

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

### **Proposed Amendments and Deletions to Title 5 of the California Code of Regulations Pertaining to the Reading and Literacy Added Authorization and Reading and Literacy Leadership Specialist Credential**

#### **Final Statement of Reasons**

##### **Public Problem**

There is no change to the public problem information since the original submission of the Initial Statement of Reasons.

##### **Purpose of Proposed Action**

There is no change from the original purpose of the proposed action in the Initial Statement of Reasons.

##### **Non-Substantive Changes Made During the Office of Administrative Law (OAL) Review**

Non-substantive changes were made to the regulation text during the OAL review to correct underline, strikeout, spacing, and punctuation errors.

Non-substantive changes were also made to the *Reading and Literacy Added Authorization and Reading and Literacy Leadership Specialist Credential Program Standards* document during the OAL review to remove the Common Standards and Preconditions. Common Standards address issues of institutional infrastructure, stability and processes that are designed to ensure that the implementation of all approved programs is successful and meets all standards. Preconditions determine a sponsor's eligibility to apply to the Commission for approval of one or more educator preparation programs. Common Standards and Preconditions must be satisfied before an institution may apply to the Commission for program approval. Therefore, the Common Standards and Preconditions should not be included in the program standards document. Additional non-substantive corrections were made to publication titles, a quotation, punctuation, and to incorporate by reference the *Reading Instruction Competence Assessment (RICA) Content Specifications (8/2009)*.

##### **Documents Incorporated by Reference:**

Pursuant to 1 CCR §20(c)(1), the Commission requests that the program standards and Reading Instruction Competence Assessment (RICA) Content Specifications documents not be printed in the code. The program standards document includes 16 pages and the RICA Content Specifications document includes 22 pages. Publishing the incorporated documents would be cumbersome, unduly expensive, and otherwise impractical. The incorporated documents were available upon request during the rulemaking period and are available as follows:

*Reading and Literacy Added Authorization and Reading and Literacy Leadership Specialist Credential Program Standards (rev. 2/2016):*

<http://www.ctc.ca.gov/educator-prep/standards/Reading-Specialist.pdf>

*Reading Instruction Competence Assessment (RICA) Content Specifications (8/2009):*

[http://www.ctcexams.nesinc.com/PDF/RC\\_content\\_specs.pdf](http://www.ctcexams.nesinc.com/PDF/RC_content_specs.pdf)

## **Updated Tally of Responses**

The Commission received the following written responses to the public announcement:

<b><i>Support</i></b>	<b><i>Opposition</i></b>
1 organizational opinion	1 organizational opinion
0 personal opinions	0 personal opinions
<b>Total Responses: 2</b>	

### ***Written Response Representing an Organization in Support***

1. Susana Fernandez, Support Services Manager, Orange County Office of Education

### ***Written Response Representing an Organization in Opposition***

1. Marva Cappello, Ph.D., Associate Professor; Director, Graduate Reading Programs; Director, Center for Visual Literacies; College of Education; San Diego State University

Attached is our response to the Coded Correspondence 15-09. While we welcome the title changes and are are (*sic*) comfortable with the updated requirements we have grave concerns over the addition of the National Board Certification as a route to earn the authorization for reasons outlined in the attached document.

*Provided here is the attachment to the email from Dr. Cappello with Commission responses in italics:*

### **Response to Coded Correspondence 15-09**

**November 2, 2015**

Coded Correspondence 15-09 makes proposed amendments and deletions to Title 5 of the California Code of Regulations pertaining to the **Reading and Literacy Added Authorization or RLAA (currently known as the Reading Certificate) and Reading and Literacy Leadership Specialist Credential or RLLS (currently known as the Reading/Language Arts Specialist Credential)**. The proposed amendments update titles of the **Reading Certificate and Reading/Language Arts Specialist Credential**, update requirements and authorization statements, and **add National Board Certification as a route to earn the Reading Certificate (RLAA)**.

### ***Authorization Statements***

The new specific reference to **English learner authorization** (p.5 and p.6) does not appear to require more than a basic teaching credential as long as the candidate's credential included the EL authorization per 2042. The Reading Program Coordinator will have to determine if this

authorization is in place for each SDSU candidate for the RLAA.

