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## Action

### *Public Hearing*

### **Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to Administrative Services Credentials**

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**Executive Summary:** This agenda item proposes amendments to Title 5 of the California Code of Regulations section 80054 pertaining to California prepared administrators and the addition of section 80054.1 to clarify, interpret, and make specific the Education Code sections pertaining to the requirements for administrators prepared outside California.

**Recommended Action:** Staff recommends that the Commission adopt the proposed regulations pertaining to Administrative Services Credentials.

**Presenter:** Tammy A. Duggan, Consultant, Certification Division

#### **Strategic Plan Goal**

##### ***I. Educator Quality***

- b) 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.

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# Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to Administrative Services Credentials

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## Introduction

This rulemaking action proposes the following:

- Amend Title 5 California Code of Regulations (CCR) section 80054.1 to allow out-of-state prepared administrators with at least three years of full-time teaching or services experience to substitute two years of out-of-state administrative experience to satisfy the five-year teaching/services experience requirement for a Preliminary Administrative Services Credential (PASC);
- Update the program standards incorporated by reference in Title 5 of the CCR section 80054 due to amendments made by the Commission since the June 2014 revision date that include the California Administrator Performance Assessment (CalAPA); and
- Make other minor amendments Title 5 of the CCR sections 80054 and 80054.1 for clarity and consistency purposes.

## Background

Amendments to Title 5 of the CCR §80054 took effect on July 1, 2013 and increased the years of required teaching/services experience for the PASC for California prepared administrators from three years to five years. Section 80054.1 was added to Title 5 of the CCR effective October 1, 2015 and details the requirements for out-of-state prepared administrators, including five years of teaching/services experience to align with the experience requirement for California prepared administrators

With very few exceptions, only three years of teaching and/or services experience is required for an individual to qualify for an administrative services credential in the other states. The increased experience requirement in California creates a potential barrier for out-of-state prepared administrators seeking certification in California. It is entirely possible that an individual with many years of successful administrative experience in another state would not qualify for an administrative services credential in California if the out-of-state administrative credential was issued on the basis of three years of teaching/services experience. Under the current regulations, an out-of-state credentialed administrator with less than five years of teaching or services experience would be required to return to the classroom (or services position) for one or two years to satisfy California's five-year experience requirement, regardless of the number of years the individual was employed in an administrative position.

There are three Education Code (EC) sections that specify the requirements for issuance of administrative services credentials to out-of-state prepared administrators (reference EC sections 44270, 44270.3, and 44270.4). Each EC section requires a minimum of three years teaching or services experience, as applicable to the credential route. The two years of additional teaching/services experience in Title 5 of the CCR section 80054.1 was added by the Commission; therefore, the Commission may define the type of experience acceptable to satisfy the additional two years of experience. The proposed regulation amendments to allow out-of-state administrative experience to satisfy the up to two years of teaching/services experience will adhere to the statutory three-year experience requirement, maintain the terms of the three credential routes available to out-of-state prepared administrators, and create a procedure for experienced administrators from other states to qualify for an administrative services credential in California.

### **Necessity and Rationale for Amendments to the Administrative Services Program Standards Document Incorporated by Reference**

The Administrative Services Program Standards were last amended in June 2014. Since that date, the Commission has adopted several significant amendments to the program standards that are included in the version with the July 2018 revision date. Since the program standards with the June 2014 revision date are currently incorporated by reference in 5 CCR section 80054, the proposed amendments are necessary in order to incorporate by reference the current program standards document with the July 2018 revision date. Specific rationale for the amendments to the program standards document are provided in the “Program Standards” section beginning on page 5.

### **Necessity and Rationale for Other Amendments**

Several other minor amendments to the language included in 5 CCR sections 80054 and 80054.1 have been proposed as related to referenced Education Code sections and 5 CCR sections, and to add language in the sections related to Commission-approved programs for clarity and consistency purposes.

### **Objectives and Anticipated Benefits of the Proposed Regulations**

The objectives of the proposed addition and amendments are to clarify and make specific the following as related to Administrative Services Credentials:

- Allow administrators prepared in other states to substitute up to two years of teaching/services experience earned outside California toward satisfying the five-year experience requirement;
- Update the program standards incorporated by reference due to amendments adopted by the Commission since 2014 and that include the CalAPA; and
- Make other minor amendments Title 5 of the CCR sections 80054 and 80054.1 for clarity and consistency purposes.

The Commission anticipates that the proposed amendments will increase openness and transparency in government by clarifying the requirement for California and out-of-state

prepared administrators and by updating the revision date of the Administrative Services Credential Program Standards incorporated by reference that now include passage of the CalAPA as a requirement for the PASC for individuals who complete Commission-approved preliminary programs. The Commission also anticipates that the proposed amendments will benefit the welfare of students attending public schools in the State of California and their families by assuring administrators will have completed the kind of comprehensive preparation and personal mentoring and support required to be more fully prepared to perform administrative duties in California's public schools. The Commission does not anticipate that the proposed regulations will result in an increase in the protection of public health and safety, worker safety, or the environment, the prevention of discrimination, the promotion of fairness or social equity, or an increase in the transparency in business.

### **Summary of Proposed Additions and Amendments to Regulations**

#### **§80054**

**(a)(2)(A) through (a)(2)(C):** Proposes a change to the *Administrative Services Credentials Program Standards* revision date due to updates to the program standards adopted by the Commission since June 2014.

**(a)(2)(A):** Subsection (a)(3) of Education Code section 44270 requires completion of an "entry-level" program as one of the minimum requirements for issuance of a PASC. The word "preliminary" has been added after "specialized and professional" to clarify that the preliminary program is the entry-level program required in statute.

**(b)(1) and (b)(2):** A prerequisite teaching or services credential is one of the requirements for a PASC as specified in subsection (a)(1). Subsection "(b)" has been added following "80493" at the end of the two subsections to accurately reference the 5 CCR language related to the dating of credentials requiring a prerequisite credential for clarity and for consistency with 5 CCR section 80053 that includes similar language.

**(d)(4)(A):** Subsection (a)(3) of Education Code section 44270.1 requires completion of a "program of advanced preparation" that is "individualized based upon individual need" as one of the minimum requirements for issuance of a Clear Administrative Services Credential. This subsection proposes amendments to replace the wording from Education Code section 44270.1 with "clear induction program" to clarify that the clear induction program is the program of advanced preparation program required in statute. The term "induction" is defined in Section IV of the program standards document, which has been incorporated by reference. The amendments to this subsection also propose a change to the *Administrative Services Credentials Program Standards* revision date due to updates to the program standards adopted by the Commission since June 2014.

**(e)(1) and (e)(2):** A prerequisite teaching or services credential is one of the requirements for a clear administrative credential as specified in subsection (d)(2). Subsection "(b)" has been added following "80493" at the end of the two subsections to accurately reference the 5 CCR

language related to the dating of credentials requiring a prerequisite credential for clarity and for consistency with 5 CCR section 80053 that includes similar language.

**(g)(1)(E):** Education Code section 47600 referenced in this subsection reads, “This part shall be known, and may be cited, as the “Charter Schools Act of 1992.” Although that language prefaces the Education Code sections related to charter schools, it does not provide a definition for those types of schools. The proposed amendments to this subsection change “established” to “defined” and changes the Education Code referenced to 47605, which defines charter schools, for consistency with other 5 CCR sections that defined charter schools as employing agencies [reference 5 CCR sections 80021(f)(1)(E), 80021.1(f)(1)(E), 80022(f)(5), 80023.1(b)(5), 80034(c)(6), 80034.1(a)(6), and 80691(e)(3)].

**§80054.1:**

**(b)(9)(A) and (b)(9)(B):** A prerequisite teaching or services credential is one of the requirements for a PASC as specified in subsection (b)(1). Subsection “(b)” has been added following “80493” at the end of the two subsections to accurately reference the 5 CCR language related to the dating of credentials requiring a prerequisite credential for clarity and for consistency with 5 CCR section 80053 that includes similar language.

**(c)(4) and (c)(6):** Amendments to 5 CCR section 80054 in 2015 (reference the Office of Administrative Law file 2015-0609-03S) included new language in subsection (d)(2) to add possession of a prerequisite teaching or services credential as a requirement for the clear Administrative Services Credential. The addition of the new language caused a re-numbering of the following subsections and the subsection related to the program or examination options for the clear credential was re-numbered to (d)(4). Subsections (c)(4) and (c)(6) of 5 CCR section 80054.1 were supposed to include cross-references to the subsections in (d)(4) of 5 CCR section 80054, but the cross-reference currently references subsections in (d)(3), which was the number of the subsection before the addition of the new language in subsection (d)(2). The proposed amendments to these sections are to correct the cross-references from the subsections in (d)(3) that do not exist to the correct subsections in (d)(4) in 5 CCR section 80054.

**(d)(5):** Subsection (d) of Education Code 44270.4 specifies completion of an out-of-state administrative services program and issuance of an administrative credential based upon the program completed as one of the requirements for a Clear Administrative Services Credential to individuals with out-of-state teaching and administrative experience. The proposed amendments to this subsection delete the words “or eligibility for” for alignment with the current statute. Verification that an out-of-state prepared individual is eligible for an administrative credential in another state does not satisfy the requirement specified in Education Code section 44270.4(d); the individual must have been issued an administrative services credential in another state to qualify under the provisions of subsection (d) of 5 CCR section 80054.1.

