

## COMMISSION ON TEACHER CREDENTIALING

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OFFICE OF THE EXECUTIVE DIRECTOR

94-0402

DATE: January 14, 1994

TO: All Individuals and Groups Interested in the Activities of  
the Commission on Teacher CredentialingFROM:   
Philip A. Fitch, Ed.D.  
Executive DirectorSUBJECT: Proposed Addition of Sections 80020, 80020.3, and 80020.5  
Pertaining to the Expansion of the Authorizations for Specific  
Credentials and Proposed Amendment to Section 80454 Pertaining  
to Scholarship Requirements**Notice of Public Hearing is Hereby Given:**

In accordance with Commission policy, proposed Title 5 Regulations are being distributed prior to the public hearing. The public hearing is scheduled on:

March 3, 1994  
1:30 p.m.  
Clarion Hotel  
700 16th Street  
Sacramento, California

**Statement of Reasons**

*Pertaining to the expansion of the authorizations for specific credentials:*  
Adding Sections 80020, 80020.3, and 80020.5 to the Title 5 regulations would help streamline the staffing of public school positions by broadening the authorizations of specific credentials.

*Pertaining to scholarship requirements:* Amending Section 80454 would allow the Commission to accept a grade of C for the student teaching and field work courses unless the college's or university's program requirement is higher. It would also no longer require colleges and universities which list the grade for student teaching and field work courses as pass/fail or credit/no credit to re-evaluate each individual's performance using a letter grading system.

### Rationale for Proposed Regulations

The Advisory Panel to Study Ways to Streamline the Credentialing System was created as a result of Education Code, Section 44225(b). The panel was formed to analyze the credentialing structure and recommend ways to make the structure less complex. It consisted of members from institutions of higher education, county superintendent of schools offices, and school districts. Two of the panel's recommendations were to 1) align those pre-Ryan credentials that have more restrictive authorizations to the Ryan credential authorizations and 2) lower the acceptable grade for student teaching and other required field work courses from a B to a C.

*Pertaining to the expansion of the authorizations for specific credentials:* Even though the Commission now issues initial credentials under the Teacher Preparation and Licensing Law of 1970 (Ryan Act), many individuals are still employed under credentials issued under two separate pre-1970 laws, the Standard Credentials and the General Credentials. The laws governing the initial issuance of the Standard Credentials were in effect from 1961 through 1969, while those governing the General Credentials were in effect prior to 1961. A credential authorizing service in every type of certificated personnel position available at a public school was issued under each of the three laws. An example of this is the three different credentials which authorize upper elementary teaching: a General Elementary Teaching Credential, a Standard Elementary Teaching Credential, or a Ryan Multiple Subject Teaching Credential. The authorizations of credentials issued under these three structures are similar, but rarely exactly the same as their counterparts.

The Advisory Panel to Study Ways to Streamline the Credentialing System was motivated to make its recommendation for the alignment of pre-1970 credentials with the Ryan credentials by two primary concerns. One concern was a response to the broadly held belief in schools that there are too many credentials which authorize the same or nearly the same services. The second concern grew out of the experience of the Commission while implementing the assignment legislation. The Commission found that many school administrators and credential holders did not understand the authorizations of credentials or were confused by the variation. It was very difficult to understand, for example, why a Ryan Multiple Subject Teaching Credential for

service in self-contained classrooms authorized service in grades K-12 while a pre-1970 Standard Elementary Teaching Credential authorized the same service in only grades K-9 since the preparation is basically the same.

Members of the Commission's Licensing and Professional Services Divisions examined the requirements and authorizations for the Standard and General Credentials to determine whether they were sufficiently comparable to other credentials. Consideration was given to whether the recommended change would simplify some of the assignment problems confronting school administrators and, at the same time, provide the credentialed individuals greater opportunities for service. The review resulted in the proposed regulations outlined below.

Section 80020 proposes to expand the authorizations of four pre-1970 teaching credentials to cover grades K-12. The authorization would be similar, in some respects, to the comparable Ryan credentials. The preparation required for these four credentials are, in general, equivalent to the Ryan counterpart. In two cases, the credential authorizations would be expanded to cover additional grade levels, but not the entire K-12 spectrum, because the preparation was not as comparable. All of these expanded authorizations would require the credential holder's consent.

Section 80020.3 would make the service authorizations of four pre-1970 administrative and supervision credentials equivalent to the Ryan Administrative Service Credential. The proposed regulation would require that individuals assigned under the expanded authorization verify a minimum of three years of employment in an assignment authorized by their administrative or supervision credentials. Individuals would be required to give their consent when employed under this regulation.

Section 80020.5 makes a relatively minor change for holders of pre-1970 credentials for pupil personnel service by making it clear that such credentials may authorize service in preschools and in schools or programs organized primarily for adults as does the Ryan Pupil Personnel Service Credential. The consent of the employee would be required.

