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# 4A

## Action

### *Educator Preparation Committee*

### **Flexibility for Commission-Approved Educator Preparation Programs Due to the COVID-19 Crisis**

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**Executive Summary:** This agenda item addresses educator preparation program and credential requirements and suggests possible actions the Commission might take to provide flexibility for programs and candidates due to the COVID-19 crisis. Specifically, the item focuses on potential modifications to Commission standards and preconditions for (1) preliminary multiple subject, single subject and education specialist teacher preparation programs, (2) services credential programs, and (3) induction programs, as well as performance assessments.

**Recommended Action:** That the Commission consider the flexibility approaches presented in this agenda item and approve those the Commission deems appropriate.

**Presenter:** Teri Clark, Director, Professional Services Division

#### **Strategic Plan Goal**

#### ***II. Program Quality and Accountability***

- a) 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.

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## Flexibility for Commission-Approved Educator Preparation Programs Due to the COVID-19 Crisis

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### Introduction

This agenda item addresses educator preparation program and credential requirements and suggests possible actions the Commission might take to provide flexibility for programs and candidates due to the COVID-19 crisis.

### Background

On March 19, 2020, Governor Newsom issued the first stay at home order in the nation for the state of California. In the days just prior, numerous school districts had closed schools and colleges and universities sent students back to their homes to await information on continuing the remainder of the semester or quarter through on-line coursework. The Commission's best estimate is that over 80,000 candidates in California were enrolled in preparation programs across the spectrum of credential areas at the time the COVID-19 Health and Safety Restrictions were initially implemented - most of whom have been impacted in some manner by the current situation. Approximately 26,000 of the enrolled candidates are in the final year of their preparation. A good portion of these candidates were in the process of fulfilling their final clinical practice, performance assessment (if applicable to their credential area), and/or program requirements with the intention of completing their program and being credentialed and employed for the upcoming academic year. Staff has heard from many programs that a good portion of the candidates will be ready to be recommended for their credential.

The Commission's Accreditation Data System (ADS) collects enrollment data from all Commission-approved educator preparation programs annually. The most current data was submitted in August 2019 and included enrollment data for the 2018-19 year. The Commission heard a report on the [ADS at its November 2019](#) meeting. Over 46,000 individuals began an educator preparation program in 2018-19 while just over 40,000 individuals were continuing their work in an educator preparation program. Most Commission-approved preparation programs vary in length from one to three years but some candidates attend only part time and therefore take longer to complete the program. Provided below are some of the candidate enrollment and completion numbers to provide context for the requests for flexibility in this agenda item. These numbers are from the 2018-19 reporting period (academic year) and the November 2019 report to the Commission.

When the scope of the COVID-19 crisis in California started to become clearer, and schools began to move to an online environment for instruction, Commission staff began developing and posting guidance for Commission-approved programs. The posted information identifies where programs have the authority to modify their coursework, clinical practice, and program-embedded assessments, and which credential requirements cannot be modified by the program. While this initial guidance provided programs with some clarity, the ongoing extent of

the crisis now requires further consideration and potential Commission action to address the multiple areas of program, candidate, and stakeholder COVID-19 concerns stemming from statutory, regulatory, and policy requirements.

Staff's work in this regard has stayed consistent with applicable statutes, Title 5 regulations, and policies which the Commission has previously adopted, as follows. Requirements that are in statute may not be modified by the Commission. Only two types of actions may modify a statutory requirement — either through legislative action or an executive order enacted by the Governor. Regulations often clarify or further interpret statute and they are adopted by action of the Commission. As such, regulations may be changed by promulgating new regulations or may be superseded by an act of the legislature or Governor. Requirements or policies that have been put in place by the Commission, such as the educator preparation program standards, can be modified through formal action of the Commission.

