

COMMISSION ON TEACHER CREDENTIALING

Title 5 of the California Code of Regulations, Sections 80033, 80046.1, 80047, 80047.1, 80047.2, 80047.3, 80047.4, 80048.3.1, 80048.3.2, 80048.5, 80048.6, 80048.7, 80048.8, 80048.9, 80048.9.4, 80048.10, 80070.4

Supplemental Justification
15-Day Notice

New Education Specialist
Credentials and Bridge Authorizations

The Commission on Teacher Credentialing proposes to adopt the regulations described in the [initial public notice](#) to Title 5 of the California Code of Regulations Pertaining to Education Specialist Credentials and Bridge Authorizations after considering all comments, objections, and recommendations regarding the proposed action. This document is intended to explain the justification for certain aspects of that rulemaking in greater detail. It is limited to discussion of those sections identified as needing greater explication. For a detailed justification of the entire rulemaking, please consult the [Initial Statement of Reasons](#) and other rulemaking documents provided by the Commission.

Summary

The Commission on Teacher Credentialing (Commission) proposes amendments to Title 5 of the California Code of Regulations (CCR), 80033, 80046.1, 80047, 80047.1, 80047.2, 80047.3, 80047.4, 80048.3.1, 80048.3.2, 80048.5, 80048.6, 80048.7, 80048.8, 80048.9, 80048.9.4, 80048.10, 80070.4 to implement the new Education Specialist credentials and their accompanying bridge authorizations created by the Commission.

Necessity and Rationale for Adding “Bridge” Authorizations for the New Education Specialist Credentials

The new Mild to Moderate Support Needs (MMSN) and Extensive Support Needs (ESN) credentials are intended to better prepare teachers to serve students across a range of disabilities. The change has resulted in new credentials that are broader in scope than the credentials that they are replacing. This will result in new credentials that authorize services in a broader array of support needs than existing special education credentials. Therefore, it would not be appropriate to simply allow existing special educators to apply for and receive the new credential that is most equivalent to their existing credential. Educators who currently hold one of the existing credentials will remain able to retain and renew their existing credential. It will continue to authorize them to teach all students that they are currently authorized to teach without any change in scope. They will not be required to obtain a new credential or undergo any additional preparation. However, the Commission expects that many educators will want to earn the broader authorizations made possible by the new credentials. While their initial preparation may not have involved formal training in the areas covered by the new MMSN and

ESN credentials, educators may have obtained these additional skills over the years through practical experience, continued formal education, or professional development. Therefore, the Commission has approved a series of “bridge” authorizations that would allow existing credential holders who choose to do so to obtain the broader scope of authorization by demonstrating sufficient mastery of Teaching Performance Expectations (TPEs) not reflected in their original preparation. These bridge authorizations and their authorization statements have been listed here.

Necessity and Rationale for Requiring a Prerequisite Credential for a “Bridge” Authorization

Bridge authorizations are not intended to be stand-alone documents. The TPE’s identified for successful completion are those that contain material not covered in the existing preparation required for the current Mild/Moderate and Moderate/Severe Disabilities credential programs. Material that is covered in the bridge authorization represents the additional knowledge, skills and abilities a teacher would need for the new authorization.

Necessity and Rationale for Allowing Coursework Through a Commission Approved Program to Obtain a “Bridge” Authorization

Commission-approved program sponsors prepare the majority of education specialist candidates who obtain credentials to teach in California school settings. They go through the Commission’s extensive accreditation process and will be in an excellent position to identify the knowledge, skills, and abilities that Education Specialists will need to add to their current portfolio of practices in order to master the new content areas authorized by the bridge authorizations.

Necessity and Rationale for Allowing Professional Development to Obtain a “Bridge” Authorization

Professional development courses are already offered by a wide variety of state and local educational agencies. A Commission-approved preliminary education specialist preparation program, an employing local educational agency, a Special Education Local Planning Area, or state educational agencies all have extensive experience in offering these types of continuing professional development opportunities to educators to keep the field current on best practices, which continue to develop and evolve over time.

Necessity and Rationale for Allowing Assessment of Prior Knowledge and Experience to Obtain a “Bridge” Authorization

Educators often obtain new skills via a variety of informal means such as mentoring, job-shadowing, and in-services. Allowing educators who have obtained new skills via a route that relies on job experience encourages continued efforts to grow their knowledge, skills, and abilities. Allowing for a practical assessment of prior knowledge and experience via observational data, a portfolio submission, video demonstration, a performance assessment, or another means to show demonstrated competence mirrors the Teaching Performance Assessment, one of the foundational tools the Commission uses in assessing candidates prior to credentialing.

Necessity and Rationale for January 1, 2023 Effective Date

The new Education Specialist Credentials and their corresponding Bridge Authorizations will be issued beginning effective January 1, 2023. This date was determined in consultation with the Commission's stakeholder community, and in view of the need to allow sufficient time for preliminary education specialist programs to adopt the new requirements. Further, Education Code Section 44252.1(a) states the intent of the legislature to allow a candidate enrolled in a preparation program a reasonable amount of time to complete the program without meeting new requirements. By adopting a January 1, 2023 date, the Commission ensures that prospective special education candidates are given adequate notice of the credentialing requirements they will be required to meet.

In accordance with Government Code section 11346.3(b), the Commission has made the following assessments regarding the proposed regulation amendments:

Creation or Elimination of Jobs Within the State of California

The proposed amendments pertain to the credentialing of education specialists. These amendments will not create or eliminate jobs in California, which are based on the pool of students requiring special education services.

Creation of New or Elimination of Existing Businesses Within the State of California

The proposed amendments pertain to the credentialing of education specialists. These amendments will not create or eliminate existing businesses in California. While they will require Commission-approved preliminary special education programs to make changes to their curriculum, education of teachers is a dynamic activity based on ongoing interaction with academic research and programs are continually updating their curriculum in response to the best and most current research in the field. The Commission has not identified any special education program that plans to cease operations, nor has it identified any institutions of higher education that plan to open new schools of special education in response to these changes.

Expansion of Businesses or Elimination of Existing Businesses Within the State of California

The proposed amendments pertain to the credentialing of education specialists. While there may be some slight expansion of enrollment at Commission-approved preliminary programs of special education due to educators seeking the new bridge authorizations, this is expected to be minimal. These amendments will not cause the elimination of existing businesses in California.

Written Comment Period

Any interested person, or his or her authorized representative, may submit written comments by fax, through the mail, or by e-mail relevant to this supplemental justification. The written comment period closes at midnight on August 16, 2021. Comments must be received by that time. You may fax your response to (916) 322-0048; write to the Commission on Teacher Credentialing, attn. Joshua Speaks, 1900 Capitol Avenue, Sacramento, California 95811; or submit an e-mail to jspeaks@ctc.ca.gov.

Authority and References

EC sections 44225 and 44251.2 authorize the Commission to adopt these proposed regulation amendments. The proposed amendments implement, interpret, and make specific EC section 44265.