

# Division VIII of Title 5 of the California Code of Regulations

## Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to the Reauthorization of Elementary Subject Matter Programs to Meet the Subject Matter Requirement for Teaching Credentials

### Final Statement of Reasons

#### Public Problem

There is no change to the public problem information since the original submission of the Initial Statement of Reasons.

#### Purpose of Proposed Action

In addition to the original purpose of the proposed action, a supplement to the Initial Statement of Reasons was included in a 15-Day Notice to provide additional modifications to the regulation text to the proposed amendments to 5 California Code of Regulations (CCR) §§80048.8 and 80413 and supportive rationale for the proposed changes to comply with Government Code §11346.2(b)(1).

#### Consideration of Alternatives

The Commission has determined that no reasonable alternative considered by the agency or that has otherwise been identified and brought to the attention of the agency would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

#### Mandated Costs

These proposed regulations will not impose a mandate on local agencies or school districts.

#### 15-day Notice

The modifications to the proposed regulations described in the 15-day Notice distributed September 20, 2016 were approved by the Commission at the September 9, 2016 Commission meeting as part of the Public Hearing. No public comments were received during the 15-day Notice period pertaining to the modifications.

The 15-Day Notice included the following additional rationale for modifications to the text of the proposed regulations and a Supplement to the Initial Statement of Reasons:

#### *Summary of Modifications to 5 CCR §80048.8*

**(a)(4)(C)** Proposes adding the terms “preliminary” and “Level I” to this subsection to clarify that individuals holding these credential types are eligible for the same subject matter exemption as clear and life credential holders when seeking a new Education Specialist Credential. Adding these terms prevents preliminary and Level I credential holders from being compelled to complete duplicative requirements. Proposes adding the phrase “verification of subject matter competence” to clarify that

the exemption in (a)(4)(C) only applies to credential holders subject to meeting that requirement and would not apply to holders of credentials in Early Childhood Special Education since these persons are not required to verify subject matter competence, as stated in (a)(4)(D), even if the individual holds a clear or life credential.

### **Supplement to the Initial statement of Reasons**

#### **§80413**

**(a)(5)(A)** Proposes deleting the phrase “prior to July 1, 2004.” This amendment is included to remove the exclusion of elementary subject matter programs completed after this date from being used by credential candidates to meet the subject matter requirement for teaching credentials.

In addition, the regulations text of §80048.8(a)(4)(A) was amended, adding the word “in” after the word “provided” to correct the grammar of the sentence. Also, Education Code §44274 was deleted from the references at the end of §80048.8 as this section has been repealed.

#### **Updated Tally of Responses**

The Commission received the following written responses to the public announcement during the 45-day comment period:

<b><i>Support</i></b>	<b><i>Opposition</i></b>
43 organizational opinions	0 organizational opinions
40 personal opinions	0 personal opinions

#### ***Written Responses Representing Organizations in Support***

1. Kristen Anderegg, Advisor, CSU Sacramento Liberal Studies Program
2. Karen DePrater, Director of Human Resources, San Joaquin County Office of Education
3. JoAnn Eastlick, Human Resources Manager, Siskiyou County Office of Education
4. Dr. Mort Geivett, Superintendent, Willows Unified School District
5. Cristhian Guillen, President, CSU Sacramento Student California Teachers Association
6. Coleen M. Johnson, Executive Director, Personnel Services, El Dorado County Office of Education
7. Tony Signoret, Assistant Superintendent, Personnel, Desert Sands Unified School District
8. Lynda Sims, Credentials Analyst, Tehama County Department of Education
9. Jenny Teresi, Administrator I, Credentials, Riverside County Office of Education
10. Charles Tracy, Superintendent, Hamilton Unified School District  
The following individuals signed in favor of an organizational opinion of support from CSU Chico:
  11. Annie Adamian, Assistant Professor
  12. Paul Bailey, Faculty
  13. Lynne Bercaw, Professor
  14. Robert Callahan, Concurrent Program Coordinator
  15. Michelle Cepello, Professor
  16. Teresa Davis, Professor