**(f)(1):** Proposes the deletion of the language prohibiting the combination of teaching experience with other school employment and the language allowing teaching experience to be combined with experience in the specified services fields. Additionally, proposes the addition of language that will allow individuals to combine teaching experience with out-of-state administrative experience to qualify for a preliminary or clear Administrative Services Credential under the provisions provided in subsections (a) and (d) or to combine teaching experience and/or experience in the specified services fields with up to two years of out-of-state administrative experience to qualify for a preliminary Administrative Services Credential under the provisions provided in subsection (b). Also includes language explaining that administrative experience accepted in lieu of teaching experience will be excluded from the administrative experience requirement specified in subsection (d)(6). An out-of-state prepared administrator will need a minimum of four to five years of acceptable out-of-state administrative experience to qualify for the clear credential under the provisions of subsection (d) if using one to two years of the administrative experience in lieu of teaching experience.

**Program Standards** (Copy to the document displaying amendments in underline and strikethrough is available [here](#))

Subsection (a) of Education Code section 44225 reads, “Establish professional standards, assessments, and examinations for entry and advancement in the education profession.” The Commission’s authority to establish program standards is further established in subsection (d) of Education Code section 44225. The current regulations related to the issuance of preliminary and clear administrative services credentials incorporate by reference the Administrative Services Credential Program Standards with the June 2014 revision date. The Commission has adopted amendments to several sections of the program standards since that date. The revisions included in the current July 2018 revision of the program standards are explained in the following sections.

**Title Page:** The outdated logo for the Commission has been replaced with the current logo that includes the California seal. In addition, the recent revision date for the preliminary program standards has been added and the handbook revision date has been updated to reflect the current program standards.

**Footer:** The footer on all pages has been reformatted and the revision date has been updated to the current version of the program standards.

**Page iii:** Governor Brown’s name has been amended to his full, legal name.

**Pages v to viii:** Table of Contents amended as needed to reflect the current program standards. Due to the addition of new text in underline and the removal of old text in strikethrough, the page numbers in the Table of Contents do not match the body of the program standards document. A clean copy of the current program standards document is available at <https://www.ctc.ca.gov/docs/default-source/educator-prep/standards/asc-admin-handbook-2018.pdf>.

Brief descriptions of the amendments to the Table of Contents follow. Specific information explaining the amendments in detail are provided in the justifications for the associated sections.

**Page v:**

- The “Program Standards Writing Group” text has been added to the end of the first line in the Table of Contents following “Membership of the Administrative Services Credential, as two lines are not required for the group list.
- Section I: The “Credential Program Standards” text has been added to the end of the section title, as two lines are not required to preface the program standards.
- Section II: The redundant words “Preconditions for the” that preface the individual listings for the preliminary and clear preconditions has been deleted. In addition, the individual listings for each of the preconditions have been deleted, since the preliminary preconditions are provided on two pages and the clear preconditions are all provided on one page.
- Section III, Category II: Title of Program Standard 6 amended and Program Standards 7, 8, and 9 deleted due to amendments approved by the Commission.

**Page vi:**

- Section III, Category II (continued): Programs Standards 10 and 11 deleted due to amendments approved by the Commission.
- Section III, Category III: Program Standard 12 renumbered to Program Standard 7 and Program Standard 13 renumbered to Program Standard 8 due to the deletion of the previous Program Standards 7, 8, 9, 10, and 11. Standards 8A, 8B, and 8C, along with their associated titles have been added.
- Section III, Category IV: Program Standard 14 renumbered to Program Standard 9 due to the deletion of the previous Program Standards 7, 8, 9, 10, and 11.
- The two lines for the preliminary program standards glossary have been combined on the same line.
- Section IV: The redundant “to the Clear Induction Programs Standards” has been removed following “Introduction,” as the title of Section IV clearly indicates that the section is related to the clear induction program standards.
- Section V, Program Standard 4: Sections A, B, C, and D, along with their associated titles, have been added.
- Section V, Program Standard 5: The titles for the first five California Professional Standards for Educational Leaders (CPSEL) have been added.

**Page vii:**

- Section V, Program Standard 5 (continued from Page vi): The title for the sixth CPSEL has been added.

- The two lines for the clear induction program standards glossary have been combined on the same line.
- Section VI: The title for this section has been renamed “Appendices” and the lines for the transition and initial program review processes have been deleted.
- Section VI, Appendix A: The “s” at the end of “CACE” has been deleted for consistency with other sections of the program standards.
- Section VI, Appendix B: The categories and titles for the California Administrator Performance Expectations (CAPE) 1 through 15 have been deleted. All the CAPE are provided in one table, so the individual categories and titles of each are not needed in the Table of Contents.

**Page viii:**

- Section VI, Appendix B (continued from Page vii): The categories and titles for the CAPE 16 through 20 have been deleted. All the CAPE are provided in one table, so the individual categories and titles of each are not needed in the Table of Contents.
- Section VI, Appendix C: Page number for the appendix added following the title and all the information related to the CPSEL deleted for consistency with the listing of the other appendices.
- Section VI, Appendix D: New entry added for an appendix that shows how the CAPE are aligned with the CPSEL.

**Section I. Forward to the Administrative Services Credential Program Standards**

• **Figure 1: The Learning to Teach System:**

- Deleted the information under the “Preliminary Credential Preparation” heading related to the Paraprofessional Teacher Training Program (PTTP). The PTTP was eliminated with the passage of Senate Bill 828 (Chap. 29, Stats. 2016) and Assembly Bill 1624 (Chap. 319, Stats. 2016).
- Deleted the asterisk following “Induction Program” under the “Clear Credential Preparation” heading and the information related to the asterisk. At the time the administrative services credential program standards were revised in June 2014, teacher induction programs were mainly offered by local education agencies (LEAs). Individuals who were unable to enroll in an induction program could seek enrollment at a California institution of higher education (IHE) that offered a Commission-approved clear credential program pursuant to EC section 44259(c)(3)(B). A separate set of program standards existed for induction program and clear credential programs. Although IHEs had the option of offering an approved induction program, an approved clear credential program, or both programs, the majority of IHEs offered only clear credential programs.

As part of the Commission’s work to strengthen and streamline the accreditation system, the Commission took action in [December 2015](#) to revise the general education induction program standards and the clear credential program standards were eliminated. Following adoption of the revised general education induction program standards, the Commission

received feedback from the field requesting similar revisions to the clear education specialist education induction program standards. In [October 2016](#), the Commission adopted a unitary set of program standards that governs induction for both general education and special education teachers. In doing so, the Commission recognized that a high quality, job embedded mentoring program is the most effective means of delivering support and assistance to new teachers regardless of credential area.

Because completion of an induction program, whether offered by an LEA or IHE, is required for issuance of a clear credential for California prepared general and special education teachers, it is no longer necessary for an employer to verify that an induction program is not available to an individual who hold a preliminary teaching credential. Holders of preliminary teaching credentials may choose to complete the approved induction program through an LEA or an IHE.

• **Figure 2: The Learning to Lead System**

- Minor edits made to the Preliminary Credential Preparation column for clarity purposes.
- Edits made to the Clear Credential Preparation column for brevity purposes. The Figure is only a guide and does not need to fully explain each term. The previous 120 day induction program requirement has also been amended to the current one year requirement, which is further explained in the section related to Section V, Category 1, Program Standard 1.
- “CAPE” has been added to the first bullet in the “Alignment” box to show that the CAPE are now aligned to the CPSEL. In addition, a previous typographical error has been corrected with the addition of “al” to the end of “Professional.”
- The Budget Act of 2015 (Assembly Bill 93, Chap. 10, Stats. 2015) provided a one-time General Fund appropriation of \$3.467 million for the Streamline and Strengthen the Accreditation Process (SSAP) which included funds to support a comprehensive review and revision of educator preparation including the development and implementation of significant improvements to streamline and strengthen the Commission’s accreditation system. As a result of these improvements, several of the terms associated with the accreditation system were amended. The proposed amendments to the first two bullets in the “CTC Accreditation System” section in the “Accountability” box have been amended to reflect the current terms. In addition, the lowercase “v” at the beginning of “visit” has been capitalized and the “s” at the end of “visit” has been deleted for consistency purposes.

**Section II. Preconditions for the Administrative Services Credential Programs:**

- The redundant phrase “Preconditions for the” prefacing “Preliminary Administrative Services Credential Programs” on page 13 has been deleted as the title of the section includes the word “Preconditions.”
- The information related to intern programs that is displayed in underline is not new text. The program standards document is formatted with the intern program information underlined for emphasis.

