



April 16, 2020

Dr. Tine Sloan, Commission Chair
The Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento, CA 95811

RE: April CTC Meeting Agenda Items 3A and 4A

Dear Chair Sloan and Commission Members:

Firstly, we hope you and your families are staying healthy!

On behalf of the EdVoice Board of Directors, I write regarding the Commission's consideration of proposed actions to assist current and future California teachers impacted by COVID-19 conditions and related school and institutional closures and social distance requirements.

Item 3A—Candidates Meeting Minimum Requirements

All teacher candidate assessments, including the basic skills requirement, serve as consumer protection for the millions of California students and families. Nonetheless, the current COVID-19 circumstance presents challenges for each candidate to objectively demonstrate they have met a uniform minimum competency and performance requirement. Therefore, EdVoice supports the Commission moving forward with deferrals, *but not permanent waivers*, of the CBEST and other examination requirements. With respect to the CBEST, the item background material appropriately notes the authority and requirements of Education Code 44252.8 that provide “any person granted a deferral pursuant to this section shall take the state basic skills proficiency test at the next available opportunity, or the deferral shall terminate.” We believe it is reasonable for the Commission to require that all candidates pass the CBEST in an appropriate timeframe as exam modalities and COVID-19 social distancing rules permit. This is particularly important for the basic skills requirement, which serves as the only floor for minimum competency for a range of permits and waivers.

Items 3A and 4A—Taskforce on Clear Credential Requirements

EdVoice concurs with the Commission's consideration of COVID-19 conditions as “good cause” in offering extensions for induction and clearing credentials, particularly for preliminary credential holders. Further, we recommend the Commission take this moment to consider deeply the clear credential requirements moving forward. Evidence suggests there could be unintended and truly unnecessary structural barriers exacerbating the California teacher shortage even before the COVID-19 pandemic.

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While research shows that high-quality mentoring is critical for improving teacher effectiveness, it is not known whether the many permutations of induction programs across the state are still achieving the intended results. California data demonstrate that clear credential requirements are correlated with, if not outright creating, barriers to remaining in the teaching profession. Most beginning teachers leave the profession without clearing their credentials. According to CTC data of a single cohort that is not an outlier, only 710 early career teachers cleared their credentials in 2017-18. This represents less than five percent of the 15,669 candidates who earned preliminary credentials in 2015-16, two years earlier.

Teachers clear their credentials through an induction program provided by their district, county office of education, or as a result of obtaining a master's degree. While some induction programs are provided at low to zero cost, many districts charge more than \$2,500, and the master's degree option costs even more. Direct costs do not include the opportunity cost of time and other moonlighting income often needed for teacher candidates trying to live near the schools where they teach. Because many California districts will have fewer resources to subsidize induction in the coming years, we believe the Commission should convene a task force to reconsider the relevance and appropriateness of all clear credentialing requirements.

Thank you for your consideration of these comments. If you have any questions regarding our input on these items, please do not hesitate to contact me directly.

Stay well!

Respectfully,



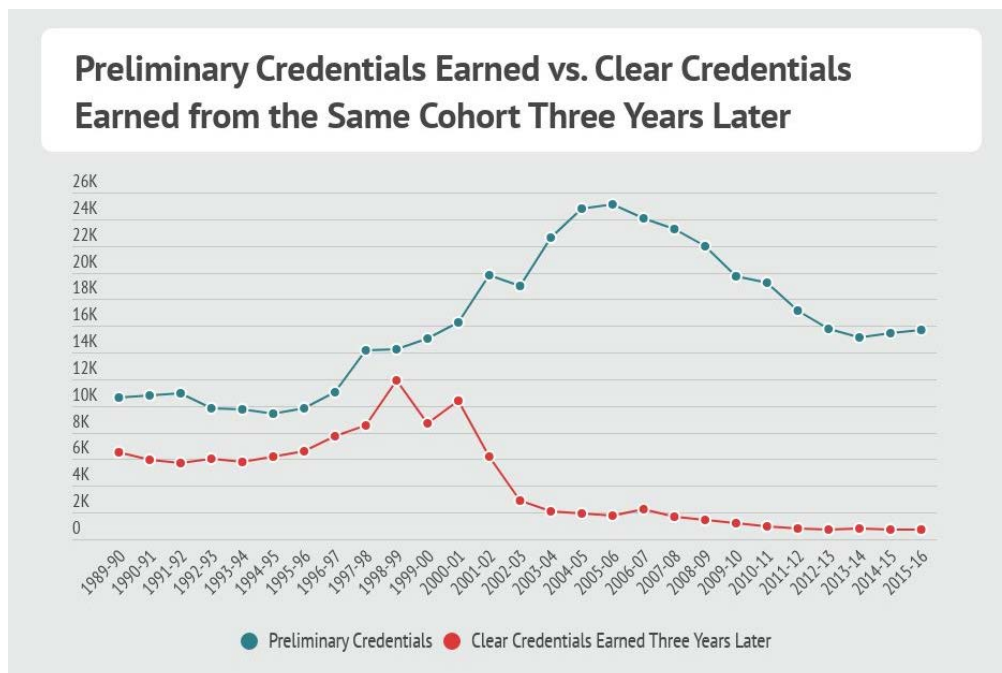
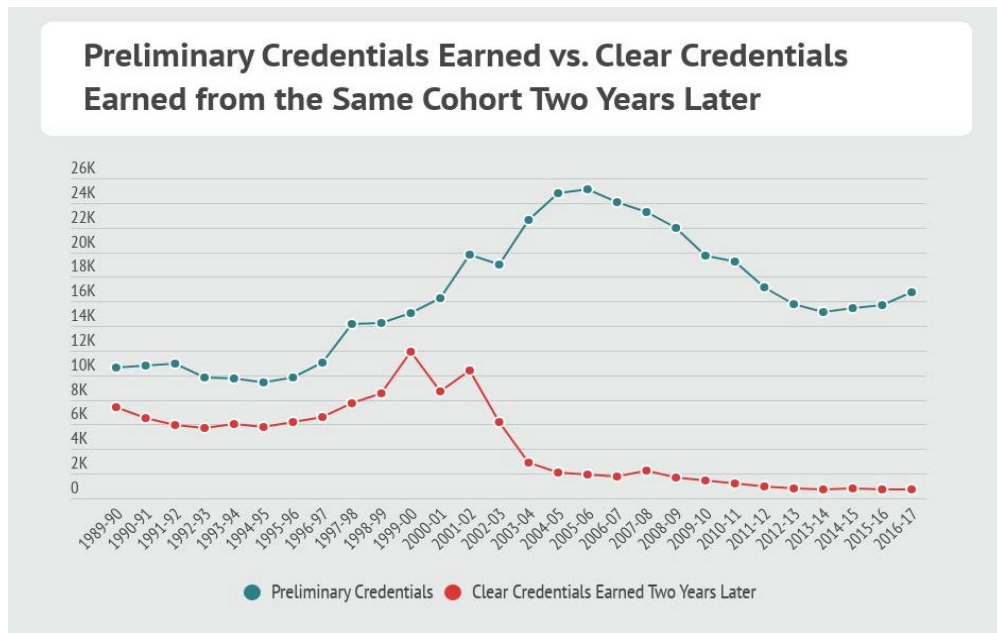
Bill Lucia
President