### **Current Staff Guidance to Programs**

In the [guidance recently provided](#) to preparation programs, staff reminded educator preparation programs that they have broad latitude to design their programs. In general, Commission adopted program standards define what the program needs to offer and what the candidate needs to know and be able to do, but the manner in which this is done is left largely up to the program. The requirements that were identified in the published guidance as areas where programs may not make modifications are requirements that are in the Education Code and/or Title 5 Regulations.

### **Areas That the Commission Cannot Modify on its Own Authority**

Examples of requirements that the Commission does not have the authority to modify are:

#### **1. Examinations that are required by Education Code and/or Title 5 Regulation:**

- a. Basic Skills: Each applicant shall take the CBEST prior to admission (EC §44252(f)(1))
- b. CSET: Subject matter verification is required prior to daily whole class instruction or recommendation for an Intern credential (EC §44252.5, §44280, §44281, and T5 §80033)
- c. Reading Instruction Competence Assessment (RICA): Passage of RICA is required prior to recommendation for Multiple Subject and Education Specialist credentials, except for Early Childhood Special Education candidates (EC §§44283, 44283.2 and T5 §§ 80048.3, 80048.8, 80071.5, 80413)
- d. Teaching Performance Assessment and Administrator Performance Assessment: Passage of a Commission-approved Performance Assessment is required prior to recommendation for Preliminary Multiple Subject, Single Subject (EC §44320.2), and Administrative Services (T5 §80054) credential candidates

#### **2. Requirements in Education Code or Title 5 Regulations:**

- a. Candidates must hold a Certificate of Clearance prior to interacting with students, no matter the delivery model for the program or the clinical practice model—this includes completing the Professional Fitness process (T5 §80301)

- b. The number of clinical practice hours for Pupil Personnel Services programs (T5 §80632)
- c. The number of hours of support and supervision required to be provided for teaching interns (T5 §80033)
- d. The Early Completion Option for Multiple Subject and Single Subject intern candidates as well as for Teacher Induction candidates (EC §44468)

### **Modifications that Commission-Approved Programs May Make and the Documentation of Those Modifications**

Staff has provided guidance to all educator preparation programs as to the types of coursework, clinical practice, and program embedded-assessment modifications the programs can make within the parameters of the adopted program standards. Programs have been advised to document the modifications that are made to address the COVID-19 Health and Safety Restrictions but that there is no requirement to develop a revised program matrix. The program matrix is a complex table that each Commission-approved educator preparation program must create and maintain that shows where each of the Commission's expectations— Teaching Performance Expectations for prospective teachers, Administrator Performance Expectations for prospective school administrators, and for other types of educator preparation programs the candidate competency requirements — are identified and the program shows in which course each expectation is introduced, practiced, and assessed. Instead, staff has stated that a summary document needs be developed and maintained by the institution for each program that made modifications to the program due to COVID-19. This document would be reviewed during future accreditation activities and will be retained at the institution.

### **Credential Expectations That the Commission Can Modify on its Own Authority**

Programs have identified additional areas within credential requirements and the adopted program standards where candidates may not be able to meet the identified expectations due to the COVID-19 Health and Safety Restrictions. Identified here are some of these areas as well as the Commission's adopted expectation with one or more options for the Commission to consider related to offering some flexibility for the candidates who were on target to complete their educator preparation program in spring/summer 2020. The Commission has the authority to modify its own program standards. These possible modifications would only apply to those candidates who were expected to complete the preparation program between March 19, 2020 and September 1, 2020.

### ***Requirements Specified in Adopted Program Standards***

Some requirements are specified in the Commission's adopted program standards but are not also included in Education Code or Title 5 regulations. Since the Commission has the authority to temporarily adjust its program standards, staff suggests that for the cohort of enrolled candidates who were on track to complete an educator preparation program this spring or summer, suspension of some requirements specified in the program standards might be appropriate. These potential suspensions are discussed by program area below. All the possible suspensions described in this agenda item are intended to apply only to the candidates whose preparation has been impacted by the COVID-19 Health and Safety Restrictions.

