in a central location where the contractor trains the readers and monitors the reliability of their score results. In addition to paying stipends for their expertise, the contractor reimburses their expenses for travel, lodging, and meals.

Score reporting also requires processing and mailing durable "tamper-proof" score records to each examinee, including historical information for candidates who have previously taken portions of the test. Reports formatted to meet the needs of postsecondary institutions and the Commission must also be produced and disseminated by the test contractor.

Scoring CBEST exams and reporting scores account for 22 percent of the current contractor's costs. Expenses in this category will increase in the next contract period, especially the costs of scoring the writing portion of the examination.

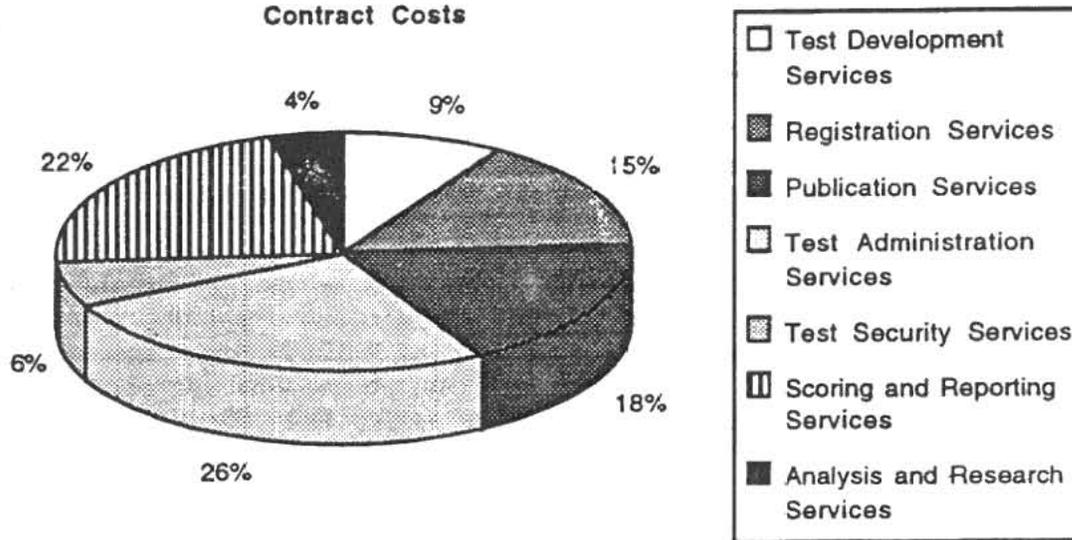
- (7) **Statistical analysis and research services** are necessary to ensure that the psychometric properties of the test questions and forms are accurately analyzed. Maintaining item histories, designing test form configurations, equating test forms with each other, and conducting research studies related to the examination are included in this category of services.

Four percent (4%) of the CBEST contract costs are currently allocated to *analytical research services*. However, given the additional item development and field testing activities that are expected to occur during the next contract period, more funds will need to be allotted for work in this category by a future contractor.

In these seven categories of services, the diagram on the following page displays the distribution of CBEST expenses in accord with the current test administration contract.

An examination program like the CBEST requires complex services that involve many individuals within the contractor's firm, and larger numbers of subcontractors from throughout the state. In the case of the CBEST program, these services consume \$29.10 of the current CBEST test fee of \$35.00 that each examinee pays. The CBEST program also places complex demands on many independent advisors to the Commission, as well as the agency's professional, analytical and clerical staff, as is outlined in the next section beginning on the following page.

Services of the CBEST Contractor As Proportions of Total Contract Costs



Other Essential Services that are Supported by Examination Fees

Examination fees must also support the costs of other services related to examinations, which include the following activities by the Commission's staff and external advisors (other than the test administration contractor). The proportions of all non-contractor expenses are indicated below for each category of services and activities.

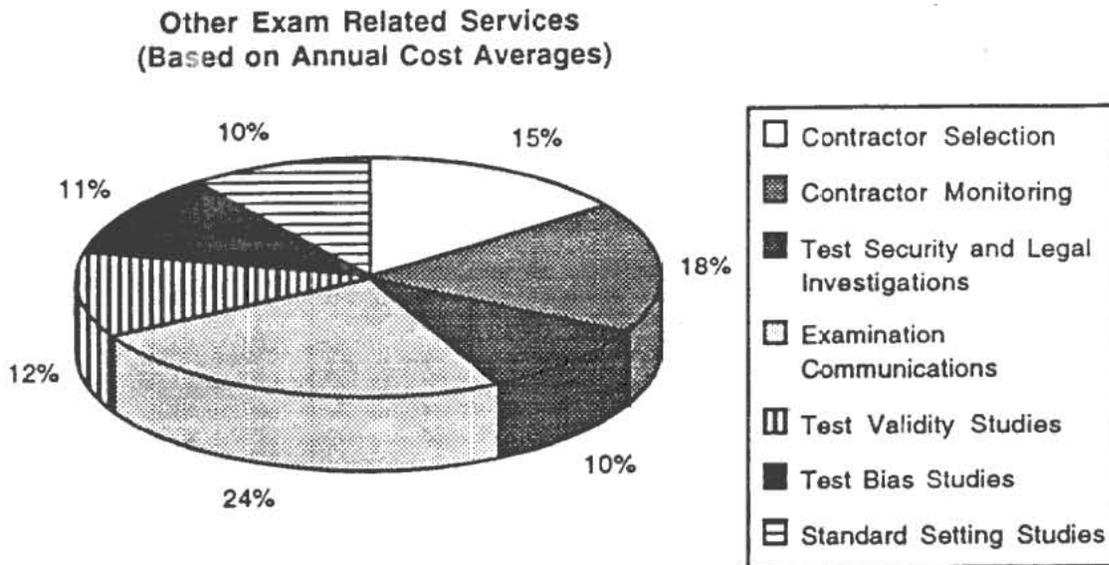
- (1) **Contractor selection** includes the preparation and dissemination of Requests for Proposals, the review and evaluation of competitive bids, and the completion of legal contracts for procuring examination services. In addition to hundreds of hours of staff time, the cost of each procurement includes the advice and expertise of external reviewers who evaluate all bids and technical proposals. In accordance with the Public Contract Code, both Commission staff members and external advisors with expertise in various aspects of testing must participate in an objective evaluation of the proposals. The project officer must also prepare and monitor the processing of any needed contract amendments and various other documents (e.g., budget change proposals, contractor evaluations, invoices) pertinent to the program. *Contractor selection* absorbs approximately 15 percent of the Commission's exam-related, non-contracted costs.