Cc: Members, Commission on Teacher Credentialing

Addendum to April 16, 2020 EdVoice letter on Agenda Items 3A & 4A

California’s Growing Teacher Retention Problem—Is it Structural?

Clear credential requirements appear to be correlated to obstacle(s) in retention. Thousands of new teachers earn “preliminary” credentials every year in California. Relatively few go on to “clear” their credentials (see charts below).





April 17, 2020

The Honorable Governor Gavin Newsom
Governor, State of California
State Capitol
Sacramento, CA 95814

Dear Governor Newsom:

On behalf of the California Association of Professors of Educational Administration (CAPEA), which represents members of universities that prepare Preliminary and Professional Administrative Services Credential (PASC) candidates across the state, we are writing to express our appreciation for your swift response to the COVID-19 pandemic. Your leadership has been an example for the nation, world and our students. The executive orders to shelter in place, and suspension of state testing for K-12 students send a powerful message about student well-being in these unprecedented times leading to pandemic trauma. Following your lead, the UC and CSU systems have suspended the SAT as a requirement for admission. Thereby, the state's students are not burdened by standardized tests and can focus on remote learning for the duration of the school year.

While testing K-12 students who apply to the state's public universities has been suspended, our state's preliminary administrative services (PASC) credential students have not received equal consideration. PASC candidates are currently employed as teachers, counselors, and teachers on special assignments. They are expected to teach their classes remotely, supervise their own children's learning, complete their credentialing classes remotely, and submit the three California Administrator Performance Assessment (CalAPA) Leadership Cycles.

The CTC strategic goal for Program Quality and Accountability is to, "Develop and maintain rigorous, meaningful, and relevant standards that drive program quality and effectiveness for the preparation of the education workforce and are responsive to the needs of California's diverse student population". The CalAPA cycles are in conflict with the leadership actions required to address the immediate and foreseeable needs of students, families, and school communities. In alignment with the CTC strategic goal, PASC programs are focusing their efforts on supporting candidates in serving school communities through the uncertainties ahead in the next several months, including provisions of food, social-emotional support, and access to distance learning.

We have been advised that CTC intends to propose a "Variable Term Waiver" for the CalAPA at the April 23 Commission Meeting. While recognizing the proposed **CTC Action Item (3A)** is designed as an accommodation that falls within the commission's authority, **CAPEA cannot support a Variable Term Waiver for the CalAPA given the inequities it creates.** The proposed CalAPA Variable Term Waiver does not address the serious equity issues that our PASC candidates are currently confronting during these unprecedented times.

To address the immediate-term needs for pre-service educational leaders (PASC candidates), we recommend the following Executive Order for your consideration:

1. Suspend the incomplete CalAPA cycles for candidates who will complete their PASC programs by Spring and Summer 2020.
 - The PASC Candidates who would be affected by this one-time suspension are candidates who are in good standing in their required coursework and fieldwork.
 - They have made appropriate progress towards completion of their program requirements.
 - They are on track to complete their preparation programs by Spring and Summer 2020.
 - They are unable to complete the CalAPA required by the CTC for program completion due to COVID 19.
 - Despite the closure of K-12 schools and inability of PASC candidates to complete all of the work for the CalAPA, preparation programs continue to provide the coursework and fieldwork coaching aligned with the California Administrative Performance Expectations that prepare leadership candidates for their first position.
2. The closure of K-12 schools and implementation of online instruction until the end of the K-12 school year create inequities for PASC candidates who are unable to complete the CalAPA using the proposed terms of the Variable Term Waiver (VTW).
 - Many PASC candidates are no longer able to access the personnel and students needed to complete the CalAPA Leadership Cycles.
 - Many PASC candidates have taken on the additional responsibility of caregiving due to the closure of childcare centers, and the scarcity of support for seniors and the medically vulnerable.
 - The study spaces that once enabled PASC candidates to complete the CalAPA tasks while working as full-time educators are no longer available.
 - Many PASC candidates do not have access to the technologies necessary to complete the CalAPA, such as computers, laptops, cameras, and Wi-Fi which they previously accessed through their schools, districts, universities and other public spaces.
3. Prior to the implementation of CalAPA (2018-19), the California Commission on Teacher Credentialing (CTC) authorized accredited programs to verify a candidate's completion of the requirements for the preliminary administrative services credential. We recommend a return to this practice for PASC candidates who will complete their credential requirements in Spring and Summer 2020.
4. In addition to the costs to the candidates, the Variable Term Waiver imposes an unfunded mandate to CTC's credentialing partners who will bear the additional expense of supporting both candidates who are completing the terms of the VTW and new candidates for the PASC.

We agree with the following key points elaborated in the letter you received from Program Directors PLI Nancy Parachini (UCLA) and Rebecca Cheung (UC Berkeley).

- We recommend that the CTC does NOT extend the preliminary ASC completion period into induction. Different than in teacher education, the ASC credentialing process has the Certificate of Eligibility. We believe that a process involving the Certificate should be used in the VTW process. As you are aware, most Preliminary candidates in California do not find administrative employment immediately upon completion of a program. Therefore, adding extra support to the Clear credential programs would not be an appropriate place to extend support. Rather, it

would compromise the intent of the induction model which is to provide early career induction support for practicing administrators. Furthermore, many approved Clear ASC programs are not connected institutionally to Preliminary ASC programs. Therefore, mandating extra support in Clear programs may cause additional strain on programs as far as capacity and expertise.

- In addition to their preliminary program, ASC candidates are also responsible for personally bearing the full expense for Clear programs- a cost that can be up to \$10,000 over two years. We know that CTC leadership is proactively advocating for funding support because we share this common concern. We want to emphasize the importance of mitigating any additional costs associated with licensure including fees, additional CalAPA submission, or program costs due to new policies.