*Pertaining to scholarship requirements:* The Advisory Panel to Study Ways to Streamline the Credentialing System recommended that the acceptable grade for student teaching and other required field work courses be lowered from a B to a C. The proposed regulation reflects this recommendation and adds that a college or university credential program may require a grade higher than a C.

Prior to 1987, the regulations allowed the Commission to accept a minimum grade of C to satisfy this requirement. However, the Commission did allow

Institutions with approved programs to require a higher grade. When the higher minimum grade was challenged by a direct appeal to the Commission, the Office of the Attorney General determined that the Commission had no authority in regulations to support the institution's higher standard and advised the Commission to grant the credential. The Commission amended the regulations to eliminate this discrepancy by requiring all applicants to have a grade of B or better in student teaching and other field work courses. Also, institutions that gave a grade of "pass" or "credit" for these courses were required to submit verification that the individual's performance was equivalent to a grade of B or better.

Verification of a letter grade equivalency to "pass" or "credit" not only required extensive paperwork for individuals and institutions, it also created a severe hardship for those not recently trained since their performance reports were not always available. This left individuals, especially those trained out of state, with no proof of an equivalent letter grade, and, because of this, no California certification. Even though this has remained in the regulations, Commission policy was soon changed to accept "pass" or "credit" grades, regardless of the institution's definition of these terms. This resulted in an inequity in evaluating individuals since a recent review of 100 out-of-state catalogues showed that the grade equivalent to credit was, in most cases, a C or C+.

A second inequity also exists. Those individuals who meet the requirements of the Interstate Certification Agreement, which California has with 24 other states, are considered to have successfully completed all non-examination credential requirements for the Multiple and Single Subject Teaching Credentials. This means that whatever grade they received in student teaching is acceptable for California certification, even a grade of C.

To insure that this proposal to return to the prior requirement is not lowering California's standards below those required by other states, a survey was conducted. Only one other state required a minimum grade of B for student teaching and other required field work courses, while a second state required a B only if the course was taken for an advanced credential. The minimum grade in all of the remaining states was either " " or that established by the individual college and university programs. Based on a review of 100 out-of-state catalogues, 79% of the individual college and university programs established a grade below a B as acceptable.

Section 80454, if amended as proposed, would create the following four changes:

1. To add clarity, "directly" would be removed from Section 80454(a) since the following two sub-sections refer to applications submitted

directly from the applicant to the Commission and those submitted through a college or university.

2. For greater understanding and clarity, the grading structure would be redefined as an "A through F grading pattern" rather than a "five-point scale".
3. For better equity among individuals and with other states, the minimum passing standards for the teaching and other field work requirements would be established by the institution of higher education where the program was completed so long as the relevant grade was not lower than a C.
4. To remove an overly burdensome requirement from the regulations, institutions would no longer need to verify that a grade of credit in a directed teaching or other field assignment was equivalent to or higher than a grade of B.

#### Documents Relied Upon in Making the Determination to Change These Regulations

- Interstate Certification Agreement
- Regulations pertaining to the requirements and authorizations of the General, Standard and Ryan teaching and service credentials.
- Staff Analysis of the Recommendation of the Advisory Panel to Study Ways to Streamline the Credentialing System
- Statistical Reports from the Credential Automation System
- Surveys conducted by the Commission staff regarding the student teaching and field work grades accepted by other states, the equivalent of a "credit" grade compared to an A through F grading pattern, and the issuance of credentials and authorizations affected by these proposed regulations.

#### **Written Comment Period**

Any interested person, or his or her authorized representative, may submit written comments on the proposed action. The written comment period closes at 5:00 p.m. on March 2, 1994.

Any 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 hearing.

### **Submission of Written Comments**

A response form is attached for your use when submitting written comments to the Commission. Please send it to the Commission at 1812 9th Street, Sacramento, CA 95814-7000, so it is received at least one day prior to the date of the public hearing.

### **Public Hearing**

Oral comments on the proposed action will be taken at the public hearing. We would appreciate 14 days advance notice in order to schedule sufficient time on the agenda. Please contact Dr. Philip A. Fitch at (916)445-0184 regarding this.

Any person wishing to submit written comments at the public hearing may do so. It is requested, but not required, that persons submitting such comments provide twenty-five copies. All written statements submitted at the hearing will, however, be given full consideration regardless of the number of copies submitted.

### **Modification of Proposed Actions**

If the Commission proposes to modify the actions hereby proposed, 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/Further Information**

Inquiries concerning the proposed action may be directed to Yvonne Novelli, telephone (916) 445-5865. Upon request, a copy of the express terms of the proposed action and a copy of the initial statement of reasons will be made available. In addition, all the information upon which this proposal is based is available for inspection and copying.

