

Division VIII of Title 5 of the California Code of Regulations
Proposed Additions to Title 5 of the California Code of Regulations Pertaining to
Subject Matter Competence
Updated Informative Digest
and
Addendum to the Final Statement of Reasons

Updated Informative Digest

In July 2021, AB 130 (Chap. 44, Stats. 2021) created new options in the Education Code for teacher candidates to demonstrate their subject matter competence through (a) degree majors in the area of the credential, (b) coursework that covers the domains of the applicable Subject Matter Requirements for the credential sought, and (c) a combination of coursework and examination subtests required for the credential sought by the candidate. At the June 2022 Commission meeting, the Commission approved proposed regulations for candidates to meet the subject matter requirement as outlined in Education Code sections 44259 and 44310. Pursuant to the state process for promulgating regulations, the Commission opened a 45-day public comment period regarding the subject matter competence proposed regulations on October 21, 2022. On November 18, 2022, the Commission received a written request for a public hearing to discuss the proposed subject matter competency regulations. The Commission held a public hearing on December 9, 2022 at which time Commission members considered the concerns and comments of the public and determined that the single subject area of Social Science be removed from the proposed regulations; that there be further examination and discussion regarding acceptable majors for the single subject area of Social Science outside of the current regulatory proposal; and, that the remaining regulations be moved forward in the rulemaking process as proposed without the Social Science single subject area.

On December 20, 2022, following the public hearing and adoption of the revised regulations, a 15-day notice was posted that included the regulation modifications. The comment period ended January 6, 2023. One comment requesting clarification was received and a response was provided. Since no additional comments or questions were received, the final rulemaking file was submitted to the Office of Administrative Law (OAL) on February 8, 2023.

In March 2023, staff received feedback from the OAL that substantive changes were needed. To address these concerns, staff voluntarily withdrew the final rulemaking file to make additional changes to the text and to provide additional justification and documents relied upon for the rulemaking file. Staff drafted revised proposed regulations, which were published along with the notice for a public hearing. The 15-day notice was posted on the Commission's rulemaking webpage on April 3, 2023, and the public comment period closed on April 20, 2023. Coded Correspondence 23-04 was emailed to a list serve of 2320 individuals who receive all and Commission meeting agenda and coded correspondence.

At its meeting on April 21, 2023, the Commission adopted the proposed revisions to the text including the strike of the word "credential" from (b)(4) that was inadvertently left in the

proposed regulations. April Commission Agenda Item 3H is included in the rulemaking file as a document relied upon and a draft of the proposed April 2023 minutes has been included in the rulemaking file as proof of adoption.

Updated Information

In March 2023, staff received feedback from OAL and voluntarily withdrew the final rulemaking file to make additional changes to the text. Staff drafted revised proposed regulations that responded to the following issues:

- Removal of the reference to subject matter domains in subdivision (a) paragraph (4) until such time as the Commission is able to approve revised subject matter requirements and domains and promulgate regulations for them.
- Clarify that the various types of science credentials are related to the Single Subject Science credentials as authorized in Education Code and not new credentials.
- Removal of the phrase “or similar major” which is too vague and undefined and would require standards for judging what constitutes a “similar major.” In an effort to move the current package along quickly, staff proposes to remove this phrase and to work to identify a term or definition for similar major that is acceptable to both the field and OAL in a future regulations package.

Staff presented the revisions during the April 21, 2023 Commission meeting. After considering all comments, both written and oral, the Commission determined that the revised regulations be moved forward in the regulatory process and adopted the following revisions to the regulatory text in addition to the strike of the word “credential” from (b)(4) that was inadvertently left in the regulations:

- The deletion of 80096 (a)(4),
- Amendments to the wording of 80096 (b)(1),
- The deletion of the term “credential” in 80096 (b) (4) through (b)(8),
- The removal of “similar major” in 80096 (b)(1) and (e), and
- The addition in 80096 (e) of the following majors as demonstration of subject matter competency for the Early Childhood Education Specialist Credential under section 44265(a) of the Education Code: Child Development; Child and Adolescent Development; Human Development; Human Development and Family Science; Family Science; Early Childhood Education; Early Childhood Studies; Child, Adolescent and Family Studies; or Child and Family Studies.

Nonsubstantive Revisions to Text

Following the resubmittal of OAL File No. 2023-0208-03S, the Commission made the following nonsubstantive revisions to the final regulation text:

- Changes to punctuation throughout text,
- Revised subsection (a) and (a)(1) to improve grammar,

- Added the word “major” to the end of subsection (c),
- Fixed formatting of cross reference in subsection (d), and
- Add authority and reference citations.

Additionally, subsection (e) was withdrawn by the Commission to allow for the noticing of the modified regulation text for a 15-day public comment period.

Problem Statement

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

Statement of Purpose

There is no change to the original purpose of the proposed action since the original submission of the Initial Statement of Reasons.

Consideration of Alternatives

No alternatives other than those addressed in the summary and response to public comments were proposed by any party or the Commission during the rulemaking proceeding; therefore, the Commission has determined that there is no alternative that would be 1) more effective in carrying out the purpose for which the regulation is proposed, 2) as effective and less burdensome to affected private persons than the adopted regulation, or 3) more cost effective to affected private persons and equally as 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.

Additional Summary and Response to 45-Day Comments

In addition to the summary and response to comments contained in the Final Statement of Reasons, the following comments were also received by the Commission during the 45-day public comment period and at the December 2022 public hearing.

1. Comment from Michelle Cherner, 12/5/2022:

Why can't having a master's degree meet subject matter requirement?

Response: The Education Code is specific as to the options that are allowable for candidates to demonstrate subject matter competency. While one of the options is a bachelor's degree or higher, which would include a Masters degree, that option for demonstrating subject matter competence is not based solely on the level of the degree earned but also needs to be in particular fields of study. The degree must be in one of the allowable subject areas. The proposed regulations clarify the academic degrees that are acceptable for demonstration of subject matter. A Masters Degree in Special Education may cover the pedagogical content necessary for teaching but it does not meet the subject matter requirement as specified in the Education Code.

2. Comment from Darrell Blanks, 12/4/2022

I would first like to affirm the decision to allow degrees to meet this requirement and the continuing evaluation of degrees to expand the list of acceptable degrees. I would also like to affirm the option of allowing courses to meet the requirements if the specific name of the degree does not allow for the requirement to be met.

Response: This comment is provided in support of these proposed regulations that clarify the degree major options to meet subject matter competency requirement as outlined in Education Code sections 44259 and 44310. Additionally, the comment provides support for the option for demonstrating subject matter competency through a coursework evaluation option, as specified by Education Code, for candidates that do not complete a bachelor's degree or higher in a degree major allowed for by the Education Code Section 44259 but who has other coursework in accordance with the education code.

Besides the inconsistencies of who evaluates the coursework, I am concerned about the constancy of acceptance of courses for the domains. From one institution to another the courses accepted as meeting the domain content is not calibrated in any way. I believe these issues could begin to be addressed.

Response: These regulations clarify options for academic degree majors that meet subject matter competency requirement as outlined in Education Code sections 44259 and 44310 under the academic degree major option and do not address how an institution will complete its course evaluation under the coursework evaluation option. The Commission will continue to work with the education community on the issues of coursework evaluation outside of these proposed regulations.