As partners in the preparation of California's educational leaders, we look forward to continuing our work with CTC staff on a humanizing approach to ensure our candidates for the preliminary administrative services credential are empowered to lead the state's schools in fall 2020 without the additional burden of completing the CalAPA Cycles in these unprecedented times. We request the CalAPA requirement be suspended for Spring and Summer 2020 PASC program graduates. We recommend a return to the practice of CTC accredited programs being authorized to recommend candidates who will complete their credential coursework and fieldwork in Spring and Summer 2020. Please feel free to contact Dr. Becky Sumbera or Dr. Ardella Dailey if you would like to discuss this further. Thank you in advance for your consideration of this consequential matter.

Sincerely,



Becky Sumbera, Ed.D.
CAPEA President



Ardella Dailey, Ed.D.
CAPEA President-Elect

Cc:

Hon. Tony Thurmond, Superintendent of Public Instruction
Linda Darling-Hammond, President, State Board of Education
Ben Chida, Chief Deputy Cabinet Secretary, Governor's Office
Karen Stapf Walters, Executive Director, State Board of Education
Sarah Neville-Morgan, Deputy Superintendent of Public Instruction
Giannina Perez, Senior Advisor, Governor's Office
Lande Ajose, Senior Advisor, Governor's Office
Mary Vixie Sandy, Executive Director, California Commission on Teacher Credentialing
Tine Sloan, Chair, California Commission on Teacher Credentialing

From: [Tammra Detviler](#)
To: [execoffice](#)
Cc: [Tammra Detviler](#)
Subject: Action Item 3A of April Board Meeting
Date: Monday, April 13, 2020 2:47:17 PM

Mr. K. Kung, Committe Chair

I am writing to express my concerns over the CalAPA for the 2019-2020 school year due to the COVID-19 pandemic. I am currently enrolled in the Administrative Credential program with Cal Poly Pomona and have already submitted and passed my CalAPA cycle 1. As you may be aware there are detailed specifications for the tasks related to CalAPA. Due to schools being closed for the duration of the school year this now presents many new challenges.

When doing the required data analysis for CalAPA Cycle 1 each individual was to collect data related to California state indicators. Through this collection and analysis of data identify an equity pattern to investigate a structural factor further that may be contributing to the equity gap for the identified group of students. Once a problem of practice is identified, leading into Cycle 2 candidates are to work through a collaborative professional learning group with educators at our site. Once we determine an agreed upon area of education focus then work to address the problem of practice. This is to involve multiple meetings with agendas, minutes, group work progress and early results with the identified group of students which are to be videotaped. This can not be done with schools closed and moving to an online distance enrichment programs that most districts have now put in place, mine included.

There are portions of Cycle 2 which can be done but certainly not the entire process because we are unable to access these groups of students as a whole. I suggest that candidates be provided the opportunity to do Step 1 and Step 2 of Cycle 2 and reflect on parts that may have been addressed or implemented as a trial prior to the officially beginning of Cycle 2. The videoing of meetings in order for all members to be viewed and determine if the candidate is able to use adult learning strategies will be very different and difficult in the current change of practice for our schools.

Cycle 3 should be able to be accomplished with a few adjustments including the fact that these meetings will be conducted via an online format and not the typical face to face where teachers are able to show items to help in the discussion of the post evaluation.

Cal Poly Pomona has been doing their best to provide us with support and guidance since the March 13, 2020 closing of all school sites and even the college programs. We have been completing an intense program with Field Work that has given us the opportunity to learn and grow as potential administrators. My current school site has four administrators who have been on the job less than one year and most are brand new administrators with less than four years experience. They have viewed my fieldwork manual and am shocked at the type of learning we have been expected to do because they have not had a

similar experience. They feel that Cal Poly Pomona is doing an exceptional job at training us for the job of administration. The guiding principle to determining if candidates are prepared to be an administrator should rely on the preparation that Cal Poly has provided to its candidates.

I choose to affiliate myself with a university program in order to learn the most about being an administrator from those who have done so already. I have learned so much in the last seven months of class meetings and nine months of doing field work and CalAPA cycle 1. I know that I could have just taken the CPACE and/or a program through a county department of education and not been required to do this additional work. I believe one part of developing the educators to be competent administrators has been the learning occurring in our cohorts with Cal Poly.

Furthermore, the Variable Term Waiver will create undue financial burdens on candidates who will need to be enrolled with their college or university program in order to continue to be supervised and to complete these cycles of inquiry during the 2020-2021 school year.

I understand that the completion of the CalAPA is required by regulation for all preliminary administrator candidates but know that the commission along with the governor's office have the ability to change this regulation for this year.

Thank you for allowing me to express my thoughts.--
Tammra Dettviler-Velarde

From: [Dover, Alison](#)
To: [execoffice](#)
Subject: WRITTEN COMMENT ON ITEMS 3A AND 4A AT CTC GENERAL MEETING APRIL 23, 2020
Date: Friday, April 17, 2020 3:08:47 PM

Dear Members of the California Commission on Teacher Credentialing,

As you are aware, COVID-19 has led to significant interruption of teacher candidates' ability to access the coursework, advising, and student teaching experiences necessary to successfully navigate standardized, externally administered credentialing assessments (such as CalTPA). Moreover, dramatic differences in school and university responses to COVID-19 render any equitable implementation of high-stakes standardized credentialing assessments impossible. I greatly appreciate the staff recommendations listed in *3A Consideration of Actions to Assist Applicants, Educators and Credential Candidates Impacted by the Emergency Health and Safety Conditions Related to the Covid 19* and ask that these be approved. I also ask for approval of all modifications suggested by the staff in *4A Action Flexibility for Commission-Approved Educator Preparation Programs Due to the Covid 19*, and specifically those modifications which leave the decisions in the hands of the commission approved educator/administrator/specialist preparation programs.

While these are important steps in responding to the crisis of COVID-19, additional action is necessary. In recent weeks, teacher education programs, including my own, have been working tirelessly to find ways to support candidates in navigating an ever-changing set of conditions related to student teaching and TPAs. In an effort to ensure candidates are eligible for credentialing, many student teachers have been offered illogical "solutions." To offer one example, this morning one of our partner districts advised student teachers to create fake virtual classes consisting of two (and only two) students and film those classes for the purposes of their TPA; they were then advised to write lesson plans after the fact to ensure they addressed the nuances of the TPA. While the district's intent was to find a way to help student teachers navigate credentialing mandates while also protecting the privacy of K-12 students, the absurdity of these suggestions illustrate the inherent risks of high-stakes, externally-regulated teacher performance assessment policies.

