

Division VIII of Title 5 of the California Code of Regulations

Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to Administrative Services 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

There is no change from the original purpose of the proposed action in the Initial Statement of Reasons.

15-Day Notice

The review of the initially proposed amendments by the Office of Administrative Law (OAL) determined that modifications to the text in the *Administrative Services Credential Program Standards* (rev. 7/2018) document that is incorporated by reference were required for clarity purposes. The modifications to the proposed amendments are described in the 15-Day Notice, and the 15-Day Notice is incorporated by reference herein. The 15-Day Notice was mailed to the three individuals who submitted written responses during the 45-day comment period, the individual who submitted a letter on February 8 before the Public Hearing, and the individual who read excerpts from the letter dated February 8 during Public Hearing. The 15-Day Notice was also posted on the Rulemaking page of the Commission's website.

The Commission approved the modifications at the June 13, 2019 Commission meeting as part of the Consent Calendar agenda item. The Commission received one public comment in response to the modifications proposed in the 15-Day Notice. The comment and the Commission's response are provided in the Tally of Responses section beginning on page 3.

Non-Substantive Modifications

Commission staff and/or the Office of Administrative Law noticed several non-substantive errors in the initial text of the *Administrative Services Credential Program Standards* (rev. 7/2018) document that is incorporated by reference and the 15-Day Notice. The errors are all typographical errors or non-substantive changes that do not alter the final proposed language of the incorporated document in any way. The following explains the non-substantive modifications to the final text of the incorporated document and provides clarifying points related to the justifications for the modifications in the 15-Day Notice:

Initial Text

• Table of Contents on Page v:

- Deleted the line for "Credential Program Standards" under the line for "Section I" as the line was not included in the June 2014 revision.

- Deleted the line for “Precondition 1” in the second line under “Section II” as the line was not included in the June 2014 revision.
- **Figure 2: The Learning to Lead System on Page 10:**

Spelled out the word “recommendation” for clarity purposes in the “Pre-Program Requirements” box on the left side of the figure for clarity purposes and added underline to indicate new text.
- **Precondition 5 on Page 14:**

Corrected the typographical error in the third word from the end of the last sentence in by changing “and” to “an.” The correction is displayed in double-strikethrough in the final regulation text.
- **Category I: Program Design and Coordination on Page 30:**

Deleted the asterisk (*) following the added text in the first paragraph that reads, “...but no later than one year from activation of the preliminary credential” and the associated footnote that reads, “* Effective January 1, 2017” because the date has already passed. The added language will take effect upon approval of the proposed regulation amendments.
- **Section VI: Transition Plans and Initial Program Review on Page 38:**
 - Added strikethrough to the title at the top of the page. Section VI was renamed “Appendices,” as explained in the Initial Statement of Reasons (see new title in underline on page 39).
 - The last two sentences of this section displayed in strikethrough included new text that was not included in the June 2014 revision. The text being deleted has been corrected to match the text in the June 2014 revision.

15-Day Notice

- The third bullet under “8B: Candidate Preparation and Support on page 3 of the 15-Day Notice indicated the word “components” was being deleted along with the other identified text. However, the word “components” is required in the sentence and was not displayed in double-strikethrough in the regulation text on page 8 of the 15-Day Notice.
- The sixth bullet under “8C: Assessor Qualifications, Training, and Scoring Reliability” on page 4 includes the word “sentence” twice. The beginning of the bullet should have read, “The third sentence that reads...” In addition, the term “Cal” had been added before “APA” in the sentence that was ultimately deleted. As a result, the justification for the deletion of the sentence includes “Cal” and the regulation text on page 9 includes “Cal” in double-underline and double-strikethrough. The final proposed regulation text displays only “APA,” as was proposed in the initial text, in double-underline.
- The eighth bullet indicates that only “assessment developer’s” was added before “initial training.” However, the word “the” was also added before “assessment developer’s” for grammatical purposes. The regulation text on page 9 of the 15-Day Notice included the word “the” in double-underline.