**Commission Response:** *The English learner authorization does not need to be issued upon completion of a California teacher preparation program, as implied by the reference to “2042.” Any current or previously issued authorization or certificate that authorizes the instruction of English learners will satisfy the English learner requirement included in the proposed regulations.*

(continuation of respondent’s letter)

**Name Changes**

The updated titles of Reading and Literacy Added Authorization (RLAA) and Reading and Literacy Leadership Specialist (RLLS) Credential were proposed in 2010 when the new program standards were issued. However, Institutions of Higher Education have not been allowed to use these names in their catalogs or program publicity. The ability to use these names officially is a welcome change.

**Commission Response:** *No response as comment is in support of the proposed regulation amendments.*

(continuation of respondent’s letter)

**Addition of National Board National Board Certification in Early and Middle Childhood/Literacy: Reading and Language Arts (EMC/Literacy: Reading-Language Arts) as an added option for earning the Reading and Literacy Added Authorization (RLLA) to be issued directly by application to the CTC**

A comparison of the CTC standards for the RLLA and those for obtaining the National Board Certification for the EMC/Literacy: Reading-Language Arts yields serious concerns about parity both in terms of the population to be served and the nature of expertise to be documented.

Mismatch in Population Served

The National Board Certificate/Literacy: Reading-Language Arts Standards document lists 13 standards specifically targeting work with students, **ages 3-12**. (See list of standards below.) The CTC approved RLAA/Reading Certificate covers “all students” **grades PreK-12**. This is serious mismatch. Candidates with Single Subject Credentials and the university approved Reading Certificate typically work in middle and high school settings. In current practice, a number of those with the RLLA/Reading Certificate and a Master’s are being drafted to teach at the community college level. Some of these new community college reading teachers have a Multiple Subject Credential but have at least completed the grades PreK-12 Reading Certificate Program, better preparing them to meet the needs of adolescent and adult learners.

**Commission Response:** *The authorization range of the RLAA is the same as the available prerequisite credentials specified in Education Code Section 44203(e). Individuals employed on the basis of an RLAA at the middle and high school levels will most likely be instructing students with reading problems similar to those encountered by children between the ages of 3 and 12.*

*The Commission issues documents that authorize service in California's public schools. Credentials issued by the Commission do not authorize service in community colleges.*

(continuation of respondent's letter)

#### Standards Mismatch

In addition, it appears that **knowledge of research and the ability to assist other teachers with grade or school-wide assessment data, implementation of instruction, or school-wide professional development** (See CTC Standards 2.1, 2.5, 3.1, 3.8 and 4 for the RLAA/Reading Certificate) are not embedded in the EMC/L: RLA standards, although these skills are included in the CTC RLAA standards. These are key expectations for RLAA/Reading Certificate holders. Based on the EMC/L standards, National Board Certificate holders would not be prepared to meet these needs at school sites.

**Commission Response:** *Standards IV, V, and XI of the National Board Literacy: Reading-Language Arts Standards address several of the issues in bold above. The information provided toward the end of the respondent's letter only provides the title and a brief synopsis for each National Board standard for the Literacy: Reading-Language Arts Certificate. The entire standards document is available at <http://boardcertifiedteachers.org/sites/default/files/EMC-LRLA.pdf>.*

(continuation of respondent's letter)

#### Level of Expertise

There are four assessment components attached to National Board Certification for EMC/Literacy: Reading-Language Arts. **Two of the four components for candidates are currently unavailable.** (See digest below of Components 1 and 2, the available assessment components.) Candidates in CTC-approved IHE RLLA programs must demonstrate competence in **eight** areas through detailed signature assignments in coursework. (See Standards 5.A1-5.A4. and 5.B1-5B4.)

The EMC/Literacy: Reading-Language Arts Component 1 assessment consists of multiple-choice items and a few very narrow, constructed response exercises. Component 2 contains a portfolio assessment. For Component 1, the sample multiple-choice items appear to be the kinds of questions any good teacher with a Basic Multiple Subject Credential should be able to answer. The first constructed response requires analysis of one student's one-page transcript of oral reading; the second response requires analysis of one student's one-page response to a writing prompt. The third response requires the candidate to integrate literacy and content area learning using a one-page content area text. None of these exercises appear to be as rigorous as those incorporated into the course criteria and semester-long supervised field-based demonstrations required of the University approved RLAA/Reading Certificate.