Especially in times of crisis, it is essential that teacher candidates – and school communities – are able to focus on the responding to the demands of teaching and learning in their local contexts, not finding ways to navigate (or circumnavigate) standardized assessments. Thus, **I am writing to request the CTC petition Governor Newsom and the California Legislature to eliminate statewide requirements related to TPAs, and empower teacher preparation programs to use locally-developed and controlled measures of teacher readiness.**

California's teacher education programs are good ones, and we have the local expertise necessary to prepare the teachers our communities need. The CTC has the opportunity and responsibility to provide visionary leadership in this time of crisis, by encouraging commonsense reforms that enable educational communities to respond nimbly to ever-changing local conditions.

Thank you,
Alison Dover

Dr. Alison G. Dover

Associate Professor

Coordinator, Combined Credential & Masters in Culturally and Linguistically Sustaining Teaching

Department of Secondary Education

California State University, Fullerton

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Fullerton, CA 92831

Phone: (657) 278-5186 / Email: adover@fullerton.edu

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California Association of Professors of Special Education/
CEC Teacher Education Division



April 16, 2020

Dr. Mary Sandy, Executive Director, California Commission on Teacher Credentialing
Dr. Tine Sloan, Chair, California Commission on Teacher Credentialing
Sacramento, California

Dear Drs. Sandy and Sloan,

The Board of the California Association of Professors of Special Education/Teacher Education Division (CAPSE/TED) is writing this letter to respond to the CTC Agenda items 3A and 4A. We understand the challenging and unique times that we are experiencing and the need to provide flexibility related to preparing Education Specialist candidates.

We would like to propose the following questions for clarification:

3A. What is the rationale for deferring the Basic Skills Exam at this time with no mention of deferring CSET? We understand that required exams cannot be waived per Title 5 regulations, but given that testing centers are closed, it would be especially important for prospective intern candidates that CSET be deferred until such time that the testing centers are open or when the examinations can be taken on-line.

Interns being exempt from Variable Term Waivers – What is the rationale for interns not being allowed to receive a Variable Term Waiver (VTM)? We understand that Interns would be allowed to extend their Intern credential for an additional year, but we anticipate unintended consequences. For example, interns would not be receiving the salary of a fully credentialed teacher while traditional candidates on VTWs would be. They would have to be enrolled in a university preparation program, and universities would vary in terms of their enrollment policies and financial requirements for the candidate. This could result in a financial hardship for both the interns and the universities.

We are also concerned about the possible implications related to the Special Education teacher shortage. Having to stay on an intern credential for another year would be a disincentive for candidates given the uncertain future. This would create additional roadblocks for completing credential requirements.

Thank you for your consideration of these issues.

Respectfully,

Victoria L. Graf, Ph.D.
President, CAPSE/TED

From: [Martha Gunter](#)
To: [comments](#)
Subject: CSET
Date: Wednesday, April 15, 2020 9:35:12 PM

Dear Department of Education,

I have graduated with my Master's of Education from Mount Saint Mary's in May of 2019. I have passed all the sections of the CBEST and have been teaching at a private school full time for the past 6 years. I have also passed two of the Multiple Subject CSET subtests (I and III). I still need to pass the science and the math (Sub test II). Is there a way in which you would consider (for those that have a Masters and teaching experience) the deferral of at least the last CSET an individual needs to pass but is unable to take due to the pandemic? There are so many teachers in this same predicament and we are literally being placed on hold because of this. I would love to get my preliminary credential and then clear it so I may start working in the public school system, where there is a shortage of teachers.

Best regards,
Marga Gunter, M.A. Ed.

Sent from AOL Mobile Mail
Get the new AOL app: mail.mobile.aol.com

From: [Alma Haight](#)
To: [execoffice](#)
Subject: CSET considerations
Date: Wednesday, April 15, 2020 4:07:11 PM

To: California Commission Teacher on Teacher Credentialing
Regarding: Appeals and Waivers Committee Action: 3A

Dear Kevin Kung and CTC Committee,

My name is Alma Cisneros and I am an Education Specialist Student at Biola University. I have completed all of my classes, completed my clinical hours. My plan of education was to become an intern teacher in Fall of 2020. I have passed my CBEST and I have successfully passed CSET Subset 1 and 3. I was scheduled to take Subset 2 in April. However, I am not able to schedule due to the COVID 19 testing closures. This situation leaves me with uncertainty of my future as an educator. The plans to teach and be intern eligible are at stake due to the testing closures. I know that I am not alone in this situation. Hundreds of fellow educators are in same concerning situation for Fall 2020.

In the agenda that was posted on the CTC website, it mentions candidates being able to have up to one year extension to pass the CBEST but mentions nothing about the CSET/RICA. My question is, what will happen to students who couldn't complete their testing requirements for CSET in order to be intern eligible for Fall 2019-2020 and teach?

I ask that you with a humble plea to consider credential candidate students who have one more CSET to pass the opportunity to obtain our intern- permits from our universities and start teaching. We are passionate teachers ready to teach and waiting another year can be crucial and devastating to our careers. I ask that the CTC committee consider allowing students who are missing a CSET subset(s) to also have the one year extension to get this requirement completed. Thank you for hearing my concern, I appreciate your time.
Sincerely,

Alma Cisneros-Haight

From: [Renee Hall](#)
To: [comments](#)
Subject: Questions regarding meeting agenda and actions
Date: Wednesday, April 15, 2020 4:18:00 PM

Good Afternoon, I have a question that I would like to address the commission about. I am currently teaching on a PIP and have completed all my courses to become intern eligible but I have to pass my last CSET. The problem is the centers are all closed and I may miss the deadline to complete the test before the fall to start as an intern. What can be done to help individuals in this situation? I know that I can possibly work next year on a STSP, but that is if I get hired back. I would like some direction as to how you will be help in this situation. Many educators are stuck at this point because they are unable to meet the CSET requirements. Thank you for your time and consideration. These test do not define us as educators, and I hope that at some point these test will be omitted as requirements to become a teacher.