Documents Relied Upon

It was noticed while compiling the final regulation packet for review by the Office of Administrative Law that the links for the September 2012 Minutes and the October 2016 Minutes were incorrect. The agenda item presented in September 2012 (Item 2D) was an Information/Action item, but no action by the Commission was recorded in the minutes. The agenda item presented in October 2016 (Item 2F) was an Information item that did not require action by the Commission. Although the links were incorrect, the minutes for the two items were correctly identified by title in the rulemaking documents and were available upon request during the rulemaking period. The minutes were also available on the Commission’s website during the rulemaking period. The Commission did not receive any requests for the minutes or inquiries about how to locate them on the Commission’s website during the rulemaking period.

The correct links to the referenced minutes follow:

Approval of September 2012 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2012-12/2012-12-1a-pdf>

Approval of October 2016 Minutes:

<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-12/2016-12-1a.pdf>

Documents Incorporated by Reference:

Pursuant to 1 CCR §20(c)(1), the Commission requests that the program standards not be printed in the code. The program standards document includes 64 pages. Publishing the incorporated document would be cumbersome, unduly expensive, and otherwise impractical. The incorporated document was available upon request during the rulemaking period and is available on the Commission’s website as follows:

Administrative Services Credential Program Standards (rev. 7/2018):

<https://www.ctc.ca.gov/docs/default-source/educator-prep/standards/asc-admin-handbook.pdf>

Updated Tally of Responses

Written Responses Received During 45-Day Comment Period and Oral Response at Public Hearing

The Commission received the following written responses to the public announcement during the 45-day comment period and during the public hearing held on February 8, 2019:

Support

1 organizational opinion

1 personal opinion

Opposition

1 organizational opinion

1 personal opinion

Written Response Representing Organization in Support

Naomi Eason, Ed.D., Assistant Executive Director, Member Services, California School Boards Association

Comments:

Item 2J – Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to Administrative Services Credentials

Allowing administrators prepared in other state (*sic*) to substitute up to two years of teaching/services experience earned outside California towards satisfying the five-year experience requirement will help to clarify requirements for out-of-state administrators. CSBA supports this recommendation to recruit out-of-state educators who have demonstrated acceptable levels of preparation elsewhere.

Written Response Representing Individual in Support

Katy Holloman

Comments:

I am eager to hear about the regulation changes regarding out-of-state prepared administrators seeking employment in California. Before moving here from Texas in October 2017, I was an assistant principal for four years and have five years of teaching experience according to Texas standards. I fully expected to sit out the 2017-2018 school year due to my arrival in California mid-year. Immediately upon moving here, I began the process of submitting all required documents so I could obtain my administrator credential to enter the workforce again for the 2018-2019 school year. Shortly after submitting everything for the credentialing office to review, I received notice that one of my years of teaching service would not be accepted since I did not work 75 percent of that particular school year. I was surprised that the extra year of admin experience under my belt didn't "trump" the year of teaching service I was not receiving credit for.

I inquired about any sort of appeal process or committee who would review extenuating circumstances only to find out that no such thing existed. I was told that my only option would be to enter the classroom and satisfy the year I'm lacking of teaching experience. Again, I have the fifth year but it is not recognized in California since I worked just over half the year, not 75 percent. The reason behind my inability to complete that particular year is because my two-year-old son became extremely sick so I had to very suddenly take a leave of absence, and I ended up having to resign from my position due to his condition worsening. It became so bad that he ended up passing away right before his third birthday. Shortly after that happened, I returned to the classroom and then entered administration the following year where I very successfully served as assistant principal for four years at the elementary level.

When I contacted the credentialing office about my situation, I was very disheartened to learn that the year I left mid-year would not count toward years of service in California. I did the math to find out that I was only lacking roughly 40 days in the classroom to satisfy the 75 percent requirement. I then asked about options for entering the classroom as a long-term substitute in order to gain those 40 days so I could then earn my clear administrative services credential and get back to school leadership where I can use my talents to the fullest capacity. I was told that is not an option since partial years would not count. I was again told that my only option to earn my clear credential would be to go back to the classroom and teach for a year. I spoke with a Commission staff member in February 2017 who let me know about the possibility that regulations would change later in the year allowing out-of-state administrators

to use up to two years of their admin experience toward the five teaching years that are required. I have been anxiously following Coded Correspondence ever since and am eager to hear about this regulation change going into effect.

As I mentioned, I feel my talents are best fit in school leadership and am anxious to get “back to school” in the capacity of principal or assistant principal. It has been a long 1.5 years waiting on this regulation change to go into effect and I feel that California has missed out on the talents I bring to the table as a school leader.