**1. General Education-Preliminary Multiple and Single Subject**

The standards require that a candidate complete a minimum of 600 hours of clinical practice. Prior to the adoption of the current program standards in 2016, the Commission-approved programs had the responsibility to determine how many hours of clinical practice each candidate was required to complete.

*Flexibility options that the Commission could consider and possibly approve:*

**a. Temporarily reduce the number of required hours of clinical practice.**

The Commission could choose to reduce the required number of hours of clinical practice for this year's cohort of prospective completers of preliminary programs. The reduction could be to a specified number of hours the Commission determines or the Commission could decide that for the identified candidates, the Commission-approved program will make the determination as to when a candidate has completed sufficient clinical practice. This modification 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. **OR**

**b. Temporarily allow reduced number of clinical practice hours as long as the candidate has passed the TPA to meet the Commission's expectation.**

The Commission could 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 (as determined by the Commission), 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.

The standards require that a candidate is formally observed by the program supervisor a minimum of six times each semester/four times each quarter. The purposes of this required support and supervision include ensuring that the TK-12 students are receiving pedagogically sound instruction, that the candidate is receiving feedback from one or more experienced educators, and that the program is able to collect data on how their candidates are performing in their clinical practice for program improvement purposes. Prior to the adoption of the 2016 Program Standards, Commission-approved programs determined the number of formal observations in which candidates participated.

*Flexibility option that the Commission could consider and possibly approve:*

**c. Temporarily eliminate or modify the specified number of formal observations.**

The Commission could consider suspending or eliminating the specified number of formal observations while still maintaining the requirement that each candidate must be supervised and supported in clinical practice by delegating the responsibility for the determination of sufficient supervision for a candidate to the Commission-approved program.

The standards require that each candidate complete four weeks of “solo” teaching. Again, prior to the adoption of the current standards in 2016, Commission-approved programs were required to ensure that each candidate completed at least two weeks of solo teaching. Staff has provided language encouraging programs to think flexibly about what counts as solo teaching during the COVID-19 crisis.

*Flexibility options that the Commission could consider and possibly approve:*

- d. **Temporarily eliminate the four-week solo teaching requirement.** The Commission could suspend the four-week solo teaching requirement and rely on Commission-approved teacher preparation programs to ensure that candidates have had sufficient opportunities to independently work with students.

## **2. Special Education**

The Education Specialist program standards require that candidates work with students across the grade levels authorized by the credential as well as across the settings. Programs report that it is challenging and may not be possible during this current extraordinary situation to ensure that each candidate has completed experiences across the grade levels and settings specified in the standards.

*Flexibility option that the Commission could consider and possibly approve:*

- e. **Temporarily suspend the Education Specialist requirement that candidates must work across grade levels and settings.**  
The Commission could suspend this requirement and rely on programs to ensure that each candidate has had sufficiently broad experiences with students. This modification 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.

## **3. Preliminary Teacher Preparation Preconditions Requiring Candidates to Meet the Subject Matter Requirement**

The Commission has adopted Preconditions that require a student teacher to have demonstrated subject matter competence prior to beginning daily whole class instructional responsibilities. This requirement is in Preconditions for all Preliminary Multiple Subject, Single Subject, and Education Specialist student teachers.

*Preliminary Multiple and Single Subject  
Candidates*  
[Precondition 6](#)

*Preliminary Education Specialist Candidates*  
[Precondition 3](#)

Currently the testing centers are closed due to the health and safety restrictions associated with COVID-19, and candidates who are beginning programs in 2020-21 may not have had the opportunity to take the subject matter examination.

*Flexibility options that the Commission could consider and possibly approve:*

- f. **Waive Precondition 6** (general education candidates) **and Precondition 3** (special education candidates for individuals enrolling in a Commission-approved teacher preparation program for the 2020-21 year.

Some of the requirements for a credential are linked to a specific time in the preparation process, such as the requirement for a candidate to meet the subject matter requirement prior to beginning daily whole class instruction. Waiving the requirement for this specified time within the preparation sequence does not waive the subject matter requirement itself. Candidates for a preliminary teaching credential must still meet the subject matter requirement as part of the statutory requirements for the credential.