Thanks again,

Renee

From: [Ogechi Ibeanusi](#)
To: [comments](#)
Subject: PUBLIC COMMENT ON ITEMS 3A AND 4A AT CTC GENERAL MEETING APRIL 23. 2020
Date: Monday, April 20, 2020 6:57:23 PM

GOOD MORNING. MY NAME IS Ogechi Ibeanusi AND I AM A Teacher AT Presidio Middle School. I support the commission taking action to waive the CalTPA and EdTPA given the challenges that the pandemic poses to their equitable completion but more importantly, research challenges both the validity and reliability of privatized teacher performance assessments and the CalTPA, edTPA, and CBEST disproportionately bar people of color from entering the teaching force. Therefore I ask that the CTC recommend Governor Newsom make an Executive Order to not only eliminate these assessments now, but permanently. California should follow Wisconsin's example and recommend the legislature permanently remove edTPA as a credentialing requirement. Let the university teacher education programs determine that student teachers master TPEs. Eliminate these assessments now, and permanently.

From: [Maya Jones](#)
To: [execoffice](#)
Subject: CTC - April 2020 Commission Meeting - Item #3A
Date: Monday, April 13, 2020 2:00:55 PM

Dear Members of the Commission, particularly the Appeals and Waivers Committee:

My comment is about Item #3A - Consideration of actions to assist applicants, educators, and credential candidates impacted by emergency health and safety conditions related to COVID-19

My name is M. Jones. I am a teacher candidate. I am pursuing a preliminary education specialist credential in extensive support needs. I am in my last semester in the credential program. I am both a graduate and credential student of San Francisco State University.

Please authorize the institution of teacher preparation programs' Variable Term Waiver (VTW) requests. The institutions of teacher preparation programs can recommend teacher candidates for the VTWs. These teacher candidates, such as myself, progress in completing required teacher credentialing requirements have been impacted by COVID-19. For example, because schools are closed in San Francisco County, I am encountering the challenge of satisfying student teaching competencies by the end of May. I may need additional time to complete the competencies. The VTW presents an alternative pathway to allow teacher candidates to stay on track to teach and to continue to make progress on meeting the credentialing requirements in a timely manner.

Thank you for considering the VTW requests,

M.Jones
Graduate and credential student
San Francisco State University

From: [Kathrynn Kang](#)
To: [execoffice](#)
Subject: Agenda items 3A and 4A
Date: Saturday, April 18, 2020 9:38:16 PM

Kathrynn Kang
CSU East Bay PASC Program

Dear Governor Newsome,

I am respectfully requesting that you consider waiving the requirements of CalAPA Cycle 2 and Cycle 3 to receive our Preliminary Administrative Services Credential (PASC) for candidates in good standing during this school year due to the impact of the COVID 19.

Prior to the implementation of the CalAPA in 2018, the California Commission of Teacher Credentialing (CTC) authorized accredited programs to verify a candidate's completion of the requirements for the PASC. With due respect, I request that you consider returning this practice for candidates who will complete their credential requirements in Spring and Summer 2020.

CalAPA Cycle 2 requires teachers to gather to discuss a problem of practice and to implement solutions to the students. CalAPA Cycle 3 requires that candidates observe another teacher, providing a pre conference and a post conference, as well as recording of the lesson. As much as the CalAPA cycles provide a standard for the candidates to experience different requirements of the administrator job, completing the cycle is just simply not feasible during this time. During these unprecedented times, with school closures to the end of the school year, candidates cannot meet with teachers to discuss problems of practice or observe teachers teaching a lesson to their students. As full time teachers, we are struggling to provide distant learning to our students using unfamiliar platforms. We need to be caretakers for our own families as well as meet the academic and social well being needs for our students. We are inundated and struggling to find balance within these troubling times, yet trying our best to provide normalcy for our students.

I respectfully request a different approach to ensure that PASC candidates receive their credential this year without the additional burden of completing the CalAPA Cycles. I ask the CalAPA requirement be suspended for Spring and Summer 2020 PASC program graduates and plead a return to the practice of CTC accredited programs being authorized to recommend candidates who will complete their credential coursework and fieldwork in Spring and Summer 2020.

Thank you for your consideration.
Kathrynn Kang



April 20, 2020

Dr. Tine Sloan, Chair
California Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento, CA 95811

RE: Agenda Items 3A and 4A

Dear Chair Sloan and Commissioners:

The mission of Teach Plus is to empower excellent, experienced, and diverse teachers to take leadership over key policy and practice issues that advance equity, opportunity, and student success. We know that the decisions our state leaders must make in this time of crisis are incredibly challenging and the implications are far-reaching, none more so than those related to how we train and support our teachers. We appreciate the thoughtful analysis and guidance by the CTC staff on these complicated issues.

We are writing in regard to Agenda Items 3A and 4A as we know how critical the preparation and support are for new teachers, especially in this time of interrupted instruction for both teacher candidates and K-12 students.

Item 3A - Consideration of Actions to Assist Applicants, Educators, and Credential Candidates Impacted by Emergency Health and Safety Conditions Related to COVID-19

Overall we are supportive of the reasonable accommodations that the Commission staff are proposing. They reflect the need to balance reducing the negative impact of the COVID-19 crisis on teachers and teacher candidates, while also ensuring that our students do not bear the burden of underprepared and under-supported teachers. As we know, historically marginalized students are the ones who are most likely to be served by underprepared teachers.

While issuing Variable Term Waivers (VTW) seems necessary, many questions remain about the implementation of these waivers. First the question of cost to candidates is of serious concern. We look forward to learning more about the Commission's proposals to determine funding needs to ensure, to the extent possible, that candidates are able to complete their preparation without incurring additional costs.

We also recommend that the Commission identify funding and policy changes necessary to ensure that the induction infrastructure and coordination between induction and preservice programs are sufficient to support teachers who hadn't completed their preservice. With more underprepared teachers in classrooms working with students, and with many unique challenges due to their own interrupted instruction, the state must make this support a priority. This could include additional investments in creative incentives, support, and structure for mentors.

In research conducted by the 2018-19 Teach Plus Fellows, they interviewed directors of twenty induction programs throughout the state. The most significant variation between the design of

mentoring programs was in the time mentors had to devote to this work and the compensation provided. When asked if release time is provided for the mentors and/or the new teachers, seven of the programs (35 percent) said that they provided at least one hour per week for the mentor and new teacher. At the same time, five programs (25 percent) reported not providing any release time and five programs reported providing 1 to 5 instances per year of release time for the mentor or the teacher. While the leaders of many of these programs lamented the lack of release time for new teachers and mentors, they felt that limited resources tied their hands. The role of mentors is even more important as we recover from the impact of the COVID-19 crisis. We would love to work with Commission staff to explore policy or funding requests that can foster innovative solutions for creating more time and support for mentors.