- (2) **Contractor monitoring** includes frequent oral and written communications with the contractor's staff. Monitoring also includes random observations of test administration centers and essay scoring sessions, and analysis of all reports and other "deliverables" by the contractor. Many hours of staff monitoring are needed to ensure effective implementation of the CBEST contract, and to inform the Commission of all matters that involve policy considerations. The Professional Services Division of the Commission includes a small number of professionals in the field of educational measurement, whose duties include the monitoring of examination contractors. Approximately 18 percent of all exam-related, non-contracted costs of the Commission pay for *contractor monitoring*.

- (3) **Test security and legal investigations** include staff evaluations of alleged irregularities such as copying, impersonation and other forms of fraud. Several cases each year consume the time of staff counsel and support staff in the Commission's Legal and Professional Standards Division. The Test Development and Administration Account also pays for the Attorney General's increasing costs in providing legal support to the Commission in cases of alleged test dishonesty. It also supports the cost of defending the test program in response to legal challenges. At least ten percent of exam-related costs consist of *test security and legal investigations* by agencies other than the test administration contractor.
- (4) **Examination communications** include the preparation of research and other reports to the Commission and its constituents, as well as the pursuit of oral and written communications with individuals and organizations regarding the CBEST examination. The Commission publishes reports of CBEST-related research each year, the professional staff meets frequently with professional organizations and educational institutions to discuss the required exam, and the professional and clerical staff engage every day in telephone conversations and written correspondence with examinees and others who have many questions regarding the CBEST. An estimated 24 percent of the Commission's in-house expenses related to examinations are allocated to the *communication of information*.
- (5) **Test validity studies** investigate the extent to which an examination measures content and skills that are essential for effective service as authorized by a credential. Because of the Commission's overall responsibility for exams that are required by state law, the Commission relies on its staff (not its contractor) to plan, design, conduct and report the results of periodic studies of the validity of the CBEST. Such studies should be repeated every three to five years, because of changing demands on teachers that result from changes in student populations, school curricula and job requirements. Validity studies are expensive because teachers, administrators and teacher educators from throughout the state must be assembled in central locations to evaluate test specifications and questions. *Test validity studies* represent approximately 12 percent of the agency exam-related expenditures for non-contracted services.
- (6) **Test bias studies** investigate the extent to which the differential effects of an exam on ethnic and gender groups can be attributed to bias or insensitivity in the test specifications or questions. Some studies focus on the performances of particular groups, while others examine reasons for the differences between groups. In the case of the CBEST, the Commission has examined bias issues statistically (by analyzing group responses to each question) and judgmentally (by asking experts to evaluate all test materials). To maintain the legal defensibility of the CBEST exam, the Test Development and Administration Account must periodically support the costs of studies that investigate all possible sources of bias, insensitivity and unfairness in the examination. The costs of bias studies derive from two sources: the travel and per diem expenses of committees that are assembled to evaluate the test materials; and the expertise of measurement specialists who complete quantitative analyses of the impact of individual test questions on different groups of examinees. *Test bias studies* absorb approximately 11 percent of the Commission's non-contracted costs related to examinations.

(7) **Standard-setting studies** are designed to indicate to the Commission the levels at which the Commission should expect credential candidates to perform on required examinations. Like validity research and bias reviews, standard-setting studies are costly because they require the expertise of teachers, administrators and teacher educators from throughout the state, in addition to the contributions of research and measurement specialists on the Commission's staff. *Standard-setting studies* absorb approximately 10 percent of the Commission's exam-related, non-contracted costs.

The following diagram shows the actual distribution of exam-related expenses in the seven categories outlined above (other than contracted test administration services).



The current CBEST test fee of \$35.00 yields \$5.10 per examinee to defray the costs of the essential activities outlined above.

In addition to these seven categories of non-contractor services, a portion of CBEST revenues should be retained each year as part of the "prudent reserve" in the Test Development and Administration Account. The Department of Finance has determined that a prudent reserve in this account is ten percent (10%) of annual expenses. In practice, however, CBEST revenues are not sufficient to contribute to the required reserve in the TDA Account, which is a primary reason why a fee increase is needed.

General and Specific Increases in Examination Costs

Over the years the Commission has sought to keep all of its fees as low as possible, and has taken many steps to reduce its costs and expenditures. These steps will be summarized later in this document. Each year, however, the essential costs of administering examinations have increased due to changes that are beyond the Commission's control. Probably the best general index of cost increases is the *Consumer Price Index*, which shows that the "general cost of doing business" has increased by 54 percent since the CBEST legislation was enacted in 1981. To illustrate these cost increases more specifically, the following chart shows several increases in general operational costs that impact the CBEST testing program since 1981.

<u>General Cost Categories</u>	<u>Changes Since 1981</u>
Average Per-Unit Cost of Printing Services	51% Increase
Civil Service Salary for a Consultant	62% Increase
Average Per-Unit Cost of Purchasing Paper	67% Increase
Civil Service Salary for a Secretary	73% Increase
Attorney General's Hourly Fee: Legal Services	91% Increase
Rent Paid by the Commission	137% Increase

In recent years, there have been particular increases in cost categories that impact the CBEST contractor's costs even more specifically than the items listed above. The second chart (below) shows increases since 1989 in four key CBEST cost categories.

<u>CBEST Cost Categories</u>	<u>Changes Since 1989</u>
Postage Rates and UPS Charges	15% Increase
Daily Stipend for Essay Readers	42% Increase
Test Center Supervisor Stipend	61% Increase
Colleges & Universities Test Center Use Fees	125% Increase

The average salary earned by California teachers also increased by 67 percent since the CBEST was created (1981 to 1993). However, the CBEST registration fee has increased by only 14 percent, from \$30.00 to \$35.00, during the same interval.

Fees Charged for Comparable Examinations in Other States

For purposes of comparison, the Commission has compiled information about the examination fees that are charged by 32 other states for tests to verify the basic reading, writing and mathematics skills of beginning teachers (the same purpose as the CBEST). The chart on the following page identifies these states, the tests that are used, and the fees that are charged. This overview of licensure examinations required by 32 states indicates that:

- (1) The CBEST examination fee (\$35.00) is the lowest fee for any examination of its type in the nation.
- (2) The CBEST fee is lower than the fee charged for two nationally-administered tests of basic skills (the Pre-Professional Skills Test and the Communication Skills Test, which cost \$65.00 and 45.00 respectively). The CBEST fee (\$35.00) is also lower than the fees charged by three other states (Connecticut, Illinois and Michigan) that administer their own basic skills tests (like the CBEST). These three states charge \$75.00, 44.00 and 49.00 respectively.

