
5B

Information/Action

Credentialing and Certificated Assignments Committee

Policy Issues Pertaining to Supplementary and Subject Matter Authorizations Added to General Education Teaching Credentials

Executive Summary: This item includes an overview of Supplementary and Subject Matter Authorizations in order to provide context for a discussion of key policy issues. Supplementary and Subject Matter Authorizations allow the holder of a prerequisite general education teaching credential to add one or more departmentalized content area authorizations to their credential. These two authorizations are based on limited coursework that is not part of a Commission-approved subject matter program and do not include subject-specific pedagogy. The required content and lack of pedagogy for educators earning these authorizations represent the two key policy issues presented in this item for Commission discussion and direction to inform future work.

Policy Question: Two policy issues are presented for the Commission's consideration and potential action: *(1) Should all teachers who add an authorization to teach in a new content area be required to complete subject-specific pedagogy preparation for that new content area? (2) Does the Commission wish to specify and/or revise the range of content that should be covered in the required coursework for the Supplementary and Subject Matter Authorizations in order to ensure consistency between the two types of authorizations and alignment with the state-adopted content standards?*

Recommended Action: Discuss the policy issues outlined above and provide direction to staff to inform future work.

Presenter: Roxann Purdue, Consultant, Professional Services Division

Strategic Plan Goal:

I. Educator Quality

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

August 2014

Policy Issues Pertaining to Supplementary and Subject Matter Authorizations Added to General Education Teaching Credentials

Introduction

There are a variety of options for educators to subsequently add new content area authorizations to their existing elementary and secondary teaching credentials. Two options include the Supplementary and Subject Matter Authorizations. This item includes an overview of Supplementary and Subject Matter Authorizations in order to provide context for a discussion of key policy issues. Supplementary and Subject Matter Authorizations allow the holder of a prerequisite general education teaching credential to add one or more departmentalized content area authorizations to their credential. These two authorizations are based on limited coursework that is not part of a Commission-approved subject matter program and do not include subject-specific pedagogy. The required content and lack of pedagogy for educators earning these authorizations represent the two key policy issues presented in this item for Commission discussion and direction to inform future work.

Background

The Commission has issued Supplementary Authorizations for secondary teaching credentials (e.g., Single Subject Teaching Credentials) since 1979 and for elementary teaching credentials (e.g., Multiple Subject Teaching Credentials) since 1981 as specified in Education Code section 44256. During 2003 through 2004, the Commission heard several agenda items on Supplementary Authorizations as they considered how best to align these authorizations with the federal mandates of the No Child Left Behind (NCLB) Act. The requirements for the Supplementary Authorization lack sufficient units for meeting the subject matter requirements under NCLB. Following stakeholder meetings, the Commission took action to continue issuing Supplementary Authorizations in order to provide staffing flexibility for school districts by allowing the issuance of Supplementary Authorizations in non-NCLB content areas (e.g., agriculture and business) and in NCLB content areas so that educators could demonstrate progress towards compliance. In addition, the Commission also created Subject Matter Authorizations (effective January 1, 2005) that were aligned with NCLB as an additional option for educators and school districts. Subject Matter Authorizations require 32 semester units of coursework in the content area and are considered compliant with NCLB.

For the most part, Supplementary and Subject Matter Authorizations provide the same authorization to teach though the coursework and content required for each vary significantly. The requirements, authorizations, and specified content areas for both the Supplementary and Subject Matter Authorizations are delineated in Title 5 of the California Code of Regulations sections 80089 through 80089.4 (*Appendix A*). Both of these authorizations types lack any subject-specific pedagogy within their requirements.

As of July 1, 2014, there are 86,820 valid and non-expired teaching credentials that include one or more Supplementary or Subject Matter Authorizations for a total of 128,878 current authorizations held. Further analysis indicates that approximately 59% of educators adding these authorizations hold a Multiple Subject Teaching Credential with 41% holding a Single Subject Teaching Credential. The top four subject areas issued for these types of authorizations are in the core academic content areas: English (28%), Sciences (18%), Social Sciences (15%), and Mathematics (13%).