Written Response Representing Individual in Opposition

Dr. Louis Wildman, Emeritus Professor of Education Leadership, Formerly California State University - Bakersfield

Comments:

1. John Dewey distinguished between "training" and "education. Training occurs when an individual is taught how to respond to a narrow specific set of circumstances. Education involves broader understanding.

Paragraph 3 on page 8 states that "The primary focus of the preliminary administrative services program will be to prepare future leaders for their initial administrative position, with special emphasis on preparation for the position of site administrator, or principal, for a specific school site."

That is narrow vocational training, not appropriate for graduate professional preparation. Further, focusing training on a specific school site is inconsistent with preparing candidates for the "highly variable nature of administrative responsibilities." (p. 12) (*sic – the referenced phrase appears on page 32*).

We should recognize that the model a principal sets has a profound impact on students. The principal sets the tone for a school. If a principal has just been narrowly trained in job procedures, that principalship will likely display a lack of respect for education.

Teachers with 5 years of experience desirous of becoming principals have surely participated in a range of leadership experiences. To give these experienced teachers narrow "how to do it" training rather than graduate education in school law, personnel, governance and politics, education finance, curriculum theory, etc. would be insulting and certainly not education that stresses understanding, which should also pervade the curriculum in PK-12 schools.

The typical preliminary education leadership credential candidate graduates with high ideals. Effort should be made to encourage those graduates to maintain those high ideals, and not "induct" them into maintaining the status quo.

Teacher education faculty frequently remind those supervising student teachers to help the student teacher develop their talents and abilities, and not try to teach them to duplicate their supervisor. Administrator coaches need to follow similar advice.

2. Paragraph 2 on page 11 talks about "powerful" instruction, implying that what will be taught is known with much certainty, whereas the knowledge base in education leadership comprises ideas which are attached to far less than certain propositions.

The AASA School Administrator magazine regularly runs a section profiling outstanding school leaders. These leaders differ in their leadership styles.

3. On page 14, the paragraph that starts "Precondition 5," includes a typographical error. The third word from the end of that paragraph should be "an" and not "and."

4. (Re: paragraph 4 on page 15) I agree with the suggestion that program sponsors and the schools, districts, and county offices with which they partner need to understand the mission and goals of their partners.

In the 19th century lawyers and physicians learned by working in law offices and medical clinics. But as the professions have progressed, "town-gown" tensions exist in every profession. With the founding of the land grant universities, farmers typically distrusted the agriculture faculty. In his history of The American College and University, Frederick Rudolph quotes one legislator in South Carolina as saying "[I've never] seen a man who could write a nice essay or make a good agricultural speech who could make corn enough to feed himself and a bob-tailed mule until the first day of March."

In medicine, town-gown tensions rose with the rise of academic stature of clinical science. Full-time medical faculty generally interacted much more closely with academic specialists around the country than with the private practitioners of the local community. And most commonly, medical faculty were hired after nation-wide searches, and not from the local medical society. In education, town-gown tensions have existed since Socrates.

While I believe graduate education leadership faculty and school administrators should develop a supportive relationship, on the other hand, the value of a creative tension between education administration faculty and the profession is desirable. Naturally, school administrators often don't like criticism of current practice, but that is partly the role of university faculty.

When I was a K-12 school administrator, I didn't like criticism either, however, a certain detachment is essential, as too close a relationship would foster a kind of "groupthink" mentality that is not conducive to independent thought. As Francis Allen has said in reference to the field of law, "if ever the law schools and the practicing profession are in perfect accord, it will be because one or the other has capitulated and abdicated its proper functions."

I believe a professor of education leadership should be publicly supportive of local school administrators, but also serve the profession as a loyal critic.

5. Paragraph 2 on page 17 states that "Partners share responsibility for program quality; candidate recruitment, selection, and advisement; curriculum development, delivery of instruction; selection of field sites, design of field experiences; selection, and advisement; curriculum development; delivery of instruction; selection of field sites; design of field experiences; selection and preparation of field experience supervisors; and assessment and

verification of candidate competence." University faculty regularly do this, but realistically, where will K-12 administrators get the time to do all of this and still do their jobs?

6. Last sentence on page 17 and top of page 18, speaking about inequitable historical practices and institutional bias: With the current attack on public education, it worries me that most education administration programs do not include a course on the history of education. Without that understanding, graduates are typically unprepared to defend the ideals of public education.

