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## Action

### *Educator Preparation Committee*

#### **Consideration of Continued Suspension of Preconditions Requiring Demonstration of Subject Matter Competence Prior to Daily Whole Class Instruction**

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**Executive Summary:** This agenda item presents a proposal for the Commission to consider extending for one additional academic year the suspension of the preconditions requirement that student teachers must satisfy subject matter competence prior to daily whole class instruction.

**Recommended Action:** That the Commission review and take action to continue the suspension of the precondition requiring demonstration of subject matter competence prior to daily whole class instruction for candidates enrolled in the 2022-23 academic year.

**Presenters:** Cheryl Hickey, Administrator, and Jake Shuler, Consultant, 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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# **Consideration of Continued Suspension of Preconditions Requiring Demonstration of Subject Matter Competence Prior to Daily Whole Class Instruction**

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## **Introduction**

This agenda item requests that the Commission consider continuing the suspension of the preconditions that require candidates enrolled in the upcoming 2022-23 academic year to demonstrate subject matter competence prior to daily whole class instruction. This proposed suspension would be for candidates in student teaching-based programs only. The proposed suspension would not apply to interns, as Education Code section 44325(C)(3) requires candidates enrolling in an intern pathway to have demonstrated subject matter competence prior to being recommended for the intern document. This suspension would only be in place for candidates enrolled during the 2022-23 school year who begin their program (coursework or clinical practice) on or before May 1, 2023. It would not apply to candidates admitted for the 2023-24 academic year.

## **Background**

Since March 2020, a series of temporary flexibilities have been afforded to educator preparation programs and their candidates to ensure that prospective educators can continue to progress in their preparation programs and achieve their licensure goals, as well as to avoid exacerbating the state's teacher shortage. Some of these flexibilities represent actions taken by and under the purview of the Commission, while others were the result of legislative and/or gubernatorial action. A table with the current flexibilities is included as [Appendix A](#). Many of these flexibilities are set to expire in summer 2022 as PK-12 schools have returned to in person instruction and as testing centers have resumed more typical operations with enhanced options for candidates to take required examinations.

## **Relevant Preconditions**

Education Code section 44259 requires demonstration of subject matter competence prior to issuance of a preliminary credential. Precondition 6 (Multiple and Single Subject) and Precondition 3 (Education Specialist) require that candidates demonstrate subject matter competence prior to daily whole class instruction. The full text of these preconditions is available in [Appendix B](#). Daily whole class instruction typically begins during formal student teaching and before or concurrent with the beginning of the candidate's four weeks of solo or co-teaching that is required by program standards. However, because programs have flexibility with respect to their program design, and student teaching/clinical practice may differ in significant ways, programs determine when "daily whole class instruction" begins within their program.

To meet the needs of candidates who were impacted by testing center closures caused by the pandemic and the stay-at-home orders, the Commission took action in [April 2020](#) to suspend

these preconditions. The Commission revisited this action again in [April 2021](#) as the impact of the pandemic continued. At that time, the Commission acted to extend this suspension through academic year 2021-22. The Commission then took action in [December 2021](#) to extend the flexibility around the subject matter requirement for interns through June 30, 2022, as authorized by AB 130 (Chap. 44, Stats. 2021). The Commission did not take action at that time for non-intern candidates since the previous action taken in April 2021 had pertained to the entire 2021-22 academic year.

As this deadline nears, many in the field have requested that the Commission consider extending the suspension of these preconditions for one additional year, through academic year 2022-23.

#### *Current Rationale for Continued Extension*

Two major reasons are cited by institutional personnel for requesting these preconditions be suspended for one additional academic year.

First, while most testing centers are now open, capacity expanded, and new options are available such as online proctoring for many exams, some programs are reporting that candidates are still experiencing difficulty taking some exams at times and locations when the candidate is available. While online proctoring has been made available for many credential areas which affords candidates flexibility to take exams at their home, campus library, or other convenient locations at a schedule that works for them within a 24-hour period for one week per month, some examinations are still provided at testing centers only. An example is CSET Multiple Subjects Subtest II (Science and Mathematics) for the Multiple Subject credential which is not currently available through the online proctoring option because this exam includes hand draw/scanning functionality which is not supported through online proctoring.

Second, institutions have reported that they need additional time to more efficiently and effectively implement the new options for candidates to demonstrate subject matter competence which were made available through passage of AB 130. Three new options include: completion of an academic degree major from a regionally accredited institution of higher education that matches the credential area being sought, completion of coursework from a regionally accredited institution of higher education that is aligned to the Subject Matter Requirements (SMRs) for the credential being sought, or a combination of coursework aligned to the SMRs and qualifying examination subtests ([See Appendix C](#)). Personnel from institutions throughout the state are reporting being overwhelmed by requests for coursework evaluation to meet subject matter competency. It has taken programs significant time to understand and establish institutional processes to implement the law and that completing coursework and transcript evaluation for a large number of candidates and prospective candidates has been challenging in this first year of implementation. Additionally, despite efforts from Commission staff and program personnel to provide accurate information, many candidates have misunderstood the new law, believing that the subject matter requirement has been eliminated entirely, when in fact, it has allowed new options for demonstrating subject matter. As a result,

some candidates had postponed signing up for necessary examinations and are now trying to take those examinations.