The proposal could identify who is responsible for the coursework evaluation. There could be an effort made to standardize courses across institutions in the state that are accepted for various domains. The commission could consider a centralized service for coursework evaluation as is the practice in other states. This would address both issues of who is responsible and how consistent are standards of course acceptance.

Response: These regulations clarify options for academic degree majors that meet subject matter competency requirement as outlined in Education Code sections 44259 and 44310 under the academic degree major option and do not address how an institution will complete its course evaluation under the coursework evaluation option. The Commission will continue to work with the education community on the issue of coursework evaluation outside of these regulations.

3. Comment from Allison Smith, 12/2/2022

Subject matter competency options are appreciated. However, there needs to be additional work on the implementation and oversight. The requirement for IHEs to be the ones verifying subject matter is incredibly burdensome to our staff and no additional funding is being provided to IHEs - public or private - to do this. In other states, the state department of education verifies all subject competencies. There is also a lack of clear guidance to IHEs on meeting the requirements.

Response: Guidance on course review is not addressed in these proposed regulations. Staff will, however, work with the education community on this issue. Issues related to staffing, funding or workload for coursework evaluation at institution of higher education is beyond the purview of the Commission and, therefore, not addressed in these regulations.

Finally, we are being asked to evaluate members of the public who are not even affiliated to our private institution, and we have no mechanism to charge for this review. While we very much support alternatives to demonstrating competency, the administrative problems here must be addressed as this current situation will rapidly become unsustainable, especially for private institutions.

Response: These regulations clarify options for majors that meet subject matter competency and do not address how an institution will complete its evaluation of coursework. The Commission does not provide guidance to institutions regarding an institution's decision to charge for the review of coursework. These proposed regulations do not require that institutions evaluate members of the public who are not affiliated with an institution as that is outside of the Commission's purview and is a local decision.

4. Comment from Rebecca, 11/27/2022

I have a BA in Human Development, per "Multiple Subject candidates: Liberal Studies degrees as well as Liberal Studies degrees that include any focus or concentration in the title. Examples include, but are not limited to, Liberal Studies: Urban Education and Liberal Studies: Elementary Education" Human Development is a focus or concentration, and is one of the domains on the cset multiple subject. I hope it counts for the new proposed regulation.

Response: Liberal Studies is an allowable degree major for the multiple subjects credential as stated in Education Code Section 44259 (b) (5) (A) (iv) (II).

5. Loyola Marymount Comment, 12/5/2022

Comment: ...we have concern about some major areas, such as Liberal Studies. Currently a degree in Liberal Studies can meet the subject matter competence requirement for the Multiple Subject credential. However, our experience in examining transcripts from candidates of Liberal Studies programs outside of California, we have discovered degrees that do not reflect subject matter content that Multiple Subject Teachers are expected to teach in California.

We would like to propose that the CTC establish a working group made up of representatives from different Institutions to dive deeper into specific concerns and solutions. Furthermore, it would be helpful to establish a clearinghouse or database of approved courses that Institutions and programs can use to make decisions. Something similar was done many years ago when Institutions were asked to approve courses for the US Constitution requirement.

We want to make it clear that we support the opportunity for candidates to have various options for meeting the subject matter competence requirement. However, we are asking that the CTC provide appropriate guidance on the evaluation of the subject matter degrees.

Response: Liberal Studies is an allowable degree major for the multiple subjects credential as stated in Education Code Section 44259 (b) (5) (A) (iv) (II). These regulations focus on majors that meet subject matter competency for multiple subject and single subject credentials. Guidance on the course review is not addressed in these regulations.

6. FAIR Comment, 12/5/2022

Comment: Transparency will preserve the public's trust in the Commission and its work. Such trust is critical, given the many public university faculty members who formed and work for private Ethnic Studies consulting firms and who stand to gain financially should the Commission approve a proposal that any Ethnic Studies major they design will serve as proof of K-12 Social Science subject matter competence. See Appendix A. That raises serious conflict of interest issues that are best avoided.

Response: Routinely, the Commission gathers experts that represent UC's, CSU's, public and private credentialing programs, and creates work groups to address, discuss and offer expertise regarding a variety of issues, in this case subject matter competency. They meet multiple times and work closely with Commission staff. The Commission works diligently to be transparent by sharing the results of these work groups with the public and constituents for input.

Comment: FAIR requests that the Commission remove the language "a major...and the following..." AB 130 does not authorize the Commission to expand the subjects beyond those listed in Section 44257(a). As written, the proposed regulation would allow the Commission to issue competence certification in any major.

Response: The subject matter competency regulations are not proposing an expansion of the list of subjects. Rather, they are designed to clarify and standardize the implementation of options to the Subject Matter Competence requirement in Education Code sections 44259 and 44310 that were created in Assembly Bill (AB) 130 (Chap. 44, Stats. 2021). The Commission revised the text to replace "and" with "or," but no other changes were made to this language.

Comment: FAIR requests that the Commission remove the language "or any other major...related ethnicities." The clause specifies no major and is inconsistent with the Education Code. The Commission should establish a Work Group of Advisory Panel to review the specific related majors the Commission desires to include. The Commission should also provide the group with evidence that each major it wishes to add includes the coursework covering each of the Commission's Social Science domains.

Response: After considering all written and oral comments presented during the December 2022 Commission Public Hearing, Agenda Item 1H, the Commission acted to remove proposed section 80096(b)(9) which had included ethnic studies as an acceptable major for single subject Social

Science credential and directed staff to take further action outside of this regulatory proposal to study this topic.

Comment: FAIR requests the Commission delete the term “ethnic studies” from the proposed regulation.

Response: After considering all written and oral comments presented during the December 2022 Commission Public Hearing, Agenda Item 1H, the Commission acted to remove proposed section 80096(b)(9) which had included ethnic studies as an acceptable major for single subject Social Science credential and directed staff to take further action outside of this regulatory proposal to study this topic.

7. StandWithUs Comment

Comment: Prior to adopting the proposed amendments, we urge the CTC to take additional steps to ensure that college and university level ethnic studies majors:

A) Will be prepared to expose K-12 students to multiple perspectives, and empower them to think critically and form their own opinions, in accordance with the ESMC, and;

B) Will not be encouraged to teach K-12 ethnic studies courses from a specific political point of view or promote any form of bias or bigotry, in accordance with AB101.

Response: After considering all written and oral comments presented during the December 2022 Commission Public Hearing, Agenda Item 1H, the Commission acted to remove proposed section 80096(b)(9) which had included ethnic studies as an acceptable major for single subject Social Science credential and directed staff to take further action outside of this regulatory proposal to study this topic. The comments submitted by this group regarding ethnic studies do not directly impact the remainder of the regulatory language that is being proposed. The Commission will continue to study and work with the education community on the appropriate role of ethnic studies in teacher preparation.

Public Comments and Responses

Following a 15-day notice and notice of public hearing, a total of 16 written comments were received prior to the April 2023 public hearing. Additionally, during the public hearing five oral comments were presented to the Commission. The majority of both the written and oral comments focused on four overarching issues related to the revised regulations. These four concerns and staff’s response are as follows:

1) The list of acceptable majors for the Early Childhood Education Specialist Instruction credential.