7. In paragraph 1 on page 18, reference is made to "pedagogical approaches that recognize the importance of building on students' strengths ..." I was pleased to see that statement, because on the one hand, we want students to learn certain pre-specified objectives, and on the other hand, we want to develop student talents, abilities, creativity, and strengths. Both of these sides of education are important. Competency-based education is just part of education. I hope recognition of the two sides of education is not contradicted by the following sentence on page 33: "Leaders guide and support the implementation of standards-based curriculum, instruction, and assessments that address student expectations and outcomes."

8. In paragraph 2 on page 25, I read that "job-embedded professional development replaces a more traditional approach where learning is more theoretical and occurs in the college classroom." This statement goes along with the often heard partial truth that one can't learn to swim or ride a bicycle by reading a book.

On the other hand, one can't concentrate when they are busy. An emergency room physician can't learn needed treatments in the midst of an emergency.

Earlier today I was trying to read a newspaper article to my wife while she was following a complicated recipe. She wanted to hear what I was reading, but she asked me to wait until later to read the article to her, as she couldn't concentrate on her cooking and still listen to me.

If you have been a school principal, you know that a principal's work day is often like working in a hospital emergency room. My point is that there is a need for "job-embedded" learning, but there is also a need for in-depth study in a college classroom. The variety of real-world administrative experience a candidate can obtain, even in a full-year internship, is inherently limited. It is usually much easier to progress from an acquaintance with the structure of a field of study (such as school law) to specific applications, than to try and deduce the structure of a field of study from a few cases.

As I have already suggested above, if we want to improve student achievement, administrative candidates must study, and not look to Trump's model--a disorganized leader jumping from "pillar to post," constantly running about, trying to learn on the fly, and not studying. Such a principal is not a good model for students.

9. "Partnership agreements" are defined on Page 36. Recently the Wallace Foundation sponsored a panel discussion in which they talked about telling students that every class, often taught by a local school district administrator, was a "job-interview." Can you imagine sitting in such a class, needing to concentrate more on giving positive feedback to your

supervisor/instructor to become eligible for a future administrative position, than on thinking about the course content"? That kind of training is called "indoctrination."

Commission Response:

Dr. Wildman's comments are all related to the previous version of the Administrative Services Credential Program Standards document with the June 2014 revision date. There are no amendments proposed by the Commission to any of the language or sections referenced in Dr. Wildman's comments. The written comment period for the amendments that updated the program standards to the June 2014 revision date closed on April 20, 2015 and the public hearing was held on April 24, 2015. The proposed amendments were approved by the Office of Administrative Law (OAL) and filed with the Secretary of State on July 20, 2015 (reference OAL Regulatory Action Number 2015-0609-035). With the exception of Comment #3, Dr. Wildman's comments are summarily dismissed as irrelevant pursuant to subsection (a)(3) of Government Code section 11346.9 as they are not specifically directed at the Commission's proposed action or the procedures followed by the Commission in proposing or adopting the action.

Although included in the amendments approved by OAL in July 2015, the referenced typographical error has been corrected as previously noted.

Oral Comment Representing Organization in Opposition

Dr. Peg Winkelman, California Association of Professors of Educational Administration (CAPEA)
Dr. Winkelman read paragraphs 2, 3, and 7 from the CAPEA letter signed by the CAPEA President, Noni M. Reis. The text of the CAPEA letter follows:

Comments:

On behalf of the California Association of Professors of Educational Administration (CAPEA), we want to acknowledge the Commission for consistently responding to recommendations from the field of educational leadership concerning the California Administrator Performance Expectations (CAPEs) and the California Professional Standards for Education Leaders (CPSEL), and the California Administrator Performance Assessment, (CalAPA). We appreciate the teamwork of CTC staff including Director Mary Sandy, Amy Reising, and Gay Roby who have worked closely with program providers.

As we consider Item 2J, Proposed Amendments to Title 5 of the California Regulations Pertaining to Administrative Services Credentials, we recognize the breadth and depth of work that has occurred since 2014. We acknowledge the logical equivalency of the proposal "to allow out-of-state prepared administrators with at least three years of full-time teaching or services experience to substitute two years of out-of-state administrative experience to satisfy the five-year teaching/services experience requirement for a Preliminary Administrative Services Credential (PASC)". We want to take this opportunity to note that preparation itself is not equivalent, because out-of-state administrators will not be required to pass the CalAPA. Thus, out-of-state administrative candidates will not be held to the same standard.