- The revision date referenced in Precondition 4 on page 14 has been amended to the date of the current program standards.
- The reference to subsection (a)(6) of Title 5 of the CCR section 80054 in Precondition 5 on page 14 has been amended to subsections (a)(7) and (a)(8) due to amendments to that section that took effect on October 1, 2015. Subsection (a)(7) of section 80054 is the current location of the language requiring an administrative offer of employment for issuance of a PASC. Subsection (a)(8) of section 80054 is the current location of the language that states an individual who meets all requirements for the preliminary credential but does not yet have an offer of employment in an administrative position shall apply for a Certificate of Eligibility.
- The redundant phrase “Preconditions for the” prefacing “Administrative Services Clear Induction Program” on page 15 has been deleted as the title of the section includes the word “Preconditions.”
- The reference to subsection (a)(6) of Title 5 of the CCR section 80054 in Precondition 2 on page 15 has been amended to subsection (a)(7) due to amendments to that section that took effect on October 1, 2015. Subsection (a)(7) of section 80054 is the current location of the verification of employment in an administrative position requirement.
- The reference to subsection (d)(1)(A) of Title 5 of the CCR section 80054 in Precondition 3 on page 15 has been amended to subsection (d)(4)(A), as that is the current location of the language requiring completion of an approved clear induction program.
- The revision date referenced in Precondition 5 on page 15 has been amended to the date of the current program standards.
- The reference to subsection (d)(3)(A) of Title 5 of the CCR section 80054 in Precondition 5 on page 15 has been amended to subsection (d)(4)(A) due to amendments to that section that took effect on October 1, 2015. Subsection (d)(4)(A) of section 80054 is the current location of the language requiring completion of an approved clear induction program.

***Section III. The Preliminary Administrative Services Credential Program:***

- The underlined text in Category 1, Program Standard 1 on page 17 for the California Administrator Performance Expectations (CAPE) are hyperlinks (not new text).
- Category II: Curriculum (beginning on page 18) - Stakeholder feedback related to the development of the administrator performance assessment (APA), which is explained in Category III below, suggested that the alignment of the CAPE governing PASC programs and the CPSEL governing clear induction programs needed to be reviewed prior to finalizing the development of the assessment. The Commission directed staff to review the alignment of the CAPE and the CPSEL at the [December 2015](#) meeting. The alignment of the CAPE to the CPSEL was adopted by the Commission at the [June 2016](#) meeting, with slight modifications made at the [September 2017](#) meeting. Additional information related to the alignment of the CAPE and the CPSEL is provided in Appendices section below.

The titles of the revised CAPE, as adopted by the Commission in June 2016, now mirror the titles of the CPSEL. Category II in the previous version of the program standards document was comprised of Standards 6 through 11 that were organized around the titles of the six CAPE as adopted in 2013. The same language for the CAPE provided in Standards 6 through 11 were also provided in Appendix B of the previous program standards document.

Rather than listing the CAPE in Category II and Appendix B, the Commission took action at the [September 2016](#) meeting to replace Standards 6 through 11 with a single standard that references the CAPE as the foundation for curriculum, fieldwork, and assessment for all candidates. This amendment is consistent with the manner in which the Teaching Performance Expectations are referenced in the [Preliminary Multiple Subject and Single Subject program standards](#) and the [Education Specialist](#) program standards. Listing the CAPE in one section of the program standards will reduce redundancy in the document and necessitate editing of only the one section when future amendments are adopted by the Commission.

The action adopted by the Commission at the September 2016 meeting renamed Category II, Program Standard 6 and deleted Standards 7, 8, 9, 10, and 11. In addition, the language previously included in Standard 6 was replaced by language that references the CAPE. Slight modifications to the language provided in the September 2016 agenda item that were made during the meeting are specified in the [September 2016 Minutes](#). The language approved at the September 2016 meeting has been further modified in the revised program standards to correct a typographical error by removing the 's from the end of California and to change the lowercase "p" and "a" prefacing "Performance" and "Assessment" as related to the CalAPA to reflect the correct name of the assessment. The words "when available" as related to the CalAPA have also been omitted from the program standards document, as the assessment is now available.

- Category III: Field Experiences in the Program (beginning on page 19) - In August 2012, the Commission granted approval for a small writing panel to be convened for the purpose of reviewing, updating, and writing Administrative Services Credential Program Standards for both preliminary and clear credential programs. At the same meeting in [August 2012](#), an Information Item was presented to the Commission exploring the concept of developing a performance assessment that candidates enrolled in approved PASC programs would be required to pass for program completion and ultimate issuance of the PASC or Certificate of Eligibility (depending on whether or not they had an administrative offer of employment at the time). An additional Information/Action item was presented to the Commission at the [September 2012](#) meeting continuing the discussion related to the development of an APA; however, no action was taken by the Commission at that meeting. A third item, presented at the [December 2012](#) meeting, seeking direction from the Commission to explore the viability of requiring an APA for all future PASC candidates was adopted. Under the authority of subsection (a) of Education Code 44225, the Commission took action at the [September 2013](#) meeting to require passage of an APA by all candidates for a PASC.

Several agenda items were presented over the next couple of years that provided updates on, or sought direction from, the Commission related to the development and implementation of the APA as follows:

- [December 2014](#) – Information
- [April 2015](#) – Information/Action
- [October 2015](#) – Action
- [December 2015](#) – Action

The design and program implementation standards for the APA were adopted by the Commission at the [February 2016](#) meeting following much research and stakeholder feedback. An update on the efforts to develop the APA, officially named the California Administrative Performance Assessment (CalAPA) was presented to the Commission at the [October 2016](#) meeting and the results of the CalAPA pilot study that ran from January 2017 through May 2017 were presented at the [June 2017](#) meeting.

Once the CalAPA design was completed, field tested, and ready for implementation, it was necessary to amend Category III and Category IV of the PASC program standards to address the program level responsibilities and administration of the CalAPA, thereby requiring passage of the assessment for issuance of the PASC or Certificate of Eligibility. Proposed amendments to the program standards were presented to the Commission as an Information item at the [April 2018](#) meeting for discussion and public input and the final proposed amendments, that included slight modifications following input from the April 2018 meeting, were adopted by the Commission at the [June 2018](#) meeting.

The amendments to Category III related to the PASC program standards include the amendments adopted by the Commission at the June 2018 meeting. Standards 12 and 13 were renumbered to 7 and 8 due to the amendments made to Category II explained earlier in this document.

- Category IV: Candidate Competence and Performance (page 22):
  - Underlined references to the CACE and CAPE are hyperlinks (not new text).
  - Additional amendments to the preliminary program standards adopted by the Commission at the [June 2018](#) meeting (see information provided above for Category III: Field Experiences in the Program) indicating that an approved administrator performance assessment may be used to verify a candidate's competence and performance "when available" has been deleted because the CalAPA is now available. The reference to the formative assessment process has also been deleted, as candidates will verify their competence and performance through passage of the CalAPA.
  - Language clarifying the components (program coursework, fieldwork, and passage of a Commission-approved APA) that must be satisfied prior to receiving recommendation for a credential has been added for clarity purposes.
  - Footnote at the bottom of page 22 related to Category IV. Candidate Competence and Performance – Following requests from approved PASC program sponsors for additional

time to prepare for implementation of the CalAPA, the Commission took action at the [June 2017](#) meeting to designate the 2018-19 school year as a non-consequential year for implementation of the assessment. The non-consequential year will be utilized by PASC program sponsors to establish memorandums of understanding with school districts, prepare faculty, revise curriculum and catalogs, review aggregate and individual data for individuals who take the assessment in order to make any necessary adjustments before the CalAPA becomes a credential requirement, etc. Candidates are not required to pay for the assessment or scoring during the non-consequential year, as passing scores will not be required until the 2019-20 school year. Footnote 5 clarifies that the 2018-19 school year is a non-consequential year.

- Glossary of Terms beginning on page 23:
  - A colon (:) has been added following “Glossary of Terms” for consistency with other titles in the program standards document.
  - The “Standard” column has been amended to reference the appropriate standard due to the amendments made to Category II explained earlier in this document.

***Section IV. Clear Induction Program Standards:***

- The redundant phrase “to the Clear Induction Program Standards” following “Introduction” on page 25 has been deleted as the title of the section indicates the purpose of the section.
- The underlined text in the last paragraph on page 25 related to the California Professional Standards for Education Leaders (CPSEL) is a hyperlink (not new text).

***Figure 4: Flowchart of California’s Administrator Induction Program-Page 26***

- The middle box at the top of the flowchart has been amended to indicate that entry into a clear induction program is to occur within one year from the issue date of the Preliminary Administrative Services Credential (PASC). The amendment from “within 120 days” to “within one year” is explained in detail in the section related to Section V, Category 1, Program Standard 1.

***Figure 5: The Components of Induction-Page 27***

- The third bullet in the Professional Learning section has been amended to spell out the words “Standard” and Administrative.” The words “Clear” and “Services” as related to the credential have been added to clarify that the information applies to the standards for the Clear Administrative Services Credential. Lastly, “CPSEL” has been added to the end of the bullet, as the referenced standard includes the information related to the CPSEL.
- “CPSEL” has also been added to the end of the third bullet in the Assessment of Candidate section, as the referenced standard includes the information related to the CPSEL.

***Figure 6: Candidate View of Induction-Page 28***

- The note at the top of the Year One box has been amended to indicate that enrollment into an induction program is to occur within one year from the issue date of the PASC. The

amendment from “120 days of job start date” to “one year of PASC credential issuance” is explained in detail in the section related to Section V, Category 1, Program Standard 1.