Although Component 2 (Portfolio) incorporates rigorous demonstration of one specific type of content knowledge, it appears to focus on writing assessment and instruction embedded in knowledge about differentiating that instruction, again for one student based upon two writing samples collected over time. As previously mentioned, information for Components 3 and 4 is still not available and therefore cannot be analyzed/compared to the RLAA standards.

Reading Certificate/RLAA holders are assessed through key assignments that address the standards set out by the CCTC and are monitored through Biennial Assessments and Program Review. For example, students complete complex case studies of students (representing different age groups) that include the appropriate implementation of assessment tools and deep analysis of the assessment data to plan for appropriate instruction.

**Commission Response:** *The National Board is in the midst of phasing in revisions to the certification process that will occur between 2014-15 and 2016-17. The two assessment components that are not currently available are new assessments that will be added in the 2015-16 and 2016-17 school years. Additional information on the National Board certification revisions is available at <http://boardcertifiedteachers.org/about-certification/updates>.*

(continuation of respondent's letter)

#### Other Considerations

##### *Quality of Instruction provided to K-12 Students*

There are currently 509 EMC/L: RLA-certified teachers in California who could potentially apply directly to the commission for the Reading and Literacy Added Authorization (RLAA /Certificate). (It would be interesting to know who is pushing for this alternative route and the motivation for same)?

Anyone who currently has the EMC/L: RLA would certainly have an inducement to apply to the state for the RLLA. Potentially, hundreds of less than well-qualified teachers could fill literacy positions of great importance at the school level.

**Commission Response:** *The Commission has been issuing Reading Certificates on the basis of National Board certification since January 1, 2010 (refer to Coded Correspondence 10-03 at <http://www.ctc.ca.gov/notices/coded/2010/1003.pdf>). The proposed addition of the National Board certificate option is to clarify the requirements and application procedures for individuals pursuing an RLAA via that route.*

*Of the 913 Reading Certificates issued between January 1, 2010 and December 1, 2015, only 16 certificates (1.75%) have been issued on the basis of National Board certification. The following table shows the number of Reading Certificates issued each year on the basis of National Board certification:*

<b>Year</b>	<b>Number of Certificates Issued</b>
2010	2
2011	2
2012	3
2013	0
2014	4
2015	5

*All 16 individuals held a Multiple Subject Teaching Credential at the time they were issued a Reading Certificate on the basis of National Board certification. It is just as likely that the 509*

*individuals referenced in the respondent's comments could have earned the National Board certificate after earning a Reading Certificate or Specialist Credential upon completion of a Commission-approved program.*

(continuation of respondent's letter)

*Transfer Regulations at Institutions of Higher Education*

When the Reading Certificate was first offered in 2000, students took courses on-line through **Colleges of Extended Studies** at CA institutions (with CTC approved Certificate Programs) and tried to transfer these units into the Reading Specialist Credential Program housed in the graduate divisions of institutions of higher education such as SDSU. Our institution would not allow acceptance of any coursework for the Certificate taken through colleges of extended studies. Potentially, we could now be asked to approve RLLA/ Reading Certificates being issued directly by the Commission to teachers with the EMC/L: RLA, a certificate that involves no coursework, *in lieu of* graduate level coursework.

This is a significant consideration for students who are looking to apply to our Literacy Leadership Specialist Credential (RLLS) and MA programs. Without course work, National Board Certificate holders could not bring in their RLLA to our nested programs.

Waiving our Certificate courses for such people (those who intend to take the Reading and Literacy Leadership Specialist Credential or RLLS and/or MA) would entail waiving 13 units of graduate coursework. Within the University system a maximum of 9 units of graduate coursework may **be transferred** into a program.

