



July 31, 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,

As Interim Chair of the Loyola Marymount University Department of Teaching and Learning, I am writing in reference to **Item 4A**.

We would like to propose the following questions for clarification as well as proposing Concerns about the implementation of Clinical Practice Guidelines and Teaching Performance Assessment:

Standard 3: Clinical Practice.


1. What is the recommended length of time for observing a synchronous lesson? Can short sequential lessons (10 minutes or less) be sufficient for an observation?
2. How do University Fieldwork Instructors provide feedback if the school is only using asynchronous work (i.e. packets or worksheets)?
3. Reference is made to "different evaluation protocols than were used during in-person clinical practice". Are there examples of what is meant by different evaluation protocols?

Standard 5: Implementation of a Teaching Performance Assessment.

1. We are requesting that the Executive Order for the Teaching Performance Assessment be extended until such time that schools are completely open for face-to face instruction or be extended to Induction.
2. We are concerned that it may be extremely difficult to obtain parent permission for videotaping in students' homes especially for students with disabilities. Is there a recommended alternative to videotaping given the potential challenges to filming in homes? Will there be another means/way to demonstrate student interactions? For example in edTPA Rubrics 6-9, it requires video recordings of interactions with 4 or more students. How can this be accomplished if candidates are not in schools where synchronous learning is taking place?

Thank you for your consideration of these issues. We are very appreciative of the upcoming discussion of the issues experienced due to the pandemic.

Respectfully,


Victoria Graf (Aug 3, 2020 12:03 PDT)

Victoria L. Graf, Ph.D.
Interim Chair
Department of Teaching and Learning
Loyola Marymount University



July 31, 2020
Commission on Teacher Credentialing
1900 Capitol Ave.
Sacramento, CA 95811

RE: **Agenda Item 4A**
CTC Meeting August 6, 2020

We so appreciate the Commission for tackling the difficult issues presented by COVID-19 and the Child Development Permit applications and approvals. We acknowledge that the proposed accommodations to respond to COVID-19 conditions have the potential of strengthening educator preparation. We are responding to the content on pages 13 through 18 of Agenda Item 4A in that spirit.

PEACH faculty members statewide from community colleges, CSU, UC and private university campuses have reviewed Item 4A and provide the following written comment regarding the points that specifically pertain to ECE educator preparation and CTC's Child Development Permits.

A. Recommended flexibilities (that are either currently in place or in development at this time):

1. *Accept electronic transcripts for Child Development (CD) Permit applications in addition to paper transcripts.*

We support CTC's plan to propose regulations to the Office of Administrative Law for approval to accept electronic transcripts for Child Development (CD) Permit applications in addition to paper transcripts.

2. *Provide flexibility for programs offering the 3-unit supervised field experience to use a variety of implementation options to accommodate current COVID-19-related conditions in the field.*

We appreciate the Commission's ongoing acknowledgement that ECE preparation programs have flexibility in implementation options for the 3-unit supervised field experience/practicum. This policy and practice honor each institution's local purview to serve its student and community in preparation programs and maximizes flexibility to accommodate current COVID-19- conditions.

We also recommend that this ongoing flexibility be honored/practiced in the future as it has been in pre-COVID CTC policy and practice. We agree with CTC that practicum and clinical experience are the most essential elements of ECE and K-12 teacher preparation.

3. *Translate and make the CD Permit application form available in Spanish. Commission staff has agreed to do this and will be working on a Spanish translation for both the CD Permit application and the leaflet on the CTC website.*



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We enthusiastically thank CTC for Spanish translations of the CD Permit application and the leaflet on the CTC website. We also urge the translation of the application and leaflet into other languages, if at all possible.

4. Establish an extension of time after expiration of the permit for renewal – i.e., a grace period. COVID-19 extensions were approved at the April 2020 Commission meeting- see Agenda Item 3A.

We support the commission providing an extension of time for permit renewal during COVID 19.

5. Provide video and webinar updates on COVID-19 permit provisions on the Child Development Training Consortium (CDTC) and CTC sites. Commission staff are considering holding an update webinar for ECE preparation programs. Staff will post any ECE flexibilities adopted by the Commission on the Commission's website but does not have control over what is posted on other institution or agency websites.