- The underlined text in the first paragraph on page 29 are hyperlinks to the California Administrative Content Expectations (CACE) and the CAPE (not new text).

***Section V. Standards of Quality and Effectiveness: Administrative Services Credential Clear Induction Program Standards:***

- At the [December 2015](#) Commission meeting, staff recommended that the requirement of enrollment in an administrative induction program occur within 120 days of starting an initial administrative position which took effect on July 1, 2015 be retroactively waived from July 1, 2015 through December 31, 2015. The last date for enrollment in a previously approved standards-based or guidelines-based program that would lead to issuance of a Clear Administrative Services Credential was June 30, 2015. Effective July 1, 2015, enrollment in an approved administrative induction program was the only available option. Because the administrative induction programs were new and program sponsors had not fully transitioned to the new program standards, individuals issued a PASC on or after July 1, 2015 experienced difficulties enrolling in a program within 120 days from the start of their initial administrative positions, such as availability (programs were not available in the individuals’ areas or the enrollment deadlines had passed), capacity (the administrative induction programs approved at the time did not have space for any additional enrollees), and accountability (program sponsors were reluctant to admit individuals who may have been issued their PASCs prior to July 1, 2015 but who had not yet sought enrollment in a program for the clear credential because they had served in their positions for more than 120 days).

Also included in the [December 2015](#) were proposed amendments to the language included in Section V, Category 1, Program Standard 1 that would have required program sponsors to make every effort to enroll candidates within their first year in an administrative position. Although the Commission approved the recommendation to waive the 120-day program enrollment requirement from July 1, 2015 through December 31, 2015, the proposed amendments to the program standards were not approved.

One year later at the [December 2016](#) Commission meeting, amendments to Section V, Category 1, Program Standard 1 were again proposed to permanently modify the language requiring candidates to enroll in an administrative induction program within 120 days of starting an initial administrative position. A survey of the active administrative induction programs revealed that the capacity issues previously identified had been resolved in most areas; however, other issues, such as the program enrollment deadlines, administrators who had been employed more than 120 days, program of choice not available when needed which caused individuals to have to enroll in different programs that may have been more expensive, and compliance to the 120-day requirement by program sponsors in order to maintain their accreditation status still remained. The Commission approved the proposed amendments to Program Standard 1 effective January 1, 2017 allowing an individual issued a

PASC up to one year to enroll in an approved administrative induction program. The amendments to Section V, Category 1, Program Standard 1 on page 30 mirror the amendments approved by the Commission at the December 2016 meeting.

- The last part of paragraph 1 and all references to Standard 5 on page 30 displayed in underline are hyperlinks (not new text).
- A note has been added to the bottom of page 30 prefaced by an asterisk (\*) to indicate when the new administrative induction enrollment requirement took effect.
- The footnote at the bottom of page 30 has been deleted due to the amendments to the 120-day administrative induction program enrollment deadline.
- All references to Standard 5 on pages 31 and 32 are hyperlinks (not new text).

### ***Section VI: Appendices***

- The information included in the previous program standards explaining the transition plan from programs approved under the pre-2104 program standards and the information related to Initial Program Review (page 38) has been deleted. The transition dates from the pre-2014 programs standards have passed and information related to Initial Program Review is not commonly included in program standards documents. The information was previously provided only because of the major changes made to the program standards in 2014. Initial Program Review information for potential program sponsors is provided on the Commission's website at <https://www.ctc.ca.gov/educator-prep/elig-inst-become>.
- Section VI is now devoted to the appendices that include information related to the "expectations" candidates enrolled in Commission-approved administrative services credential programs are expected to know upon program completion. There are three sets of expectations included in the program standards. The California Administrator Performance Expectations (CACE) and the California Administrator Performance Expectations (CAPE) are foundational sets of expectations that guide the preliminary programs in the development of coursework, practice experiences, and assessments and represent the knowledge and skills expected of beginning administrators. The CACE identify the basic knowledge and understanding needed in order to successfully perform what is included in the CAPE. The third set of expectations is the California Professional Standards for Education Leaders (CPSEL), which apply to administrators during participation in the clear induction program and throughout their administrative careers.

Stakeholder feedback related to the development of the CalAPA suggested that the alignment of the CAPE and the CPSEL needed to be reviewed prior to finalizing the development of the assessment. The Commission directed staff to review the alignment of the CAPE and the CPSEL at the [December 2015](#) meeting.

An action item presented to the Commission at the [February 2016](#) included a proposed realignment of the CAPE to the CPSEL. The item included a reorganization of the CAPE into six main categories with tiles that match the titles of the six CPSEL, which was adopted by the

Commission. However, the Commission directed staff to meet with stakeholders and return with any proposed edits for potential adoption at a future meeting. Commission staff held a two-day CAPE alignment meeting in April 2016, had the revised CAPE reviewed by the Commission's Bias Review Committee in May 2016 to address any potential bias issues, held six "think tank" meetings throughout the state in May 2016, and coordinated an online job analysis and validity survey with the Commission's technical contractor, Evaluation Systems, in May and June 2016.

Revisions to the CAPE and the alignment of the CAPE to the CPSEL were adopted by the Commission at the [June 2016](#) meeting as presented in the [agenda insert for item 2C](#), with the proposed CAPE preamble and the additional text at the end of CAPE 5B1. as presented in the [agenda handout for item 2C](#).

Once the CAPE had been aligned to the CPSEL, Commission staff next reviewed the CACE for realignment with the newly adopted CAPE. With assistance from the California Comprehensive Center at WestEd, a small informal group that included individuals who helped write and design the 2014 program standard revisions, the California Preliminary Administrative Credential Examination (CPACE), and the CalAPA, as well as individuals with expertise in preparing school administrators reviewed the CACE and CAPE. An online survey that included the revisions suggested by the group was then sent to the Commission's stakeholders asking if the proposed CACE were still clearly written and important to a novice administrator. The proposed realignment of the CACE to the CAPE was then presented to the Commission as an information item at the [June 2017](#) meeting. Based on feedback received at the June 2017 meeting, additional revisions were made to the proposed realignment of the CACE to the CAPE. The final draft, along with suggested edits to the CAPE Preamble (agenda insert for item 4E), were presented to and adopted by the Commission at the [September 2017](#) meeting.

The adopted realignment of the CACE to the CAPE included additional revisions to CAPE 2 and CAPE 3 to achieve stronger alignment. No new concepts related to the CAPE were added in the revisions. The revisions only represent a rearrangement of the previous content for clarity purposes.

The adopted realignment of the CACE included revisions to align the titles of the categories with the title of the six CPSEL and CAPE. In addition, the workgroup reviewed the CACE to identify and revise statements written as performance rather than content expectations; duplications within a category; statements needing rewriting for clarity; and missing content. However, the substance of the CACE was not changed. The organization of the CACE was revised only to clarify the alignment and coherence among the two sets of expectations.

The specific amendments to the appendices adopted by the Commission, as explained above, are described below.

- Appendix A:
  - The title “Section VI: Appendices” has been added to the top of page 39 and the acronym “(CACE) has been added to the end of the title for Appendix A for consistency with the titles of the other appendices.
  - The CACE and CAPE Preamble initially adopted by the Commission in [June 2016](#) for only the CAPE and amended in [September 2017](#) to apply to both the CACE and the CAPE has been added to the top of page 39.
  - The titles of the six CACE categories have been amended to align with the titles of the CAPE and the CPSEL.
  - The column displaying the associated CAPE has been deleted, as the CAPE are now aligned to the CPSEL (discussed in the section for Appendix D).
  - The “Content Knowledge Expectations” column header has been deleted, as the entire appendix is related to the CACE.
  - The previous language related to the CACE has been deleted and replaced with the revised language adopted by the Commission at the [September 2017](#) meeting.
- Appendix B:
  - The appendix has been amended to reflect the reorganization of and revisions to the CAPE as adopted by the Commission in [June 2016](#) along with the revisions adopted in [September 2017](#).
- Appendix C:
  - A colon (:) has been added following “Appendix C” for consistency with the titles of the other appendices.
- Appendix D:
  - This is a new appendix added to display the alignment of the CAPE to the CPSEL as adopted by the Commission in June 2016 along with the revisions adopted in September 2017. The alignment of the CAPE to the CPSEL, rather than the CACE to the CAPE, was necessary to ensure that the performance expectations required to earn a PASC are aligned to the work that the PASC holder will do in the clear induction program.

**Documents Incorporated by Reference:**

*Administrative Services Credential Program Standards (rev. 7/2018):*

<https://www.ctc.ca.gov/docs/default-source/educator-prep/standards/asc-admin-handbook-2018.pdf>

The Commission on Teacher Credentialing awards credentials and certificates on the basis of completion of programs that meet Standards for Educator Preparation and Educator Competence. For each type of professional credential in education, the Commission has developed and adopted standards which are based upon recent research and the expert advice of many professional educators. Each standard specifies a level of quality and

effectiveness that the Commission requires from programs offering academic and professional preparation in education.

Program standards address aspects of program quality and effectiveness that apply to each type of educator preparation program offered by a program sponsor. Program standards contain statements describing the nature and purpose of each standard and language that details the requirements that all approved programs must meet. Program sponsors must meet all applicable program standards before the program application may be approved by the Commission.