- (3) The CBEST examination fee would continue to be the lowest fee in the nation for a basic skills exam even if increased from \$35.00 to \$40.00.

Among the tests used for initial teacher certification, the CBEST is the only examination that requires the production of *two essays*. Other exams typically require one writing sample and, in some cases, include multiple-choice questions about "editing skills" (i.e., usage, grammar, and mechanics). Although the scoring of essays is labor-intensive and requires highly qualified and trained readers, the Commission has succeeded in maintaining the lowest fee in the nation to cover the costs of administering an examination that assesses writing skills most authentically.

Fees Charged by Other States for Basic Skills Examinations

States	Basic Skills Tests	Three Levels of Fees		
		\$50 +	\$40-49	\$40 -
Arizona	Pre-Professional Skills Test	\$65.00		
Arkansas	Pre-Professional Skills Test	65.00		
California	CBEST Test			35.00
Connecticut	CONCEPT Test	75.00		
Delaware	Pre-Professional Skills Test	65.00		
Hawaii	Communication Skills Test		45.00	
Idaho	Communication Skills Test		45.00	
Illinois	Illinois Basic Skills Test		44.00	
Indiana	Communication Skills Test		45.00	
Kansas	Pre-Professional Skills Test	65.00		
Kentucky	Communication Skills Test		45.00	
Louisiana	Communication Skills Test		45.00	
Maine	Communication Skills Test		45.00	
Maryland	Communication Skills Test		45.00	
Michigan	Michigan Basic Skills Test		49.00	
Minnesota	Pre-Professional Skills Test	65.00		
Mississippi	Communication Skills Test		45.00	
Montana	Communication Skills Test		45.00	
Nebraska	Pre-Professional Skills Test	65.00		
Nevada	Pre-Professional Skills Test	65.00		
New Mexico	Communication Skills Test		45.00	
New York	Communication Skills Test		45.00	
North Carolina	Communication Skills Test		45.00	
Oklahoma	Pre-Professional Skills Test	65.00		
Oregon	CBEST Test			35.00
Pennsylvania	Communication Skills Test		45.00	
Rhode Island	Communication Skills Test		45.00	
Tennessee	Pre-Professional Skills Test	65.00		
Virginia	Communication Skills Test		45.00	
West Virginia	Pre-Professional Skills Test	65.00		
Wisconsin	Pre-Professional Skills Test	65.00		

The *Pre-Professional Skills Test* includes reading, mathematics and writing (one essay). The fee for this test is expected to increase to \$70.00 next Fall. The *Communication Skills Test* also includes reading, writing and mathematics. It is a component of the NTE Core Battery. Most states that use the Core Battery Tests require candidates to pass all three components (i.e., Communication Skills, General Knowledge and Professional Knowledge), for a total fee of \$85.00.

Significant Steps by the Commission to Reduce CBEST Costs

During the three-year contract that expired in 1989, the fixed costs of administering the CBEST increased more than 18 percent. To avoid imposing a \$40.00 fee on CBEST examinees at that time, the Commission's staff recommended a cost-cutting measure that was adopted by the Commission. This step consisted of discontinuing the development of new test questions to replace the items that had previously been used. As a consequence of this action, during 1989, 1990 and 1991, the contractor re-used test questions that were originally developed and administered prior to 1988. The Commission saved approximately \$600,000 because of the three-year discontinuation of test development services by the contractor.

When the staff recommended this action to the Commission, the recommendation included certain cautions about how long it should remain in effect. The staff proposed a *short term* discontinuation of test development that would remain in effect only during the term of the three-year contract that was due to expire in 1992. The staff cautioned against viewing this as a *long term* solution to the problem of increasing costs. The reason is that examinees who repeat the CBEST exam become acquainted with many of the questions, which reduces the validity, security, uniformity and fairness of the test over time. The Commission accepted the staff recommendation on this issue, and the contractor has resumed item development on a limited basis under the terms of the current contract.

In addition to this action, which saved approximately \$600,000 in costs, the Commission's staff has achieved other savings in administering the CBEST program. To postpone as long as possible the need for a fee of \$40.00, the staff has: (1) used fewer and fewer external reviewers in the evaluation of bids by potential CBEST contractors; (2) taken fewer and fewer occasions to monitor the CBEST test administration centers in the state; (3) postponed studies of CBEST validity, impact and passing standards; and (4) reduced the number of CBEST reports to the Commission. The staff has also postponed several specific plans to improve the CBEST testing program, again for the purpose of avoiding costs that cannot be supported under the current fee structure.

Actual and Estimated Condition of the Test Account

State law requires the Commission to charge examination fees that are "sufficient" to recover the costs of developing, administering and scoring all required examinations. In 1986 the Legislature concurred with a proposal by the Commission to establish a separate account, the Test Development and Administration (TDA) Account, within the Teacher Credentials Fund, to monitor the receipt and expenditure of exam funds as effectively as possible.

Since the TDA Account was established, all exam-related revenues and expenditures have been included in the Commission's annual budget. Because of the increases in exam costs that were previously described, and because the CBEST exam fee has remained the same for five years, the TDA Account is approaching a condition of depletion and possible deficit, as reflected in the following fund condition statement.

**Condition of the Test Development and Administration Account
With No Change in the CBEST Fee
(Dollars in Thousands)**

	<u>1988-89</u>	<u>89-90</u>	<u>90-91</u>	<u>91-92</u>	<u>92-93</u>	<u>93-94</u>	<u>94-95</u>
Beginning Reserve	642	189	400	2,089	1,591	743	156
Adjustments	-200	-23	+1,120	+146	--	--	--
Revenues	+2,625	+3,126	+4,315	+4,023	+3,852	+3,774	3,673
Expenses	-2,878	-3,472	-3,746	-3,837	-4,569	-4,260	-4,158
Loans/Transfers	<u>0</u>	<u>+580</u>	<u>0</u>	<u>-830</u>	<u>-131</u>	<u>-101</u>	<u>-101</u>
Reserve	189	400	2,089	1,591	743	156	- 430

- In 1988-89, the Test Development and Administration Account began with a reserve fund of \$642,000.
- Adjustments are from unanticipated expenditures and from encumbrances that were not fully expended the prior fiscal year.
- The Loan/Transfer for 1989-90 was a repayment of a loan from the Commission's Teacher Credentials Fund; for 1991-92, a transfer to the Teacher Credentials Fund; for 1992-93, 1993-94 and 1994-95, mandatory transfers to the State of California General Fund. These mandatory transfers to the General Fund are the amounts of interest from investments that the Commission receives from this account. This transfer was required for 1992-93, and it is anticipated for 1993-94 and 1994-95.
- The above information for 1992-93, 1993-94 and 1994-95 are current estimates that are subject to change as actual revenues and expenditures materialize. Because the adjustments for these three fiscal years are unknown, no figures are entered.