We raise the CalAPA at this time because the consequential year of the Cal APA is set to begin this fall and many design issues have yet to be resolved.

On Thursday, September 27th an Update on the Development of the California Administrator Performance Assessment was presented by Amy Reising, Director of Performance Assessment Development at the Commission on Teacher Credentialing Meeting. Based on input from CAPEA members the following remarks were shared during public comments on the 3D information item by Dr. Peg Winkleman, CAPEA Liaison to CTC.

CAPEA appreciates the collaborative work involved in the creation of an authentic, embedded performance assessment designed to promote best leadership practices to serve California students. The first two Think Tanks have been well-attended and have stimulated important conversations in the field. Think Tank participants have expressed a concern that the next steps in the successful implementation of the CalAPA involve more than merely convening a group to address the setting of standards. In reviewing the newly released (September 18th) CalAPA revision, programs that piloted the Cal APA last year raised issues with the directions and rubrics that have not been resolved. Programs that were not involved in the pilot field test just received the directions, rubrics, etc. and want assurance that their feedback will be considered in the final revision of the Cal APA. With this in mind, will the Design Team be convened to address feedback from programs participating in this non-consequential year?

At the September meeting the concern from the field regarding two or three cycles was also shared and it was noted that the pilot programs were a self-selected sample.

CAPEA members who have actively participated in Think Tanks, virtual office hours and scoring sessions continue to raise essential questions regarding not just discrepancies in the directions and the scoring rubrics, but the scope of cycles 1 and 2. It is critical that: (1) the cycles model best practice and (2) that candidates are provided the conditions (i.e. time for preparation, practice, and reflection) to demonstrate their leadership capacity. With this in mind, we again ask that a group be convened to work to resolve the issues that have come to light through the pilot process before proceeding to a high-stakes, consequential year. Moreover, we request that the convening group include both members from the original design team as well as new members. On behalf of our membership, I thank you in advance for your consideration of our concerns. Please do not hesitate to contact me if you have further questions.

Commission responses:

Response to paragraphs 2 and 3: Assembly Bill (AB) 877 (Scott, Chap. 703, Stats. 2000) streamlined credential requirements for out-of-state prepared teachers and administrators. The bill added Education Code (EC) sections 44270.3 and 44270.4 to establish the requirements for out-of-state prepared administrators who taught and/or served as administrators outside California. The passage of AB 877 resulted in three different routes for out-of-state prepared administrators as follows:

Route 1: For administrators prepared outside California who also hold teaching credentials and have taught full-time in another state for a minimum of three years (reference EC section 44270.3). Administrators who qualify by this route are not required to hold a prerequisite California teaching or services credential to qualify for the preliminary Administrative Services Credential.

Route 2: For administrators prepared outside California who do not also hold a teaching credential and/or have not taught full-time in another state for the number of years specified by the Commission. EC sections 44270.3 and 44270.4, as added by AB 877, pertain only to out-of-state prepared administrators who also hold teaching credentials and satisfy the experience requirement in another state. There are no provisions in either EC section that pertain to out-of-state prepared administrators who may have completed a teacher preparation program in California, may hold a prerequisite services credential, and/or may not meet the out-of-state teaching experience requirement. However, AB 877 did not exclude this population of out-of-state prepared administrators from qualifying for a preliminary or clear ASC in California.

Route 3: For out-of-state prepared and experienced administrators who also hold out-of-state teaching credentials and taught full-time time in another state for a minimum of three years (reference EC section 44270.4). Administrators who qualify by this route are not required to hold a prerequisite California teaching or services credential to qualify for the clear Administrative Services Credential.

The CalAPA is completed while a candidate is enrolled in a Commission-approved preliminary administrative services program in California. Requiring out-of-state administrators to pass the CalAPA would create an undue hardship and a barrier to California certification, as these individuals would not be able to apply for the preliminary or clear credential under any of the currently available routes until the assessment was passed. In addition, enrollment in a Commission-approved preliminary administrative services program is required for CalAPA registration. It is not feasible to require administrators prepared in another state to enroll in a Commission-approved preliminary administrative services program just to be able to register for the CalAPA.