**Documents Relied Upon in Preparing Regulations:**

August 2012 Commission agenda item 4B – Exploration of the Concept of a Preliminary Administrative Credential Candidate Performance Assessment:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2012-08/2012-08-4b-pdf>

Approval of August 2012 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2012-09/2012-09-1a-pdf>

September 2012 Commission agenda item 2D – Continuation of the Discussion of Examination Options relating to the Preliminary Administrative Services Credential:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2012-09/2012-09-2d-pdf>

Approval of September 2012 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2012-09/2012-09-1a-pdf>

December 2012 Commission agenda item 4E – Further Discussion of Assessment Options for the Preliminary Administrative Services Credential:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2012-12/2012-12-4e-pdf>

Approval of December 2012 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2013-01/2013-01-1a-pdf>

September 2013 Commission agenda item 4E – Update on Administrator Performance Assessments:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2013-09/2013-09-4e-pdf>

Approval of September 2013 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2013-12/2013-12-1a-pdf>

December 2014 Commission agenda item 3B – Update on Administrator Performance Assessment Development:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2014-12/2014-12-3b-pdf>

Approval of December 2014 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2015-02/2015-02-2a-pdf>

April 2015 Commission agenda item 4C (Revised) – Update on Work Relating to Administrator Preparation:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2015-04/2015-04-4c-pdf>

Approval of April 2015 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2015-06/2015-06-3a-pdf>

October 2015 Commission agenda item 2F – Update on the Development of Administrator Performance Assessment Design and Implementation Standards and Plans to Develop an Administrator Performance Assessment:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2015-10/2015-10-2f-pdf>

Approval of October 2015 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2015-12/2015-12-1a-pdf>

December 2015 Commission agenda item 2F – Update on the Development of Administrator Performance Assessment Design and Program Implementation Standards:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2015-12/2015-12-2f-pdf>

December 2015 Commission agenda item 2H – Proposed Revision of the Enrollment Requirement for the Clear Administrative Services Credential Standards:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2015-12/2015-12-2h-pdf>

Approval of December 2015 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-02/2016-02-1a-pdf>

February 2016 Commission agenda item 3F – Update on the Alignment of the CAPEs and CPSEL and Proposed Adoption and Approval of Administrator Performance Assessment Design and Program Implementation Standards:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-02/2016-02-3f-pdf>

February 2016 Commission agenda item 3F Insert:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-02/2016-02-3f-insert.pdf>

Approval of February 2016 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-04/2016-04-2a-pdf>

June 2016 Commission item 2C – Adoption of Revised California Administrator Performance Expectations:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-06/2016-06-2c-pdf>

June 2016 Commission agenda item 2C Handout:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-06/2016-06-2c-handout.pdf>

June 2016 Commission agenda item 2C Insert:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-06/2016-06-2c-insert-apa.pdf>

Approval of June 2016 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-09/2016-09-2a-pdf>

September 2016 Commission agenda item 3F – Proposed Revision to the Preliminary Administrative Services Program Standards to Align with the Recently Adopted CAPEs:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-09/2016-09-3f-pdf>

Approval of September 2016 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-10/2016-10-1a-pdf>

October 2016 Commission agenda item 2F – Update on the Development of the California Administrator Performance Assessment (CalAPA):

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-10/2016-10-2f-pdf>

Approval of October 2016 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-10/2016-10-1a-pdf>

December 2016 Commission agenda item 3A – Proposed Revision of the Enrollment Requirement for the Clear Administrative Services Credential Standards:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-12/2016-12-3a.pdf>

Approval of December 2016 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2017-02/2017-02-1a.pdf>

June 2017 Commission agenda item 3E – Update on the Development of the California Administrator Performance Assessment (CalAPA) and Pilot Study and Request for a Non-consequential Administration Year (2018-19):

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2017-06/2017-06-3e.pdf>

June 2017 Commission agenda item 3F – Realignment of the Preliminary Administrative Services Content and Performance Expectations:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2017-06/2017-06-3f.pdf>

Approval of June 2017 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2017-09/2017-09-3a.pdf>

September 2017 Commission agenda item 4E – Realignment of the Preliminary Administrative Services Content and Performance Expectations:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2017-09/2017-09-4e.pdf>

September 2017 Commission agenda item 4E Insert:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2017-09/2017-09-4e-insert.pdf>

Approval of September 2017 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2017-10/2017-10-2a.pdf>

April 2018 Commission agenda item 3D – Proposed Preliminary Administrative Services Credential Program Standards Additions:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2018-04/2018-04-3d.pdf>

April 2018 Commission agenda item 3D Insert:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2018-04/2018-04-3d-insert.pdf>

Approval of April 2018 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2018-06/2018-06-2a.pdf>

June 2018 Commission agenda item 4C – Proposed Preliminary Administrative Services Credential Program Standards Additions:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2018-06/2018-06-4c.pdf>

Approval of June 2018 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2018-08/2018-08-1a.pdf>

## **Disclosures Regarding the Proposed Actions**

The Commission has made the following initial determinations:

*Mandate to local agencies or school districts:* None.

*Other non-discretionary costs or savings imposed upon local agencies:* None.

*Cost or savings to any state agency:* None.

*Cost or savings in federal funding to the state:* None.

*Significant effect on housing costs:* None.

*Significant statewide adverse economic impact directly affecting businesses including the ability of California businesses to compete with businesses in other states:* None.

*Cost to any local agency or school district requiring reimbursement under Part 7 (commencing with Section 17500) of the Government Code:* None.

*Cost impacts on a representative private person or business:* The Commission is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

*Statement of the Results of the Economic Impact Assessment [Govt. Code § 11346.5(a)(10)]:* The Commission concludes that it is (1) unlikely that the proposal will create any jobs within the State of California; 2) unlikely that the proposal will eliminate any jobs within the State of California; 3) unlikely that the proposal will create any new businesses within the State of California; 4) unlikely that the proposal will eliminate any existing businesses within the State of California; and 5) unlikely the proposal would cause the expansion of businesses currently doing business within the State of California.

*Benefits of the Proposed Action:* The Commission anticipates that the proposed amendments will increase openness and transparency in government by clarifying the requirement for California and out-of-state prepared administrators and by updating the revision date of the Administrative Services Credential Program Standards incorporated by reference that now include passage of the CalAPA as a requirement for the PASC for individuals who complete Commission-approved preliminary programs. The Commission also anticipates that the proposed amendments will benefit the welfare of students attending public schools in the State of California and their families by assuring administrators will have completed the kind of comprehensive preparation and personal mentoring and support required to be more fully prepared to perform administrative duties in California's public schools.

The Commission does not anticipate that the proposed regulations will result in an increase in the protection of public health and safety, worker safety, or the environment, the prevention of

discrimination, the promotion of fairness or social equity, or an increase in the transparency in business.

*Effect on small businesses:* The proposed regulations will not have a significant adverse economic impact upon business. The proposed regulations apply only to individuals seeking Administrative Services Credentials that authorize service in California's public schools.

### **Notice of Proposed Rulemaking Mailing List and Responses**

#### Mailing List

- Members of the Commission on Teacher Credentialing
- California County Superintendents of Schools
- Credential Analysts at the California County Superintendents of Schools Offices
- Superintendents of Selected California School Districts
- Deans and Directors at the California Institutions of Higher Education with Commission-approved programs
- Credential Analysts at the California Institutions of Higher Education with Commission-approved programs
- Presidents of Selected Professional Educational Associations

Also placed on the Internet at <http://www.ctc.ca.gov>.

#### **Tally of Responses**

As of January 25, 2019 the Commission had received the following written responses to the public announcement:

##### ***Support***

0 organizational opinions

1 personal opinion

##### ***Opposition***

0 organizational opinions

1 personal opinion

##### ***Written Response Representing Individual in Support***

Katy Holloman

##### Comments:

I am eager to hear about the regulation changes regarding out-of-state prepared administrators seeking employment in California. Before moving here from Texas in October 2017, I was an assistant principal for four years and have five years of teaching experience according to Texas standards. I fully expected to sit out the 2017-2018 school year due to my arrival in California mid-year. Immediately upon moving here, I began the process of submitting all required

documents so I could obtain my administrator credential to enter the workforce again for the 2018-2019 school year. Shortly after submitting everything for the credentialing office to review, I received notice that one of my years of teaching service would not be accepted since I did not work 75 percent of that particular school year. I was surprised that the extra year of admin experience under my belt didn't "trump" the year of teaching service I was not receiving credit for.

I inquired about any sort of appeal process or committee who would review extenuating circumstances only to find out that no such thing existed. I was told that my only option would be to enter the classroom and satisfy the year I'm lacking of teaching experience. Again, I have the fifth year but it is not recognized in California since I worked just over half the year, not 75 percent. The reason behind my inability to complete that particular year is because my two-year-old son became extremely sick so I had to very suddenly take a leave of absence, and I ended up having to resign from my position due to his condition worsening. It became so bad that he ended up passing away right before his third birthday. Shortly after that happened, I returned to the classroom and then entered administration the following year where I very successfully served as assistant principal for four years at the elementary level.