In the absence of a CBEST fee increase, the reserve will be depleted in the Test Development and Administration Account, which will show a deficit of \$430,000 at the end of 1994-95.

Need for a Prudent Reserve in the Test Account

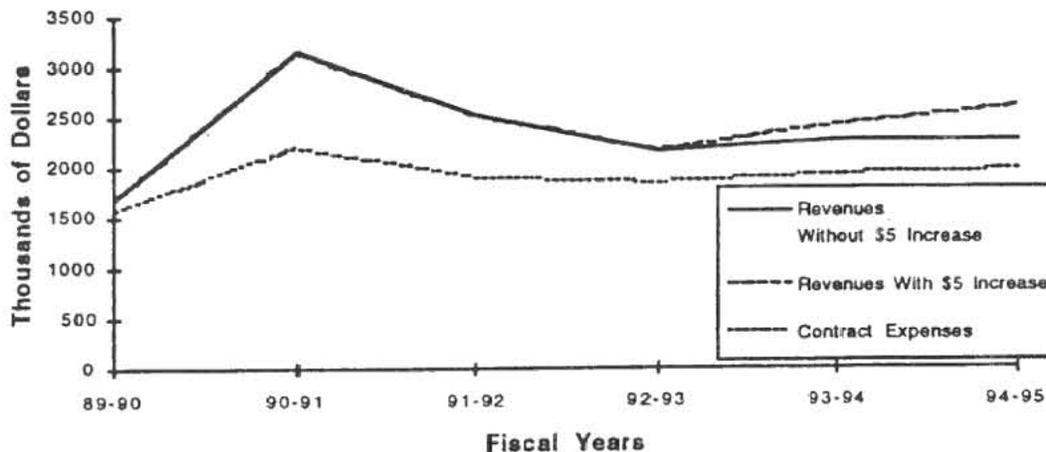
The TDA (TDA) Account is part of the Teacher Credentials Fund, and is required to include a prudent reserve each year to protect the fund from unanticipated contingencies that could impair the Commission's capacity to implement state laws and meet its financial obligations. A prudent reserve in the TDA Account would also enable the Commission to invest in needed improvements in required exams and assessments, including the CBEST. Since the TDA Account was established, its reserve has been depleted because of the combination of (1) increasing costs that have escalated despite the Commission's cost-cutting steps, and (2) a stable CBEST fee that has not kept pace with the increased costs.

Additionally, in the development and administration of high stakes exams, "mid-course corrections" are occasionally needed because some test specifications and questions do not function as they were intended. Although the test development process typically follows well-established procedures and criteria, the Commission should have the capacity to make necessary *modifications* in an examination program if problems occur. In the absence of a prudent reserve in the TDA Account, such modifications and corrections would become impossible for the Commission to pursue.

Projected Impact of the Proposed Action

If the proposed action is adopted, CBEST revenues being deposited into the Test Development and Administration Account would increase, and would keep pace with increases in contract expenses for the CBEST program, as the following diagram shows.

Projections for CBEST Revenues and Contract Expenses With and Without a Fee Increase (1989-95)



The proposed action would also have the effect of maintaining a small reserve in the Test Development and Administration Account. The following chart shows the condition of this account if the Commission adopts an increase of \$5.00 in the CBEST fee effective January 1, 1994.

Condition of the Test Development and Administration Account
With an Increase of \$5.00 in the CBEST Fee
(Dollars in Thousands)

	1988-89	89-90	90-91	91-92	92-93	93-94	94-95
Beginning Reserve	642	189	400	2,089	1,591	743	299
Adjustments	-200	-23	+1,120	+146	0	0	0
Revenues	+2,625	+3,126	+4,315	+4,023	+3,852	+3,917	3,998
Expenses	-2,878	-3,472	-3,746	-3,837	-4,569	-4,260	-4,558
Loans/Transfers	0	+580	0	-830	-131	-101	-101
Reserve	189	400	2,089	1,591	743	299	38

The increase of \$5.00 in the CBEST fee will not be used to increase the contractor's budget during the remaining term of the current contract. Nor would other unbudgeted expenditures be increased as a result of a possible increase in the CBEST fee. The fee increase would restore a small reserve (\$38,000, which would be less than one percent) in the TDA Account, which is why the Commission is considering an increase in the CBEST fee to \$40.00 as authorized by state law.

Without a CBEST fee increase, the condition of the TDA Account is projected to have a deficit of \$430,000 in 1994-95, as was shown on page 13 above. With an increase of \$5.00, the account is expected to have a reserve of \$38,000, as was displayed on page 14. The year-end reserves on pages 13 and 14 are compared with each other in the following diagram that covers the fiscal years from 1988-89 through 1994-95.

**Test Development and Administration Account:
Year End Reserves With and Without a Fee Increase
(1988-1995)
(Thousands of Dollars)**