If National Board EMC/L: RLA teachers are grandfathered into the RLLA/Certificate (which need not be renewed), would their knowledge meet recency requirements? Although it appears that National Board Certificates must be renewed, once the RLAA is obtained, it remains valid indefinitely as long as the requisite basic teaching credential remains valid.

*Impact on Existing RLLA Programs in Institutions of Higher Education*

Since the RLLA/Reading Certificate is the point of entry to the RLLS/Reading Specialist Credential, the National Board Certification route to the RLLA could potentially have serious consequences for University enrollment in a program that is already languishing. Furthermore, should the market for teachers with the Reading and Literacy Leadership Credential (RLLS) improve, candidates for the RLLS who obtained the EMC/L: RLA may well enroll in the program with significantly different entry-level knowledge than those who had taken RLLA/Reading Certificate coursework at a CTC approved institution of higher education.

***Commission Response to Comments Related to "Transfer Regulations" and "Impact on Existing RLAA Programs":*** *The Commission began issuing Reading Certificates on November 24, 1997 (refer to Coded Correspondence 97-9723 at <http://www.ctc.ca.gov/notices/coded/1997/979723.pdf>). From November 27, 1997 until June 30, 2000, individuals could qualify for the certificate by completing 12 semester units of course work covering specified areas in lieu of an approved program. There was also an option available for a short time that allowed individuals to combine course work and passage of the*

*Reading Instruction Competence Assessment (RICA) to qualify for the certificate.*

*Individuals who qualified for the Reading Certificate on the basis of one of the previously available options will encounter the same recency and transfer issues as individuals who qualified on the basis of National Board certification when attempting to enroll in a Commission-approved Reading Specialist program. However, each Commission-approved educator preparation program establishes its own recency and residency requirements. There are no recency or residency requirements in the RLAA/RLS Credential program standards established by the Commission.*

(continuation of respondent's letter)

*Effects of California Dyslexia Bill A.B. 1369 just signed by the Governor*

What will AB1369 (the dyslexia bill just signed by the governor) mean in general for teachers and specifically for those obtaining the RLAA/Certificate? Dyslexia is currently addressed in the RLAA/Reading Certificate University program content in both assessment and instructional strategies courses, but is not mentioned in the EMC/L: RLA assessments.

**Commission Response:** *Assembly Bill 1369 (Chap. 647, Stats. 2015) added section 56335 to the Education Code and requires the Superintendent of Public Instruction to develop dyslexia program guidelines by the beginning of the 2017-18 school year. The Commission does not have purview over Education Code section 56335.*

(continuation of respondent's letter)

**National Board Early and Middle Childhood/Literacy: Reading Language Arts (EMC/L: RLA Standards)**

**Standard I: Knowledge of Learners**

Accomplished early and middle childhood literacy: reading–language arts teachers draw on their relationships with students as well as their knowledge of literacy and child development to acquire knowledge of their students as intellectual, social, emotional, cultural, and language learners.

**Standard II: Equity, Fairness, and Diversity**

Accomplished early and middle childhood literacy: reading–language arts teachers practice equity and fairness; they value diversity and diverse perspectives. They teach all students to know and respect themselves and others and to use literacy practices to promote social justice.

**Standard III: Learning Environment**

Accomplished early and middle childhood literacy: reading–language arts teachers establish a caring, supportive, inclusive, challenging, democratic, and safe learning community in which students take intellectual, social, and emotional risks while working both independently and collaboratively.

**Standard IV: Instruction**

Accomplished early and middle childhood literacy: reading–language arts teachers employ rich instructional resources and provide instruction that is tailored to the unique needs of students in order to foster inquiry; facilitate learning; and build strategic, independent thinkers who understand the power of language.

### Standard V: Assessment

Accomplished early and middle childhood literacy: reading–language arts teachers use a range of ongoing formal and informal assessment methods and strategies to gather data in order to shape and drive instructional decisions; monitor individual student progress; guide student self-assessment; gather information to communicate to various audiences; and engage in ongoing reflection.

### Standard VI: Reading

Accomplished early and middle childhood literacy: reading–language arts teachers use their knowledge of the reading processes, of their students, and of the dynamic connections within the other language to create effective instruction so that all readers construct meaning and develop an enduring appreciation of reading.