When I contacted the credentialing office about my situation, I was very disheartened to learn that the year I left mid-year would not count toward years of service in California. I did the math to find out that I was only lacking roughly 40 days in the classroom to satisfy the 75 percent requirement. I then asked about options for entering the classroom as a long-term substitute in order to gain those 40 days so I could then earn my clear administrative services credential and get back to school leadership where I can use my talents to the fullest capacity. I was told that is not an option since partial years would not count. I was again told that my only option to earn my clear credential would be to go back to the classroom and teach for a year.

I spoke with a Commission staff member in February 2017 who let me know about the possibility that regulations would change later in the year allowing out-of-state administrators to use up to two years of their admin experience toward the five teaching years that are required. I have been anxiously following Coded Correspondence ever since and am eager to hear about this regulation change going into effect.

As I mentioned, I feel my talents are best fit in school leadership and am anxious to get "back to school" in the capacity of principal or assistant principal. It has been a long 1.5 years waiting on this regulation change to go into effect and I feel that California has missed out on the talents I bring to the table as a school leader.

### ***Written Response Representing Individual in Opposition***

Dr. Louis Wildman, Emeritus Professor of Education Leadership, Formerly California State University - Bakersfield

Comments:

1. John Dewey distinguished between "training" and "education. Training occurs when an individual is taught how to respond to a narrow specific set of circumstances. Education involves broader understanding.

Paragraph 3 on page 8 states that "The primary focus of the preliminary administrative services program will be to prepare future leaders for their initial administrative position, with special emphasis on preparation for the position of site administrator, or principal, for a specific school site."

That is narrow vocational training, not appropriate for graduate professional preparation. Further, focusing training on a specific school site is inconsistent with preparing candidates for the "highly variable nature of administrative responsibilities." (p. 12) (*sic – the referenced phrase appears on page 32*).

We should recognize that the model a principal sets has a profound impact on students. The principal sets the tone for a school. If a principal has just been narrowly trained in job procedures, that principalship will likely display a lack of respect for education.

Teachers with 5 years of experience desirous of becoming principals have surely participated in a range of leadership experiences. To give these experienced teachers narrow "how to do it" training rather than graduate education in school law, personnel, governance and politics, education finance, curriculum theory, etc. would be insulting and certainly not education that stresses understanding, which should also pervade the curriculum in PK-12 schools.

The typical preliminary education leadership credential candidate graduates with high ideals. Effort should be made to encourage those graduates to maintain those high ideals, and not "induct" them into maintaining the status quo.

Teacher education faculty frequently remind those supervising student teachers to help the student teacher develop their talents and abilities, and not try to teach them to duplicate their supervisor. Administrator coaches need to follow similar advice.

2. Paragraph 2 on page 11 talks about "powerful" instruction, implying that what will be taught is known with much certainty, whereas the knowledge base in education leadership comprises ideas which are attached to far less than certain propositions.

*The AASA School Administrator* magazine regularly runs a section profiling outstanding school leaders. These leaders differ in their leadership styles.

3. On page 14, the paragraph that starts "Precondition 5," includes a typographical error. The third word from the end of that paragraph should be "an" and not "and."

4. (Re: paragraph 4 on page 15) I agree with the suggestion that program sponsors and the schools, districts, and county offices with which they partner need to understand the mission and goals of their partners.

In the 19th century lawyers and physicians learned by working in law offices and medical clinics. But as the professions have progressed, "town-gown" tensions exist in every profession. With the founding of the land grant universities, farmers typically distrusted the agriculture faculty. In his history of The American College and University, Frederick Rudolph quotes one legislator in South Carolina as saying "[I've never] seen a man who could write a nice essay or make a good agricultural speech who could make corn enough to feed himself and a bob-tailed mule until the first day of March."

In medicine, town-gown tensions rose with the rise of academic stature of clinical science. Full-time medical faculty generally interacted much more closely with academic specialists around the country than with the private practitioners of the local community. And most commonly, medical faculty were hired after nation-wide searches, and not from the local medical society. In education, town-gown tensions have existed since Socrates.

While I believe graduate education leadership faculty and school administrators should develop a supportive relationship, on the other hand, the value of a creative tension between education administration faculty and the profession is desirable. Naturally, school administrators often don't like criticism of current practice, but that is partly the role of university faculty.

When I was a K-12 school administrator, I didn't like criticism either, however, a certain detachment is essential, as too close a relationship would foster a kind of "groupthink" mentality that is not conducive to independent thought. As Francis Allen has said in reference to the field of law, "if ever the law schools and the practicing profession are in perfect accord, it will be because one or the other has capitulated and abdicated its proper functions."

I believe a professor of education leadership should be publicly supportive of local school administrators, but also serve the profession as a loyal critic.

5. Paragraph 2 on page 17 states that "Partners share responsibility for program quality; candidate recruitment, selection, and advisement; curriculum development, delivery of instruction; selection of field sites, design of field experiences; selection, and advisement; curriculum development; delivery of instruction; selection of field sites; design of field experiences; selection and preparation of field experience supervisors; and assessment and verification of candidate competence." University faculty regularly do this, but realistically, where will K-12 administrators get the time to do all of this and still do their jobs?

6. Last sentence on page 17 and top of page 18, speaking about inequitable historical practices and institutional bias: With the current attack on public education, it worries me that most education administration programs do not include a course on the history of education. Without that understanding, graduates are typically unprepared to defend the ideals of public education.

7. In paragraph 1 on page 18, reference is made to "pedagogical approaches that recognize the importance of building on students' strengths ..." I was pleased to see that statement, because on the one hand, we want students to learn certain pre-specified objectives, and on the other hand, we want to develop student talents, abilities, creativity, and strengths. Both of these sides of education are important. Competency-based education is just part of education. I hope recognition of the two sides of education is not contradicted by the following sentence on page 33: "Leaders guide and support the implementation of standards-based curriculum, instruction, and assessments that address student expectations and outcomes."

8. In paragraph 2 on page 25, I read that "job-embedded professional development replaces a more traditional approach where learning is more theoretical and occurs in the college classroom." This statement goes along with the often heard partial truth that one can't learn to swim or ride a bicycle by reading a book.

On the other hand, one can't concentrate when they are busy. An emergency room physician can't learn needed treatments in the midst of an emergency.

Earlier today I was trying to read a newspaper article to my wife while she was following a complicated recipe. She wanted to hear what I was reading, but she asked me to wait until later to read the article to her, as she couldn't concentrate on her cooking and still listen to me.

If you have been a school principal, you know that a principal's work day is often like working in a hospital emergency room. My point is that there is a need for "job-embedded" learning, but there is also a need for in-depth study in a college classroom. The variety of real-world administrative experience a candidate can obtain, even in a full-year internship, is inherently limited. It is usually much easier to progress from an acquaintance with the structure of a field of study (such as school law) to specific applications, than to try and deduce the structure of a field of study from a few cases.

As I have already suggested above, if we want to improve student achievement, administrative candidates must study, and not look to Trump's model--a disorganized leader jumping from "pillar to post," constantly running about, trying to learn on the fly, and not studying. Such a principal is not a good model for students.

9. "Partnership agreements" are defined on Page 36. Recently the Wallace Foundation sponsored a panel discussion in which they talked about telling students that every class, often taught by a local school district administrator, was a "job-interview." Can you imagine sitting in

such a class, needing to concentrate more on giving positive feedback to your supervisor/instructor to become eligible for a future administrative position, than on thinking about the course content"? That kind of training is called "indoctrination."

*Response:*

*Dr. Wildman's comments are all related to the previous version of the Administrative Services Credential Program Standards document with the June 2014 revision date. There are no amendments proposed by the Commission to any of the language or sections referenced in Dr. Wildman's comments. The written comment period for the amendments that updated the program standards to the June 2014 revision date closed on April 20, 2015 and the public hearing was held on April 24, 2015. The proposed amendments were approved by the Office of Administrative Law (OAL) and filed with the Secretary of State on July 20, 2015 (reference OAL Regulatory Action Number 2015-0609-03S). With the exception of Comment #3, Dr. Wildman's comments are summarily dismissed as irrelevant pursuant to subsection (a)(3) of Government Code section 11346.9 as they are not specifically directed at the Commission's proposed action or the procedures followed by the Commission in proposing or adopting the action.*

*Although included in the amendments approved by OAL in July 2015, the referenced typographical error will be corrected and noted in the Final Statement of Reasons (reference Title 1 of the CCR section 100).*

#### **Staff Recommendation**

Staff recommends that the Commission adopt the proposed regulations pertaining to Administrative Services Credentials.