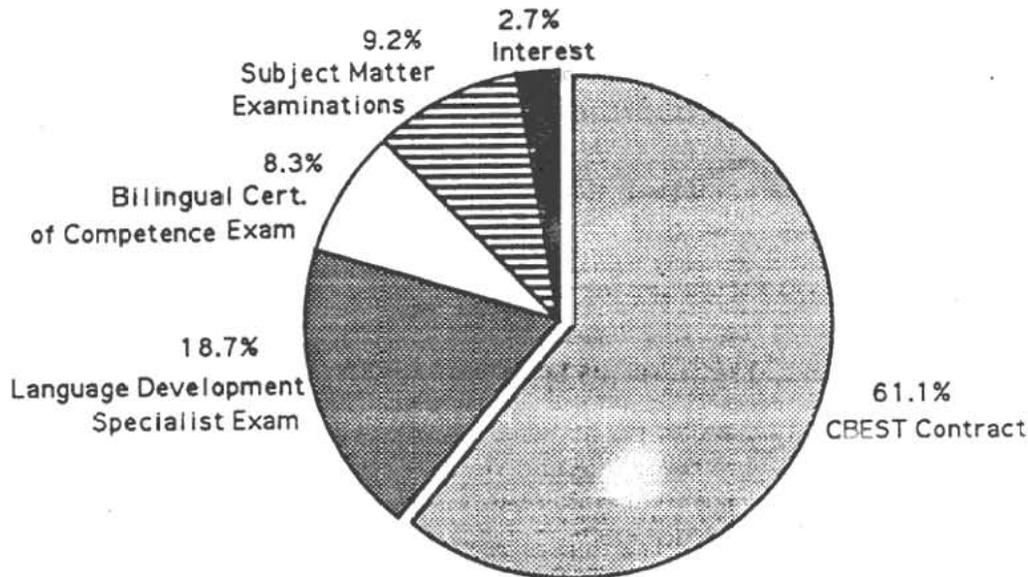


This time-series diagram confirms that the reserve in the TDA Account will be depleted entirely during the 1993-94 fiscal year, and will show a deficit during 1994-95, unless a fee increase is adopted effective January 1, 1994.

Multiple Sources of Revenue in the Test Account

The Test Development and Administration (TDA) Account receives fee revenues from several examination programs, as the following diagram suggests. Pages 16-20 examine the role of multiple exam programs on the condition of the TDA Account. Alternative ways to restore a prudent reserve to the TDA Account are also examined.

Sources of Revenues in the Test Development and Administration Account:
Projections for 1993-94 (Without a CBEST Increase)

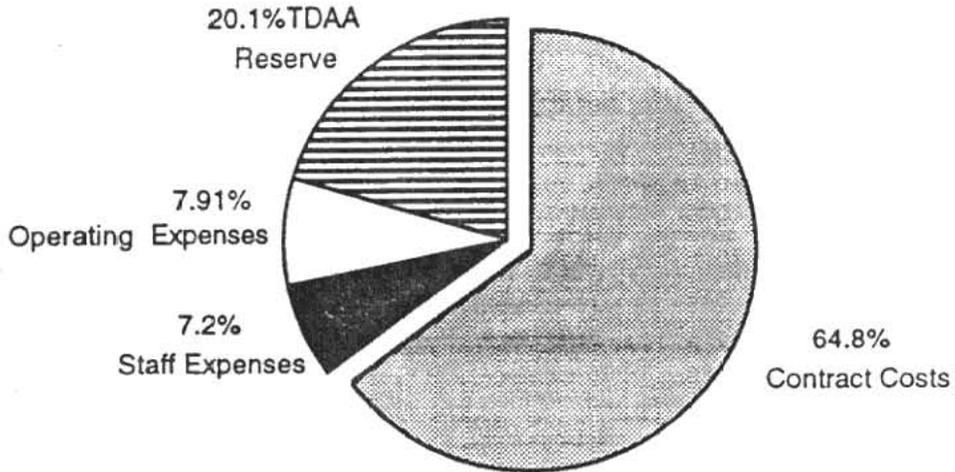


Proportionate Support of the Test Account by Different Exam Programs

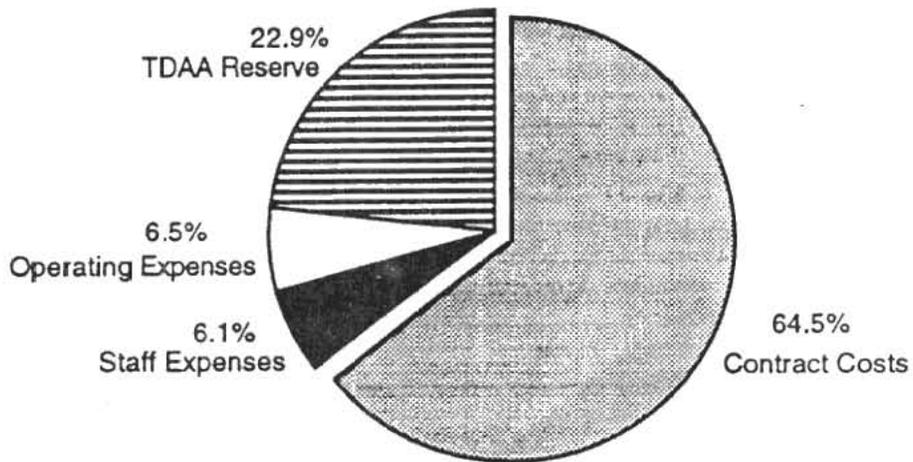
Over time, the Commission has sought to ensure that the fees charged for each exam do two things: (1) cover the necessary costs of each test administration contractor, and (2) contribute proportionately to the payment of the Commission's own exam-related *staff expenses*, the agency's exam-related *operating expenses*, and the *prudent reserve* in the TDA Account. If a particular examination program were allowed by the Commission to contribute *insufficient revenues* to these latter elements, the effect would be to increase the reliance of the TDA Account on funds from other exam programs. If this reliance were allowed to become disproportionate to the size of the examinee populations, then some examinees would unfairly underwrite the Commission's exam-related costs more heavily than other examinees.

The four graphs on the following two pages show the budgeted uses of revenues from three similar exam programs: the Language Development Specialist (LDS) Exam, the Bilingual Certificate of Competence (BCC) Exam, and the California Basic Educational Skills Test (CBEST). In the case of the CBEST, the diagrams show how revenues are budgeted with the fee at \$35.00, and how they would be budgeted with a fee of \$40.00 during the term of the current contract. Each diagram shows the proportion of exam revenues that pay for (1) contract costs, (2) the Commission's own exam-related staff expenses, (3) the agency's exam-related operating expenses, and (4) the reserve in the TDA Account.

