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June 12, 2020

Dr. Tine Sloan

Chair, Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento, CA 95811

Dr. Mary Vixie Sandy

Executive Director, Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento, CA 95811

**RE: *Discussion of Proposed Changes in Language for Initial Program Review
Preconditions (Item 2B)***

Dear Chair Sloan and Executive Director Sandy:

The California Teachers Association appreciates the Commission on Teacher Credentialing reviewing the two initial program preconditions included in Agenda Item 2B. We support the direction of the proposed changes and offer some additional language for your consideration to clarify and strengthen the evidence required to demonstrate satisfaction of the preconditions for program approval.

Demonstration of Need

Staff's recommendation for using explicit evidence grounded in data is fully supported by CTA. The required elements included in the proposed language are all necessary and can help validate a genuine need for a new program in the region and credential area proposed. However, elements in the needs analysis are missing and must be inserted, specifically, 1) whether and why existing CTC-accredited programs in the region are unable to meet the identified need, and 2) what impact a new program will have on existing accredited programs. If there exist active, accredited preparation programs in the region that have the capacity and intention to meet the anticipated need, the CTC should not be approving new programs in the same credential area, serving the same geographic region, unless there is a compelling reason for doing so.

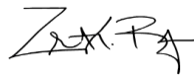
Expanding programs unnecessarily taxes the resources of the Commission to thoroughly review new preparation programs, adequately monitor ongoing program quality, and support current preparation programs in innovating and strengthening preparation for all certificated educators. Furthermore, expanding duplicative preparation programs, both preliminary preparation and induction programs, can undermine existing CTC-accredited programs by eroding their participation base. CTA is not suggesting that no new programs ever be approved, rather that the CTC consider the systemwide impacts the new program will have and whether those impacts are beneficial or deleterious to the preparation of a qualified, diverse, and adequate California educator workforce.

Practitioner Participation in Program Design

Authentic engagement of relevant stakeholders is often a difficult, yet critically important, factor in ensuring strong educational programs of all types. CTA recognizes and supports staff's acknowledgment that the evidence of genuine participation is sometimes lacking during accreditation reviews. CTA suggests two additions to the proposed language that are foundational to engagement and participation in another California planning and accountability system, the Local Control Accountability Plan (LCAP). First, the local certificated bargaining unit should be included as a required stakeholder in the initial design of the program. Second, the institution should report not just who participated through the staff recommended table, minutes, and agenda, but also provide a short description of how the consultative process with the stakeholders impacted the development of the design. This provides substantive evidence to the Commission reviewers. Additionally, responding to the prompt allows stakeholders and the institution to reflect and acknowledge the benefit of that collaboration, and see the potential value of continuing to cooperate in program development and implementation.

Thank you for considering these revisions and we urge you to incorporate them into the final language.

Sincerely,



E. Toby Boyd, President
California Teachers Association

db:ETB

C: CTA Executive Officers
Teri Holoman, Associate Executive Director, CTA
Lori Easterling, Manager, CTA Legislative Relations
CTA Liaisons to the CTC