Also in their VTW guidance, Commission staff elevated the role of the Individual Development Plans as a tool to meet the needs of these new teachers under waivers. Most induction programs reported clear visions for their mentoring program rooted in the new teachers' Individualized Learning Plans but they also found that it was difficult to determine if they were consistent with the transition plans that the candidates produced in their preparation programs. While the induction programs aimed to build a robust mentoring program that built on what candidates learned in their preservice preparation programs, many shared that it was often difficult to know because they did not see the transition plans that candidates were expected to produce in their pre-service programs. Two district programs cited only having ever seen one transition plan out of the hundreds of new teachers who had come through their program. As it is even more important that induction programs build on what candidates learned in their preservice, we would recommend that additional guidance be provided for the integration of robust transition plans into the Individualized Learning Plans

Finally, with so much uncertainty, it reinforces the need for more robust information about our teacher pipeline, so we can assess the impact of these measures. We recommend that the Commission identify key metrics to assess the effect of these accommodations, including the number and percentage of those to begin teaching under the VTW who completed their preparation and received a preliminary credential, the extent to which they are teaching in high-need subjects and locations, and retention rates. We appreciate the thoughtful guidance provided with the VTW but we suggest that the Commission explore what other strategies need to be implemented to mitigate the negative impact of more underprepared teachers entering the workforce - for both teachers and students. We would welcome the opportunity to be a part of that process.

Item 4A - Flexibility for Commission-Approved Educator Preparation Programs Due to the COVID-19 Crisis

On the staff suggestions that the Commission suspend some requirements from specific program standards, we are supportive of most of the staff recommendations. For the preliminary multiple and single subject credential, we support option b that would consider that if a candidate has passed a Commission-approved Teaching Performance Assessment AND that candidate has completed a specified minimum number of hours of clinical practice, the Commission could deem that these candidates have met the required clinical practice hours. These candidates would not be required to complete the full 600 hours of clinical practice and this would be noted on the Individual Development Plan (IDP) that the candidate and preliminary program develop for the new teacher to take to their induction program.

Thank you for the opportunity to comment. We would like to continue to work with the Commission as you move forward with this important work.

Sincerely,

A handwritten signature in black ink, appearing to read 'SL', is centered below the closing.

Sarah Lillis
Teach Plus California Executive Director
916.761.1385
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cc: Commission on Teacher Credentialing Commissioners
Erin Skubal, Director, Certification Division
Teri Clark, Director, Professional Services Division

April 16, 2020

Nicholas Linnet
CSU East Bay PASC Program

Dear Governor Newsom,

I am writing you this evening to humbly request that you consider waiving the CalAPA assignments for this Spring semester 2020 at all PASC accreditation schools in California in response to the COVID-19 pandemic that has closed all public schools and essentially stopped daily economic and physical activities across the globe.

The requirements for PASC students working to attain a Preliminary Administrative Services Credential in California involve a complex research inquiry into an equity gap for Cal APA, cycle 1. Many PASC students have already completed this work in the Fall 2019 semester, but not all.

The requirements for Cal APA, cycle 2 involve candidates facilitating and recording a problem of practice with other educators at their site over multiple sessions. This work is time extensive, and works best when educators can meet in person to discuss the identified problem and work to create goals and improved practices into action over time at the site. This work is nearly impossible to complete in a distance learning format, when educators are now working to teach from home, support families with assignments, tech issues, and other inequities that can be avoided within the confines of the school setting. They are also working to support their own children's educational needs, and still take care of the daily necessities for living (food, shopping, exercise, etc.). It is highly impractical to expect PASC educators, and their staff, to continue this problem of practice virtually when everyone's schedules have been so greatly impacted by the shelter-in-place orders that have gone into effect all across California.

The requirements for Cal APA, cycle 3 involve candidates facilitating a pre-observation conference with a colleague, observing them teach a lesson, then conducting a post-observation conference with the colleague to share observations, ask questions, and make recommendations to help support and improve practices. This is an excellent task to help PASC candidates experience one of the essential roles Administrators are expected to participate in yearly as they coach, mentor, and support their educational staff. With that said, asking PASC candidates to complete this work remotely through Zoom conferences hardly seems an appropriate (or relevant) demonstration of the work Administrators will be expected to demonstrate when schools resume next school year. The personal connections of sitting down together, discussing current practices, listening to teacher's goals and educational needs, observing how said teacher engages, facilitates, and assesses the learning of her students in the classroom setting that she created, then sharing the results of the observation, hearing her thoughts on how the lesson went, and creating goals

for future learning within the classroom can scarcely be found when everyone is collaborating through computer screens and hoping their internet connections do not fail them. The CTC has identified that these tasks cannot possibly be completed to any quality level virtually, which is why they have chosen to offer PASC candidates a Variable Term Waiver, so that we may continue this work next year (without the support of our PASC professors or support coaches).

My PASC candidate colleagues and I believe that this is unfair of the CTC to ignore the global crisis and request us to somehow complete these expectations without providing adequate modifications in light of the changes the world has all had to make in response to COVID-19. We also know that we are not alone, as many new teachers are subjected to trying to satisfy the requirements to earn their teaching credential under a distance learning format. The truth of the matter is, schools all across California are going to need new teachers and administrators to help in the recovery from this crisis when they open up again sometime in the Fall. They should be able to begin that work without a cloud of expectations hanging over them from the CTC. I am humbly requesting that when you review Agenda items 3A and 4A, that you consider waiving the Cal APA tasks for this calendar year, or request that CTC accept our CAPE assignments in lieu of the Cal APA assignments for this year in response to COVID-19. The simple truth is that educators have worked so very hard this year, learning and facilitating learning in new ways built out of necessity and on the fly during this pandemic, and educational leadership has been demonstrated by all through this crisis. Please use your authority and consider an executive order that would allow us to earn the credentials we have worked so very hard to attain this year, so that we can have a clean slate when starting our new careers next year in helping restore our educational learning communities in schools all over this great state.

I thank you for your time and consideration.

-Nic Linnet, Educator & PASC Candidate
nicl@fsusd.org

From: [Annette Minafo](#)
To: [execoffice](#)
Cc: [Lee, Stephen](#); [Phoebe Au-Yeung](#)
Subject: Questions regarding 2020-04-3a
Date: Wednesday, April 15, 2020 5:04:23 PM

CTC,

San Francisco Unified School District (SFUSD) is requesting the following questions be presented at the Commission Meeting for April 23, 2020 item 2020-04-3a Consideration of Actions to Assist Applicants, Educators, and Credential Candidates Impacted by Emergency Health and Safety Conditions Related to COVID-1.

