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# 4H

## Information/Action

### *Educator Preparation Committee*

### **COVID Flexibilities: Recommendation to Extend the Waiver of Preconditions Related to Demonstration of Subject Matter Competence and Student Teaching**

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**Executive Summary:** This agenda item requests consideration of extending the waiver of preconditions requiring demonstration of subject matter competence prior to daily whole class instruction for the 2021-22 academic year as adopted by the Commission.

**Recommended Action:** That the Commission review and discuss the recommendation and take action to waive, through academic year 2021-22, the waiver of the precondition that requires candidates to have demonstrated subject matter prior to daily whole class instruction.

**Presenters:** Sarah Solari-Colombini, Consultant and Cheryl Hickey, Administrator; 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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# **COVID Flexibilities: Recommendation to Extend the Waiver of Preconditions Related to Demonstration of Subject Matter Competence and Student Teaching**

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## **Introduction**

This agenda item requests that the Commission continue for the 2021-22 academic year the waiver of the precondition related to demonstration of subject matter competence prior to student teaching, that was authorized by Commission action in April 2020 for the 2020-21 academic year due to the COVID-19 pandemic.

## **Background**

The Commission acted in April 2020 to provide flexibilities for credential holders, applicants, candidates, and program completers impacted by the COVID-19 pandemic for academic year 2019-20. The Commission took this action as candidates enrolled in educator preparation programs experienced numerous interruptions to their program including: (1) face-to-face coursework shifting to distance learning modalities; (2) a delay, interruption or change in clinical practice placements as a result of TK-12 school closures and that system's move to distance learning; and (3) the closure of testing centers which affected candidates' ability to complete examination requirements. The flexibilities adopted by the Commission were intended to allow candidates who were on track to complete their programs and earn their credentials in spring 2020 the ability to still do so.

Additionally, in May 2020, the Governor issued an Executive Order (EO) to assist applicants and candidates in educator preparation programs. As it became clear that the pandemic would impact the 2020-21 academic year, the language in the EO was then adopted as part of the state budget which extended the provisions of the EO through August 2021. The EO and budget trailer bill offered the following flexibilities:

1. Interns and program applicants who are required to demonstrate basic skills and subject matter competence prior to admission but could not do so due to testing center closures were allowed to begin preparation and meet these requirements prior to earning their preliminary teaching credential.
2. Teacher candidates who could not access a testing center to take and pass the Reading Instruction Competency Assessment (RICA) for their preliminary teaching credential were allowed to meet this requirement prior to earning their clear credential.
3. Teachers and administrators completing preparation programs at the end of the 2019-20 or 2020-21 academic year who could not complete their performance assessments due to school closures are allowed to earn their preliminary credential and meet the performance assessment requirement during their induction program prior to earning their clear credential.

Further, during its August 2020 meeting the Commission took action to define other flexibilities that could be afforded to candidates enrolled in and completing their credential programs. At the [February 2021](#) Commission meeting, action was taken to extend the Program Sponsor Variable Term Waiver (PS-VTW) option, allowing candidates to begin teaching and complete unfinished requirements for the preliminary credential within one year, through August 31, 2021. [Appendix A](#) summarizes the flexibilities provided to candidates and programs through legislation and Commission action. [Appendix B](#) provides the various ways teacher preparation programs can recommend completers during the 2020-21 year.

### **Demonstration of Subject Matter Competence Prior to Daily Whole Class Instruction**

Programs approved by the Commission must adhere to all relevant statute, regulations, preconditions, and program standards. [Preconditions](#) are program requirements that are grounded in statute, regulations or Commission policy and generally are matters of compliance. An example of a precondition is that all institutions of higher education offering educator preparation in California must hold regional accreditation through the Western Association of Schools and Colleges or one of the other federally approved regional accrediting bodies.

For teacher preparation, the Commission has long had preconditions that are intended to ensure that prospective educators have demonstrated subject matter proficiency by the point in their clinical practice where they have assumed a leading instructional role in the classroom, which the Commission has established as prior to “daily whole class instruction.” The two relevant preconditions are included below:

#### Preliminary Multiple and Single Subject Precondition 6: Subject Matter Proficiency

The approved preliminary teacher preparation program sponsor determines that each candidate meets the subject matter requirement prior to being given daily whole class instructional responsibilities in a TK-12 school or before becoming the teacher of record as an intern in a TK-12 school. Reference: Education Code section 44259(b)(5).