Intern teaching candidates are also required to meet the subject matter requirement prior to being eligible for the Intern credential. This requirement is in Title 5, California Code of Regulations (CCR) and there is no ability for the Commission to waive the requirement. Staff is working with the administration to address this issue.

#### **4. Teacher and Administrator Induction**

Both teacher and administrator induction programs are designed to be two-year programs and are defined as such in the adopted program standards. With the closure of TK-12 schools, questions were quickly received by the Commission asking if the current second year program participants who were meeting all program requirements were going to be required to continue in the program in fall 2020 to make up for the months this spring when the schools were closed.

Staff developed and posted [guidance for induction programs](#) on the Commission's COVID-19 website. In that guidance, staff indicated that the definition of a year of participation in the program could be an area where the Commission might want to provide some flexibility by allowing participation in the 2019-20 school year to be defined as a year of participation even though the actual timeframe may be affected by the COVID-19 situation.

*Flexibility options that the Commission could consider and possibly approve:*

- g. **Designate the 2019-20 year of induction program participation to be a full year.** The Commission could affirm that the 2019-20 year of participation in induction is a full year even though the school year has been interrupted by the COVID-19 crisis. Although school buildings have closed, teachers are still teaching and administrators are still working. The expectation is that new teachers and administrators continue to work with their mentors and coaches in this time of change. Further, given that all educators are working to address the numerous challenges of moving the state's large and diverse school system to an on-line environment, some consideration may be warranted to recognizing the induction work that has taken place to date and the work educators are currently doing in this time of unanticipated crisis. This would allow new teachers and administrators to focus on the immediate needs of their students while recognizing the

work they have done in recent weeks to convert their classrooms and schools from face to face to technology assisted as a valuable part of their induction experience.

This action would include all candidates who were on track to complete the year as defined by the program. Programs would still maintain the ability to not recommend a 2<sup>nd</sup> year candidate for the Clear credential if the individual had not been participating in the program and making satisfactory progress at the time of the COVID crisis. **AND**

- h. **Temporarily amend the precondition requiring induction participants to hold a Preliminary credential.** The Commission's Preconditions specify that a teacher or administrator who enrolls in a Commission-approved induction program must hold a preliminary credential. The Commission could amend this precondition for the identified candidates so that new teachers and administrators who hold Variable Term Waivers due to the COVID situation are able to begin induction when they begin practice.

### **5. Specialized Services Credentials**

Many of the specialized credentials that the Commission is authorized to issue have professional associations that also have established standards and requirements for the license as part of the larger profession. This is most applicable to the Pupil Personnel Services credentials and is also the case with the Speech-Language Pathology credential. The text below provides information about the California credential requirements, the association that also addresses that type of educator, and the association's guidance/directives due to the COVID-19 pandemic. At this time, staff recommends that the Commission consider aligning its requirements with the professional associations' stated guidance provisions related to the COVID-19 pandemic.

For each of the credential types listed below, the text identifies the requirements in the Commission's program standards that programs have indicated are likely to be challenging for candidates to meet due to the COVID-19 Health and Safety Restrictions. Programs have requested some flexibility in these areas so that their candidates are not universally restricted from completing the program this spring/summer. Provided in each section below are the requirements in the Commission's adopted program standards where flexibility has been requested and the national association guidance aligned with that requirement.

#### ***School Counseling:***

Provided below are the requirements that a candidate for a School Counseling credential are required to meet by the Commission's standards and the related COVID-19 guidance that was provided by the Accreditation of Counseling and Related Educational Programs (CACREP).

Commission Standards: [Program Standard 31](#)

1. 100 hours of Practica.
2. 600 hours of Field Experience, with up to 200 of the hours completed in settings other than public schools.
3. Candidate must have field experience in a minimum of two of the following: elementary, middle, and high school.