Can an educator prep program apply for a Variable Term Waiver for someone who has already used a Provisional Internship Permit or Short-Term Staff Permit?

The document states that the deferral of CBEST "would not be available to any individual who has previously taken and failed CBEST." Does this also apply if the educator has not taken all three parts of CBEST?

If someone is not enrolled in a credential program and the Variable Term Waiver is not a possibility because they previously failed CBEST or they already had a STSP which cannot be extended or reissued, will the CTC allow any other credentialing options for these people to be hired by employing school districts?

How much oversight will the CTC have around educator prep programs applying for Variable Term Waivers? So far the information available sounds like there are many reasons for which a program could apply for a Waiver and it is up to the program whether or not to apply for someone. Therefore it stands to reason that cred programs may vary greatly in who they decide qualifies for a Waiver. Will all Waiver requests made by a program be honored by the CTC?

More clarification is needed around the VTW application process. Confusion is around who is actually applying for this waiver, is it the credentialing institution or the employing school district or a cooperative effort between both? What documentation would be required to support the VTW such as a supporting letter from the credential institution which has been listed under Appendix A in 2020-04-3a and included with the VTW application packet that is submitted by the employing school district? OR Does the employing school district provide a letter verifying employment and the VTW application is submitted by the credential institution.

The Teaching and Services Credential Appeals and COVID-19 FAQ says that "if the ability to complete requirements was directly impacted by COVID-19 closures you may apply for an RGA-07 medical appeal." However, AL-3 says that a medical appeal requires a physician's statement. If the educator was not diagnosed with COVID-19, what documentation does the CTC require for this appeal? Also, this answer directly contradicts with an answer given later in the same document: "No, there have been no changes to the requirements for Medical Appeals. Unless the

educator contracts COVID-19 or is the caretaker for someone who contracts the virus, the educator cannot qualify for a Medical Appeal due to COVID-19. They will need to look into the RGA-10 and RGA-20 extension appeals."

Can the cancellation by the testing agency of a qualifying exam suffice as "good cause" for the basis of an appeal application? What documentation will CTC accept as proof of the exam cancellation?

Is the CTC still reviewing paper applications currently and given that we are sheltering in place and unable to go to the office, will the CTC be lenient on the requested issuance date or stay strict on the 90 day backdating rule?

Can the CTC share any updates on how DPP is handling fingerprinting and COCs currently?

Can the CTC share more information on how reject letters will be handled? The General Application Processing FAQ says: "The Commission will work with educators and employers on returning requested materials to the Commission in order to provide flexibility during this time. We understand the difficulties surrounding the current situation and can develop solutions necessary for continuing the application process. Please contact credentials@ctc.ca.gov if additional time is needed to submit materials." Will all of these situations be handled on a case-by-case basis or is there any kind of guidance the CTC can provide so that we can know what to expect for a reject letter when we are not able to meet the deadline due to sheltering in place?

Thank you

Sincerely,

Annette Minafo, Credential Analyst
San Francisco Unified School District

Human Resources Dept. 2nd floor | 555 Franklin Street | San Francisco, CA 94102

Email: credentials@ctc.ca.gov | Ph: (415) 355 - 7656 | Fax: (415) 241 - 6147



Visit SFUSD's credential website at sfusd.edu/credentialing

IMPORTANT INFORMATION FROM THE CALIFORNIA COMMISSION ON TEACHER CREDENTIALING (CTC):

To contact CTC: email credentials@ctc.ca.gov or website www.ctc.ca.gov or call after 12:00 PM (916) 322-4974, option 1. CTC has the final authority to grant or deny a credential/permit application.

This message contains information from the SFUSD that may be confidential or privileged. If you are not the intended recipient, be aware that any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited by law. If you received this message in error, please notify the sender and delete the material from any computer.

I am writing to highly recommend that the CTC to cancel the TPA requirement for all teacher candidates completing their student teaching during the semester of Spring 2020. As a teacher educator and university supervisor for student teachers, I have witnessed directly the immense stress and strain that this exam causes for teacher candidates. This stress was occurring before the COVID-19 pandemic, and now with remote learning mandates, the strain, stress, and anxiety has only intensified.

Teacher candidates in the state of California endure rigorous course work, field work experiences, writing assignments, and exams throughout their teacher education programs. Teacher candidates already exhibit their ability to learn from students, parents, and mentors through student teaching. In addition, teacher education programs conduct a total of six official observations by a qualified university supervisor, two formal evaluations where they demonstrate they have mastered the six Teacher Performance Expectations (TPEs), and they create an Individual Development Plan. These diverse assessments and documents should suffice in demonstrating candidates' ability to become teachers.

In working to meet the demands of the TPA exam, teacher candidates are currently attempting to record their lessons via diverse video technologies, collect artifacts, and answer lengthy exam questions in the middle of the COVID-19 pandemic. This chaotic and stressful experience will not lead to better prepared or equipped teachers. I ask the CTC to please cancel the TPA requirement for all teacher candidates during this semester, allowing them to immediately apply for an appropriate credential. We need to consider not only our state's need for highly qualified teachers, but the strain and stress we are putting teacher candidates through by asking them to complete this requirement. I encourage the CTC to consider what kind of trauma will be inflicted by the process of asking teacher candidates to complete this exam during a global pandemic. We have the power to transform this experience for the teacher candidates in our state; to allow them to use their time and resources during the remainder of the semester to support and uplift students, families, and communities.

I appreciate the committee's time in reading my statement and considering this possibility.

Sincerely,

Oona Fontanella-Nothom, Ph.D.
Assistant Professor of Curriculum and Instruction
California State University, Los Angeles
Ofontan@calstatela.edu

From: [Tricia](#)
To: [execoffice](#)
Subject: Agenda Items 3A and 4A
Date: Friday, April 17, 2020 5:06:05 PM

Tricia Ouellette
CSU East Bay PASC Program

I respectfully request that you consider suspending the Cycle II and Cycle III requirements for this year. These requirements were intended to be completed during the PASC preparation program when you had the support of your PASC program instructor. Providing a waiver to complete the requirements the following year when schools are recovering from the COVID 19 closure creates a hardship that previous candidates have not had to endure. Completing the PASC program and passing the CALAPA Cycle 1 would be a fair and equitable requirement for a preliminary credential in the 2019-2020 year.