After considering all written and oral comments presented the Commission adopted the following amended list of majors as demonstration of subject matter competency for the Early Childhood Education Specialist Instruction Credential under section 44265(a) of the

Education Code: Child Development; Child and Adolescent Development; Human Development; Human Development and Family Science; Family Science; Early Childhood Education; Early Childhood Studies; Child, Adolescent and Family Studies; or Child and Family Studies.

2) Liberal Studies and Liberal Arts as acceptable majors for the Multiple Subject credential.

AB130 identified majors for subject matter competency however, because there is wide variation in academic major titles across institutions of higher education and since Liberal Studies and Liberal Arts have been used interchangeably, both are appropriate for the purpose of determining subject matter competency.

3) Concerns about when a candidate in an integrated (combined undergraduate and teacher preparation program) program must meet the subject matter requirement.

The issue of when a candidate must demonstrate subject matter is not addressed in these proposed regulations. Commission staff will address this issue outside of this regulatory process.

4) Liberal Studies not meeting requirements for the PK-3 Early Childhood Education Specialist Instruction credential

This concern is rooted in a misunderstanding about the authorization for the Early Childhood Education Specialist Instruction credential. Liberal Studies does not meet the requirements for the Early Childhood Education Specialist Instruction credential. The Education Specialist credential is not the same credential as the Early Childhood Education Specialist Instruction Credential despite the similarity in the name. The first is intended to serve students with disabilities, while the second instructs young learners preschool through early elementary. Liberal Studies is allowable as a major for both Multiple Subject and Education Specialist under Education Code Section 44259 (b) (5) (A) (iv) (II) and (III). However, it is not being proposed as an acceptable major for the Early Childhood Education Specialist Credential.

In addition to the comments about the regulations, there was a technical concern about “differences” between the posting of the coded correspondence notice and the posting of the subject matter competency agenda item 3H. The proposed regulations were correctly posted in both the agenda item and the notice; however, there was some confusion due to the fact that there were two public hearings being held back-to-back during the April 2023 Commission meeting.

To provide further clarification, each of the written comments received and the corresponding response heard during the public hearing, can be found in [Appendix A](#). The individual oral comments presented during the April 21, 2023, Commission meeting can be viewed/heard in the video file included in the Table of Contents.

Updated Tally of Public Comments

Written Comments

<i>In Support</i>		<i>In Opposition</i>	
<i>Written Comments Representing Organizations in Support</i>	<i>1</i>	<i>Written Comments Representing Organizations in Opposition</i>	<i>12</i>
<i>Written Comments Representing Individuals in Support</i>	<i>0</i>	<i>Written Comments Representing Individuals in Opposition</i>	<i>3</i>
<i>Total Comments in support</i>	<i>1</i>	<i>Total, Comments in opposition</i>	<i>15</i>
Grand Total of Written Comments:			16

<i>Oral Comments In Opposition</i>	
<i>Oral Comments Given During Public Hearing April 21, 2023 in Opposition</i>	<i>5</i>
Grand Total of Oral Comments Given During Public Hearing:	5

**Appendix A
Comments and Responses**

WRITTEN COMMENTS REPRESENTING ORGANIZATIONS IN SUPPORT		
Comment	Concerns Identified in Comments	Responses
1. Allison Smith Association of Independent California Colleges and Universities-Education (AICCU-ED)		
We are in support of the subject matter competence options. We do find the wording of “degree awarded” to be problematic when trying to confirm subject matter for undergraduate students because SMC needs to be approved before student teaching, which is prior to a degree being awarded. We recommend considering other flexibilities, such as a 4/5 solution.	Concerns about when a candidate in an integrated program must meet the subject matter requirement.	Any concerns about flexibility in the timing of subject matter competency approval will be addressed outside of this regulatory package.

WRITTEN COMMENTS REPRESENTING ORGANIZATIONS IN OPPOSITION		
Comment	Concerns Identified in Comments	Responses
1. Michael Rozendal, Ph.D. Associate Professor, Rhetoric and Language Dept. Academic Director, Undergraduate Teacher Education Center University of San Francisco		

<p>On behalf of the Undergraduate Teacher Education Center at the University of San Francisco, we are writing to comment on the changes outlined in Coded Correspondence 23-04 dated April 3, 2023.</p> <p>In particular, we are writing to advocate against the proposed change to the California Code of Regulations, Title 5, Division 8, Chapter 1, Article 3, §80096 (b) (9).</p> <p>We are strongly against the removal of this section, of the removal of these majors as subject matter requirement (SMR) satisfaction and, by extension, as pathways into the teaching profession.</p> <p>This will not serve California’s students or California's teacher candidates. In recognizing that majors in “history, ethnic studies, and any other major on the study of one or more related ethnicities” satisfy the SMR for the single subject social sciences credential, we are celebrating the vibrant majors at our IHEs, and encouraging our candidates to pursue lively, integrated majors that are accredited and assessed regularly.</p> <p>We see these integrated majors as far superior formations for teachers rather than disaggregated courses or standardized testing. Both of these routes work functionally as gatekeepers, intentionally blocking inspiring, diverse candidates on one hand and harming California’s students on the other.</p> <p>Even more, the California Alliance of Researchers for Equity in Education network (CARE-ED) has described in a 2021 petition that teaching ethnic studies improves cross-racial attitudes and relationships for all students.</p>	<p>Concerns about the lack of inclusion of some majors as acceptable Majors for Social Science Single Subject</p>	<p>After considering all written and oral comments presented during the December 2022 Commission Public Hearing, Agenda Item 1H, the Commission acted to remove proposed section 80096(b)(9) which had included ethnic studies as an acceptable major for single subject Social Science credential and directed staff to take further action outside of this regulatory proposal to study this topic.</p>
--	---	---

<p>We hope that the CTC will celebrate the years of study and commitment that teacher candidates put into coherent and deeply grounded majors in “history, ethnic studies, and any other major on the study of one or more related ethnicities.” Recognizing these as SMR satisfaction for the social sciences credential will fuel dynamic, targeted, and timely teaching of social sciences across the Golden State.</p>		
<p>2. Adam Sawyer, Ed.D Associate Professor of Teacher Education Director, Liberal Studies Program</p>		
<p>I would like to comment on the Coded Correspondence 23-04: Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to Determination of Subject Matter Competency. Specifically, the section on multiple subject: <i>(c) When reviewing official transcripts for subject matter competency for a Multiple Subject Credential under section 44259(b)(5)(A)(iv)(II) of the Education Code, a liberal studies major shall mean any of the following: (1) Liberal Studies (2) Liberal Arts (3) Elementary Education</i></p> <p>I am a member of the CSU Liberal Studies Council and have served as Director of Liberal Studies at CSU Bakersfield for the past five years. Moreover, I wrote the Elementary Subject Matter Program that was approved by the Commission. Since approval of our ESM Program, I have overseen the transcript review of students seeking their ESM Multiple Subject CSET Waiver.</p> <p>I don’t think that Liberal Arts should be included in the proposed changes as many degrees in Liberal Arts have very little content that directly meets the Elementary Subject Matter Domains. If Liberal Arts and Interdisciplinary Studies are included, there is no way to ensure that the multiple subject candidates have enough subject matter preparation in the domains that are currently required by a Liberal Studies</p>	<p>In opposition of Liberal Arts being considered for subject matter competency for Multiple Subject Credential</p>	<p>Since Liberal Studies and Liberal Arts are often used interchangeably, both are appropriate when determining subject matter competency.</p>