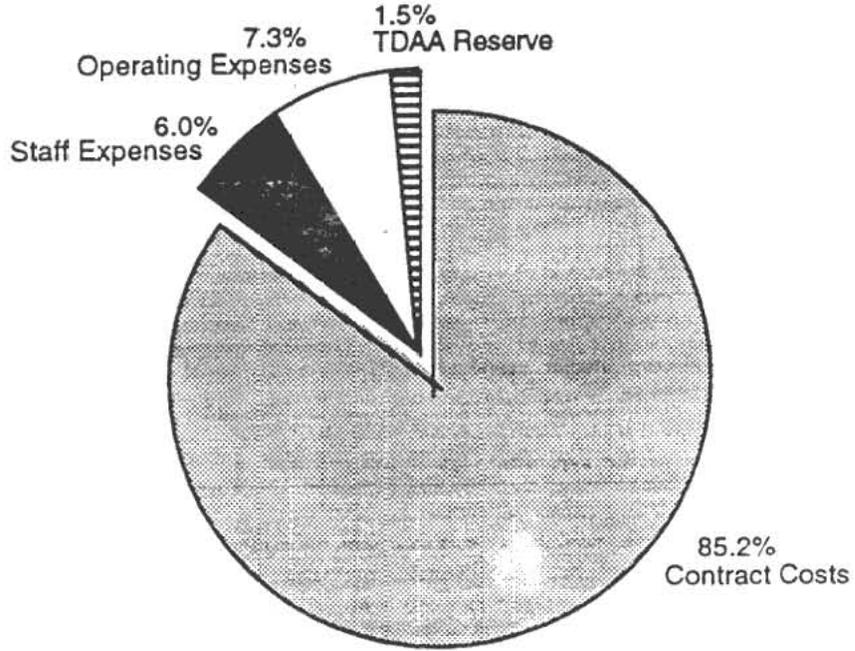
**Budgeted Uses of Revenues from the
Language Development Specialist (LDS)
Examination (1993-94) (Fee = \$100)**



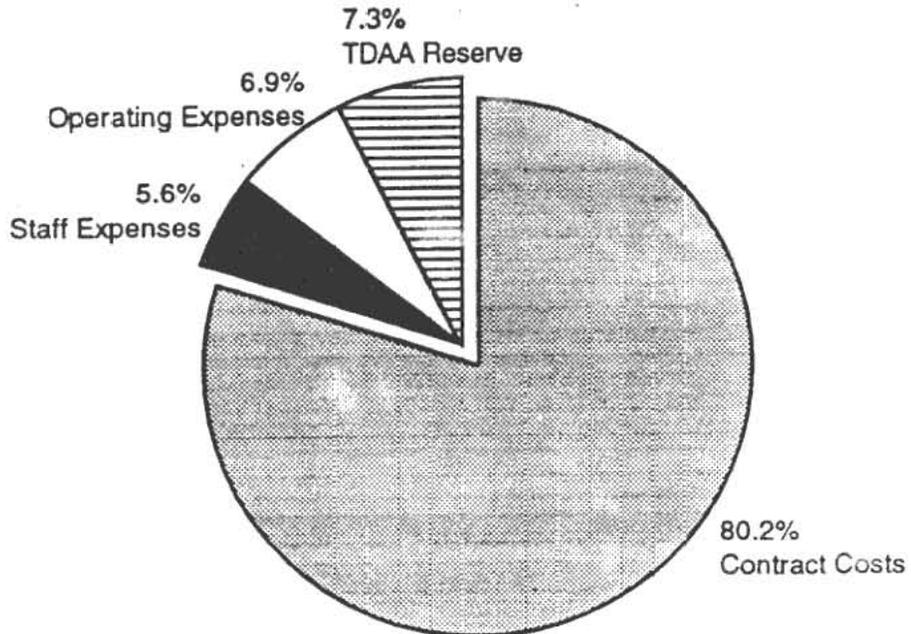
**Budgeted Uses of Revenues from the
Bilingual Certificate of Competence (BCC)
Examination (1993-94) (Fee = \$120)**



**Budgeted Uses of Revenues from the
California Basic Educational Skills Test (1993-94)
Without a Fee Increase (\$35.00)**



**Budgeted Uses of Revenues from the
California Basic Educational Skills Test (1993-94)
With a \$5.00 Fee Increase (\$40.00)**

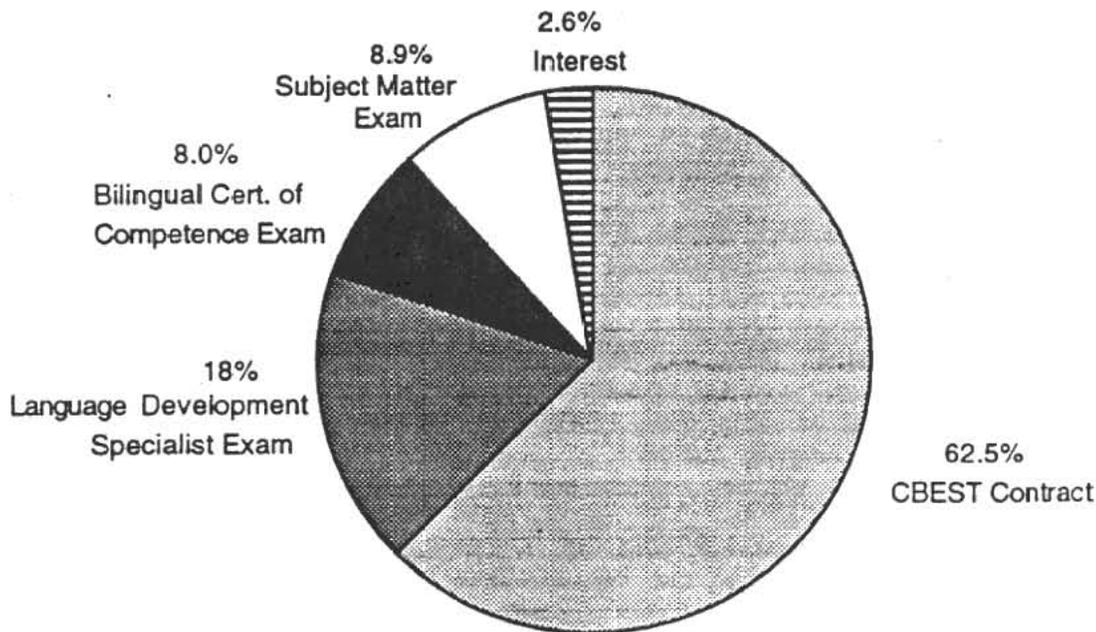


The diagrams on the two prior pages show that teachers who take the LDS Examination and the BCC Examination contribute disproportionately to the reserve in the TDA Account, and that examinees who take the CBEST provide much less support to this reserve. Although an increase of \$5.00 in the CBEST fee would not fully equalize the contributions of various test programs to the TDA reserve, it would make the Commission's various exam fees more equitable than is currently the case. Seven percent (instead of 1.5 percent) of CBEST fee revenues would go to support the required reserve, which would more nearly approximate the contributions of teachers who take the LDS Examination (20.1 percent) and the BCC Examination (22.9 percent).