Institutions have been in communication with Commission staff continually since passage of the bill to ensure that they are implementing the law in the manner that it was intended. They continue to update Commission staff on the challenges and opportunities associated with these new options and to work with the staff to ensure that these new options are available to all prospective educators who qualify for them.

*Who would be eligible for this flexibility?*

If the Commission approves the continued suspension of the relevant preconditions, this flexibility will apply to all candidates in a **student teaching pathway** (including residencies) who are admitted to a credential program **for enrollment in the academic year 2022-23**. It would not apply to any new candidates admitted for enrollment in academic year 2023-24 or beyond, including any candidate admitted with a start date of May 1, 2023, or later.

*Does this flexibility apply to Interns?*

Action taken by the Commission in accordance with AB 130 (Chap. 44, Stats. 2021) requires that all applicants for an intern credential after June 30, 2022, must demonstrate subject matter.

*When would these candidates receiving the flexibility for 2022-23 academic year be required to demonstrate subject matter competence?*

Any candidate enrolled in academic year 2022-23 that has been allowed to participate in daily whole class instruction prior to demonstrating subject matter competence must demonstrate subject matter competence prior to being recommended for the preliminary credential.

*When would this flexibility end?*

This flexibility would end for all newly admitted candidates with start dates of May 1, 2023, or later.

*Why is the Commission proposing a May 1, 2023, end date for this flexibility if the flexibility only applies to candidates in academic year 2022-23 and not beyond?*

Institutions across the state have different parameters for defining an academic year. By establishing a sunset date for this flexibility of May 1, 2023, it helps avoid having candidates who begin programs in the summer months of 2023 across the state from being held to different standards, with some programs considering this period of time as part of academic year 2022-23 and others 2023-24. All candidates who are newly admitted for a start date of May 1, 2023, or later will need to demonstrate subject matter competence prior to daily whole class instruction per the relevant preconditions.

*Would this flexibility apply to candidates who are admitted during the 2022-23 academic year for enrollment in the 2023-24 academic year?*

No. The flexibility would only apply to candidates in the 2022-23 academic year and who begin their program (coursework or clinical practice) before May 1, 2023.

Any new candidate admitted for enrollment in a program in academic year 2023-24 or who will begin their program on or after May 1, 2023, must meet subject matter prior to daily whole class instruction.

*What if a candidate who was given this flexibility for the 2022-23 academic year has not completed their program by May 1, 2023, and must continue their enrollment?*

Candidates enrolled in 2022-23 (or earlier) under this flexibility will be able to continue their program into the future under this flexibility. They must demonstrate subject matter competence prior to receiving their preliminary credential.

*Would the institution be allowed to require its candidates to demonstrate subject matter competence prior to daily whole class instruction even if the Commission adopted this extension?*

Yes, an institution may choose to require that its candidates enrolled in 2022-23 demonstrate subject matter competence prior to daily whole class instruction. This would be an institution level decision.

It is important to note that, if the Commission votes to approve this extension of this flexibility, programs should strongly encourage and prepare all candidates to complete all examination requirements as early as possible in their programs. This action should not be seen as a waiver of the subject matter requirement or endorsement of unreasonable delays in completing credential requirements.

### **Staff Recommendation**

Staff recommends that the Commission continue the suspension of Precondition 6 (Multiple and Single Subject) and Precondition 3 (Education Specialist) for student teaching candidates enrolled in a preliminary Multiple, Single, or Education Specialist program for academic year 2022-23 and who have a start date prior to May 1, 2023.

### **Next Steps**

If the Commission takes action to continue the suspension of the relevant preconditions related to subject matter competence and daily whole class instruction, the Commission staff will prepare a Program Sponsor Alert to communicate this action to the field.