In particular, [CACREP guidance](#) due to COVID-19 includes the following:

1. Programs may move to fully online teaching.
2. No prohibition on tele-practice.
3. No change in the direct and indirect service hours required.
4. Flexibility in effect until June 30, 2021 for candidates enrolled when the COVID-19 crisis began.

***School Psychology:***

Provided below are the requirements that a candidate for a School Psychology credential are required to meet by the Commission's standards and the related COVID-19 guidance that was provided by the National Association of School Psychology (NASP).

Commission Standards: [Program Standard 26](#)

1. 450 hours of Practica.
2. 1200 hours of Field Experience with a minimum of 800 hours in preschool to K-12 settings providing direct and indirect services to students.
3. Candidate must have field experiences in three of the following four settings: preschool, elementary, middle school, or high school with at least 150 hours in each of at least two of the settings.

In particular, [NASP guidance due to COVID-19](#) includes the following:

1. The candidate must complete a minimum of 800 hours in direct, field-based supervised experiences, with a minimum of 400 hours in a school setting.
2. Programs may employ flexibility on the remainder of hours.

***School Social Work:***

Provided below are the requirements that a candidate for a School Psychology credential are required to meet by the Commission's standards and the related COVID-19 guidance that was provided by the Council on Social Work Education (CSWE).

Commission Standards: [Program Standard 24](#)

1. Each candidate must complete 1000 hours of Field Experience with at least 450 hours in school-based practice and a minimum of 100 hours with at least 10 students of an ethnic background different from that of the candidate.
2. The school settings must include at least two of the following settings: preschool, elementary, middle, or high school. There must be a minimum of 100 hours at each of the two settings.

In particular, the [CSWE guidance due to COVID-19](#) includes the following:

1. The candidate must complete 85 percent of the required hours of Field Experience (765 hours instead of 900 hours).
2. Allows remote-based field activities: activity can include engagement such as field-related assignments, trainings, and virtual meetings.

### ***Speech-Language Pathology:***

Provided below are the requirements that a candidate for a School Psychology credential are required to meet by the Commission's standards and the related COVID-19 guidance that was provided by the Council on Academic Accreditation in Audiology and Speech-Language Pathology (ASHA/CAA)

Commission Standards: [Program Standard 6](#)

1. The candidate must complete the equivalent of a semester of Field Experience in the schools.
2. Each candidate must have experience with a variety of speech/language disorders assessment and intervention techniques.
3. Each candidate must have experience with a diverse population of students from birth to age twenty-two.

[Council on Academic Accreditation in Audiology and Speech-Language Pathology \(ASHA/CAA\):](#) guidance due to COVID-19:

1. Programs may use online course delivery models.
2. No reduction in the number of supervised clinical hours.
3. Broad approval to use online technologies including simulation, tele-practice, and tele-supervision when the clinical educator provides 100 percent direct supervision of the sessions in real time.

*Flexibility options that the Commission could consider and possibly approve:*

- i. **Align temporary modifications to program requirements to national associations' guidance as presented above.** The Commission could affirm that the requirements identified in the national associations' guidance as indicated in the text above meet the Commission's requirements for the following programs: School Counseling, School Psychology, School Social Work, and Speech-Language Pathology. **AND**
- j. **Temporarily give programs the authority to determine when candidates have met the expectations identified in the program standards.** The Commission could give programs the authority to determine how candidates develop proficiency in practice across a broad spectrum of experiences, and when they have completed and demonstrated that proficiency.

### **Administrator Performance Assessment**

The Commission's program standards require that each candidate for a Preliminary Administrative Services credential must pass a Commission-approved Administrator Performance Assessment prior to being recommended for the Preliminary Administrative Services Credential. At this time the only assessment approved by the Commission for this purpose is the California Administrator Performance Assessment (CalAPA), which was developed by a design team appointed by the Executive Director of the Commission in partnership with the Evaluation Systems group of Pearson. The Commission took [action at its August 2019 meeting](#) to adopt a passing standard for the CalAPA and further directed staff "to

analyze the candidate outcomes data, including the diversity data on the scores, during the next year in preparation for a second standard setting panel in spring 2020.”