- For Multiple and Single Subject programs (traditional and intern), the candidate provides evidence of having passed the appropriate subject matter examination(s) or having completed the appropriate Commission-approved subject matter preparation program, or a course of study deemed equivalent by the program sponsor.
- For integrated undergraduate programs only, the candidate must be monitored by the program for subject matter competency both prior to beginning and during early field experiences. Each candidate in an integrated undergraduate program must have satisfied subject matter or at a minimum completed four-fifths of the Commission-approved subject matter preparation program prior to beginning solo (i.e., student) teaching.

#### Preliminary Education Specialist Precondition 3: Subject Matter Proficiency

Subject Matter Proficiency. The approved teacher preparation program sponsor determines that each candidate meets the subject matter requirement prior to solo teaching, or, for intern candidates, before being given daily whole class instructional responsibilities in a TK-12 school

or before becoming the teacher of record in a TK-12 school. Reference: Education Code section 44227.

As previously noted, in April 2020, the Commission waived these preconditions in order to allow candidates enrolled in the 2019-20 academic year to progress in their programs. The flexibility was extended in August 2020 to apply to candidates in the 2020-21 academic year. Testing center closures caused by the COVID-19 pandemic made it impossible for candidates to take and pass the CSET examinations. The Commission’s action allowed candidates to continue their program uninterrupted by these closures and allowed them to participate in student teaching without requiring them to first demonstrate subject matter competency. Education Code requires that all candidates demonstrate subject matter prior to being recommended for the preliminary credential. Other options, such as the Program Sponsor Variable Term Waiver (PS-VTW) were also approved by the Commission to accommodate these candidates as they completed their programs. The PS-VTW provides program completers with an option if they were still unable to take and pass subject matter examinations during their preliminary programs due to continued testing center closures. The PS-VTW allows completers to seek employment while giving them up to one year from the date of issuance to take and pass these examinations.

As programs begin to admit candidates for the 2021-22 academic year, testing center closures and limitations on capacity due to COVID-19 social distancing restrictions continue to be a significant hurdle for candidates who need to demonstrate subject matter competence. The Governor’s Executive Order and the subsequent budget statutory language in SB 820 allows candidates who have not demonstrated subject matter or basic skills due to testing center closures between March 19, 2020 and August 31, 2021 to be admitted to educator preparation programs. Programs are now in the process of admitting candidates into programs for the 2021-22 academic year; however, many of these candidates have not yet demonstrated subject matter and/or basic skills. Questions have arisen about whether these candidates will be allowed to student teach without subject matter.

### **Collaborative Group**

In June 2020, staff reached out to a handful of preparation program sponsors to discuss COVID-19 impacts on candidates seeking to complete preparation. The collaborative group has grown over time to now include all of those listed below. The purpose of the group is to provide the Commission with information about the challenges that candidates, programs, and employers continue to face as a result of the pandemic and its impact on schools, and to help identify areas within the Commission’s purview where the Commission could work to mitigate or eliminate these challenges. The list of participants is provided below.

<b>Segment</b>	<b>Member</b>	<b>Role and Institution</b>
Teacher Induction	Constance Best	Executive Director, Yolo/Solano Center for Teacher Credentialing (Davis Joint Unified)
CTA	Danette Brown	Teacher, LaHabra City School District
CSU	Ernest Black	Statewide Director, Cal State TEACH

<b>Segment</b>	<b>Member</b>	<b>Role and Institution</b>
Employer	Paul Deal	Manager, Solano County Office of Education
AICCU	Deborah Erickson	Dean, Point Loma Nazarene University
ACSA	Doug Gephart	ACSA Liaison to the Commission
Teacher Induction	Melissa Meetze-Hall	Administrator, Center for Teacher Innovation (Riverside County Office of Education)
AICCU	Michael Hillis	Dean, California Lutheran University
Employer	Bryan Johnson	Director, Certificated Workforce Management, Los Angeles Unified School District
AICCU	Ira Lit	Associate Professor, Stanford University
LEA	Linda Liebert	Director, Sacramento County Office of Education
UC	Virginia Panish	Director of Teacher Education, UC Irvine
Employer	Denise Payne	Manager, Human Resources, San Bernardino Superintendent of Schools
LEA	Patricia Pernin	Administrative Coordinator, Los Angeles Unified School District
UC	Elisa Salasin	Director, UC Berkeley
CSU	Pia Wong	Associate Dean, CSU Sacramento
Teacher Induction	Jacquelyn Sanborn	Coordinator, Orange County Department of Education
Commission Liaison	David Simmons	Assistant Superintendent, Goleta Union School District