### Standard VII: Writing

Accomplished early and middle childhood literacy: reading–language arts teachers use their knowledge of writing processes, language acquisition, writing development, and ongoing assessment to provide authentic and relevant instruction that prepares students to write for a variety of purposes and audiences.

### Standard VIII: Listening and Speaking

Accomplished early and middle childhood literacy: reading–language arts teachers know, value, and teach oral language development, listening, and both verbal and nonverbal communication skills as essential components of literacy, and they provide opportunities for all students to listen and speak for a variety of purposes and audiences.

### Standard IX: Viewing and Visual Literacy

Accomplished early and middle childhood literacy: reading–language arts teachers know, value, and teach viewing and visual literacy as essential components of literacy instruction in order to prepare students to interpret and interact with an increasingly visual world.

### Standard X: Literacy Across the Curriculum

Accomplished early and middle childhood literacy: reading–language arts teachers understand the reciprocal and interrelated nature of the literacy processes of reading, writing, listening, speaking, and viewing and engage students in language arts processes in all disciplines.

### Standard XI: Teacher as Learner and Reflective Practitioner

Accomplished early and middle childhood literacy: reading–language arts teachers seek to improve their knowledge and practice through a recursive process of learning and reflecting.

### Standard XII: Collaboration with Families and Communities

Accomplished early and middle childhood literacy: reading–language arts teachers develop positive and mutually supportive relationships with family and community members to achieve common goals for the literacy education of all students.

### Standard XIII: Professional Responsibility

Accomplished early and middle childhood literacy: reading–language arts teachers actively contribute to the improvement of literacy teaching and learning and to the advancement of literacy knowledge and practice for the profession.

**Commission Response:** *No response to the excerpt of the National Board Standards that was included in the respondent's letter.*

(continuation of respondent's letter)

**Analysis National Board EMC/Literacy: Reading Language Arts Assessments:**

**Component 1:**

**Multiple Choice** items appear to be the sorts of questions any good teacher with a basic Multiple Subject Credential could answer. Samples:

- How to foster parent-teacher relationships
- How to utilize community resources.
- Purpose of a guided reading lesson.
- Demonstration of effective communication using organizational skills in K classroom (use of a story map for retelling).
- Visual literacy skills to enhance writing during a persuasive writing unit.

**Constructed Response Exercises with Scoring Rubric**

- Analyzing Student Reading  
Analysis of a one-page transcript of a student's oral reading in order to identify two significant patterns with respect to miscues and/or fluency and discuss appropriate teaching strategy to address one of these patterns.
- Writing Development  
Analyze one area of strength and one area of need in a student's writing sample (one prompt and one student's written response provided) and describe developmentally appropriate teaching strategy to address each.
- Literacy Across the Curriculum  
Demonstrate the ability to integrate literacy and content-area learning (one prompt provided). Using the grade-level content-area text provided, create a learning experience that effectively supports students' development of literacy strategies and content knowledge by identifying challenging text features, describing strategies to guide students through the text and an explanation of how the latter would help students with the text.

**Component 2: Differentiation in Instruction**

**EMC/Literacy: Reading-Language Arts Portfolio Entry**

- The portfolio centers on promoting literacy development through writing over an instructional period from 3 weeks to 3 months
- Requires assessment, evaluation, analysis of one student's writing in order to design differentiated instruction connecting student's reading and writing to support construction of meaning through writing
- Analysis of two, one-page work samples for selected student, discussing his/her writing development and teacher support; reflection on practice
- The above to be summarized in a written commentary of no more than 13 pages.

**A detailed scoring rubric is used to evaluate the portfolio entries; Standards measured by Component 2 include: I-VII (see above list).**

**Commission Response:** *No response to the respondent's analysis of the National Board assessments.*

## **Grand Total of Responses: 2**

### **Consideration of Alternatives**

The Commission has determined that no reasonable alternative considered by the agency or that has otherwise been identified and brought to the attention of the agency would be more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed action or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

### **Mandated Costs**

These proposed regulations will not impose a mandate on local agencies or school districts that must be reimbursed in accordance with Part 7 (commencing with section 17500) of the Government Code.