<p>Elementary Subject Matter Program. Subject matter is an important aspect of being a qualified teacher-- I don't think we should make changes that would result in candidates being less prepared to teach.</p> <p>If Liberal Arts and Interdisciplinary Studies must be included, I think it is important to include language that states that the course of study in Interdisciplinary Studies or Liberal Arts majors must have some connection or alignment to the elementary subject matter domains. I know that in the past year or so, the CTC has been advising a "light review" so there is some attention to whether these majors from different institutions connected to the elementary subject matter domains. For example, the Interdisciplinary Studies major at CSUB is more of a degree completion major—there are many choices of classes--if a student chose this major, they would meet very few of the elementary subject matter domains.</p> <p>In addition to these suggestions, I as find it important to note that note that our Liberal Studies Programs in the State are not monolithic. In fact, many of our programs (in addition to our teacher preparation pathways) include non-teaching pathways that more closely resemble the Liberal Arts and Interdisciplinary Studies programs I have just described. As such, I would urge the Commission to consider recommending "light reviews" of non-ESM Liberal Studies degrees.</p>		
<p>3. Jocelyn Ahlers Professor of Linguistics Chair, Liberal Studies Department Liberal Studies Department CSU San Marcos</p>		
<p>I am writing to comment on Coded Correspondence 23-04: Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to Determination of Subject Matter Competency, with a specific focus on</p>	<p>In opposition of Liberal Arts being considered for</p>	<p>Since Liberal Studies and Liberal Arts are often used interchangeably, both are</p>

<p>section c: <i>When reviewing official transcripts for subject matter competency for a Multiple Subject Credential under section 44259(b)(5)(A)(iv)(II) of the Education Code, a liberal studies major shall mean any of the following: (1) Liberal Studies; (2) Liberal Arts; (3) Elementary Education.</i></p> <p>I am the Chair of the Liberal Studies Department at CSU San Marcos. Our program received a CCTC Multiple Subject Waiver prior to the passage of AB 130. I was deeply involved in the waiver application process, and in the work to align our program with the state standards for multiple subject matter competency. I am also extremely passionate about K-8 teacher preparation, and I feel strongly that K-8 teachers (like all teachers) should have a thorough grounding in all of the content that they will be responsible to teach. While a credential program teaches our future teachers <i>how</i> to teach, a high-quality content preparation program teaches them <i>what</i> they're teaching, and also teaches them to delight in the process of content acquisition – which in turn is an inspiration for their own students one day. Liberal Studies programs are designed to cover all of the mandated core content areas, across a wide range of domains. Liberal Arts programs, as valuable as they are, do not have that goal as part of their fundamental design, and they should not be considered equivalent to Liberal Studies programs when it comes to multiple subject matter preparation. Given that our K-8 teachers are vested with preparing the citizens and workers of tomorrow, I believe that it is worth maintaining the integrity of teacher preparation whenever and wherever possible, and therefore strongly urge the CTC <i>not</i> to adopt language allowing Liberal Arts programs to serve as CSET waiver programs across the board. I would further suggest that language be adopted to specify that only programs which are, in fact, multiple subject preparation programs be counted. For example, within our Liberal Studies major, we long had a Border Studies option which</p>	<p>subject matter competency for Multiple Subject Credential</p>	<p>appropriate when determining subject matter competency.</p>
--	--	--

<p>was not a multiple subject preparation program. Although it has been recently discontinued, students who are graduating in that major option are now considered waived from the Multiple Subject CSET – even though they are not prepared to teach multiple subject content. Situations such as this should be avoided, and I would very much like to see the CCTC consider adopting language that upholds the integrity of K-8 teacher preparation.</p>		
<p>4. Kalpana Thatte Santa Clara County Office of Education</p>		
<p>Thinking about teacher preparation programs, and how teachers have to meet the subject matter requirement that they are getting their credential in, it comes to mind that candidates getting their special education credentials are given very little consideration. If a person wants to get a single subject credential in, say Dance, they have to meet the subject matter requirement in Dance through a degree major or by clearing a single subject CSET in Dance. But if a person is seeking a Mild to Moderate Support Needs credential, there is no specific subject matter requirement that they have to meet, so long as they meet some subject matter requirement. This creates a barrier and it is an equity issue. Many of our special education credentialing candidates have a degree major in psychology or early child development or human development, but these are not acceptable subject matter competencies where the Commission is concerned. How does a person who has majored in psychology not be considered as having met subject matter competency when working with students with disabilities, but someone who has majored in agriculture or business administration is considered to have met that requirement? This puts a burden on these candidates as they are trying to complete their credentialing program and start their work to support students with disabilities. Commission should seriously consider allowing special education candidates to meet the subject matter requirement through any of the degree majors</p>	<p>Concerned about Special Education competency and advocating for the acceptance of majors in psychology, human development, and child development for Education Specialists. .</p>	<p>Consideration of additional majors beyond those being proposed in this regulatory package is not part of the proposal at this time. It is possible that the Commission could consider analyzing and proposing other majors that may be in accordance with Ed Code Section 44259 in the future.</p>

<p>pertaining to psychology, human development, child development areas.</p>		
<p>5. Janet Fish CSUN Professor Emerita</p>		
<p>I have serious concerns about the options for meeting the Subject Matter Competence Requirement for the PK-3 ECE Specialist Instruction Credential described in Item 3H.</p> <p>ITEM 3H Unclearly Presents Early Childhood/Child Development Subject Matter for the ECE Specialist Instruction Credential:</p> <p>Item 3H further</p> <p>1) minimalizes the “operational specificity” of the CTC-approved subject matter in Early Childhood/Child Development for the PK-3 ECE Specialist Instruction Credential.</p> <p>a. The second option (twenty-four EC/CD units) as a second option for meeting subject matter competency for this credential that must sunset permanently in the near future.</p> <ul style="list-style-type: none"> ▪ 24 units is NOT equivalent to a baccalaureate in a subject matter. ▪ 24 units do not meet CTC’s cited Strategic Plan Goal II Program Quality and Accountability neither in o developing and maintaining “rigorous, meaningful, and relevant standards,” <ul style="list-style-type: none"> o driving “[education workforce preparation] program quality and effectiveness”, nor o being “responsive to the needs of California’s diverse student population” (cover page, Item 3H). ▪ In addition, we all know that some LEAs are using loopholes regarding candidates who hold a School Age CD Permit that only requires 6 units—one, 3-unit course in Child Development and 	<p>Concerns regarding academic major options for meeting subject matter competence for the Early Childhood Education Specialist Instruction Credential</p>	<p>Some of the issues identified in this letter are not germane to this regulatory package.</p> <p>In response to comments made prior to and during the April 2023 public hearing regarding the list of academic majors that would be acceptable to demonstrate subject matter competence for the Early Childhood Education Specialist Instruction credential, the following majors were adopted: Child Development; Child and Adolescent Development; Human Development; Human Development and Family Science; Family Science, Early Childhood Education; Early Childhood Studies; Child, Adolescent and Family Studies; and, Child and Family Studies.</p> <p>1. Minimization of operational specificity.</p>