Staff: *Cheryl Hickey, and Sarah Solari-Colombini, Jake Shuler*

The Commission staff continues to monitor the changing situation particularly as many TK-12 schools are beginning to reopen to in-person learning. Staff continues to facilitate office hours to hear from programs about the challenges they are facing. In addition, in February and March 2021, the Commission had numerous opportunities through virtual conferences to talk with program personnel. The Commission has heard from program personnel, the collaborative group, and other stakeholders that the flexibilities afforded in this current academic year with respect to waiving demonstration of subject matter prior to whole class instruction are still needed for the 2021-22 academic year.

#### *Intern Candidates*

Intern candidates are also challenged by the subject matter requirement. Because interns are the teacher of record in their classroom assignments, interns are required to demonstrate subject matter competence prior to being issued the intern document. This requirement was waived under the Governor's initial Executive Order and then extended in the state budget process. These flexibilities are set to expire as of August 31, 2021. However, interns admitted under the provisions of the current statutory language will be able to serve on the intern document in 2021-22 academic year without having demonstrated subject matter competence. Without another legislative or executive action, interns admitted outside of the provisions of

the current statute will have to first demonstrate subject matter competence prior to being issued an intern credential.

**Staff Recommendation**

Staff recommends that the Commission extend, through academic year 2021-22, its previous action to waive Precondition 6 for Preliminary Multiple and Single Subject teacher candidates and Precondition 3 for Education Specialist candidate.

**Next Steps**

If approved by the Commission, staff will issue a Program Sponsor Alert to notify programs of this extension. Staff will continue to work with the collaborative group to monitor the impact of the pandemic on teacher preparation and to seek solutions where appropriate. In addition, Commission staff continues to communicate with the state legislature and Administration the possible need to have the flexibilities authorized first by the Governor’s Executive Order and then by the state budget extended beyond the August 2021 sunset date.

## Appendix A

### COVID Flexibilities

	Summary of Flexibility	Eligible for Use	Authority and Conditions
<b>TPA/APA</b>	<b>Move performance assessment requirement (TPA/APA) to the Clear Credential</b> if impacted by COVID. The performance assessment must be passed prior to recommendation for the clear credential.	March 19, 2020-August 31, 2021	<b>Authority:</b> EO and SB 820 <b>Conditions:</b> Enrolled in program, met all requirements other than the performance assessment, COVID prevents completion
<b>RICA</b>	<b>Move RICA requirement to the Clear Credential</b> if impacted by COVID. The assessment must be passed prior to recommendation for the clear credential.	March 19, 2020-August 31, 2021	<b>Authority:</b> EO and SB 820 <b>Conditions:</b> Unable to take RICA due to COVID
<b>CBEST</b>	<b>Waive requirement of CBEST for Program Entry</b> and the requirements for programs to use the CBEST data to support candidates. Basic Skills must be met prior to recommendation for the credential.	March 19, 2020-August 31, 2021	<b>Authority:</b> EO and SB 820 <b>Conditions:</b> For prospective candidates unable to take the exam
<b>Subject Matter - Interns</b>	<b>Waive Subject Matter Requirement for Interns</b> to enter the Intern program. The subject matter requirement must meet be met prior to recommendation for the preliminary credential.	March 19, 2020-August 31, 2021	<b>Authority:</b> EO and SB 820 <b>Conditions:</b> Unable to take CSET due to COVID
<b>Subject Matter - Student teaching</b>	<b>Waive Subject Matter Requirement prior to Daily Whole Class Instruction.</b> All candidates must satisfy the subject matter requirement prior to recommendation for the preliminary credential.	2020-21 school year	<b>Authority:</b> Commission action, April 2020, Agenda item 4A <b>Conditions:</b> Unable to take CSET due to COVID
<b>PS-VTW</b>	<b>Program Sponsor Variable Term Waiver (PS-VTW)</b> allows candidates who were on track to complete an educator preparation program to have an additional year to complete the credential requirements.	March 19, 2020-August 31, 2021	<b>Authority:</b> Commission Action, April 2020 and October 2020 <b>Conditions:</b> Almost all requirements met, need more time, and impacted by COVID