17. Christina Fisher, Adjunct Professor
18. Cris E. Guenter, Professor, School of Education
19. Talya Kemper, Professor
20. Frances L. Kidwell, Professor – Adjunct Faculty
21. Steven P. Koch, Associate Faculty
22. Michael Kotar, Professor Emeritus
23. Jack Krause, Adjunct Professor
24. Esther L. Larocco, Professor
25. Rena Marino, Liberal Studies Advisor
26. Lynn Maurer, ASAll
27. Melissa B. Miller, Professor
28. Linda Mobilio-Keeling, Instructor/Faculty
29. Andrew Nichols, Credential Advisor
30. Jennifer Oloff-Lewis, Associate Professor
31. Maggie Payne, Professor Emerita
32. Maria Rodriguez Lorrain, Field Placement Coordinator
33. Alfred Schademan, Associate Professor
34. Ann Schulte, Professor
35. Paula M. Selvester, Coordinator, Liberal Studies
36. Rachelle Sousa, Credential Analyst
37. Richard G. Stout, Instructor/Supervisor
38. Deborah Summers, Director/Associate Dean
39. Yer Thao, Advisor
40. Angela Trethewey, Dean
41. Dorothy J. Wall, Assistant Professor
42. Erin Whitney, Asst. Professor
43. Charles G. Zartman Jr., Professor/Director

***Written Responses Representing Individuals in Support: 40***

1. April Alvarez, Sr. Credential Specialist, Alameda County Office of Education
2. Fred Baldini, Dean, CSU Sacramento
3. Anna Brown, Liberal Studies Major, CSU Sacramento
4. Derek Carpenter, Student – Teacher, CSU Chico
5. Aggie Christensen, Coordinator II, San Joaquin County Office of Education
6. Linda Diaz, Coordinator, Certificated Personnel, Murrieta Valley USD
7. Sydney Escobar, Student, CSU Sacramento
8. Timothy P. Fong, Professor, CSU Sacramento
9. Katie Gabris, Student, CSU Sacramento
10. Alissa Glayzer, RMA, Eskaton
11. Anna Glover, Liberal Studies Major, CSU Sacramento
12. Allison Golde, Instructor-Special Student Services, Chabot College
13. Justin Franklin Golde, Application/Sales Engineer, Hamilton Robotics
14. Kelly Huang, Student, CSU Sacramento
15. Deborah J. James, Staff Support, CSU Sacramento
16. Sorn Kham, Graduate Student, Notre Dame de Namur University

17. Christopher Knight, Student, California Teachers Association
18. Jessica LeBoeuf, Student/Teacher's Assistant
19. Karen Lee, Student, CSU Sacramento
20. Melanie Loo, Professor of Biological Sciences, Emeritus
21. Stephanie Magdaleno, Human Resources Technician II, San Joaquin County Office of Education
22. Berenice Martinez, Student, CSU Sacramento
23. Riley MacMillan, Student Teacher
24. Aimee Nicewonger, Credentials Analyst, San Joaquin County Office of Education
25. Jeffery Paradis, Professor of Chemistry, CSU Sacramento
26. Charles Preisiy, Student, CSU Sacramento
27. Ashley Robinson, Student
28. Tanya Radomskiy, Liberal Studies Major, CSU Sacramento
29. Adam Rechs, Professor of Biological Studies, CSU Sacramento
30. Jessica Reher, Student
31. Gabrielle Sankey, Liberal Studies Major, CSU Sacramento
32. Lisa M. Taylor, Professor of Mathematics, CSU Sacramento
33. Jordan Thompson, Student, CSU Sacramento
34. Stephanie Tomasi, Credentials Manager, Alameda County Office of Education
35. Amy Utley, Student, CSU Sacramento
36. Tania Van Der Walt, Student, CSU Sacramento
37. Angie Velasquez, Student, Department of Education, CSU Chico
38. Amber Ward, Asst. Professor Art Education, CSU Sacramento
39. Denisha White, Liberal Studies Student, CSU Sacramento
40. Jeanie Yang, Liberal Studies Major, CSU Sacramento

***Written Responses Representing Organizations in Opposition: None***

***Written Responses Representing Individuals in Opposition: None***

***Oral Responses Received During the Public Hearing:***

The following individuals spoke in support of the proposed amendments:

1. Karen Cadiero-Kaplan, Professor, San Diego State University
2. Janet Davis, California Federation of Teachers
3. Cynthia Grutzik, Associate Dean, CSU Long Beach
4. Catherine Spencer, Professor, CSU San Bernardino
5. Jenny Teresi, Senior Manager/Liaison Credential Services, San Bernardino County

***Total: 5 responses in support***

***Total: 0 responses in opposition***

The Commission received 3 written responses to the proposed regulations after the close of the 45-Day comment period. These are provided below:

***Written Responses Representing Organizations in Support: 1***

1. Patricia Gunderson, Superintendent, Lassen County Office of Education

**Written Responses Representing Individuals in Support: 2**

1. Kassidy Salters, Superintendent/Principal, Gazelle Union Elementary School District
2. Danielle Brand, Personnel Specialist, Lake Tahoe Unified School District

**Total late responses: 3 responses in support**

**Total: 0 responses in opposition**

**Total Written Responses to 15-Day Notice: 0**

**Grand Total of Responses: 91**