## Appendix A

### COVID Flexibilities 2021-22 Updated: December 29, 2021

COVID Flexibility	Summary of Flexibility	Eligible for Use	Authority and Conditions
TPA/APA	<p><b>Move performance assessment requirement (TPA/APA) to the Clear Credential</b> if impacted by COVID as noted in <a href="#">PSA 21-08</a>. The performance assessment must be passed prior to recommendation for the clear credential.</p>	<p>March 19, 2020- August 31, 2022</p>	<p><b>Authority:</b> EO N-66-20 and <a href="#">SB 820 (Chap. 110, Stats. 2020)</a> Extended with <a href="#">AB 130 (Chap. 44, Stats.2021)</a> <b>Conditions:</b> Enrolled in program, met all requirements other than the performance assessment, COVID prevents completion</p>
RICA	<p><b>Move RICA requirement to the Clear Credential</b> if impacted by COVID as noted in <a href="#">PSA 21-08</a>. The assessment must be passed prior to recommendation for the clear credential.</p>	<p>March 19, 2020- June 30, 2022</p>	<p><b>Authority:</b> EO N-66-20 and <a href="#">SB 820 (Chap. 110, Stats. 2020)</a> Extended with <a href="#">AB 130 (Chap. 44, Stats.2021)</a> The Commission took action to extend this deadline to June 30, 2022 <b>Conditions:</b> Unable to take RICA due to COVID</p>

COVID Flexibility	Summary of Flexibility	Eligible for Use	Authority and Conditions
CBEST	<p><b>Suspends requirement of CBEST for Program Entry</b>, if the candidate is unable to complete the exam due to testing center closures related to COVID-19, and the requirements for programs to use the CBEST data to support candidates. Basic Skills must be met prior to recommendation for the credential.</p>	<p>March 19, 2020- June 30, 2022</p>	<p><b>Authority:</b> EO N-66-20 and <a href="#">SB 820 (Chap. 110, Stats. 2020)</a> Extended with <a href="#">AB 130 (Chap. 44, Stats.2021)</a> The Commission took action to extend this deadline to June 30, 2022 <b>Conditions:</b> For prospective candidates unable to take the exam due to testing center closures related to COVID-19</p>
Subject Matter - Interns	<p><b>Suspends Subject Matter Requirement for Interns</b> to enter the Intern program if the candidate is unable to complete it due to testing center closures related to COVID-19. The subject matter requirement must be met prior to recommendation for the preliminary credential.</p>	<p>March 19, 2020- June 30, 2022</p>	<p><b>Authority:</b> EO N-66-20 and <a href="#">SB 820 (Chap. 110, Stats. 2020)</a> Extended with <a href="#">AB 130 (Chap. 44, Stats.2021)</a> The Commission took action to extend this deadline to June 30, 2022 <b>Conditions:</b> Unable to take CSET due to testing center closures related to COVID</p>

COVID Flexibility	Summary of Flexibility	Eligible for Use	Authority and Conditions
<b>Subject Matter - Student Teaching</b>	<p><b>Waive the Preconditions that Require Subject Matter Requirement prior to Daily Whole Class Instruction</b> for Preliminary Multiple/Single Subject and Preliminary Education Specialist candidates. All candidates must satisfy the subject matter requirement prior to recommendation for the preliminary credential.</p> <p><i>This is the flexibility that would be extended if the proposal in this agenda item is accepted.</i></p>	<p>For school year 2021-22. The suspension ends August 31, 2022</p> <p><i>(Proposed – May 1, 2023)</i></p>	<p><b>Authority:</b> Commission action, April 2020, Agenda item 4A Extended with Commission action, June 2021, Agenda item 4E <b>Conditions:</b> Unable to take CSET due to COVID.</p>
<b>PS-VTW</b>	<p><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.</p>	<p>March 19, 2020- August 31, 2021</p>	<p><b>Authority:</b> Commission Action, April 2020 and October 2020 <b>Conditions:</b> Almost all requirements met, need more time, and impacted by COVID</p>
<b>PPS -2<sup>nd</sup> Placement</b>	<p><b>Waives the Requirement for 2 Placements for Pupil Personnel Credentials.</b> 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.</p> <p><i>This flexibility has expired.</i></p>	<p>March 19, 2020- June 30, 2021</p>	<p><b>Authority:</b> SB 98 (Chap. 24, Stats. 2020) <b>Conditions:</b> Impacted by COVID</p>
<b>CBEST</b>	<p><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).</p> <p><i>This flexibility has expired.</i></p>	<p>March 19, 2020- August 31, 2021</p>	<p><b>Authority:</b> Commission Action, April 2020 and October 2020 <b>Conditions:</b> Not previously failed CBEST as noted in the <a href="#">CBEST Deferral and BSR Guidance Document</a></p>