	<b>Summary of Flexibility</b>	<b>Eligible for Use</b>	<b>Authority and Conditions</b>
<b>PPS -2<sup>nd</sup> Placement</b>	<b>Waives the Requirement for 2 Placements for Pupil Personnel Credentials.</b> The Title 5 regulations require candidates to complete placements in at least two grade level bands for a minimum of 100 hours in each placement. This requirement is waived. Candidates are still subject to the minimum number of total required clinical practice hours.	March 19, 2020-June 30, 2021	<b>Authority:</b> AB 77 and SB 98 <b>Conditions:</b> Impacted by COVID
<b>CBEST</b>	<b>Defer CBEST for one year</b> if the candidate who has not previously failed the assessment (used most often by out of state candidates).	March 19, 2020-August 31, 2021	<b>Authority:</b> Commission Action, April 2020 and October 2020 <b>Conditions:</b> Not previously failed CBEST
<b>Length of Validity of Scores</b>	<b>Examination Scores are Valid for eleven (11) years</b> rather than the ten years in Regulations due to the COVID pandemic.	March 19, 2020-June 30, 2021	<b>Authority:</b> AB 77 and SB 98 <b>Conditions:</b> Impacted by COVID
<b>Extension of Credentials</b>	<b>COVID has been defined as a Good Cause</b> for a one-year extension to a credential or permit. (PIPS and STSPs do not qualify for this extension).	Through the 2020-21 School Year	<b>Authority:</b> Commission, April 2020 Agenda Item 3A <b>Conditions:</b> Impacted by COVID
<b>PIP/STSP</b>	<b>Individuals who have served on a PIP or STSP</b> can downgrade to an employer requested Variable Term Waiver (VTW).	Through the 2020-21 School Year	<b>Authority:</b> Commission Action, April 2020 <b>Condition:</b> Impacted by COVID
<b>VTW</b>	<b>Individuals serving on a VTW</b> may, through an employer, request an additional issuance of the waiver even if the criteria for renewing the waiver has not been met.	Through the 2020-21 School Year	<b>Authority:</b> Commission Action, April 2020 <b>Condition:</b> Impacted by COVID



## Appendix B

### Documents the 2020-21 Teacher Preparation Programs Can Recommend Completers

Document	Remaining Preliminary Program and Credential Requirements	Authorization to Teach	Validity Period	To Renew or move toward the Clear Credential
Preliminary Credential (P5)	None	Yes	5 years	<ul style="list-style-type: none"> <li>• Complete Teacher Induction Program</li> </ul>
Preliminary Credential with a TPA renewal code (P5 TPA) and/or a RICA renewal code (P5 RICA)	One or both of the following: <ul style="list-style-type: none"> <li>• Passage of a Teaching Performance Assessment</li> <li>• Passage of the RICA</li> </ul>	Yes	5 years	<ul style="list-style-type: none"> <li>• Pass remaining assessments (TPA and/or RICA) <b>and</b></li> <li>• Complete Teacher Induction Program</li> </ul>
Program Sponsor Variable Term Waiver (PS-VTW <sup>1</sup> )	One or both of the following: <ul style="list-style-type: none"> <li>• Basic Skills</li> <li>• Subject Matter</li> </ul> Candidate may also need to complete the TPA and/or the RICA.	Yes	1 year	<ul style="list-style-type: none"> <li>• The Preliminary program may request an additional year for the waiver if the candidates makes progress on the remaining requirements, <b>or</b></li> <li>• Complete the remaining requirements so the preliminary program recommends for a Preliminary credential.</li> </ul>

<sup>1</sup> a letter accompanies the PS-VTW and will identify the remaining Preliminary requirements