The budgeted uses of LDS revenues, BCC revenues and CBEST revenues have gradually shifted over the course of several years. The contributions of CBEST funds to the TDA reserve have declined because (1) the CBEST contract costs increased while (2) the CBEST exam fee (\$35.00) remained much lower than the LDS fee (\$100.00) and the BCC fee (\$120.00). The failure of CBEST revenues to keep pace with contract costs has had two effects: it has depleted the reserve in the TDA Account and it has created an inequity between LDS-BCC teachers (who contribute substantially to the reserve) and CBEST examinees (who contribute very little to the reserve).

This analysis of the multiple sources of revenue in the TDA Account began on page 16 with a diagram that showed the major sources of revenue in 1993-94 if the CBEST fee is not increased. For comparative purposes, the following diagram shows the revenues that would come from the same sources if the CBEST fee is increased by five dollars.

**Sources of Revenues in the Test Development and Administration Account:
Projections for 1993-94 With a CBEST Increase of \$5.00**



Analysis of Alternatives to a CBEST Fee Increase

A prudent reserve in the Test Development and Administration (TDA) Account could be restored by (1) increasing exam fees other than the CBEST fee, or (2) reducing CBEST-related expenditures. Each of these alternatives has been analyzed by the agency's fiscal and professional staff.

Option One: Increase Exam Fees Other than the CBEST Fee. One alternative would be to increase the revenues that are produced by one or more examinations other than the CBEST. The TDA Account receives revenues from several examinations, but the exams other than the CBEST already contribute disproportionately to the TDA reserve (as was shown on pages 17-18). Because of the relatively large number of CBEST examinees, increasing the CBEST fee would be most effective in maintaining a prudent reserve in the TDA Account. To maintain even a modest reserve, the other exam fees would have to be increased much more than five dollars, because fewer teachers take the other exams.

One year from now the Commission intends to replace the Language Development Specialist (LDS) Examination and the Bilingual Certificate of Competence (BCC) Examination. The new examinations for prospective teachers of limited-English proficient students will be the Crosscultural, Language, and Academic Development (CLAD) Examination, and the Bilingual Crosscultural, Language, and Academic Development (BCLAD) Examination. When these new examinations are adopted by the Commission, the policymaking body will need to establish appropriate fees to defray the costs of administering them. In the meantime, increasing the LDS and BCC fees would have only a very modest, temporary effect on the TDA Account, because these exams will be discontinued soon.

An increase in the Subject Matter Exam Development and Administration Fee would also have little impact on the condition of the TDA Account. The subject matter exams are waived (under the Education Code) by thousands of candidates each year (who complete approved programs of subject matter preparation). One consequence of this "waiver policy" is that the subject matter exam fees contribute less than the CBEST fee or the LDS fee to annual TDA revenues.

Option Two: Reduce CBEST-Related Expenses. The Commission and its staff have previously taken many steps to reduce CBEST costs, including significant reductions that were described on page 12. Continuation of these reductions beyond the term of the current contract would diminish the fairness, validity and defensibility of the CBEST as a "high stakes" licensure test for teacher credentialing. The Commission's staff has evaluated several possible reductions in CBEST expenses, each of which would make the testing program less fair, valid or uniform for the examinees. Cost reductions beyond those already initiated by the Commission would not be fair to those who are most affected -- the fee-paying examinees.

Further reductions in expenses are also not fiscally possible because of the continuing increases in costs that are beyond the Commission's control, such as those cited on page 10. The fact that the Commission has already kept CBEST-related costs at the lowest possible level is reflected in the current fee, which is the lowest fee of its type anywhere in the nation (pp. 10-11). If the Commission adopts a \$5.00 increase in the CBEST, this fee (\$40.00) will still be the nation's lowest fee for a basic skills exam in teacher credentialing.

Proposed Amendments to Existing Regulations

California Code of Regulations Part VIII of Title 5 Article 4. Fees for Credentials Section 80487. Fees.

(a) For the purpose of this section credential means any certificate, permit authorization, or other certification document, which the Commission is empowered to issue.

(1) The fee for the issuance, reissuance, or renewal of a credential shall be sixty dollars unless otherwise established by law. Effective September 1, 1992, this fee shall be sixty-five dollars.

(2) The fee for a duplicate or credential shall be one-half the fee specified in (a)(1) or the credential fee established by law.

(3) Two hundred fifty dollars for a Board of Examiners' fee as provided in Section 80076.

(4) Thirty dollars for an examination processing fee as provided in Section 80077.

(5) ~~Thirty-two dollars~~ The fee for the state basic skills assessment examination pursuant to Education Code Section 44252.5 shall be forty dollars.

(6) Fourteen dollars, or the actual fee if different from this amount, to reimburse the Commission for the actual amount charged by the Federal Bureau of Investigation for furnishing its summary criminal history information applicable to all credentials, permits.

(7) Sixteen dollars and fifty cents, or the actual fee if it is different from this amount, to reimburse the Commission for the fee charged by the California State Department of Justice, Criminal Identification and Investigation Bureau, for furnishing its summary criminal history information on applicant for credentials.

(8) Thirty-eight dollars for each unit of the Bilingual-Crosscultural Competency Certificate examination if taken separately or a fee of one hundred twenty dollars for the entire examination, (all three units of the examination) if taken at the same time. For persons who take only one section of the Language portion of the examination, a fee of thirty-five dollars will be charged.

(9) A fee of one hundred dollars for the full language Development Specialist examination; thirty-five dollars for Part I, and seventy-five dollars for Part II, if taken separately.

(10) A fee of one hundred dollars for the full Bilingual Certificate of Assessment Competence examination; a fee of thirty-seven dollars for either the oral production or case study section, and twenty-nine dollars for either the multiple choice or audio transcription section if taken separately.

(11) The fee for the Certificate of Clearance as specified in Section 80028 shall be one-half the fee (a)(1) or the credential fee established by law.

(b) Except for the fee specified in (a)(5), (a)(8), (a)(9), and (a)(10), the fees shall accompany the application for issuance, reissuance or renewal, or the request for a duplicate credential; the fees shall be deemed earned upon receipt and shall not be refunded even though the applicant does not qualify for the credential or subsequently finds a reportedly lost or destroyed document.

(c) The fee for examination administered by a contractor on behalf of the Commission, specifically (a)(5), (a)(8), (a)(9), and (a)(10), shall be paid directly to the testing contractor unless otherwise specified by contract.