<p>one- 3-unit course in school age development to satisfy this requirement.</p> <p>2) does not include EC/CD names of baccalaureate majors that prepare the education workforce for teaching 3-8-year-olds.</p> <p>3) By not including EC/CD baccalaureate majors as meeting Multiple Subject Credential subject matter does not reflect CTC’s recognition of national research and CTC dedication to collaboration in development of the California Transforming the Workforce for Children 0-8 Implementation Plan (2016).</p> <p>RECOMMENDATIONS:</p> <ul style="list-style-type: none"> ▪ I urge the Commission NOT approve the revised proposed regulations in Appendix B. <p>We need more time and foundational attention to EC/CD Subject Matter in the design of the credential so that we can serve the diverse population of California’s children, families, and the cultural and linguistic strengths they possess that are essential building blocks to young children’s identity formation and validation, belongingness, learning proficiency in English, and optimal learning and development, overall.</p> <p>WE DO NOT WANT TO CREATE ANOTHER TENNESSEE.</p> <p>My related recommendations include cited, highlighted, and underlined portions: (p GS 3H-6) Article 3. 80096)</p> <ul style="list-style-type: none"> o (c) “When reviewing official transcripts for subject matter competency for a Multiple Subject Credential under section 44259(b)(5)(A)(iv)(II) of the Education Code, the list of baccalaureate majors includes the following: <ul style="list-style-type: none"> • (1) Liberal Studies • (2) Liberal Arts 		<p>This comment is vague and unclear and therefore, not actionable.</p> <p>2. 24 EC/CD units as not equivalent to the bachelors degree.</p> <p>The commenter is misunderstanding the requirements. A bachelors degree is required for a ECE Specialist Instruction Credential, however, the degree requirement is separate from the subject matter requirement where one option is 24 units of early childhood education or child development. All candidates need to have a bachelor’s degree. All candidates must also meet the subject matter requirement in one of two ways, either through a bachelor’s degree in one of the</p>
---	--	---

<ul style="list-style-type: none"> • (3) Elementary Education • (4) Child Development and other baccalaureate majors listed under (e) below. <p>o (e) “When reviewing official transcripts for an Early Childhood Education Specialist Instruction Credential, under section 44265(a) of the Education Code, subject matter competency shall be demonstrated by a baccalaureate major in Child Development, Child and Adolescent Development, Human Development, Child and Family Studies, Early Childhood Studies, or Early Childhood Education.</p> <p>Thank you for this opportunity to contribute to the quality and effectiveness of a new ECE Specialist Instruction Credential. This is an exciting prospect and needs more time and collaboration to ensure a clear, cohesive ECE-Centric vision and pedagogy, to support optimal outcomes for young children’s development and learning.</p>		<p>specified majors or, if their degree major was in another field, 24 units of child development or early childhood education.</p> <ol style="list-style-type: none"> 3. Needing more time and attention to EC/CD subject matter <p>The Commission has collaborated with numerous stakeholders over several years revamping the ECE credential in order to meet the statewide, multi agency effort to meet the demand for new PK 3 teachers, particularly to meet the need for universal preschool and transitional kindergarten.</p> <ol style="list-style-type: none"> 4. Revising subsection (c) to include “child development and other baccalaureate majors listed under (e) below” <p>The Commission has</p>
---	--	---

		<p>revised the proposed regulations to include an expanded list of academic degree majors that may be used to demonstrate subject matter competence.</p> <p>The commenter does not indicate which additional academic degree majors they believe are missing from the proposed regulations.</p> <p>5. Revising subsection (e) to change “may” to shall” and insert “baccalaureate”</p> <p>The use of may or shall in this case does not change the meaning of (e).</p>
<p>6. Katherine Bono, Ph.D. California State University Fullerton</p>		
<p>Students who complete a Child and Adolescent Studies degree, which includes subject matter preparation, should meet subject matter competency and should have the CSET waived. I am the department chair for CSUF's Child and Adolescent Studies. We offer a degree in Child and Adolescent Studies with a concentration in Elementary School</p>	<p>Concerns regarding options for meeting subject matter competence for</p>	<p>In response to comments made prior to and during the April 2023 public hearing regarding the list of academic majors that would be acceptable to</p>

<p>Settings. The purpose of this degree is to prepare students to enter into a multiple subjects or special education credential program. As it stands currently, my students do not receive a waiver from the CSET despite the fact that the major requirements provide more alignment with all CSET subtests than do the liberal studies requirements on our campus.</p> <p>The CTC continues to exclude child development programs even though a significant portion of credential students have received their degree from these programs instead of from liberal studies. Students who pursue child development rather than liberal studies are also more likely to be under-represented students as well as first-generation college students. Taking the CSET often presents an economic barrier to them. It is inequitable that students from child development programs face an additional barrier to becoming teachers. If we want more teachers of color in our diverse communities, we must move barriers when possible.</p>	<p>Early Childhood Education Specialist Instruction Credential</p>	<p>demonstrate subject matter competence for the Early Childhood Education Specialist Instruction credential, the following majors were adopted as acceptable demonstration of subject matter competency for an Early Childhood Education Specialist Credential: Child Development; Child and Adolescent Development; Human Development; Human Development and Family Science; Family Science, Early Childhood Education; Early Childhood Studies; Child, Adolescent and Family Studies; and, Child and Family Studies.</p>
<p>7. Eden Haywood-Bird Cal Poly Pomona</p>		
<p>This comment is in two parts: Part one- degree in Child development/early childhood not considered SM for education specialist credential.</p> <p>I respectfully request that the Commission consider early childhood and/or child development bachelor degree to be subject matter competency for the education specialist mild/moderate and extensive support credentials. Early childhood and/or child development are interdisciplinary degrees by design, include a robust general education requirement as well as require graduates demonstrate exceptional</p>	<p>Concerns regarding options for meeting subject matter competence for Early Childhood Education Specialist Instruction Credential</p>	<p>In response to comments made prior to and during the April 2023 public hearing regarding the list of academic majors that would be acceptable to demonstrate subject matter competence for the Early Childhood Education Specialist Instruction credential, the following majors were adopted</p>