### **CALIFORNIA CODE OF REGULATIONS TITLE 5. EDUCATION DIVISION 8. COMMISSION ON TEACHER CREDENTIALING**

#### **§ 80054. Services Credential with a Specialization in Administrative Services; Requirements for California-Prepared Candidates.**

- (a) The minimum requirements for the preliminary Administrative Services Credential include (1) through (7).
- (1) One of the following:
- (A) a valid clear or life California teaching credential that requires a baccalaureate degree and a program of professional preparation, including student teaching or the equivalent; or
  - (B) a valid clear or life California designated subjects teaching credential in adult education, career technical education, vocational education or special subjects, provided the applicant also possesses a baccalaureate degree; or
  - (C) a valid clear or life California services credential in pupil personnel services, health services for school nurse, teacher librarian services, or speech-language pathology or clinical or rehabilitative services requiring a baccalaureate degree and a program of professional preparation, including field work or the equivalent;

- (2) Completion of one of the following:
    - (A) a specialized and professional preliminary preparation program in administrative services based on the *Administrative Services Credential Program Standards* (rev. 6/20148) available on the Commission's website and hereby incorporated by reference taken in California and accredited by the Committee on Accreditation; or
    - (B) intern program in administrative services based on the *Administrative Services Credential Program Standards* (rev. 6/20148) available on the Commission's website and hereby incorporated by reference and accredited by the Committee on Accreditation; or
    - (C) Successfully pass an examination adopted by the commission that is aligned to the *Administrative Services Credential Program Standards* (rev. 6/20148) identified in subsections (A) and (B).
  - (3) Meet the basic skills requirement as described in Education Code section 44252(b), unless exempt by statute;
  - (4) Verification of one of the following as defined in (g)(2)(A):
    - (A) five years of successful, full-time teaching experience at a public school or private school of equivalent status located in California and/or another state;
    - (B) five years of successful, full-time experience in the fields of pupil personnel, school nurse, teacher librarian, or speech-language pathology or clinical or rehabilitative services at a public school or private school of equivalent status located in California and/or another state; or
    - (C) a combination of (A) and (B) equal to five years;
  - (5) For an individual who completes a program as specified in subsection (a)(2)(A) or (a)(2)(B), verification of completion from a Commission-approved program as specified in section 44227(b) and accredited by the Committee on Accreditation as provided in Education Code section 44373(c). An individual who passes an examination as specified in subsection (a)(2)(C) may submit an application directly to the Commission;
  - (6) Submission of an application form as defined in section 80001(b)(2) and the application fee as specified in section 80487(a)(1); and
  - (7) Verification of an offer of employment in a full- or part-time administrative position in an employing agency as defined in subsection (g)(1).
  - (8) An individual who has completed requirements (1) through (6) but does not have an offer of employment as specified in (7) shall apply for a Certificate of Eligibility which verifies completion of all requirements for the preliminary Administrative Services Credential and allows the holder to seek employment.
- (b) A Preliminary Administrative Services Credential issued on the basis of the completion of all the requirements in subsection (a) shall be dated as follows:
- (1) If the prerequisite teaching or services credential listed in (a)(1) is valid for five years or less from the issuance date of the preliminary Administrative Services Credential, the preliminary credential shall be valid from the issuance date established in section 80440 and will expire on the expiration date of the basic teaching credential as established in section 80493**(b)**.
  - (2) If the prerequisite teaching or services credential listed in (a)(1) is valid for more than five years from the issuance date of the preliminary Administrative Services Credential, the preliminary

credential shall be valid for five years from the issuance date established in section 80440 and will expire the first day of the following month as established in section 80493(b).

- (c) A preliminary Administrative Services Credential authorizes the services specified in section 80054.5.
- (d) The minimum requirements for the clear Administrative Services Credential shall include (1) through (6):
  - (1) Possession of a valid preliminary administrative services credential;
  - (2) Possession of a valid teaching or services credential as specified in (a)(1);
  - (3) Verification of two years of successful experience in a full-time administrative position as defined in subsection (g)(2)(B) with an employing agency as defined in subsection (g)(1) while holding the preliminary administrative services credential;
  - (4) Completion of one of the following:
    - (A) ~~an individualized clear induction program of advanced administrative services preparation~~ based on the *Administrative Services Credential Program Standards* (rev. ~~6/2014~~8) available on the Commission's website and hereby incorporated by reference accredited by the Committee on Accreditation provided in Education Code section 44373(c) designed in cooperation with the employing agency and the Commission-approved preparation program; or
    - (B) demonstrate mastery of Commission-accredited fieldwork performance standards for the clear administrative services credential pursuant to Education Code section 44270.5(b)(2); or
    - (C) pass a national administrator performance assessment adopted by the Commission;
  - (5) For an individual who completes the program specified in (d)(4)(A) or demonstrates mastery as specified in (d)(4)(B), verification of completion from a Commission-approved program as specified in section 44227(b) and accredited by the Committee on Accreditation as provided in Education Code section 44373(c). An individual who passes an assessment as specified in subsection (d)(4)(C) may submit an application directly to the Commission; and
  - (6) Submission of an application form as defined in section 80001(b)(2) and the application fee as specified in section 80487(a)(1).
- (e) A clear Administrative Services Credential issued on the basis of the completion of all requirements in subsection (d) shall be dated as follows:
  - (1) If the prerequisite teaching or services credential listed in (a)(1) is valid for five years or less from the issuance date of the clear Administrative Services Credential, the clear credential shall be valid from the issuance date established in section 80440 and will expire on the expiration date of the basic teaching credential as established in section 80493(b).
  - (2) If the prerequisite teaching or services credential listed in (a)(1) is valid for more than five years from the issuance date of the clear Administrative Services Credential, the clear credential shall be valid for five years from the issuance date established in section 80440 and will expire the first day of the following month as established in section 80493(b).
- (f) A clear Administrative Services Credential authorizes the services specified in section 80054.5.
- (g) Definitions:
  - (1) The term "employing agency" as used in this section shall mean:
    - (A) public school districts in California.

- (B) county offices of education or county superintendents of schools in California.
  - (C) schools that operate under the direction of a California state agency.
  - (D) California Nonpublic, Nonsectarian Schools and Agencies as defined in Education Code sections 56365 and 56366.
  - (E) California Charter Schools as ~~established~~ defined in Education Code section 476005.
  - (F) California Private Schools of equivalent status.
  - (G) California Juvenile Court Schools.
  - (H) California Juvenile or Adult Corrections.
- (2) The term 'full-time experience' as used in this section shall mean:
- (A) Full-Time Teaching or Services Experience: This is defined as teaching or employment in one or more of the services fields specified in subsection (a)(4)(B) for a minimum of four hours a day, unless the minimum statutory attendance requirement for the students served is less. Experience must be on a daily basis and for at least 75% of the school year. Experience may be accrued in increments of a minimum of one semester. No part-time employment will be accepted. Only teaching experience and experience in one or more of the services fields specified in subsection (a)(4)(B) may be combined. Experience earned outside California must be verified on the official letterhead of the out-of-state employer or employers by the superintendent, assistant superintendent, director of personnel, or director of human resources by which the individual was employed. Experience from outside the United States will not be considered.
  - (B) Full-Time Administrative Experience: This is defined as serving as an administrator a minimum of four hours a day, unless the minimum statutory attendance requirement for the students served is less. Experience must be on a daily basis and for at least 75% of the school year. Experience may be accrued in increments of a minimum of one semester. No part-time or combination of administrative service with other school employment will be accepted.
- (3) The term 'state' as used in this section means a state, territory, or possession of the United States, the District of Columbia, or the Commonwealth of Puerto Rico.

Note: Authority cited: Section 44225, Education Code. Reference: Sections 44065, 44227(b), 44252(b), 44265.3, 44260.1, 44269, 44270, 44270.1, 44270.5, 44372, 44373, 56365 and 56366, Education Code.

**§ 80054.1. Services Credential with a Specialization in Administrative Services; Requirements for Candidates Prepared Outside California.**

- (a) The minimum requirements for the preliminary Administrative Services Credential for individuals with five years of full-time teaching experience earned in another state are (1) through (7):
- (1) A baccalaureate degree or a higher degree from a regionally-accredited college or university;
  - (2) Completion of a teacher preparation program taken at a regionally-accredited college or university located in another state or approved by another state and completed through a local educational agency;
  - (3) Possession of a professional-level teaching credential issued by another state as defined in section 80413.3(c)(5) for a general education credential or section 80048.3.1(c)(5) for a special education credential;

- (4) Verification of five years of successful, full-time experience teaching at a public school or private school of equivalent status located in another state;
  - (5) Completion of an administrator preparation program at a regionally-accredited college or university located in another state and possession of or eligibility for an administrative services credential in another state;
  - (6) Submission of an application form as defined in section 80001(b)(2); the application fee as specified in section 80487(a)(1); and fingerprint clearance as specified in section 80442; and
  - (7) Satisfy California's basic skills requirement as specified in Education Code section 44252(b).
  - (8) An individual who satisfies requirements (a)(1) through (a)(6), but has not satisfied the basic skills requirement listed in (a)(7) may apply for a one-year nonrenewable credential through a California public school employer or county office of education, as provided in Education Code section 44252(b)(4).
  - (9) A preliminary Administrative Services Credential issued on the basis of completion of requirements (a)(1) through (a)(7) shall be valid for five years from the issuance date established in section 80440 and will expire the first day of the following month as established in section 80493(a).
- (b) The minimum requirements for the preliminary Administrative Services Credential for individuals with less than five years of full-time teaching experience earned in another state are (1) through (6):
- (1) One of the following:
    - (A) A valid clear or life California teaching credential that requires a baccalaureate degree or a higher degree from a regionally-accredited college or university and a program or professional preparation, including student teaching or the equivalent; or
    - (B) A valid clear or life California designated subjects teaching credential in adult education, career technical education, vocational education or special subjects as specified, provided the applicant also possesses a baccalaureate degree or a higher degree from a regionally-accredited college or university; or
    - (C) A valid clear or life California services credential in pupil personnel services, health services for school nurse, teacher librarian services, or speech-language pathology or clinical or rehabilitative services requiring a baccalaureate degree or a higher degree from a regionally-accredited college or university and a program of professional preparation, including field work or the equivalent;
  - (2) Verification of one of the following:
    - (A) Five years of successful, full-time experience teaching at a public school or private school of equivalent status located in California and/or another state;
    - (B) Five years of successful, full-time experience in the fields of pupil personnel, school nurse, teacher librarian, or speech-language pathology or clinical or rehabilitative services at a public school or private school of equivalent status located in California and/or another state;
    - (C) A combination of (A) and (B) equal to five years.
  - (3) Completion of an administrator preparation program at a regionally-accredited college or university located in another state and possession of or eligibility for an administrative services credential in another state;