Response to paragraph 7: The Commission has included our stakeholders and the public in the development of the CalAPA at every stage and plans to continue this collaborative environment in the future. As of the public hearing on February 8, 2019, there were four additional Virtual Think Tanks scheduled to provide the opportunity for program faculty, CalAPA coordinators, and master, mentor, or supervising TK-12 administrators to discuss best practices and tips for success in preparing for and implementing the newly developed CalAPA. The virtual discussions, conducted via the Cisco Webex platform, were/are scheduled on the following dates: February 22, 2019, March 29, 2019, April 26, 2019, and May 31, 2019.

In addition to the monthly Virtual Think Tank Discussions, Commission staff is providing support to preliminary administrative services program sponsors through weekly program support “office hours” and the updated website (www.ctcpa.nesinc.com) with technical supports including how to upload and annotate video, faculty supports, and policies.

Written Response to 15-Day Notice

The Commission received one response to the 15-day Notice from Dr. Peg Winkelman representing the California Association of Professors of Educational Administration (CAPEA). Dr. Winkelman’s suggestions and the Commission’s responses to each follow:

Comments:

This email is offered in response to your email regarding the Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to Administrative Services Credential. We appreciate having another opportunity to gather feedback on the proposed amendments.

Four general concerns and four suggestions are summarized below.

"In [April 2016](#), the Commission approved a sole source contract with Evaluation Systems group of Pearson, a business of NCS Pearson, Inc. (Pearson) to design, develop, and administer the APA, which has been named the "California Administrator Performance Assessment" or CalAPA. The design and development of the CalAPA is complete and the assessment is ready to be implemented."

(1) A primary concern is that CalAPA design team members, PASC candidates and PASC program providers who have administrated the field test and participated in the non-consequential year, do not agree with the statement that the Cal APA assessment is ready to be implemented.

The Cal APA assessment provided to the field in late September did not address the the (*sic*) revisions suggested by the Design Team. Per the APA Development Process Graphic, the assessment developer was to "analyze results, present to Design Team, then finalize tasks and rubrics".

APA Development Process Graphic (agenda insert for Item 3A):<https://www.ctc.ca.gov/docs/default-source/commission/agendas/2016-04/2016-04-3a-apa.pdf>

PASC candidates and program providers found a lack of alignment across directions, templates and rubrics. The CalAPA offered in this non-consequential year should be revised based on feedback from CalAPA design team members, PASC candidates and PASC program providers.

Suggestion:

The standard- setting advisory panel of CA content experts, including membership from the Design Team, should be provided with time to revise and approve the finalized version of the CalAPA.

(2) A second concern is in the section regarding field experiences.

"Field experiences include a variety of diverse and realistic settings both in the day-to-day functions of administrators and in long-term policy design and implementation.

Candidates must complete a range of activities in educational settings. *The settings must:

- 1) support the candidate's ability to complete the CalAPA;
- 2) demonstrate commitment to collaborative student-centered practices and continuous program improvement;
- 3) have partnerships with appropriate other educational, social, and community entities that support teaching and learning for all students;
- 4) create a learning culture that supports all students;
- 5) understand and reflect socioeconomic and cultural diversity;

- 6) support the candidate to access data, work with other educators, and observe teaching practice; and
- 7) permit video capture, where designated, for candidate reflection and CalAPA task completion. "

Suggestion:

The standard-setting advisory panel of CA content experts, including membership from the Design Team, should take into consideration how to address submissions of candidates employed in settings that do not offer sufficient support in all 7 areas.

(3) A third concern was shared by program providers present when a *(sic)* the question was raised as to whether the APA would be the property of the contractor or the commission. At the April 2016 meeting the commission and the public were assured that the assessment would belong to the CCTC. The substitution of Pearson for the commission throughout the amendments was never brought to the attention of the public, specifically program providers.

Suggestion:

A panel, perhaps the standard- setting advisory panel could be maintained to advise and partner with Pearson throughout the consequential years.

(3) A fourth concern is that program providers report not having been made aware of any opportunities to pursue the local scoring option referred to in the April 2016 contract.