Due to the COVID-19 crisis the standard setting study cannot be conducted in Spring 2020. Staff suggests that the Commission act to extend the current passing standard for the full 2020-21 year. When the current COVID-19 crisis has resolved and appropriate data is available, the standard setting study can be conducted and an action item prepared for the Commission to consider modifying the passing standard for the CalAPA.

*Flexibility option that the Commission could consider and possibly approve:*

- k. **Postpone the standard setting study and extend the current CalAPA passing standard.**  
The Commission could postpone the CalAPA standard setting study to Spring 2021 and maintain the current passing standard for the 2020-21 year.

### **Staff Recommendations**

Staff recommends that the Commission consider the following options and, where appropriate, approve the options for the current candidates enrolled in a Commission-approved educator preparation program who have had their program impacted by the COVID-19 Health and Safety Restrictions. ***These options are only for candidates who are on track to complete their educator preparation program between March 19, 2020 and September 1, 2020.***

### ***Preliminary Multiple and Single Subject Credential Requirements***

#### *600 hours of clinical practice*

- a. The Commission could choose to reduce the required number of hours of clinical practice for this year’s cohort of prospective completers of preliminary programs. The reduction could be to a specified number of hours the Commission determines or the Commission could decide that for the identified candidates, the Commission-approved program will make the determination as to when a candidate has completed sufficient clinical practice. This modification 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. **OR**
- b. The Commission could 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 (as determined by the Commission), 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.

#### *Number of formal observations*

- c. The Commission could consider eliminating or modifying the specified number of formal observations while still maintaining the requirement that each candidate must be supervised and supported in clinical practice by delegating the responsibility for the

determination of sufficient supervision for a candidate to the Commission-approved program.

*Four weeks of solo teaching*

- d. The Commission could suspend the four-week solo teaching requirement and rely on Commission-approved teacher preparation programs to ensure that candidates have had sufficient opportunities to independently work with students.

***Preliminary Education Specialist Credential Requirements***

- e. The Commission could suspend this requirement and rely on programs to ensure that each candidate has had sufficiently broad experiences with students. This modification 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.

***Preliminary Teacher Preparation Preconditions Requiring Candidates to Meet the Subject Matter Requirement***

- f. Waive Precondition 6 (general education candidates) and Precondition 3 (special education candidates) for individuals enrolling in a Commission-approved teacher preparation program for the 2020-21 year.

***Teacher and Administrator Induction***

- g. The Commission could affirm that the 2019-20 year of participation in induction is a full year even though the school year has been interrupted by the COVID-19 crisis. This would include all candidates who were on track to complete the year as defined by the program— first year induction candidates, second year induction candidates and Early Completion Option candidates. **AND**
- h. The Commission’s Preconditions specify that a teacher or administrator who enrolls in a Commission-approved induction program must hold a preliminary credential. The Commission could suspend this precondition so that new teachers and administrators who hold Variable Term Waivers are able to begin induction when they begin practice.

***Services Credentials***

- i. The Commission could affirm that the requirements identified in the national associations as indicated in the text above meet the Commission’s requirements for the following programs: School Counseling, School Psychology, School Social Work, and Speech-Language Pathology. **AND**
- j. The Commission could give programs the authority to determine how candidates develop proficiency in practice across a broad spectrum of experiences, and when they have completed and demonstrated that proficiency.

***Preliminary Administrator Preparation and Cal APA***

- k. The Commission could postpone the CalAPA standard setting study to Spring 2021 and maintain the current passing standard for the 2020-21 year.

**Next Steps**

Based on the Commission's action(s), if any, staff will disseminate information to all Commission-approved programs about the flexibility that programs may implement during the COVID-19 crisis for currently enrolled candidates.