<p>knowledge and understanding of children and how they learn and grow over childhood. As the education specialist credentials do not have specific subject matter domains, it would make sense for early childhood and/or child development to be considered as part of the list of subject matter aligned bachelors degrees for these credentials. A candidate with a bachelor's degree in child development and/or early childhood would be just as prepared subject matter-wise as a candidate with a bachelor's degree in chemistry. I would argue that the candidate with the bachelor's degree in early childhood and/or child development would be even better prepared, with more robust subject matter training. Their degree would be interdisciplinary, covering multiple academic domains while the chemistry candidate would be focused on one specific aspect of a specific content area. Again, please consider adding early childhood and/or child development to the list of bachelor's degrees that can be used as an alternative to the CSET for both education specialist credentials mild/moderate and extensive support.</p> <p>Part two- implications of the current language for alternative pathways for meeting subject matter requirement Because the language regarding SMR by degree and/or transcript review requires the degree to be awarded and the course is to be completed prior to the candidates admission to the credential program, this has caused an undue burden on students whose plan is to enter a credential program the academic year after graduating with their bachelor's degree. The current regulations require credential programs to verify a student's SMR within 30 days of admission, and the majority of credential programs require applications early in the semester before a candidate can start their program, there is a lag time between when the application is due and when the student completes their bachelor's program. This has led to students who would otherwise meet subject matter by degree being required to take the CSET in order to keep their</p>	<p>Concerns about when a candidate in an integrated program must meet the subject matter requirement.</p>	<p>as acceptable demonstration of subject matter competency for an Early Childhood Education Specialist Credential: Child Development; Child and Adolescent Development; Human Development; Human Development and Family Science; Family Science, Early Childhood Education; Early Childhood Studies; Child, Adolescent and Family Studies; and, Child and Family Studies.</p> <p>Concerns about flexibility in the timing of subject matter competency approval will be addressed outside of this regulatory package.</p>
---	---	--

<p>admission spot in the credential program. There are also serious implications for students who are in an ITEP program in regard to both basic skills and subject matter as these students may be majoring in an aligned bachelor's degree program but as they obtain their bachelor's degree and credential at the same time they are required to pass both the CBest and the CSET prior to beginning their credential courses. This is creating quite a bottleneck for students and leading to many issues regarding application timelines and approvals. I encourage the commission to consider rewording and or clarifying how credential programs should analyze students SMR and basic skills if the student is currently in a bachelor's program aligned to SMR. Thank you for your consideration.</p>		
<p>8. Cindy Stephens College of the Canyons</p>		
<p>As an early childhood professional community college faculty, I am requesting that the commission take into consideration that liberal studies does not meet the subject matter requirement and remove it as one of the options to clear a PK – 3 credential.</p>	<p>In opposition of Liberal Studies being considered for subject matter competency for the Early Childhood Education Specialist Credential</p>	<p>The proposed regulations does not include Liberal Studies as an acceptable major for the Early Childhood Education Specialist Credential. It is an allowable degree major for the multiple subjects credential in Education Code Section 44259 (b) (5) (A) (iv) (II).</p>
<p>9. Denise Kennedy Cal Poly Pomona</p>		
<p>SUBJECT: Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to Determination of Subject Matter Competency First of all, the coded correspondence and the agenda item are completely different. Also, when written comments are to be uploaded is</p>	<p>Concerns about Coded Correspondence and agenda item</p>	<p>The regulations were correctly posted. Two public hearings were held during the April 2023 Commission meeting.</p>

<p>also inconsistent, one says Tuesday and the other Monday at 5:00 pm. On the coded correspondence:</p> <p>Under the section: (e) When reviewing official transcripts for an Early Childhood Education Specialist Credential under section 44265(a) of the Education Code, subject matter competency may be demonstrated by a major in Child Development, Child and Adolescent Development, Human Development, or Early Childhood Education, or a similar major. Early Childhood Studies (ECS) needs to be added to this section. Several CSU programs are ECS and unable to use ECE as engineering has this program designation on some campuses. On the agenda item 3H which again is very different than the coded correspondence section (III) For education specialist credentials, either a major in one of the subject areas in which the commission credentials candidates or a liberal studies or other major that includes coursework in the content areas pursuant to subdivision (b) of Section 44282 Liberal studies is not and does not meet the subject matter for any Specialist credential. Why is the information contradictory? Implementation of transcript review also makes no sense as students that want to enter a credential program MUST wait a year since their degree will not be conferred until the summer while applications are due in March.</p>	<p>language not matching.</p>	<p>Some members of the public incorrectly compared proposed regulations from one public hearing/agenda item to other.</p>
	<p>Concerns regarding options for meeting subject matter competence for Early Childhood Education Specialist Instruction Credential.</p>	<p>In response to comments made prior to and during the April 2023 public hearing regarding the list of academic majors that would be acceptable to demonstrate subject matter competence for the Early Childhood Education Specialist Instruction credential, the following majors were adopted as acceptable demonstration of subject matter competency for an Early Childhood Education Specialist Credential: Child Development; Child and Adolescent Development; Human Development; Human Development and Family Science; Family Science, Early Childhood Education; Early Childhood Studies; Child, Adolescent and Family Studies; and, Child and Family Studies.</p>

		Any concerns about flexibility in the timing of subject matter competency approval will be addressed outside of this regulatory package
<p>10. Nancy Hurlbut, PH.D. Emeritus Professor of Early Childhood Studies, Co-Lead of PEACH and CA EC BACC, Past Dean and Associate Dean in Colleges of Education at the CSU</p>		
<p>Now, with only a few hours remaining to submit written comments, agenda item 3H has been changed after I asked CTC staff, “why the agenda item 3H and the coded correspondence 23-04 were so different.” It now seems the agenda item 3H presents CTC’s correct proposed subject matter document. As such written comments on 3H may be confusing since until after 10:00 AM, Tuesday, April 18, 3H was not the CTC’s coded correspondence 23-04 but instead looked like CTC’s present subject matter regulations which I believe is in Education Code § 44259. On the previous version of Item 3H, a statement of concern to the disciplinary experts stated “(III) For education specialist credentials, either a major in one of the subject areas in which the commission credentials candidates or a liberal studies or other major that includes coursework in the content areas pursuant to subdivision (b) of Section 44282.” This statement created major concerns/discussions to/among the discipline experts in Early Childhood Education so many may have commented on what was in the previous agenda item 3H. We were not left with sufficient time to modify our responses.</p> <p>Moving onto the present 3H (coded correspondence 23-04), there are a few concerns I would like to share.</p>	<p>Concerns about Coded Correspondence and agenda item language not matching.</p>	<p>The regulations were correctly posted. Two public hearings being held during the April 2023 Commission meeting: Some members of the public incorrectly compared proposed regulations from public hearing/agenda item 3H to the proposed regulations for public hearing/agenda item 3I, and vice versa.</p>
	<p>Concerns regarding options for meeting subject matter competence for Early Childhood Education Specialist Instruction Credential.</p>	<p>In response to comments made prior to and during the April 2023 public hearing regarding the list of academic majors that would be acceptable to demonstrate subject matter competence for the Early Childhood Education Specialist Instruction credential, the following majors were adopted as acceptable demonstration of</p>