1. April 2016 contact

<ul style="list-style-type: none"> • Process for the online candidate registration system • Fully-developed process for the online reporting system for candidates, programs, and the Commission • Fully-developed processes and supporting materials for APA scorer training • Fully-developed processes for the ongoing identification of local program scoring needs, including the required turnaround time for scoring reports and the facilitation of the local scoring option • Completion of program and scorer training in preparation for the initial two statewide operational years of the APA 	<p>3/1/2017 6/15/2018 6/15/2018 6/30/2018 6/30/2018 6/30/2018</p>
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Suggestion:

The commission could request that Pearson offer the facilitation of and opportunity to pursue the local scoring option referred to in the April 2016 contract.

We hope these comments and suggestions will support the successful implementation of the CalAPA.

Responses:

Suggestion (1): The overall design and development of the CalAPA was completed in August of 2018 for the non-consequential 2018-19 school year (registration opened for candidates on October 9, 2018 with materials available). Since implementation of the August 2018 version, revisions have been made to the CalAPA materials (guidebooks, templates, and rubrics) based on candidate score data and via surveys sent to CalAPA coordinators, candidates, and assessors. In addition, the Commission conducted online webinars and conversations to gather feedback,

and in person workshops with program faculty to maintain the validity and reliability of the assessment. Design team members provided feedback at each of the 12 in person meetings held from 2016-2018. 10 design team members currently participate as lead assessors and assessors. In such roles, design team members have provided feedback in the non-consequential 2018-19 school year to inform the revisions made for the 2019-20 school year when the assessment becomes consequential.

The revisions to maintain the validity and reliability of the assessment do not change its overall design e.g. the assessment requires candidates to submit the same evidence and the same number of scoring rubrics are used to make a score determination of a candidate's performance. Accordingly, the Commission's stakeholders, including membership from the Design Team, were provided with ample time to propose revisions that led to the finalized version of the CalAPA, and based on these revisions, the finalized version is ready to deploy as consequential for the 2019-20 school year."

Suggestion (2): The only modification made to Program Standard 7: Nature of Field Experiences in the 15-day Notice was to add "Cal" before "APA" to clarify that the CalAPA is the only administrator performance assessment available. All other language in Program Standard 7 was included in the initial notice and the 45-day public comment period for that language closed on January 7, 2019. Dr. Winkelman's comments related to Program Standard 7 are summarily dismissed as irrelevant pursuant to subsection (a)(3) of Government Code section 11346.9 as they are not specifically directed at proposed modifications included in the 15-Day Notice or the procedures followed by the Commission in proposing or adopting the action.

Suggestion (3): The Notice of Proposed Rulemaking distributed on December 21, 2018 included the following statement as one of the purposes for the proposed regulations, "Update the program standards incorporated by reference in Title 5 of the CCR section 80054 due to amendments made by the Commission since the June 2014 revision date that include the California Administrator Performance Assessment (CalAPA)." The proposed modifications are not related to ownership of the CalAPA. The modifications are to clarify that the CalAPA is the only administrator performance assessment currently available. In addition, "Pearson" is not referenced in the proposed modifications to the regulation text. "Pearson" is only referenced in the justification for the proposed modifications to clarify that is the current sole entity offering an approved administrator performance assessment.

Suggestion (4) [also numbered as (3) in Dr. Winkelman's comments]: The local scoring option language was in the program standards document included in the initial rulemaking file and explained the procedures for participating in the local scoring option. The 45-day public comment period for the language related to the local scoring option closed on January 7, 2019. The only modifications to the sections of the proposed regulations related to the local scoring option are to add the term "CalAPA" before "local scoring option" to clarify that is the only administrator performance assessment currently available and to clarify that the "assessment developer" (currently Pearson) is responsible for selecting and training assessors who score candidate responses. Dr. Winkelman's comments related to the local scoring option are summarily dismissed as irrelevant pursuant to subsection (a)(3) of Government Code section

11346.9 as they are not specifically directed at proposed modifications included in the 15-Day Notice or the procedures followed by the Commission in proposing or adopting the action.

Grand Total of Responses: 5

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. The only alternatives considered by or brought to the attention of the Commission were the comments received during the 45-day comment period and the subsequent 15-day notice comment period. A summary of the comments received and the Commission's responses are included in this document beginning on page 3.

Mandated Costs

These proposed regulations will not impose a mandate on local agencies or school districts that must be reimbursed in accordance with Part 7 (commencing with section 17500) of the Government Code.