### **Attachments**

COMMISSION ON TEACHER CREDENTIALING

DIVISION VIII OF TITLE 5  
CALIFORNIA CODE OF REGULATIONS

PROPOSED ADDITION OF SECTIONS 80020, 80020.3, AND 80020.5  
PERTAINING TO THE EXPANSION OF THE AUTHORIZATIONS FOR  
SPECIFIC CREDENTIALS  
AND  
PROPOSED AMENDMENT TO SECTION 80454  
PERTAINING TO SCHOLARSHIP REQUIREMENTS

§80020. Additional Assignment Authorizations for Specified Teaching Credentials

- (a) The holder of a General Kindergarten-Primary Teaching Credential may be assigned, with his or her consent, to teach self-contained classes in grades four through eight.
- (b) The holder of a Standard Elementary Teaching Credential may be assigned, with his or her consent, to teach self-contained classes and to teach departmentalized classes in the subject or subjects of his or her majors in grades ten through twelve.
- (c) The holder of a Standard Teaching Credential for Early Childhood Education may be assigned, with his or her consent, to teach self-contained classes and to teach departmentalized classes in the subject or subjects of his or her majors in grades four through twelve.
- (d) The holder of a General Secondary Teaching Credential may be assigned, with his or her consent, to teach departmentalized classes in grades kindergarten through six in the subjects of his or her majors or minors or in subjects in which he or she has taught successfully for three years within the ten years prior to the assignment.
- (e) The holder of a General Junior High Teaching Credential may be assigned, with his or her consent, to teach classes in grades kindergarten through grades six in the subjects of his or her majors or minors or in subjects in which he or she has taught successfully for three years within the ten years prior to the assignment.
- (f) The holder of a Standard Secondary Teaching Credential may be assigned, with his or her consent, to teach departmentalized classes in grades kindergarten through six in the subjects of his or her majors or minors.

Note: Authority cited: Section 44225(q), Education Code. Reference: Sections 44225(b) and 44225(e), Education Code.

§80020.3. Additional Assignment Authorizations for Specified Administrative and Supervision Credentials

- (a) The holder of a General Elementary or General Secondary School Administration Credential may be assigned, with his or her consent, to any

- administrative position in a school district or county office of education provided that he or she has been employed successfully for a minimum of three years in an administrative assignment authorized by the credential.
- (b) The holder of a General Supervision or Standard Supervision Credential may be assigned, with his or her consent, to any administrative position in a school district or county office of education provided that he or she has been employed successfully for a minimum of three years in an administrative assignment authorized by the credential.

Note: Authority cited: Section 44225(q), Education Code. Reference: Sections 44225(b) and 44225(e), Education Code.

#### **§80020.5. Additional Assignment Authorizations for Specified Pupil Personnel Services Credentials**

The holder of a General Pupil Personnel Services Credential or a Standard Designated Services Credential with Specialization in Pupil Personnel Services may be assigned, with his or her consent, to provide the services authorized by the credential in preschools and in schools organized primarily for adults.

Note: Authority cited: Section 44225(q), Education Code. Reference: Sections 44225(b) and 44225(e), Education Code.

#### **§80454. Scholarship Requirements.**

- (a) When applying directly to the Commission for a credential, the applicant shall meet the scholarship requirements set out in this section.
- (b) In courses above the twelfth grade which are offered toward fulfillment of requirements for a credential, the applicant shall have a grade point average of C or better on ~~a five-point scale~~ an A through F grading pattern, or a grade point average that is required by an approved educational institution for granting a degree, whichever is higher.
- (c) Each assignment in directed teaching or other field work requirement shall ~~be completed with a grade of B or better~~ meet the minimum passing standards established by the institution of higher education where the program was completed so long as the relevant grade is not lower than a C on a five-point scale an A through F grading pattern. ~~Institutions that utilize a credit/no credit grading system shall verify to the Commission that the performance of the individual in a directed teaching or other field assignment was completed at a level equivalent to or higher than the grade B level.~~

Note: Authority cited: Section 44225(q), Education Code. Reference: Section 44320 44225(a) Education Code.

**COMMISSION ON TEACHER CREDENTIALING**

312 Ninth Street  
Sacramento, California 95814-7000



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

Title: **The Expansion of Authorizations for Specific  
Credentials and the Scholarship Requirements**  
Section Nos.: 80020, 80020.3, 80020.5 and 80454

**Response to the Above Title 5 Regulations**

So that the Commission on Teacher Credentialing can more clearly estimate the general field response to the attached Title 5 regulations, please return this response form to the Commission office at the above address by 5 pm on March 2, 1994, in order that the material can be presented at the March 3, 1994 public hearing.

- 1.  Yes, I agree with the proposed Title 5 regulations. Please count me in favor of these regulations.
- 2.  No, I do not agree with the proposed Title 5 Regulations for the following reasons:

- 3.  Personal opinion of the undersigned only. and/or
- 4.  Organizational opinion representing: \_\_\_\_\_  
(Circle One) School District, County Schools, College, University, Professional Organization, Other
- 5.  I shall be at the public hearing, place my name on the list for making a presentation to the Commission.
- 6.  No, I will not make a presentation to the Commission at the public hearing.

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name of Signatory: \_\_\_\_\_

Title: \_\_\_\_\_ Phone: \_\_\_\_\_

Employer/Organization: \_\_\_\_\_