<p>1. For e under Appendix B, page G5 3H-6, please add Early Childhood Studies as one of the possible majors that can meet the subject matter for the Early Childhood Education Specialist Credential. Since “similar major” was deleted, this resulted in at least 3 quality early childhood programs at the 23 California State Universities not being one of the subject matters for this credential. In fact, the only California nationally accredited baccalaureate program with NAEYC is an early childhood studies program.</p> <p>2. Appendix A and Appendix B seem to contradict each other in the following way: Appendix A (Education Code § 44259 (b) (5), continues to state that liberal subjects is the subject matter for all education specialist credentials. See page GS 3H-3, “(III) For education specialist credentials, either a major in one of the subject areas in which the commission credentials candidates or a liberal studies or other major that includes coursework in the content areas pursuant to subdivision (b) of Section 44282.” The discipline experts in Early Childhood Education know of no research or practice that would support liberal studies as the appropriate discipline to support quality early childhood teacher preparation. In contrast, on page GS 3H-6, Appendix B (California Code of Regulations; Title 5. Education...) states “(e) When reviewing official transcripts for an Early Childhood Education Specialist Credential under section 44265(a) of the Education Code, subject matter competency may be demonstrated by a major in Child Development, Child and Adolescent Development, Human Development, or Early Childhood Education, or a similar major.”</p> <p>The discipline experts in the field of early childhood education agree with (e) above and many of us request that III Appendix A specifically states that “for the PK-3 and the newly proposed PK-K credentials, liberal studies does not meet the subject matter requirement.”</p>		<p>subject matter competency for an Early Childhood Education Specialist Credential: Child Development; Child and Adolescent Development; Human Development; Human Development and Family Science; Family Science, Early Childhood Education; Early Childhood Studies; Child, Adolescent and Family Studies; and, Child and Family Studies.</p> <p>While closely related to the proposed subject matter the competency requirements for an Early Childhood Education Specialist Credential, comments #2 and #3 relate specifically to the proposed regulations regarding the PK-3 credential. P he proposed regulations regarding the PK-3 credential. K-3 is not addressed in the subject matter competency regulations.</p>
---	--	---

<p>3. On page GS 3H-6, for c in Appendix B, the CA EC Baccs and PEACH faculty have contacted CTC staff multiple times concerning whether Child Development or similar major could be one of the possible majors to meet the multiple subject matter requirements. On 10/5/22, we received the following email, “Thank you for the work you all have done identifying where your programs cover the content areas of the Multiple Subject credential. We will review the document and get back to you.” However, we have not heard anything since and would very much like to continue a discussion with CTC staff and to provide additional materials to support our request that child development/child and adolescent development/human development be considered as an appropriate subject matter for the multiple subject credential.</p> <p>I appreciate the opportunity to provide information on these important decisions.</p>		
<p>11. Kheng Ly-Hoang Cal Poly Pomona ECE</p>		
<p>Agenda item 3H: “Early Childhood STUDIES” needs to be added as an approved subject matter for the PK-3 Early Childhood Education Specialist Instruction Credential under section 80096(e) of the Education Code. Cal Poly Pomona is one of 22 California State University (CSU) campuses that offer teacher preparation programs for the early childhood workforce. Therefore, a decision to exclude or omit our academic program would disenfranchise students from Cal Poly Pomona, CSU Channel Islands, and CSU Sonoma, further disadvantaging California and California's early childhood workforce. On a similar note, Liberal studies is not the subject matter for any early childhood credential. They are not experts in developmental studies nor early childhood education/studies.</p>	<p>Concerns regarding options for meeting subject matter competence for Early Childhood Education Specialist Instruction Credential.</p>	<p>In response to comments made prior to and during the April 2023 public hearing regarding the list of academic majors that would be acceptable to demonstrate subject matter competence for the Early Childhood Education Specialist Instruction credential, the following majors were adopted as acceptable demonstration of subject matter competency for an Early Childhood Education Specialist Credential: Child</p>

<p>The Commission espouses a mission to ensure integrity, relevance, and high quality in the preparation, certification, and discipline of the educators who serve all of California's diverse students. Yet, California ranks 42nd nationally in public education. Not only is this embarrassing, but this should also give pause to what our state has been doing in order to reevaluate and reconceptualize what effective education means to the constituents and those in power. Thus, it is critically incumbent on the Commission's integrity and mission to advance California's efforts to improve our educational system for all of California's children and educators by not only considering ECE stakeholders' input, including IHE child development and early childhood education/studies faculty, but effectively incorporate the information that early childhood education experts in California have been providing for years without misconstruing and misrepresenting the information and perpetuating false narratives.</p>		<p>Development; Child and Adolescent Development; Human Development; Human Development and Family Science; Family Science, Early Childhood Education; Early Childhood Studies; Child, Adolescent and Family Studies; and, Child and Family Studies.</p>
<p>12. Anthony Ayala Solano Community College</p>		
<p>One of the greatest issues in our K-12 system is that of a lack of diversity. I strongly suggest allowing Early Childhood Education to be listed under the subject matter competency for a Multiple Subject Credential. This will allow the barriers faced by ECE students to be removed as well as bring a vast amount of diverse knowledge into our public-school systems. I have full faith these students would be ready to complete a credential program and move into teaching position within those systems successfully.</p> <p>2) Does the language in appendix B supersede the commission's plan to allow a mere 24 units in child development to be considered as subject matter competency to the Early Childhood Education Specialist Credential?</p> <p>(e) When reviewing official transcripts for an Early Childhood Education Specialist (Instruction) Credential under section 44265(a) of the Education Code, subject matter competency may be demonstrated by a</p>	<p>Concerns regarding options for meeting subject matter competence for Early Childhood Education Specialist Instruction Credential</p>	<p>In response to the suggestion to include Early Childhood Education under the subject matter competency for a Multiple Subject Credential is not addressed in these regulations since under section 44259(b)(5)(A)(iv)(II) of the Education Code, a liberal studies major shall mean any of the following majors:</p> <ul style="list-style-type: none"> (1) Liberal Studies. (2) Liberal Arts. (3) Elementary Education. <p>In response to comments made prior to and during the April</p>

<p>major in Child Development, Child and Adolescent Development, Human Development, or Early Childhood Education. If so, I am in full agreement with (e</p>		<p>2023 public hearing regarding the list of academic majors that would be acceptable to demonstrate subject matter competence for the Early Childhood Education Specialist Instruction credential, the following majors were adopted as acceptable demonstration of subject matter competency for an Early Childhood Education Specialist Credential: Child Development; Child and Adolescent Development; Human Development; Human Development and Family Science; Family Science, Early Childhood Education; Early Childhood Studies; Child, Adolescent and Family Studies; and, Child and Family Studies.</p>
---	--	---

WRITTEN COMMENTS REPRESENTING INDIVIDUALS IN OPPOSITION		
Comment	Concerns Identified in Comments	Responses
<p>1. Valerie Winston Member of the public</p>		

<p>I'm not sure why a degree in History is not proof of subject matter competency for the Social Science credential. While going over the subjects one can teach with each granted credential, I noticed that an art degree can teach art history courses. Looking at the requirements at CSUS, there is more art history content taught in history major coursework than an art major learns - how does that make sense? In the majority of documents and information regarding the social science credential that one can find online, including the CSUS credential website (and links) as well as some sections of the CTC, social science is connected with history when mentioned. If you won't accept a history major as proof of subject matter competency for the social science credential, you need to reevaluate and update all other single subject credentials and the corresponding majors that satisfy competency (as well as what each is allowed to teach). I have been a substitute in two large districts in and around Sacramento. I've been in 6-12 history/social science/government/econ classes in many schools. I (as well as many of my peers with a major in history) can confidently say everything I taught in those classes as a guest teacher was covered by my degree. I sincerely hope you reconsider.</p>	<p>In support of adding History major coursework as proof of subject matter competency for single subject social science.</p>	<p>During a public hearing held December 2022 (Agenda Item 1H) the Commission approved the proposed regulations adopted in June 2022 to remove section 80096(b)(9) and directed staff to take further action outside of this regulatory proposal to study this topic.</p>
<p>2. Stephanie Hernandez Member of the Public</p>		
<p>To meet the Subject Matter competence for multiple subject why wouldn't Early Childhood Education be an option and only Liberal Art and Elementary Education? If a major in early childhood development can be waived for the early childhood specialist credential. My major is Early Childhood Education and Multiple Subject Credential and I plan to teach tk-k. What is the difference in this case?</p>	<p>Concern over the lack of inclusion of Early Childhood Education degree major as an acceptable means of demonstrating subject matter competence for the Multiple</p>	<p>At this time, it is not clear that most Early Childhood Education degree majors contain the subject matter content required for the Multiple Subject Credential.</p>