We strongly support CTC's action of presenting and archiving an informational webinar regarding COVID-19 provisions and flexibilities related to the CD Permit with a link on both the CTC and CDTC websites. We further urge CTC adopt the standard of preparing CD Permit webinars/information in multiple languages and close-captioned.

In addition, we encourage CTC provide a direct link labeled CD Permit on its website and to not hide it under the Credential link. The present location is extremely confusing for CD Permit applicants (who purportedly represent approximately 20% of all educators served by CTC); their mentors confirm that it is hard to find for many.

6. Modify observation hours for practicum classes during COVID-19 to include specialized (intentional) online content for program participants that are in a 100% distance learning model (and not able to engage face to face with children). ECE preparation programs already have the authority to structure their coursework and fieldwork appropriately to meet local contexts and needs. Regulations do not have required observation hours.

We appreciate that the CTC recognizes preparation programs continue to have the authority to structure coursework and fieldwork to meet local contexts and needs. We also ask that this description be clarified. Practicum and observation demand separate objectives and activities and are not interchangeable.

7. Add Zoom or phone assistance for application completion and multi-lingual support. Phone support can be provided on request, however, assistance with application completion is within the purview of preparation programs.

We appreciate the availability of phone assistance for applicants. We ask for more clarification on the nature and availability of CTC's phone assistance for CD Permit applicants. How does an applicant find the CTC phone assistance and contact information? On the CD Permit application form? Designed to be accessed at a specific point in the application process? On the CTC website?

We further want to recommend revision of the Child Development Professional Growth Manual (November 2015) We are aware that CTC resources are limited and that the Commission



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defers to ECE preparation program faculty advisors to provide professional growth advisement; we want to cite that there is no longer statewide systemic funding for ECE professional growth advisors/advisement to support training, updating, and compensating campus ECE professional growth advisor faculty. This situation, and the threatened cuts to the Child Development Training Consortium and the California Early Childhood Mentor Program and to IHEs, increasingly challenge the state's faculty capacity to consistently support all ECE IHE students as they pursue professional growth and prepare to apply for their first or next level of CD Permit. We urge the Commission to advocate for strengthening ECE education preparation infrastructure statewide, across all IHE segments and to support advising at CTC if possible.

CDTC is often contacted by CD Permit applicants for help in navigating the CTC website to access Permit information; however, their budget is being cut. So where will an applicant go? Presently, the CDTC annual budget allocates: \$288,000 for 2,880 permit applications and \$87,759 for 1791 live scans which are being defunded. Simplifying CTC's application website and specifying a CD Permit portal could help applicants' access to information and facilitate their CTC website navigation greatly.

B. Recommendations that are currently in planning, but will take more than a year to implement:

1. *Add the Child Development Permit to the Commission's online electronic application and recommendation system. The Commission could approve submission of recommendation via CTC Online. TBD how long this would take the Commission's Information Technology (IT) division to add to the system, but it would not be for the 20-21 year.*

Again, we urge the development of a CTC website portal have a direct link labeled CD Permit to welcome CD Permit applicants. We urge this be completed in less than one year, if at all possible.

C. Recommendations that are *not possible* due to data security, Education Code provisions, or Title 5 Regulations:

4. *Allow the use of payment systems that are commonly used by applicants such as Venmo and PayPal. The Commission cannot accept payments via Venmo and PayPal. The Commission can accept payments from third parties such as institutions of higher education and the Child Development Training Consortium if they are submitting the application on an educator's behalf.*

We understand these current limitations of CTC to accept fees and to pre-review transcripts. Increasingly, students may not use checking accounts, but depend upon electronic transfer of funds for most of their financial transactions. This makes it increasingly difficult for CD Permit applicants to sending in a paper check to cover application processing. We stand ready to collaborate with CTC to advocate for alternative ways to process CD Permit applications.