COVID Flexibility	Summary of Flexibility	Eligible for Use	Authority and Conditions
<b>Length of Validity of Scores</b>	<p><b>Examination Scores are Valid for eleven (11) years</b> rather than the ten years in Regulations due to the COVID pandemic.</p> <p><b>This flexibility has expired.</b></p>	March 19, 2020- June 30, 2021	<p><b>Authority:</b> SB 98 (Chap. 24, Stats. 2020)</p> <p><b>Conditions:</b> Impacted by COVID</p>
<b>Extension of Credentials</b>	<p><b>COVID has been defined as a Good Cause</b> for a one-year extension to a credential or permit for individuals.</p> <p><b>Requires evidence of school closure, medical reasons, mandated quarantine, or other disruption directly related to COVID.</b> (PIPs and STSPs do not qualify for this extension)</p>	Available for all credential holders except for holders of a PIP or STSP.	<p><b>Authority:</b> Commission Action, April 2020 Agenda Item 3A</p> <p><b>Conditions:</b> Impacted by COVID</p>
<b>PIP/STSP</b>	<p><b>Individuals who have served on a PIP or STSP</b> can downgrade to an employer requested Variable Term Waiver (VTW).</p>	Available for PIP/STSP Holders	<p><b>Authority:</b> Commission Action, April 2020</p> <p><b>Condition:</b> Impacted by COVID</p>
<b>VTW</b>	<p><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 have not been met.</p> <p><b>Requires evidence of school closure, medical reasons, mandated quarantine, or other disruption directly related to COVID.</b></p>	Available for all VTW holders	<p><b>Authority:</b> Commission Action, April 2020</p> <p><b>Condition:</b> Impacted by COVID</p>

## **Appendix B**

### **Precondition 6**

#### **Multiple and Single Subject Programs**

(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 sections 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.

### **Precondition 3**

#### **Education Specialist Programs**

(3) 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 K-12 school or before becoming the teacher of record in a K-12 school. Reference: Education Code section 44227.

To demonstrate subject matter competence, a candidate for an Education Specialist teaching credential, except for the Early Childhood Special Education credential, shall:

1. Pass the Commission-approved Multiple Subject matter examination; or pass a Commission-approved subject matter examination in Art, English, Mathematics, including foundational-level Mathematics, Music, Social Science or Science, including foundational-level General Science; or
2. Complete a Commission-approved subject matter program in Art, Elementary, English, Mathematics including foundational-level Mathematics, Music, Social Science or Science, including foundational-level General Science; or Preliminary Education Specialist 2 Preconditions For integrated undergraduate programs only, the candidate must be monitored 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.
3. Hold a California general education teaching credential in any subject.

## Appendix C

### Relevant Education Code References AB 130 (Chap. 44, Stats. 2021)

#### RICA

(c) (1) The requirements in sections 44283 and 44283.2 of the Education Code and paragraph (5) of subdivision (a) of Section 80048.3 of, paragraph (5) of subdivision (a) of section 80048.8 of, section 80071.5 of, and paragraph (4) of subdivision (a) of section 80413 of Title 5 of the California Code of Regulations for preliminary multiple subject credential candidates and Level 1 or preliminary education specialist credential candidates to complete a reading instruction competence assessment are suspended for candidates who, between March 19, 2020, and December 31, 2021, are unable to complete a reading instruction competence assessment due to testing center closures related to COVID-19. The Commission on Teacher Credentialing may extend the suspension of this requirement to a date no later than June 31, 2022, if it determines that credential candidates are unable to complete a reading instruction competence assessment due to testing center closures or capacity issues related to COVID-19.

#### CBEST

(d) (1) The requirement in paragraph (1) of subdivision (f) of section 44252 of the Education Code and any accompanying regulations for credential program applicants to complete the basic skills proficiency test before admission to a credential program approved by the Commission on Teacher Credentialing is suspended for applicants who, between March 19, 2020, and December 31, 2021, are unable to complete the basic skills proficiency test due to testing center closures related to COVID-19. The Commission on Teacher Credentialing may extend the suspension of this requirement to a date no later than June 31, 2022, if it determines that credential candidates are unable to complete the basic skills proficiency test due to testing center closures or capacity issues related to COVID-19.

(2) An applicant for whom the basic skills proficiency test requirement is suspended pursuant to paragraph (1) shall complete the basic skills proficiency test during the credential program before recommendation for a preliminary credential. Any use of an applicant's basic skills proficiency test scores by a credential program shall be consistent with subdivision (f) of Section 44252 of the Education Code.

#### CSET for Interns

(e) (1) The requirement in subdivision (a) of section 44453 of the Education Code and any accompanying regulations for applicants for a university intern credential program to complete a subject matter examination before admission to a university intern credential program, and the requirement in paragraph (3) of subdivision (c) of section 44325 of the Education Code and any accompanying regulations for applicants for a university or district intern credential to complete a subject matter examination, are suspended for applicants who, between March 19, 2020, and December 31, 2021, are unable to complete a subject matter examination due to testing center closures related to COVID-19. The Commission on Teacher Credentialing may extend the suspension of this requirement to a date no later than June 31, 2022, if it determines that credential candidates are unable to complete a subject matter examination due to testing center closures or capacity issues related to COVID-19.