Thank you for your consideration in this matter.
Tricia Ouellette

Sent from [Mail](#) for Windows 10

April 15, 2019

To: California Commission Teacher on Teacher Credentialing
Regarding: Appeals and Waivers Committee Action: 3A

Dear Kevin Kung and CTC Committee,

I am an Education Specialist Student at Biola University who has completed all of my classes, completed my clinical hours, and was on schedule to hopefully become an intern teacher in Fall of 2020. I have obtained my Education Specialist Masters of Education degree, I have passed my CBEST, CSET Subset 1 and 3 and was scheduled to take Subset 2 in April.

Unfortunately my test was cancelled and I am not able to reschedule at this time due to the COVID 19 closures. This situation leaves me in a predicament and the inability to intern teach. I know that I am not alone in this situation as I have heard from many other students in the same exact position, we are not sure where this leaves us come Fall 2020. In the agenda that was posted on the CTC website, it mentions candidates being able to have up to one year extension to pass the CBEST but mentions nothing about the CSET/RICA. What will happen to students who couldn't complete their testing requirements but are otherwise ready to move on?

I hope you will consider credential candidate students in the same situation that I am in, students who are eager to get into the classroom, students who have the passion and desire to serve the students and families that we have the opportunity and privilege to work with. I humbly ask that the CTC committee consider allowing students who are missing a CSET subset(s) to also have the one year extension to get this requirement completed. Thank you for hearing my concern, I appreciate your time.

Sincerely,

Karina Pannizzo

Loyola Marymount University Teacher Preparation Program

Comments for CTC Consideration

Interns whose ability to complete credential requirements are impeded by COVID-19 should be eligible to apply for the Variable Term Waiver being offered to teacher candidates on the traditional pathway. Loyola Marymount University (LMU) has Multiple/Single Subject and Education Specialist interns who are already in their second year on an intern credential, whose only missing requirement is a passing RICA and/or edTPA score. They have been working diligently this semester, with the support of their fieldwork instructor, to prepare to pass these exams. Offering them another year-long extension, rather than permitting them to utilize a VTW, would cause them to incur additional costs (additional fieldwork) and would prevent them from advancing on the salary scale due to no fault of their own. It is also unclear about the responsibility of the IHE if they have a year-long extension.

Furthermore, LMU has first year Multiple/Single Subject and Education Specialist interns who are already on track toward meeting all of their credentialing requirements, and are only missing a passing RICA and/or edTPA score. It is unfair to penalize them by requiring them to remain on an intern credential for an additional year and burden the cost when we are confident that many of them would have passed the RICA and/or edTPA upon first having the opportunity to undertake them. They have met their other programmatic requirements, including being on track toward successfully completing their fieldwork requirements under the supervision of a fieldwork instructor. We need these teachers to advance into the profession without any additional roadblocks, and without having to shoulder the additional financial burden of remaining on an extended intern credential, which also implies associated fieldwork course fees. They, too, should be eligible for the VTW or other comparable leniency that would permit them to advance in their careers on their intended schedule.

From: [SueEllen Thomas](#)
To: [execoffice](#)
Subject: Agenda items 3A and 4a
Date: Friday, April 17, 2020 7:04:00 PM

SueEllen Thomas
CSU East Bay PASC Program

Good afternoon,

I am respectfully writing today to ask you to please consider waiving the requirements of CalAPA Cycle II and CALAPA Cycle III, for candidates in good standing during this school year (2020). The requirements for these cycles were based on the premise that, as educators, we would have access to students, teachers, and administrators as necessary.

During this time we have been drastically impacted by the COVID-19 virus and, as you are well aware, have had to completely create curriculum, instruction and methods with which we communicate with students, faculty and stakeholders. Equity has become an issue of the highest importance during this crisis. This pandemic alone has distanced students, teachers, administrators and stakeholders from the basics that are required to perform daily functions in and out of the classroom.

Teachers are overwhelmed with emails, questions, hand holding, acquiring internet access for students, locating online and physical texts for students, not to mention, in many cases helping to attain meals and safety for students. We are asking these same teachers to put these challenges aside and complete business as usual” for these Cycles in the PASC program? How does that seem fair and equitable in a time of pandemic and crisis?

Teachers (we) are barely treading water to keep our heads above water and get our students what they need, to not only survive this critical time, but to thrive in it! Asking peers to add more to their schedules and workload seems not only unfair, but counter productive, as we learn about equity and High Reliability in the school systems.

If we are able to acquire employment as administrators in the Fall, or even if we continue on in the teaching capacity, we will be playing “catch-up” in a system that will be struggling to serve ALL students. Asking candidates to pile additional requirements onto a work load that will be unprecedented, does not seem fair and equitable.

I strongly encourage you to consider it “fair and equitable” to pass student this semester that have already completed the requirements for CalAPA Cycle I and PASC program (2019-2020) requirements, and are in good standing, at this time.

Thank you for your time and consideration.
Stay well and safe during this time of crisis and upheaval.
SueEllen Thomas

From: mzaval44@calstatela.edu
To: [comments](#)
Cc: [Zavala, Miguel](#)
Subject: PUBLIC COMMENT ON ITEMS 3A AND 4A AT CTC GENERAL MEETING APRIL 23. 2020
Date: Friday, April 17, 2020 8:52:58 PM

GOOD MORNING. MY NAME IS MIGUEL ZAVALA AND I AM A DIRECTOR OF THE URBAN LEARNING PROGRAM AND ASSOCIATE PROFESSOR AT THE CHARTER COLLEGE OF EDUCATION AT CAL STATE LA.

I am responsible for over 400 urban credential candidates, and am drawing from research and first-hand experience working with our students, the vast majority of which are not able to pass standardized assessments imposed by the California Commission on Teacher Credentialing.

I support the commission taking action to waive the CalTPA and EdTPA given the challenges that the pandemic poses to their equitable completion but more importantly, research challenges both the validity and reliability of privatized teacher performance assessments and the CalTPA, edTPA, and CBEST disproportionately bar people of color from entering the teaching force. Therefore I ask that the CTC recommend Governor Newsom make an Executive Order to not only eliminate these assessments now, but permanently. California should follow Wisconsin's example and recommend the legislature permanently remove edTPA as a credentialing requirement. Let the university teacher education programs determine that student teachers master TPEs. Eliminate these assessments now, and permanently.

Miguel Zavala, Ph.D.

(he/his/him)

Director, Urban Learning Program

Associate Professor, Division of Curriculum & Instruction

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Author, *Raza Struggle and the Movement for Ethnic Studies* (Peter Lang)

Co-Editor, *Rethinking Ethnic Studies* (Rethinking Schools)

Co-Author with C. Sleeter, *Transformative Ethnic Studies in Schools* (Teachers College Press)