	Subjects Credential.	
<p>3. Donna Cecil Member of the Public</p>		
<p>I would like to address Appendix A section (III): <i>For education specialist credentials either a major in one of the subject areas in which the commission credentials candidates or a liberal studies or other major studies includes coursework in the content areas pursuant to subdivision 9b) of Section 44282.</i> According to this statement it indicates that liberal studies is the subject matter for every education specialist credential. Liberal Studies is not the appropriate subject matter for the PK-3 credential or the proposed PK-3 Early Childhood Education Specialist Instruction Credential. The only appropriate subject is child development/early childhood/early childhood education degree.</p> <p>On another note, why does this document not agree with coded correspondence 23-04 posted on CTC website on April 3, 2023?</p>	<p>In opposition of Liberal Studies being considered for subject matter competency for the Early Childhood Education Specialist Instruction Credential</p>	<p>The Education Specialist credential is not the same credential as the PK-3 Early Childhood Education Specialist Instruction Credential. The first is intended to serve students with disabilities, while the second instructs young learners preschool through early elementary. Liberal Studies is not identified in the proposed regulations as an acceptable major for the Early Childhood Education Specialist credential. It is, however, specifically allowed for the Education Specialist credential in Education Code Education Code Section 44259 (b) (5) (A) (iv) (III).</p> <p>In response to comments made prior to and during the April 2023 public hearing regarding the list of academic majors that would be acceptable to demonstrate subject matter</p>

		competence for the Early Childhood Education Specialist Instruction credential, the following majors were adopted as acceptable demonstration of subject matter competency for an Early Childhood Education Specialist Credential: Child Development; Child and Adolescent Development; Human Development; Human Development and Family Science; Family Science, Early Childhood Education; Early Childhood Studies; Child, Adolescent and Family Studies; and, Child and Family Studies.
	Concerns about Coded Correspondence and agenda item language not matching.	There were two public hearings held on the same day. Some members of the public incorrectly compared proposed regulations from public hearing/agenda item 3H to the proposed regulations for public hearing/agenda item 3I, and vice versa.
Jennifer Paris Faculty, Early Childhood Education		
... In brief, here are some of my concerns:		Concerns included in this letter were related to a different

<ul style="list-style-type: none"> • As currently written, the language and priorities expressed within the credential are demeaning to the field of Early Childhood Education (for example, what happens in kinship care, family child care, and community-based child care is also in fact education, but is not recognized as such) and devalues the expertise of ECE professionals (for example, if a bachelor's degree in ECE will have to be followed with becoming credentialed, this is not an equitable pathway). • Emphasizing and promoting an expedited pathway will not serve children and families well, and in fact may cause them harm. I have recently taught courses in an expedited pathway to help credentialed teachers get their 24 ECE units to become qualified to teach TK by the August 1st deadline, I can speak from experience (as can those cohort members) that truly understanding the developmental needs and how to best support those through developmentally appropriate practice with an emphasis on play, is not something that can effectively be done without time to deeply engage in the content, develop pedagogical and philosophical values and principles in line with that, and the full support of their local school administration to create environments in which children and teachers can thrive and learning can flourish (which often they do not even have the requisite knowledge to understand what that is or advocate for it). • The timeline proposed is unreasonable. In order to make curricular changes to support a credential, a Transfer Model Curriculum needs to be developed and adequate time to develop and have coursework and degrees approved through local curriculum committees and the Chancellor's Office needs to be provided. This is a multi-year process. It seems as if the Commission has not taken the opportunity to learn about this process, which faculty would have been more than willing to outline and explain. This transfer pathway is vital as more than half of CSU students begin their education in the California Community College system. 		<p>public hearing held during the April 2023 Commission Meeting and are not within the scope of the subject matter competency regulations presented during Commission Agenda Item 3H.</p>
---	--	---

- A majority of the work required to implement this credential will fall on higher education faculty without any compensation for this additional labor. Recreating courses and programs, any requisite hiring and training of faculty, and any other additional responsibilities fall outside the scope of our work and it is not provided for with our current compensation/budgeting.

We need to slow down this process. I urge the Commission to bring ECE professionals to the table to really hear what we are saying and see that we want to work together to create a credential which pushes up what we know as experts in early learning and development instead of pushing down an educational system that is focused more on academic learning, often at the expense of the "whole child," especially their social and emotional needs (which is especially relevant with the trauma that the disruption caused by Covid). We need to be thoughtful about the implications of the credential and provide both time and support for this critical work to happen with intention.

I am choosing to remain hopeful that we can be an active part of re-envisioning a system that engages children and families in education that supports the whole child through developmentally appropriate approaches centering on an understanding that children learn best through play (to emphasize this one more time: play is learning). This includes acknowledging that teachers will need significant support in this new way of thinking about education through grade 3. There is a wealth of valuable experience and expertise from early childhood education professionals across the state who should be given an equitable opportunity to become part of the PK-3 education system.

I am looking forward to being a part of the solution along with many colleagues across the state that want to do what is best for children and their families (and thus for our greater society).

ORAL COMMENTS PRESENTED DURING APRIL 2023 PUBLIC HEARING	
1. Kimberly Barker Developmentalist and Early Learning Specialist	
Opposes the pathway related to PK-3 Early Childhood Specialist Instruction Credential	Concern was related to a different public hearing held during the April 2023 Commission Meeting
2. Denise Kennedy	
Concerns about when a candidate in an integrated program must meet the subject matter requirement.	Concerns about flexibility in the timing of subject matter competency approval are outside the scope of the regulations being proposed, and will be addressed outside of this regulatory package.
3. Deana Davis Hall	
Expressed concerns about PK-3 Early Childhood Specialist Instruction Credential.	Concern was related to a different public hearing held during the April 2023 Commission Meeting
4. Tony Ayala	
Made a statement about the history of the PK-3 Early Childhood Education Specialist Instruction credential	This was a statement and contained no concern or question that required a response
5. Nancy Hurlbut PH.D. Emeritus Professor of Early Childhood Studies, Co-Lead of PEACH and CA EC BACC, Past Dean and Associate Dean in Colleges of Education at the CSU	
Reiterated orally her written comments documented in the opposing comments section of this table	See the responses posted in #10 of the "WRITTEN COMMENTS REPRESENTING ORGANIZATIONS IN OPPOSITION" section of this table for Nancy Hurlbut's comments