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5. Provide financial support or waive permit fees during this emergency period - due to lack of CDTC stipend. Historically, the Child Development Training Consortium has assisted permit candidates by paying for their permit application fees. However, the CDTC budget and timing for availability of funds for this purpose is less certain at this point in time. However, the Commission is a fee-supported special fund agency and is not supported by general funds for its operations. The Commission's funding is derived primarily from the fees that candidates pay for credentials and permits. Statute and regulations require a fee. The Commission would need statutory authority to waive the application fee. The Commission does not provide financial aid to any candidates for a credential or a permit.

Again, as CDTC funding is drastically cut, we urge the CTC work with ECE professionals to promote consistent support for CD Permit applicants and ECE teachers' ongoing professional development. The inequity in compensation of K-12 and ECE teachers exacerbates the impact of CDTC funding cuts on the individual ECE teacher's capability to pay fees.

6. Extend the five-year renewal requirement for those due to renew in 2020/2021 and/or modify the number of professional growth hours required for renewal for those due to renew in 2020/2021. This would require a change to regulations. The Commission cannot do this on its own authority.

We wonder--Are there other routes to explore in order to change or waive regulations temporarily in a pandemic?

D. Recommendations that would require Commission action to implement:

1. Allow ECE preparation programs that are participating in piloting the implementation of the TPEs and the Program Guidelines to directly recommend candidates via paper application for the CD Permit (similar to the current Verification of Completion/VOC process), for as long as the programs are participating in the pilot, and until such time as a new program review and approval process is developed and in place. The Commission has the authority to do this based on Commission action and regulatory authority.

We do not support this recommendation be considered until the pilot programs are completed and fully vetted. Please provide additional information regarding the pilot process. We are not aware of any specifics for the pilot program. We don't know its SOW, its objectives, its methods... Also, we do not feel the TPEs have been vetted well enough to use them to verify a program. How will the pilot IHEs be compensated for their work? There are many additional issues with accepting a program's graduates before the standards have been tested for validity and reliability.

2. Allow ECE preparation programs that have earned NAEYC accreditation to directly recommend candidates via paper application for the Permit. The Commission has the authority to do this based on Commission action and regulatory authority.



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We appreciate the Commission recognizing the value of NAEYC (National Association of the Education of Young Children) accreditation. This national ECE accreditation is recognized nationwide and internationally in ECE preparation programs across segments of higher education in EC/CD.

We strongly support CTC recognizing NAEYC program preparation accreditation as meeting a high standard. In fact, an IHE preparation program's NAEYC accreditation adds "weight" to its value in the field and in the higher education milieu.

3. Add a Waiver process for Child Development Permits. The Commission might consider approving LEA employer-requested waivers for ECE candidates, providing additional time to meet requirements for the permit.

We have more questions about the waiver process--Who could do this? How would it work? Why limit it to LEA's?

Next Steps Related to Early Care and Education: Child Development Permit

- participate in ongoing discussions in the field with both the ECE Practicum Community of Practice and the EDU Practicum Community of Practice and bring any additional information as appropriate to inform the Commission;*
- move forward with implementing the provisions of the Professional Development Grant-Renewal (PDG-R) as provided in the terms of the grant; and*
- monitor the information as it may become available about the work of the Governor's Master Plan Committee and the applicability of this plan to the work of the Commission relative to the Child Development Permit.*

Regarding next steps listed at the end of Item 4A:

- We appreciate the Commission seeking input from stakeholders. We are confused on exactly who is "the ECE Practicum Community of Practice." There are many ECE Community of Practice groups that have sprung up especially in the COVID-19 context. Each of these communities of practice reaches a different group of ECE professionals. It is critical to be inclusive in "who gets to give key input" and we encourage CTC to be as inclusive of the various Communities of Practice (CoPs) as possible. A few long-standing groups with ECE-focused CoPs include CCCECE, PEACH, and CCPC.
- Please describe the provisions of the PDG-R—it is not clear if you are referring to the Professional Development Grant or Preschool Development Grant. What are the PDG-R Grant's provisions and deliverables?
- PEACH will continue to be engaged in the Early Childhood Policy Council Master Plan development process.
- We urge the Commission explore collaborating with the ECE Registry that currently verifies ECE teacher transcripts. The registry processes could enhance CD permit application process.



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Thank you again to the Commission for its continual support for ECE and flexibilities regarding the CD Permit application process and ECE preparation in the time of COVID.

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