- (4) Submission of an application form as defined in section 80001(b)(2) and the application fee as specified in section 80487(a)(1);
- (5) Verification of an offer of employment in a full- or part-time administrative position from an employing agency as defined in section 80054(g)(1); and
- (6) Satisfy California's basic skills requirement as specified in Education Code section 44252(b).
- (7) An individual who satisfies requirements (b)(1) through (b)(5), but has not satisfied the basic skills requirement listed in (b)(6) may apply for a one-year nonrenewable credential through a California public school employer or county office of education, as provided in Education Code section 44252(b)(4).
- (8) An individual who satisfies requirements (b)(1) through (b)(4) and (b)(6), but does not have an offer of employment as specified in (b)(5), shall apply for a Certificate of Eligibility which verifies completion of all requirements for the preliminary Administrative Services Credential and allows the holder to seek employment.
- (9) A preliminary Administrative Services Credential issued on the basis of completion of requirements (b)(1) through (b)(6) shall be dated as follows:
  - (A) If the prerequisite teaching or services credential listed in (b)(1) is valid for five years or less from the issuance date of the preliminary Administrative Services Credential, the preliminary credential shall be valid from the issuance date established in section 80440 and will expire on the expiration date of the prerequisite credential as established in section 80493(b).
  - (B) If the prerequisite teaching or services credential listed in (b)(1) is valid for more than five years from the issuance date of the preliminary Administrative Services Credential, the preliminary credential shall be valid for five years from the issuance date establish in section 80440 and will expire the first day of the following month as established in section 80493(b).
- (c) The minimum requirements for the clear Administrative Services Credential for individuals who qualify on the basis of subsection (a) or (b) are:
  - (1) Possession of a valid preliminary administrative services credential;
  - (2) For individuals who qualify via subsection (b), possession of a valid teaching or services credential as specified in (b)(1);
  - (3) Verification of two years of successful, full-time administrative experience with an employing agency as defined in section 80054(g)(1) earned while holding the preliminary administrative services credential;
  - (4) Completion of one of the options provided in subsection (d)(~~34~~)(A), (d)(~~34~~)(B), or (d)(~~34~~)(C) of section 80054;
  - (5) A completed application form as specified in section 80001(b)(2) and the application fee specified in section 80487(a)(1); and
  - (6) For an individual who completes a program as specified in subsection (d)(~~34~~)(A) or (d)(~~34~~)(B) of section 80054, verification of completion from a Commission-approved program as specified in Education Code section 44227(b) and accredited by the Committee on Accreditation as provided in Education Code section 44373(c). An individual who passes the assessment specified in subsection (d)(~~34~~)(C) of section 80054 may apply directly to the Commission.

- (7) A clear Administrative Services Credential issued on the basis of completion of requirements (c)(1) through (c)(5) shall be dated as follows:
- (A) For an individual who qualified for the preliminary Administrative Services Credential on the basis of completion of the requirements specified in subsections (a)(1) through (a)(7), the clear credential shall be valid for five years from the issuance date established in section 80440 and will expire the first day of the following month as established in section 80493(a).
  - (B) For an individual who qualified for the preliminary Administrative Services Credential on the basis of completion of the requirement specified in subsections (b)(1) through (b)(6), the clear credential shall be dated as follows:
    - 1. If the prerequisite teaching or services credential listed in (b)(1) is valid for five years or less from the issuance date of the clear Administrative Services Credential, the clear credential shall be valid from the issuance date established in section 80440 and will expire on the expiration date of the prerequisite credential as established in section 80493(b).
    - 2. If the prerequisite teaching or services credential listed in (b)(1) is valid for more than five years from the issuance date of the clear Administrative Services Credential, the clear credential shall be valid for five years from the issuance date established in section 80440 and will expire the first day of the following month as established in section 80493(b).
- (d) The minimum requirements for the clear Administrative Services Credential for individuals with out-of-state teaching and administrative experience are:
- (1) A baccalaureate degree or a higher degree from a regionally-accredited college or university;
  - (2) Completion of a teacher preparation program taken at a regionally-accredited college or university located in another state or approved by another state and completed through a local educational agency;
  - (3) Possession of a professional-level teaching credential issued by another state as defined in section 80413.3(c)(5) for a general education credential or section 80048.3.1(c)(5) for a special education credential;
  - (4) Verification of five years of successful, full-time experience teaching at a public school or private school of equivalent status located in another state;
  - (5) Completion of an administrator preparation program at a regionally-accredited college or university located in another state and possession of ~~or eligibility for~~ an administrative services credential in another state;
  - (6) Verification of three years of successful, full-time experience in an administrative position at a public or regionally-accredited private school located in another state or successfully completed an individual program of professional development that included intensive mentoring, assistance, and support as certified by the employing school district;
  - (7) Performance evaluations from the last two years of the verified out-of-state administrative experience;
  - (8) Submission of an application form as defined in section 80001(b)(2); the application fee as specified in section 80487(a)(1); and fingerprint clearance as specified in section 80442; and
  - (9) Satisfy California's basic skills requirement as specified in Education Code section 44252(b).

- (10) An individual who satisfies requirements (d)(1) through (d)(8), but has not satisfied the basic skills requirement listed in (d)(9) may apply for a one-year nonrenewable credential through a California public school employer or county office of education, as provided in Education Code section 44252(b)(4).
- (11) A clear Administrative Services Credential issued on the basis of completion of the requirements (d)(1) through (d)(9) shall be valid for five years from the issuance date established in section 80440 and will expire the first day of the following month as established in section 80493(a).
- (e) An Administrative Services Credential issued pursuant to this section authorizes the services specified in section 80054.5.
- (f) The following definitions apply to the terms used in this section:
- (1) 'Full-time teaching or services experience' shall mean a minimum of four hours a day, unless the minimum statutory attendance requirement for the students served is less. Experience must be on a daily basis and for at least 75% of the school year. Experience may be accrued in increments of a minimum of one semester. No part-time employment will be accepted. ~~Teaching experience may not be combined with other school employment to satisfy (a)(4) or (d)(4). Teaching experience and experience in one or more of the services fields specified in subsection (b)(2)(B) may be combined to satisfy (b)(2).~~ Up to two years of successful, full-time experience in an administrative position at a public or regionally-accredited private school located in another state as defined in (f)(2) may be combined with teaching experience to satisfy (a)(4) or (d)(4), or may be combined with teaching experience and/or experience in one or more of the services fields specified in (b)(2)(B) to satisfy (b)(2). Administrative experience accepted to satisfy the teaching experience requirement in (a)(4) or (d)(4) shall be excluded from the administrative experience requirement in (d)(6). Experience earned outside California must be verified on the official letterhead of the out-of-state employer or employers by the superintendent, assistant superintendent, director of personnel, or director of human resources by which the individual was employed. Experience from outside the United States will not be considered.
  - (2) 'Full-time administrative experience' as used in (d) shall mean serving as an administrator a minimum of four hours a day, unless the minimum statutory attendance requirement for the students served is less. Experience must be on a daily basis and for at least 75% of the school year. Experience may be accrued in increments of a minimum of one semester. No part-time or combination of administrative service with other school employment will be accepted. Experience earned outside California must be verified on the official letterhead of the out-of-state employer or employers by the superintendent, assistant superintendent, director of personnel, or director of human resources by which the individual was employed. Experience from outside the United States will not be considered.
  - (3) The term 'state' as used in this section means a state, territory or possession of the United States, the District of Columbia, or the Commonwealth of Puerto Rico.
  - (4) Performance evaluations:
    - (A) The effectiveness areas on the performance evaluations must include, but are not limited to, all of the areas, 1. through 4., below. If these areas are not included in the evaluations,

the individual may submit a supplemental letter on the employer's letterhead and signed by the superintendent or his/her designee.

1. Demonstration of leadership skills;
2. Verification of leadership in program implementation and instructional practices;
3. Implementation of effective procedures for smooth operations of the school; and
4. Evidence of self-motivation, continuous professional development, and the updating of skills in administration.

(B) Performance evaluation ratings must be satisfactory or better.

Note: Authority cited: Section 44225, Education Code. Reference: Sections 44227(b), 44252(b), 44270, 44270.1, 44270.3, 44270.4, 44270.5, 44372, 44373, 47605, 56365 and 56366, Education Code.