Current Supplementary and Subject Matter Authorizations by Type

Supplementary and Subject Matter Authorizations allow the holder of a prerequisite elementary or secondary teaching credential (e.g., Multiple and Single Subject Teaching Credential) to add on one or more departmentalized content area authorizations. There are two types of Supplementary and Subject Matter Authorizations - Introductory and Specific. There are distinctions in the authorizations for each type noted in *Table 1* depending on whether the authorization is Introductory or Specific and for Supplementary Authorizations whether the authorization is added to an elementary or secondary teaching credential.

Introductory Supplementary and Subject Matter Authorizations are issued in the same broad content areas as the Single Subject teaching credential; however, these authorizations are limited by either the grade level of the students or the curriculum level of the content. In contrast, the Specific Subject Supplementary and Subject Matter Authorizations have the same grade level authorization as the Single Subject Teaching Credential but the teacher is limited to a narrow subject area authorization rather than a broad content area authorization as indicated in *Table 1*.

Table 1: Supplementary and Subject Matter Authorizations

Authorization Type	Prerequisite Credential*	Authorization Scope
(Introductory) Supplementary Authorization	Multiple Subject Teaching Credential	departmentalized instruction in the introductory subject listed on their credential in grades 9 and below
Introductory Supplementary Authorization	Single Subject Teaching Credential	departmentalized instruction in the introductory subject if the content is typically included in curriculum guidelines and textbooks for study in grades 9 and below but the students in the class may be in grades 10-12
Introductory Subject Matter Authorization	Multiple or Single Subject Teaching Credential	
Specific Subject Supplementary Authorization	Single Subject Teaching Credential	departmentalized instruction in a specific narrow subject area (e.g., drama) in grades preschool, kindergarten-12, and classes organized primarily for adults
Specific Subject Matter Authorization	Multiple or Single Subject Teaching Credential	

*Previously issued equivalent Standard Teaching Credentials would also serve as appropriate prerequisite credentials.

Current Requirements for Supplementary and Subject Matter Authorizations by Type

Supplementary Authorization Requirements

Individuals holding a valid, non-expired elementary or secondary teaching credential (e.g., Multiple or Single Subject Teaching Credential) may qualify to add a Supplementary Authorization upon the completion of one of the following:

- a. Twenty semester units or ten upper division semester units, or the equivalent quarter units, of non-remedial college coursework in the subject requested.
 - *Introductory* subjects require at least one course in each of the content areas listed; the balance of the ten or twenty units may be in any course within the subject category.
 - *Specific* subjects require the same unit total but there are no required content areas.
- b. A collegiate major from a regionally accredited college or university in a subject directly related to the subject to be listed on the credential.

Subject Matter Authorization Requirements

Individuals holding a valid, non-expired elementary or secondary teaching credential may qualify to add a Subject Matter Authorization upon the completion of one of the following:

- a. Thirty-two semester units, or the equivalent quarter units, of non-remedial college coursework in the subject requested.
 - *Introductory* subjects require at least one course in each of the content areas listed; the balance of the thirty-two units may be in any course within the subject category.
 - *Specific* subjects require the same unit total but there are no required content areas.
- b. A collegiate major from a regionally accredited college or university in a subject directly related to the subject to be listed on the credential.

Subject Matter Content Preparation

The subject matter content requirements vary for these two types of authorizations both in the quantity of semester units and the range of course content. *Table 2* provides information for the Introductory Math Supplementary and Subject Matter Authorizations as an example to illustrate the differences in the subject matter content required for these two types of authorizations. Table 2 represents only one content area example out of the 12 available for the Introductory Supplementary Authorization and 7 content areas available for the Introductory Subject Matter Authorization. Additionally, there are 49 Specific Supplementary Authorization subject areas and 19 Specific Subject Matter Authorization subject areas. All required subject matter content for each content area authorization is delineated within the regulations provided in *Appendix A*.

Table 2: Subject Matter and Supplementary Authorizations in Mathematics

Authorization	Unit Requirements	Subject Matter Content Requirements
Subject Matter Authorization - <i>Introductory Mathematics</i>	32 Semester Units*	<ul style="list-style-type: none"> • Requires 3 semester units of coursework in each content area:** <ul style="list-style-type: none"> - algebra, - advanced algebra, - geometry, - probability or statistics, and - development of the real number system or introduction to mathematics
Supplementary Authorization - <i>Introductory Mathematics</i>	20 Semester Units* or 10 Semester Units of Upper Division or Graduate	<ul style="list-style-type: none"> • Two Options:** <ol style="list-style-type: none"> 1. Requires at least one course in each content area: <ul style="list-style-type: none"> - algebra, - geometry, and - development of the real number system or introduction to mathematics 2. Requires 3 courses in calculus or other advanced mathematics)

*All lower division units or a combination of upper and lower division units.

**The balance of the units may be in any course that falls within the academic department for that subject category.

In reviewing the subject matter content requirements for each type of authorization, the Subject Matter Authorization requires an individual to have completed a minimum of 32 semester units across five content areas that are aligned to the K-12 courses it authorizes. In contrast, the Supplementary Authorization in Introductory Mathematics requires an individual to have completed only 10 upper division or 20 total semester units, including one course in Algebra, Geometry, and the Real Number System and does not require any coursework in Advanced Algebra or Probability and Statistics. The authorization for a Supplementary Authorization in Introductory Mathematics, therefore, appears to extend beyond the actual preparation required to earn the authorization.

Table 2 demonstrates that while the Supplementary and Subject Matter Authorizations in Introductory Mathematics retain the same authorization, the unit and content area requirements are not aligned. Furthermore, the required coursework content areas for the Supplementary Authorizations have not been examined for consistency with the newer Subject Matter Authorization or with the current state-adopted academic content standards.

Specific Subject Pedagogy

Content-specific pedagogy is required whether a teacher earns an initial Single Subject Teaching Credential or adds a new content area authorization under Title 5 section 80499 subsequent to initial preparation. In contrast, educators adding new content areas to their credential through Supplementary and Subject Matter Authorizations are not required to complete a subject-specific pedagogy course. For example, the holder of a Multiple Subject Teaching Credential can

add a Specific Subject Matter Authorization in Chemistry that authorizes teaching at the high school level without additional content-specific science pedagogy coursework at the secondary level.

Key Policy Issues Pertaining to Supplementary and Subject Matter Authorizations

Policy Issue 1: Subject-Specific Pedagogy

The Commission took action in 2013 (<http://www.ctc.ca.gov/commission/agendas/2013-03/2013-03-2A.pdf>) to require that the pedagogy course used to add a new content area under Title 5 section 80499 must align with the specific content area requested for both credential holders seeking to add either a new credential type or a new content area.

Currently, neither the Subject Matter Authorization nor the Supplementary Authorization requires the educator to complete subject-specific pedagogy for the content area of the new subject area authorization being added. This situation raises a key policy issue for the Commission's consideration and potential action and/or direction to staff:

Should all teachers who add an authorization to teach in a new content area be required to complete subject-specific pedagogy preparation for that new content area?

Policy Issue 2: Subject Matter Content Preparation

The Commission's preparation standards and examinations must align with California student academic content standards, including the California Common Core State Standards and the Next Generation Science Standards. These standards and examinations have been aligned and/or are currently in process of revision to align with those standards. The current unit requirements for the Supplementary and the Subject Matter Authorizations do not indicate the specific range of content that should be covered within the coursework.

Given the need for all teachers to provide K-12 students with effective instruction that is aligned to the state's adopted academic content standards, including the CCSS and the NGSS, a policy question for the Commission's consideration and potential action and/or direction to staff would be:

Does the Commission wish to specify and/or revise the range of content that should be covered in the required coursework for the Supplementary and Subject Matter Authorizations in order to ensure consistency between the two types of authorizations and alignment with the state-adopted content standards?

Staff Recommendation

Staff recommends that the Commission discuss the policy issues outlined above and provide direction to inform future work.

Next Steps

Regarding Policy Issue 1, if the Commission provides guidance to staff that the subject-specific pedagogy should be required then staff would proceed with proposed regulations to amend the appropriate section for review and a potential future public hearing.

Regarding Policy Issue 2, if the Commission provides staff guidance on alignment of the required content between the two authorizations as well as with the state-adopted K-12 content standards, staff would proceed to include this information in proposed regulations in conjunction with the work completed for Policy Issue 1.

As specified in statute, if any changes are made to the requirements for these authorizations within regulations only individuals initially earning one of these authorization in the future would be impacted not educators who already hold one of these authorizations.

Appendix A
Title 5 of the California Code of Regulations
§§80089, 80089.1, 80089.2, 80089.3, and 80089.4

§80089. Adding Supplementary Authorizations to Teaching Credentials Used Predominantly in Secondary Schools.

(a) The holder of a valid teaching credential specified in Education Code Section 44256(a) may have one or more of the subjects listed in Sections 80089.1 and 80089.2, added as a supplementary authorization. The candidate or an approved institution shall verify completion of either (1) or (2) below:

- (1) 20 semester hours or 10 upper division semester hours of non-remedial collegiate coursework in a subject listed in Sections 80089.1 or 80089.2, or
- (2) a collegiate major in a subject directly related to each subject listed in Sections 80089.1 or 80089.2. A "C" grade or above in any course used to meet provisions of this section shall be required. Non-remedial coursework for the purposes of this section shall be defined as coursework that is applicable to a bachelor's degree or a higher degree at a regionally accredited college or university.

(b) Authorization.

- (1) A supplementary authorization added under the provisions of Section 80089.1 authorizes the holder to teach that subject at any grade level; preschool, kindergarten, grades 1-12, or in classes organized primarily for adults;
- (2) A supplementary authorization added under the provisions of Section 80089.2 authorizes the holder to teach at any grade level (preschool, kindergarten, grades 1-12, or in classes organized primarily for adults) only the subject matter content typically included for that subject in curriculum guidelines and textbooks for study in grades 9 and below.

(c) Applicants who are progressing toward completion of supplementary authorization requirements as they existed on July 1, 1996, shall have until July 1, 1998, to apply for said authorizations.

Note: Authority cited: Section 44225, Education Code. Reference: Sections 44256 and 44349, Education Code.

§80089.1. Subjects Added as Supplementary Authorizations (Specific Subjects).

(a) The following listed subjects may be added as supplementary authorizations to a valid teaching credential specified in Education Code Section 44256(a):

Accounting including finance	Geosciences
Agricultural mechanic	Graphic Arts
Animal science	Industrial crafts and plastics
Anthropology	Instrumental music

Auto mechanics	Interior design (home economics)
Biological Sciences	Journalism
Chemistry	Literature
Child development (home economics)	Marketing/entrepreneurship
Clothing and textiles (home economics)	Metals (industrial arts)
Comparative political systems and international relations	Office technologies including word processing and business communications
Computer concepts and applications	Ornamental horticulture
Consumer education (home economics)	Painting and drawing
Crafts, including jewelry and ceramics (art)	Photography
Dance	Physics
Drafting	Plant science
Drama	Plastics (industrial arts)
Economics	Psychology
Economic and consumer education	Sociology
Electronics	Speech
English Composition	US Government and US Civics
Family life and parenting (home economics)	US History and California History
Family life education including drug, alcohol and tobacco use prevention (health science)	Vocal Music
Food and nutrition (home economics)	Woods (industrial arts)
Forestry and horticulture	World History
Geography	

- (b) A supplementary authorization in a specific subject of Science may be added to a valid teaching credential specified in Education Code Section 44256(a). The course of study for Biological Sciences or Chemistry or Geosciences or Physics must include each of the components for that area. One of the courses must include a laboratory component.
 - (1) Biological Sciences, including: Molecular and Cellular Biology, Biology of Organisms, and Evolution.
 - (2) Chemistry, including: Structure and Stability, and Chemical Reactions.
 - (3) Geosciences, including: Astronomy, Geology, Meteorology and Oceanography.
 - (4) Physics, including: Energy - Mechanics, Energy - Heat Energy - Electricity and Magnetism, Wave Motion and Atomic and Nuclear Physics.
- (c) A supplementary authorization in each of the specific subjects of Child development (home economics), Clothing and textiles (home economics), Food and nutrition (home economics), and Interior design (home economics) must include a laboratory component.
- (d) A supplementary authorization in the subject of Family life education including drug, alcohol, and tobacco use prevention (health science) must include the following components: sexually transmitted disease including HIV/AIDS, human development and human sexuality, parenting education, violence prevention, and drug, alcohol and tobacco use prevention and cessation.

Note: Authority cited: Section 44225, Education Code. Reference: Sections 44256 and 44349, Education Code.

§80089.2. Subjects Added as Introductory Supplementary Authorizations.

- (a) Candidates seeking supplementary authorization in any language other than English shall, in addition to the requirements specified in Section 80089, submit verification of having either (1), (2), (3), or (4) below:
 - (1) passed the oral language portion of the Bilingual Certificate of Competence Examination in the language to be listed on the credential. Such verification shall be in the form of a letter from any institution or other educational agency, approved by the Commission as an assessor agency for the Bilingual Certificate of Competence. Whenever a written assessment instrument for a language other than Spanish is not available, a panel may be used by assessor agencies to assess a candidate's knowledge of the target language competencies, in accordance with Commission guidelines regulating assessment for languages other than Spanish, or
 - (2) passed the speaking and listening sections of Test 6 of the Crosscultural Language and Academic Development/Bilingual Crosscultural Language and Academic Development (CLAD/BCLAD) Examinations described in Section 80015.3 in the language to be listed on the credential; or
 - (3) oral proficiency in the language to be listed on the credential at a level equivalent to that of a person with a bachelor's degree with a major in that language. This level of proficiency shall be verified by a letter from the Chair of the Language Department of a regionally accredited 4 year college or university; or
 - (4) oral proficiency in the language to be listed on the credential at the level required to complete a Bilingual Emphasis or Bilingual Crosscultural Language and Academic

Development (BCLAD) Emphasis Credential Program as verified by a letter from a person authorized to issue such verification by the college or university that offers such a program.

(b) The following listed subjects may be added as introductory supplementary authorizations to a valid teaching credential specified in Education Code Section 44256(a).

- (1) Introductory Agriculture, including at least one course in each of the following areas: animal science, plant science, and agricultural mechanics;
- (2) Introductory Art, including at least one course in each of the following areas: drawing and painting, art history or appreciation, and crafts;
- (3) Introductory Business, including at least one course in each of the following areas: business management, business marketing or introduction to business, computer concepts and applications, economics, business communications or business English, and accounting;
- (4) Introductory English, including at least one course in each of the following areas: composition, literature, and grammar or language structure;
- (5) Introductory Language Other Than English (Specify), including at least one course in the language covering each of the following areas: grammar, composition, conversation, and literature;
- (6) Introductory Health Sciences, including at least one course in each of the following areas: substance abuse (including alcohol, drug, and tobacco), family life education (including human sexuality, HIV/AIDS, and sexually transmitted diseases), nutrition, comprehensive school health systems or programs, and health education theory, behavior, or foundations;
- (7) Introductory Home Economics, including at least one course in each of the following areas: food and nutrition, clothing, child development, and family life and parenting;
- (8) Introductory Industrial Arts, including at least one course in each of the following areas: drafting or graphic arts, woods or metals, and electricity or electronics;
- (9) Introductory Mathematics, including at least one course in each of the following areas (all course work shall be at least at a level for which intermediate algebra is a prerequisite): college algebra, geometry, and development of the real number system or introduction to mathematics; or three courses in calculus or other mathematics courses for which algebra and geometry are prerequisites;
- (10) Introductory Music, including at least one course in each of the following areas: vocal music, instrumental music, music history or appreciation, and music theory;
- (11) Introductory Physical Education, including at least one course in each of the following areas: team sports and games; fundamental and creative movement skills (such as dance and gymnastics); human movement, motor development, and/or motor learning; and individual, dual, nontraditional and global sports and games (such as aquatics, conditioning, and archery);
- (12) Introductory Science, including at least one course in each of the following areas: biological sciences, chemistry, geosciences, and physics; and (13) Introductory Social Science, including at least on course in each of the following areas: United States history, California history, world history, geography, and United States government.

- (c) Introductory Home Economics Supplementary Authorizations must include a laboratory component in one of the listed subject areas. The course of study must cover both subject areas of food and nutrition but a single course may be used to meet the requirement. The course of study must cover both subject areas of family life and parenting, but a single course may be used to meet the requirement.
- (d) Introductory Science Supplementary Authorizations Authorized by 80089.2(b)(12) shall include a one year sequence of courses in at least two of the listed subject areas. At least one course must include a laboratory component.

Note: Authority cited: Section 44225, Education Code. Reference: Sections 44256 and 44349, Education Code.

§80089.3. Introductory Subject Matter Authorizations.

- (a) The holder of a valid teaching credential specified in Education Code Section 44256(a) and (b) may have one or more of the subjects listed in subsection (b) added as an introductory subject matter authorization. Equivalent quarter hours may be used to meet the semester hour requirement. The candidate shall verify completion of either (1) or (2) below:
 - (1) a collegiate major from a regionally accredited college or university in a subject or in a subject directly related to each subject from subsection (b) to be listed, or
 - (2) 32 semester or 48 quarter hours of non-remedial collegiate coursework in a subject listed in subsection (b). Included within the 32 semester or 48 quarter hours is a minimum of three semester or four quarter hours in each of the specific content areas listed for the subject in subsection (b) except for Science which requires a minimum of six semester or eight quarter hours in each of the specific content areas listed. A grade of "C" or above in any course used to meet the provisions of this subsection shall be required. Non-remedial coursework for the purpose of this section shall be defined as coursework that is applicable toward a bachelor's degree or a higher degree at a regionally accredited college or university.
- (b) The following subjects may be added as introductory subject matter authorizations to a valid teaching credential specified in Education Code Section 44256(a) and (b):
 - (1) Art, with the content areas of art history including aesthetics and appreciation, two-dimensional art including drawing, painting, and printmaking, three-dimensional art including sculpture and ceramics, and photography/computer generated imagery;
 - (2) English with the content areas of grammar or language structure, advanced composition, speech, drama or theatre, and literature;
 - (3) A Language Other Than English (specify) with the content areas of grammar, composition, culture, conversation, and literature;
 - (4) Mathematics with the content areas of algebra, advanced algebra, geometry, probability or statistics, and development of the real number system or introduction to mathematics;
 - (5) Music with the content areas of vocal music including the analysis of repertoire and literature appreciation for developing musicians, instrumental music including the analysis of repertoire and literature appreciation for developing musicians, aural

- musicianship, keyboard, music history including music appreciation, world music, conducting, and music theory;
- (6) Science with the content areas of biological sciences, chemistry, geosciences, and physics; and
 - (7) Social Science with the content areas of United States history, California history, world history, world civilization or world cultures, physical geography, and United States government.
- (c) A subject specified in subsection (b) as an introductory subject matter authorization authorizes the holder to teach only the subject matter content typically included for that subject in curriculum guidelines and textbooks approved for study in grades 9 and below to students in preschool, kindergarten, grades 1-12, or in classes organized primarily for adults.

Note: Authority cited: Sections 12001 and 44225, Education Code. Reference: Sections 44225(e), 44256 and 44349, Education Code; and 20 U.S.C. Sections 6319(a) and 7801(23).

§80089.4. Specific Subject Matter Authorizations.

- (a) The holder of a valid teaching credential specified in Education Code Section 44256(a) and (b) may have one or more of the subjects listed in subsection (b) added as a specific subject matter authorization. Equivalent quarter hours may be used to meet the semester hour requirement. The candidate shall verify completion of either (1) or (2) below:
- (1) a collegiate major from a regionally accredited college or university in a subject directly related to each subject from subsection (b) to be listed, or
 - (2) 32 semester or 48 quarter hours of non-remedial collegiate coursework directly related to the requested subject listed in subsection (b) except for history which requires a minimum of 16 semester units in both world history and U. S. history. A grade of "C" or above in any course used to meet the provisions of this subsection shall be required. Non-remedial coursework for the purposes of this section shall be defined as coursework that is applicable toward a bachelor's degree or a higher degree at a regionally accredited college or university.
- (b) The following subjects may be added as a specific subject matter authorization to a valid teaching credential specified in Education Code Section 44256(a) and (b):
- Art History/Appreciation
 - Biological Sciences
 - Chemistry
 - Civics/Government
 - Dance
 - Drama/Theatre
 - Economics (social science)
 - English Composition
 - Geography
 - Geosciences
 - History
 - Instrumental Music

Literature
Photography
Physics
Plant Science
Three-Dimensional Art
Two-Dimensional Art
Vocal Music

- (b) A subject specified in subsection (b) as a specific subject matter authorization authorizes the holder to teach courses in the specific subject in departmentalized classes in grades preschool and K-12 or in classes organized primarily for adults.

Note: Authority cited: Sections 12001 and 44225, Education Code. Reference: Sections 44225(e) and 44256, Education Code; and 20 U.S.C. Sections 6319(a) and 7801(23).