(d) The applicant shall receive either a credential or an evaluation which sets forth the requirements which have not been met.

(e) Where an applicant has all the qualifications for a credential at the time the application therefore is submitted, but where required verification or documentation

has been delayed, no new or additional fee shall be charged if such required verification or documentation is submitted within one year.

(f) Where applicable, each application for a credential shall be accompanied by an examination processing fee pursuant to Section 80077 of these regulations.

NOTE: Authority cited: Sections 44225, 44252.5 and 44475, Education Code. Reference: Section 44235, 44252.5, 44253.5, 44280, 44289, 44298, 44332.5(b), 44339, 44340, 44341, 44352, 44479, 44481, 52134 and 52178, Education Code; and Section 11105(e), Penal Code.

Documents and Other Sources of Information that Served as Bases for Considering this Change in Regulations

- Adoption of Test Dates for CBEST, NTE, and CLEP Examinations for 1989-1990 (Commission on Teacher Credentialing, 1989)
- Approval of Fee Changes for the California Basic Educational Skills Test (Commission on Teacher Credentialing, 1989)
- CALSTARS Accounting Reports Q-25
- CALSTARS Accounting Reports Q-26
- Consumer Price Index, 1992 Edition
- Copies of payments and invoices received from contractors
- Current and Projected CBEST Surplus and Its Implications for Test Fees (Commission on Teacher Credentialing, 1984)
- Deering's California Codes: Public Contract Code, Article 4, Contracts for Services
- Educational Testing Service Contract: TCC-1020
- Educational Testing Service Contract: TCC-7020
- Educational Testing Service Contract: TCC-9014
- Educational Testing Service Contract: TCC-C020
- Expenditures from contract estimates provided by Commission Examination and Research staff
- Governor's Budget for 1990-1991
- Governor's Budget for 1991-1992
- Governor's Budget for 1992-1993
- Governor's Budget for 1993-1994
- Manual on Certification and Preparation of Educational Personnel in the United States (National Association of State Directors of Teacher Education and Certification, 1988)
- NTE Programs 1992-93 Bulletin of Information (Educational Testing Service, 1992)
- Payment Records from Contracted Fiscal Services (Department of General Services)
- Pre-Professional Skills Test 1992-93 Information Bulletin (Educational Testing Service, 1993)
- Recommended Changes in Revenue for the Test Development and Administration Account (Commission on Teacher Credentialing, 1991)
- Request for Proposals for the Development, Administration, Scoring, Reporting and Other Services Related to the California Basic Skills Test (CBEST) During 1992-95 (Commission on Teacher Credentialing, 1992)
- State Administrative Manual, Section 1200
- Standards for Educational and Psychological Testing (American Educational Research Association and American Psychological Association, 1988)
- 1986-87 CBEST Administration Dates and Fees (Commission on Teacher Credentialing, 1986)

Response Options for Public Comment

The Commission encourages members of the public to comment on the prospect of increasing the CBEST fee by five dollars.

Written Comment Period

Any interested person, or his or her authorized representative, may submit written comments on the proposed action. For written comments, the Commission urges citizens to use the response form that is attached to this *Notice of Proposed Rule-making*. Written comments may be submitted in any format, however.

The written comment period closes at 5:00 p.m. on August 18, 1993. Comments must be received by that time at the Commission on Teacher Credentialing, 1812 9th Street, Sacramento, CA 95814-7000.

All written comments received 14 days prior to the public hearing will be reproduced by the Commission as a courtesy to the person submitting the comments, and will be included in the Commission's printed agenda for the public hearing.

Public Hearing

Oral comments on the proposed action will also be accepted at a public hearing:

August 19, 1993
1:30 p.m.
Clarion Hotel
700 16th Street
Sacramento, California

If you would like to testify at the hearing, please notify the Commission (preferably by August 5, 1993) so sufficient time can be scheduled for public comments at the hearing. Please contact the Office of the Executive Director at (916) 445-0184.

If you would like to submit written comments at the public hearing, please provide twenty-five copies. All written statements submitted at the hearing will be given full consideration by the Commission, regardless of the number of copies submitted.

Modification of Proposed Action

If the Commission decides to modify the action described in this notice, the modifications (other than nonsubstantial or solely grammatical modifications) will be made available for public comment for at least 15 days before they are adopted.

Contact Person for Further Information

Inquiries concerning the proposed action may be directed to Dr. Patricia Brinlee, Consultant in Examinations and Research, Commission on Teacher Credentialing, 1812 Ninth Street, Sacramento, California 95814-7000 (telephone 916-445-5865). On request, a copy of the Initial Statement of Reasons will be made available. In addition, the information on which this *Notice* is based is available for inspection and copying.

**Response to Proposed Amendment of
California Code of Regulations, Title 5, Section 80487,
Pertaining to the CBEST Fee**

The Commission on Teacher Credentialing encourages public comment on the proposed amendment to regulations. For the Commission to consider comments at the public hearing, responses must be received at the Commission office (address on back) by 5:00 pm on August 18, 1993. Please check 1, 2, 3 or 4.

1. _____ **Yes**, I agree with the proposed regulation change. Please count me in favor of this change.
 2. _____ The rationale for the regulation change is complete, but I do not wish to endorse the change.
 3. _____ The rationale for the regulation change is **not** complete. It needs the following information:

 4. _____ **No**, I disagree with the proposed regulation change for the following reasons. (If additional space is needed, please use the back.)
-

Please respond to 5 or 6 below.

5. _____ I have examined only the informative digest on page 1 of the *Notice of Proposed Rulemaking*.
 6. _____ I have examined the informative digest and the detailed analysis (pp. 2-20) in the *Notice*.
-

Please respond to 7 or 8 below.

7. _____ This response is the personal opinion of the individual who has signed on the back.
8. _____ This response is the organizational opinion by: _____

Please respond to 9 or 10 below.

9. _____ I shall be at the public hearing. Please place my name on the list to testify at the hearing.

10. _____ No, I will not make a presentation to the Commission at the public hearing.

Please provide the following information about the respondent.

Printed Name _____ Date: _____

Signature _____ Phone: _____

Title _____

Organization _____

Address _____

Please return all written comments to the following address, preferably by August 5, 1993, but no later than August 18, 1993.

Commission on Teacher Credentialing
Attn: CBEST Fee Increase Comments
Professional Services Division
1812 Ninth Street
Sacramento, California 95814-7000

Additional Space for Comments: