

Division VIII of Title 5 of the California Code of Regulations

Proposed Amendments and Additions to Title 5 of the California Code of Regulations Pertaining to PK-3 Early Childhood Education Specialist Instruction Credential

Final Statement of Reasons

Problem Statement

There has been no change to the public problem statement since the original submission of the Initial Statement of Reasons.

Statement of Purpose

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

Necessity and Summary of Modifications

These regulations are necessitated by the Master Plan for Early Learning and the Governor's 2022 budget. The Governor's 2022 budget, which made the statutory changes being implemented and clarified by this rulemaking, provided significant investments for implementing universal transitional kindergarten (UTK) to serve all four-year-olds. The budget also assists with moving towards implementation of universal preschool (UPK) on a phased-in basis, potentially serving children as young as two-years-old in the future.

At the Commission on Teacher Credentialing's August 2022 meeting, the Commission adopted regulations for authorization and credential requirements, as outlined in Education Code Section 44265, for the PK-3 Early Childhood Education (ECE) Specialist Instruction Credential. At its October 2022 meeting, the Commission adopted the program standards and teaching performance expectations for this credential. At its December 2022 meeting, the Commission approved and adopted the full set of regulations for the credential and agreed on making minor revisions, as outlined in Title 5 of the California Code of Regulations (CCR) proposed sections 80067.1, 80067.2, and 80067.3 respectively. Following this approval, Commission staff were directed to move forward with the rulemaking process. Pursuant to the California Office of Administrative Law rulemaking process, the Commission opened a 45-day public comment period for the proposed regulation on February 10, 2023. On March 13, 2023, the Commission received a written request for a public hearing and this hearing occurred during the April 2023 Commission meeting.

On April 21, 2023, the Commission held a public hearing on proposed modifications to Title 5 of the California Code of Regulations section 80067 and sections 80067.1, 80067.2, and 80067.3. Commission members considered the public commentors' concerns and voted on proposed amendments using this public feedback. For list of amendments voted on, see Table 5 in the April 2023 Commission meeting's "Public Hearing 3I – Agenda Insert Proposed Amendments" (located in "Additional Documents" section). The Commission also approved the following:

- Amendments to majors utilized to meet subject matter requirements for the credential listed in the "15 Day Notice" located in "Additional Documents" section.
- Amendments recommended, starting on page 14, by staff identified in Table 5 of the "Public Hearing 3I – Agenda Insert Proposed Amendments" (located in "Additional Documents" section).

The recording of the public hearing and subsequent vote by the Commission can be viewed between minutes 31:39 and 1:44:30 via the [April 21, 2023 Commission Meeting – Recording on YouTube](#). A transcript of this recording can also be the "Public Hearing Transcript" (located in the "Additional Documents" section).

On November 17, 2023, the Commission issued a 2nd 15-day Notice and an Initial Statement of Reasons (ISOR) addendum. The ISOR addendum included a list of specific changes made to regulation text as well as the rationale for them. In addition to these changes, additional non-substantive changes were made to correct numbering, formatting, removal of acronyms by spelling them out, and grammatical changes throughout the amended and adopted Regulation text. Furthermore, after an additional review of the ISOR addendum, the Commission has made corrections to change the word "site" to the appropriate word "cite" throughout the document. The deadline for submission of public comments was Tuesday, December 5th. The Commission did not receive any public comments.

The Commission determined that the regulation be moved forward in the rulemaking process as proposed. Commission staff will submit these regulations to the Office of Administrative Law for review and approval, and a Program Sponsor Alert will be posted when the proposed regulations become effective.

Consideration of Alternatives

Since the original rulemaking was initiated, no alternative considered by the agency would be more effective in carrying out the purpose for which the regulation is proposed, would be as effective and less burdensome to affected private persons than the adopted regulation, or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

The amendments adopted by the Commission are the only regulatory provisions identified by the Commission that accomplish the goal of ensuring that credential processing and assignment monitoring activities accurately, effectively, and efficiently identify educators who have met high

and rigorous certification standards and who are appropriately assigned. Except as set forth and discussed in the summary and responses to comments, no other alternatives were proposed or otherwise brought to the Commission’s attention.

Mandated Costs

The proposed regulation does not impose a mandated cost on local agencies or school districts.

Updated Tally of Responses from the 45-Day Public Comment Period

The Commission received a total of 73 written responses during the 45-day comment period, and an additional 26 comments (outlined later in this document) in the weeks leading up to the public hearing on April 21, 2023. The Commission received written responses to the 15-day notice started on June 15, 2023, and ended on June 30, 2023 (additional details about these comments are located later in this document; all comments related to the 15-day notice can be found in the “15 Day Notice” and “Addendum 45-day Comments” (located in the “Additional Documents” section). Details about the written public comments received during the 45-day public comment period about this regulations package are detailed below.

Summary and Response to Comments Received During 45-Day Public Comment Period

The Commission received 73 written responses to the public announcement during the initial 45-day public commenting period (February 10, 2023, through March 27, 2023) which included four requests for public hearing. There were no comments submitted via the telephone number listed on the Notice of Proposed Rulemaking. In response to the requests for a public hearing, a hearing was held before the Commission on April 21, 2023. Comments submitted can be found in Appendix D of the April 2023 Commission hearing, in the Public Hearing 3I – Agenda (located in “Additional Documents” section).

A summary of the comments submitted during this public commenting are included below:

Support:

- 4 - Organizational opinions
- 2 - Personal opinions

Opposition:

- 0 - Organizational opinions
- 67 - Personal opinions

Full texts of written public comments submitted during this timeframe, can be viewed, starting on page 76, in Appendix D of the April 2023 Commission hearing, in the “Public Hearing 3I – Agenda” and “Addendum 45-day Comments” (located in “Additional Documents” section). Also included below are major concerns for each section of the regulation, with responses from the Commission subject matter experts.

Major concerns raised during the 45-day public commenting period:

1. Objection to 80067.1. Preconditions:

Main Concern: Without clear required content regarding the development of young children, candidates may not learn everything they need.

Response from Commission:

The preconditions specifically mention the California K-3 Student Content Standards and Frameworks as well as the Preschool Learning Foundations as required foundational content the program must include. These references are consistent with the ECE publications from the California Department of Education. The national frameworks and the California Early Childhood Educator Competencies were used as reference materials along with the California K-3 Student Content Standards and Frameworks as well as the Preschool Learning Foundations in the development of the Teaching Performance Expectations (TPEs) referenced in 80067.3.

Program Standards 1 and 3, Program Design and Curriculum, and Clinical Practice, specifically state that the program's curriculum must include coverage of and preparation in the California K-3 Student Content Standards and Frameworks as well as the Preschool Learning Foundations and Curriculum Framework.

The 24 units of Early Childhood Education (ECE)/Child Development (CD) required to meet the subject matter competence requirement serve as the knowledge needed to begin a PK 3 ECE program. Once enrolled in the program, the candidate will be provided curriculum and fieldwork opportunities that will deepen their knowledge of child development and early childhood education pedagogy. This requirement only provides the foundation upon which the preparation programs will build. ECE/Child Development Programs organized and offered by California's four higher education systems (California Community Colleges, California State University, University of California, and Independent California Colleges and Universities) do not necessarily share common course titles or common content within the multiple courses across these four systems, and these courses and titles can change over time. Given this context, it is not practicable or possible for the Commission to specify names of individual specific courses for this purpose. All ECE/CD courses, however, must address the core content of early childhood education and child development and must be offered for degree-applicable credit by a regionally accredited institution of higher education. Classroom practice is also addressed not only by coursework but also by the required fieldwork and clinical practice experiences all teacher candidates must complete within the teacher preparation program sequence, and which are specifically referenced in the program standards in 80067.2.

No changes to the proposed regulations are recommended.

2. Objection to 80067.3. TPEs are not developmental, or play based enough.

Main Concern – How well teacher training will serve the ECE age group in the classroom; not enough emphasis on play-based pedagogy; not enough detail about how students will be evaluated/assessed in the classroom in an age-appropriate way.

Response from the Commission:

The proposed requirements for the PK-3 ECE Specialist Instruction Credential were developed with the advice of an advisory panel composed of ECE experts in the field. Members of the ECE expert advisory workgroup were appointed by the Executive Director following a public application process. The advisory workgroup included 7 ECE practitioners from local school

districts; 13 ECE faculty from a variety of institutions of higher education – all content experts in ECE; 8 ECE employers -including at least 5 of whom are also ECE practitioners/experts; and 5 ECE professional organizations in the field, whose representatives are also all ECE experts/practitioners. These content experts provided their knowledge and experience to focus on developmentally appropriate practices informing the proposed credential requirements, program standards, and teaching performance expectations included in the proposed regulations.

Following public comment as well as discussions during the October and December 2022 Commission meetings, the draft TPEs were modified to increase the specific references to play-based activities. The TPEs now include six specific references by name to play-based activities (TPEs 1.7, 3.1, 3.2, 4.2, 7.4, 8.5). The number of times a specific concept or theme is mentioned in the TPEs does not have any relationship to its importance or to how much attention is paid to the concept or theme within the teacher preparation program, since all TPEs are required to be fully addressed within the teacher preparation program regardless of the number of times a given concept or theme is mentioned within the applicable set of TPEs for the credential sought.

Family engagement references were also increased following public comment and Commissioner input, and this concept is specifically referenced nine times throughout the set of TPEs (1.5, 2.3, 2.4, 4.3, 4.8, 5.7, 6.2, 6.4, 8.8).

The TPEs also reference developmentally appropriate practice as well as the social, emotional, and physical growth and development of young children (TPEs 1.1, 1.7, 2.1, 2.5, 2.6, 2.7, 3.1, 3.6, 4.1, 4.2, 4.5, 4.7, 5.6, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 8.1, 8.4, 8.5).

The Commission does not have the authority to prescribe any particular curriculum, learning objectives and/or exercises to be used with or by students in the public schools.

No changes to the proposed regulations are recommended.

3. Perception of poor utilization of public input in the pre-work stages of the regulation.

Main concern – Commission highlighted primarily positive feedback from field; Commission did not offer to allow public comments on webinar events. Some individuals within the CCC’s feel like they were largely left out as stakeholders in this process, in favor of four-year institutions.

Response from Commission:

All Commission meetings are available live streamed to the public and the web link to watch the meeting live as well as how to make public comment during the meeting is posted with the meeting notice on the Commission’s website. Public comment is specifically and explicitly provided for at all Commission meetings, with directions as to how to submit public comments both in writing and in person or remotely via technology during Commission meetings included in the public meeting notices published on the Commission’s website. The instructions for making public comments during the Commission meetings are also reviewed orally during the meetings by the Chairs facilitating each of the committee agendas.

Public comment was also explicitly provided for during the meetings of the Advisory workgroup that assisted in the development of the PK-3 ECE Specialist Instruction Credential requirements, program standards, and teaching performance expectations. Any member of the public

attending these meetings had the opportunity to make public comments during one or more dedicated time periods for public input during the meetings.

The development of the PK-3 ECE Specialist Instruction Credential was moved forward as expeditiously as possible given California's teacher shortage and the urgent need for additional teachers to teach in TK classrooms as well as other elementary grades as part of the states UPK implementation.

Webinars and other public engagements where slide presentations were provided are also archived on the Commission's website for viewing by members of the public. Samples of these webinars and slide presentations can be accessed via links provided in Appendix A.

No changes to the proposed regulations are recommended.

4. Inclusivity for students starting their ECE education at CCC

Main concern - There is some concern about pathways, including collective pathways to teaching credentials, for California Community College (CCC) students. There's a perception among CCC faculty and students that the credential is more favorable for students from 4-year IHEs.

Response from Commission:

Coursework from the California Community Colleges is accepted within the proposed regulations for meeting the 24 units of Early Childhood Education/Child Development for the subject matter requirement for the PK-3 ECE Specialist Instruction Credential, as well as for providing candidates with Clinical Practice experience via Practicum courses offered by the California Community Colleges. Coursework offered by the California Community Colleges via the AS-T (associate degree for transfer) process are also acceptable for providing undergraduate level preparation in support of preparation for the PK-3 ECE Specialist Instruction Credential. Only four-year regionally accredited institutions of higher education offer a baccalaureate degree and a Commission approved educator preparation program, both a baccalaureate degree as well as completion of a teacher preparation program are statutory requirements for all California teaching credentials. Thus, candidates who may choose to begin their preparation for the PK-3 ECE Specialist Instruction Credential at a California Community College must complete their credential preparation program at a four-year institution of higher education approved by the Commission.

No changes to the proposed regulations are recommended.

5. Too much like Multiple Subject credential

Main concern – There should be more of a focus on foundational development for children.

Response from Commission

As explained in #1 and #2 above, preparation program standards and performance expectations for candidates have a strong emphasis on the Preschool Learning Foundations and child development, and they are based on national frameworks and the California Early Childhood Educator Competencies. This credential is intended to cover the entire span of PK-3, so there are necessary overlaps with the Multiple Subject credential, which authorizes service in grades PK-12.

The members of the ECE Credential workgroup represented content experts in the field of early childhood education, including seven ECE practitioners from local school districts; thirteen ECE faculty from a variety of institutions of higher education – all content experts in ECE; eight ECE employers -including at least five of whom are also ECE practitioners/experts; and five ECE professional organizations in the field, whose representatives are also all ECE experts/practitioners. These content experts provided their knowledge, experience, and expertise to focus on developmentally appropriate practices informing the proposed credential requirements, program standards, and teaching performance expectations included in the proposed regulations. Developmentally appropriate practices in early childhood education are included throughout the Teaching Performance Expectations for the PK-3 credential (TPEs 1.1, 1.7, 2.1, 2.5, 2.6, 2.7, 3.1, 3.6, 4.1, 4.2, 4.5, 4.7, 5.6, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 8.1, 8.4, 8.5).

In compliance with the provisions of SB 488, the PK-3 ECE Specialist Instruction Credential TPEs have also been updated to focus on early literacy consistent with the principles of scientifically based reading instruction. TPE 7 sets a foundation for the preparation of young children’s reading, writing, listening, and speaking literacy skills. Program standard 7 specifies in detail the knowledge and skills relating to early literacy. In addition, the PK-3 ECE Specialist Instruction credential program standard 8 as well as TPE 8 are specifically focused on developmentally appropriate principles and practices of early mathematics teaching and learning.

No changes to the proposed regulations are recommended.

6. TPE Differentiation

Main concern – The Teaching Performance Expectations (TPEs) should be more fully differentiated for candidates completing a 2-year, 4-year, or graduate degree.

Response from Commission

The Commission has already differentiated TPEs for 2-year degree candidates who are pursuing a Child Development Permit. The TPEs for 4-year and graduate level candidates, which are part of this rulemaking, cannot be differentiated because candidates at both levels are earning the same credential and must meet the same expectations.

No changes to the proposed regulations are recommended.

7. Subject Matter Requirement is weak

Main concern – An individual could meet the subject matter requirement with only 3 units of child development coursework.

Response from Commission

The proposed regulations allow for only two ways to meet the subject matter requirement – 1) holding a bachelor’s degree or higher with a major in child development, child and adolescent development, human development, early childhood education, child and family studies, early childhood studies, family science, human development and family science, or child, adolescent, and family studies or 2) the completion of 24 semester units or the equivalent quarter units of non-remedial, degree-applicable coursework at a regionally accredited institution of higher education in early childhood education and/or child development.

No changes to the proposed regulations are recommended.

8. Access to public comments unavailable

Main concern – The public no longer has access to public comments made during the development of the credential.

Response from Commission

Public comments submitted in response to agenda items are published on the Commission website as part of the official agenda record. These comments remain available for review by the public.

Public comments submitted as part of Commission workgroup activities are summarized in Commission agenda items reporting on this work.

Informational webinars are not part of the official rule making process, so participant chats and comments are not considered “public comments” for the purpose of rulemaking.

No changes to the proposed regulations are recommended.

9. California Community Colleges

Main concern – Community college programs were stigmatized, and their faculty not listened to.

Response from Commission

The California Community Colleges play a fundamental and critical role in the development and preparation of the early childhood workforce.

Coursework from the California Community Colleges is recognized for meeting the subject matter requirement, and staff request that the Commission also recognize in the proposed regulations practicum hours completed at Community Colleges as counting towards meeting clinical practice requirements for the PK-3 ECE Specialist Instruction credential.

In addition, 13 faculty members, including from the California Community Colleges, served on the PK-3 Credential Advisory workgroup that developed the requirements for the PK-3 ECE Specialist Instruction credential. In addition, a liaison representative from the California Community Colleges Chancellor’s Office also attended the Credential Advisory workgroup meetings.

As part of the public input activities during the development of the PK- 3 ECE Specialist Instruction credential, as reported on in the agenda items cited in Appendix A, there were also public forums and opportunities for the participation of Community College faculty.

No changes to the proposed regulations are recommended.

10. Misinformation

Main concern – Staff may have omitted comments, which could have biased Commissioners’ decisions.

Response from Commission

Commission staff presented all data to the Commission in the report on the forums, including that “Nothing” was a response at some the forums to the question posed.

No changes to the proposed regulations are recommended.

11. No ECE TPA

Main concern – Not offering a TPA that would measure these PK-3 ECE TPEs creates chaos in designing programs.

Response from Commission

Preparation programs are designed to meet the Commission-approved program standards and to prepare candidates toward mastery of the Teaching Performance Expectations (TPEs) for each respective credential. They are not designed specifically to meet a Teaching Performance Assessment (TPA) because a single assessment cannot and is not designed to measure all of the TPEs and because there are currently three different TPA models approved for use.

The Commission believes that all teacher candidates should be prepared in a common trunk of TPEs plus additional TPEs specific to the credential.

While the PK-3 ECE Teaching Performance Assessment is being developed, it is reasonable for candidates to use a Multiple Subject TPA because the PK-3 and Multiple Subject credentials share a common trunk of TPEs and since the Multiple Subject TPAs have been validated for use in kindergarten through grade 3.

No changes to the proposed regulations are recommended.

12. Lack of transparency

Main concern – The process lacked transparency that is required for a government agency to follow.

Response from Commission

All Commission meetings are open to the public and are fully transparent as to Commission discussion and any actions taken during the meeting, including with regard to the development of the PK-3 ECE Specialist Instruction credential. The public is invited to participate either at the Commission's office in Sacramento or online via Zoom. All Commission meetings are compliant with Bagley-Keene requirements.

The meetings of the PK-3 Credential Workgroup were also open to the public, and several members of the public regularly attended those meetings. There was a dedicated public comment period during each of the PK-3 Credential Workgroup meetings as well.

No changes to the proposed regulations are recommended.

13. Developmentally inappropriate credential

Main concern – The credential is not developmentally appropriate.

Response from Commission

The ECE Credentialing Workgroup focused on creating an early childhood credential built on a foundation of developmentally, linguistically, culturally, and instructionally appropriate practices. Within the TPEs, developmentally appropriate practice is mentioned multiple times across the eight domains.

Developmentally appropriate practices are mentioned throughout the range of the set of program standards as well. The ECE practitioners on the ECE Credentialing Workgroup were experts in developmentally appropriate practices, including in particular early literacy and early mathematics. In addition, in response to prior public comments, the TPEs were modified to add additional references to play-based approaches that also reflect developmentally appropriate

practices in early childhood education. The scope of the credential is preschool through grade 3 and is not intended to serve infants and toddlers.

No changes to the proposed regulations are recommended.

14. Belittling Language

Main concern – Language used regarding the credential belittled early learning and care professionals.

Response from Commission

The credential has primarily been designed to address the need for new teachers required by the implementation of universal TK and to complement current efforts by the California Department of Education to create a more developmentally appropriate experience for students as they move from PK through third grade.

Because the Education Code requires all credential holders to possess a bachelor's degree or higher, current PK teachers who hold an associate or bachelor's degree or higher are an important pool of potential TK teachers, who have already met some of the requirements. Since many of them are already teaching 4-year-olds, a purposeful effort was made to make the PK-3 credential attainable by them. No disrespect was meant to professionals who are already working in early learning and care.

No changes to the proposed regulations are recommended.

15. Misleading and Unrealistic Expectations

Main concern – The Commission has created misleading and unrealistic expectations regarding how quickly current teachers can earn the credential.

Response from Commission

Teachers who already hold a bachelor's degree and a Child Development Permit at the Teacher level will be able to complete an internship program, allowing them to complete a PK-3 credential program while serving as the teacher of record. Since they have already met the subject matter requirement, they may be able to complete the Early Completion Option and finish in less than the normal two years.

Teachers who hold a Multiple Subject credential may already have completed some coursework toward the 24-unit requirement as part of their credential program (e.g., child or human development).

The commenter indicated concerns about a lack of support among school administrators for developmentally appropriate programming for 4-year-olds. Professional development for practicing school administrators is outside the authority of the Commission but is within the purview of the California Department of Education, which is investing in professional development for administrators to help ensure that TK programs are developmentally appropriate.

No changes to the proposed regulations are recommended.

16. Home languages of students

Main concern – The credential does not require candidates to learn the home languages of students.

Response from Commission

While the credential requirements do not require candidates to learn one or more home languages of students, they do require every candidate to earn an English Language authorization within their teacher preparation program so that they are trained to support students whose home language is not English.

The TPEs for the PK-3 ECE Specialist Instruction credential also support the promotion and development of the home language wherever possible and encourage parents and families to maintain and use their home language with their children.

No changes to the proposed regulations are recommended.

17. Scoring of the Teaching Performance Assessment

Main concern – Local scoring of the TPA will result in inconsistent results.

Response from Commission

In practice, all qualified faculty from teacher preparation programs statewide who will serve as scorers of the TPA will receive the same training to understand and apply the scoring scales accurately and appropriately to candidate TPA responses, eliminate or minimize to the extent possible any potential bias within the scoring process, and to be calibrated so that candidates will be scored fairly and equitably across the range of scorers. “Local scoring option” means that programs may choose to have only their own faculty who are trained as scorers as described above score their candidate’s TPA responses. This process supports and helps maintain standards of scoring consistency across programs and candidates.

No changes to the proposed regulations are recommended.

18. “Push down” of K-5 into ECE

Main concern – That policies, procedures, and practices applicable to grades K-5 are being replicated/required in grades PK/TK.

Response from Commission

The members of the ECE Credentialing Workgroup represented experts in the ECE field who consciously and deliberately focused on assuring that the TPEs developed for this credential were focused on a wide range of developmentally appropriate practices for young children. The group discussed the issue of potential “push down” of teaching and learning approaches and practices into the PK/TK grades and kept that issue in mind during each workgroup session. The TPEs as well as the program standards reflect numerous instances where developmentally appropriate practices are indicated as required for candidates to learn and to practice during their preparation program. The Literacy TPEs (TPE 7) and Literacy Program Standard 7 as well as the Mathematics TPEs (TPE 8) and Mathematics Program Standard 8 were also deliberately crafted to reflect developmentally appropriate practices in these foundational content areas.

No changes to the proposed regulations are recommended.

19. Barriers for candidates

Main concern – There are barriers for experienced preschool teachers to be able to teach in PK-3 in the public schools.

Response from Commission

California state statute requires teachers in the public schools to hold a valid appropriate teaching credential for their job role. Lead preschool teachers, even with a master's degree and/or experience, are subject to the provisions of state statute and must hold a valid teaching credential to serve as the teacher of record in a California public school PK-3 classroom. The Commission does not have the authority to waive state statute.

No changes to the proposed regulations are recommended.

20. Field input ignored

Main concern – That the Commission has ignored input from the field.

Response from Commission

Commission staff acknowledge and greatly appreciate the multiple contributions of time and expertise graciously and enthusiastically provided by members of the ECE community throughout the development of the PK-3 ECE Specialist Instruction credential. Input from ECE groups and individuals in the field have been reflected in the edits made over time to the TPEs and the program standards, as has been reported in multiple prior Commission agenda items and are also reflected in the proposed amendments and modifications to the regulations presented in this agenda item. It is not always possible to incorporate every piece of input as provided by interested members of the ECE community and/or the public as these diverse viewpoints can sometimes be contradictory or inconsistent and the Commission must find a way to reconcile these differing viewpoints and move the work forward.

Sometimes input may be received from the field that is also outside the purview of the Commission, or that may be in conflict with the provisions of statute. All public input, however, is heard, considered by the Commission as well as by members of any related content expert advisory group in that area, and reported to the Commission via agenda items and other public communications.

No changes to the proposed regulations are recommended.

21. Lack of respect for experts in the field

Main concern – That the Commission does not respect experts in the field.

Response from Commission

State statute under EC 44280 prohibits the Commission from paying individuals who voluntarily serve as content area experts on Commission advisory workgroups and panels for the development of standards and examinations. However, the Commission can pay for related travel expenses and for a substitute if needed for the content area experts serving on these workgroups and panels as needed. The lack of payment for these professional contributions does not reflect in any way a lack of respect on the part of the Commission for the knowledge, expertise, and time of these content area experts.

No changes to the proposed regulations are recommended.

Additional Written Public Comments

In accordance with Government Code 11346.8(a), the public was able to submit comments via email, through the Commission's online commenting portal, or directly at the public hearing

either in-person or via Zoom. Additional written public comments were captured between April 7 and April 21, 2023, via email or the Commission commenting portal, in anticipation of the public hearing.

The total number of written public comments made during this timeframe are summarized below:

Organizational Opinion

- 3 – In support
- 3 – In opposition

Individual Opinion

- 4 – In support
- 16 – In opposition

Full texts of written public comments submitted during this timeframe are in the following addendums located in the “Additional Documents” section:

Addendum Public Hearing Oral Comments

Addendum Heather Malley

Addendum Public Hearing Written Comments April 7-21

Request for Public Hearing

The requests for public hearing were as follows:

From: Kimberly Barker, Antelope Valley College

Comment: The purpose of this email is to request a public hearing regarding the proposed PK-3rd teaching credential. I believe there have been, and continue to be, inadequacies in the process leading to the potential passing of the PK-3rd teaching credential, as well as an immense oversight of significant deficits, inequities, systemic barriers, professional undermining etc., in reference to the proposed PK-3rd teaching credential.

Response:

Attached is the Notice of Public Hearing regarding the proposed PK-3 credentials.

From: Yadira Arellano, TEACH El Campo/TPP Regional Collaborative

Comment: The purpose of this email is to request a public hearing regarding the proposed PK-3rd teaching credential. I believe there have been, and continue to be, inadequacies in the process leading to the potential passing of the PK-3rd teaching credential, as well as an immense oversight of significant deficits, inequities, systemic barriers, professional undermining etc., in reference to the proposed PK-3rd teaching credential.

Response:

Attached is the Notice of Hearing regarding the proposed PK-3 Credential.

From: Rachel Johnson, from Ventura College

Comment: The purpose of this email is to request a public hearing regarding the proposed PK-3rd teaching credential. I believe that there needs to be open dialogue around the concerned inadequacies addressed by faculty, within the process leading to the potential passing of the PK-

3rd teaching credential, inequities, systemic barriers, professional undermining etc., in reference to the proposed PK-3rd teaching credential. There needs to be open space for communication about these concerns and strategic planning with actionable changes once public opinion has been expressed.

Response:

Attached is the Notice of Hearing regarding the proposed PK-3 Credential.

From: Deanna Hall, from Ventura College

Comment: I am writing out of concern regarding the proposed PK-3 teaching credential. Protocols have often not been followed and the expertise of the field has been ignored. Systemic barriers are being put in place (and expanded) that will disallow students to complete their education. Because of these, and many other concerns I have about the process being followed and the content of the proposed credential, I am requesting a public hearing.

Response:

Attached is the Notice of Hearing regarding the proposed PK-3 Credential.

Thank you.

Written Responses Representing Organizations in Support

The three written responses in support of the regulations were from organizations who appreciated the amendments for (1) relation to clinical hours and how it validates experience in preschool settings and that the practicum coursework completed as part of work towards a Child Development Teacher Permit or as part of a degree major in Early Childhood Education or Child Development will be counted towards the clinical hour requirement; (2) the incorporation of asset-based and inclusive approaches that are culturally and linguistically affirming and recognize children's cultures, languages, and communities; and (3) the development of the PK-3 ECE Specialist Credential addresses the state's early literacy and mathematics crisis, and the significant improvement in outcomes for kids participating in high-quality, early learning programs with well-prepared teachers.

Written Responses Representing Individuals in Support:

The four written responses in support of the regulations from individuals who supported (1) the credential reflecting what children should know and be able to do as described in current California Preschool Learning Foundations and the California Standards K-3rd grade; (2) the regulations removing barriers for current ECE workforce members and better meeting the needs of the Universal PreK expansion; and (3) reducing barriers for current ECE educators to obtain the PK-3 credential.

Written Responses from Organizations in Opposition:

Three letters were received from organizations opposing the amended regulations, except for the acceptance of the practicum coursework toward required clinical practice hours. Opposition included (but is not limited to) the following: (1) Amendment #2 – stating that establishing two authorizations within the PK-3 ECE Specialist credential undermines the integrity of the credential by allowing for a permanent subset of educators with a restricted PK-K authorization who cannot fully engage in collaboration and movement through the grade span; and (2)

Amendment #3 – stating the reconfiguration of the clinical practice grade levels as it will alter the value and integrity of the credential.

Written Responses Representing Individuals in Opposition:

Sixteen comments were received representing individuals in opposition to the amended regulations. Opposition included (but is not limited to) the following: (1) There is not accountability for the 24 unit apportionment by the Commission; (2) There is a lack of knowledge and understanding of early childhood education pedagogy and it will not create qualified teachers; (3) Individuals would like to see a bridge between the PK-3 and Multiple Subject Credential with a seamless process for those who are working on dual credentials; (4) There is a continued misunderstanding about what early childhood education does in the context of teacher preparation; (5) The specific language in the regulations needs to be more specific and inclusive of multiple, supervised practicum/fieldwork courses and hours across community college, 4-year, and graduate programs in Early childhood education and Child Development; (6) It is not equitable that ECE credential candidates must complete clinical practice in two separate age ranges to be fully authorized TK-3rd, while not requiring the same of multiple subject candidates; (7) Two authorizations with the Pk-3 ECE Specialist Instruction credential would ultimately disadvantage those who are awarded the PK-K authorization by school districts being likely to hire a Pk-3 than a PK-K candidate; (8) A PK-K candidate would have to complete an additional 200 hours, totaling 800 hours of clinical experience which is inequitable and increases barriers instead of reducing them; and (9) There is no direct discussion about grandfathering in individuals who have a wide breadth of education, and experience, and there is not a clear plan on how to support the growth of teachers that are not currently multi-subject credential.

The written comments submitted during this period were taken into consideration by the Commission staff in preparation of the proposed amendments to the regulation. The modifications proposed to the Commission can be found beginning on page 15 of the “Public Hearing 31 – Agenda Insert Proposed Amendments” (located in “Additional Documents” section). Following the public hearing, the amendments were voted on by the Commission on April 21, 2023, and there was a slight modification made to the proposed regulation regarding the distribution of 600 clinical hours requirements for PK-3 ECE credential candidates.

Oral Comments from the Public Hearing

During the April 21, 2023, public hearing, there were 15 oral comments. Comments made at the public hearing were discussed amongst Commissioners. The Commission’s discussion, meeting, and vote can be viewed between minutes 31:39 and 1:44:30 [April 21, 2023 Commission Meeting - YouTube](#) . The total public comments are summarized below:

Organizational Opinion

- 4 – In support
- 4 – In opposition

Individual Opinion:

- 0 – In support

- 7 – In opposition

Details of public hearing can be found in the “Addendum Public Hearing Oral Comments” (located in “Additional Documents” section).

Additionally, a record of meeting minutes from the meeting can be located on the [Commission’s meetings website](#) under the sub header “April 2023”.

Tally of Responses Received During 15-day Notice

Following the April 21, 2023, public hearing, the Commission proposed changes to the PK-3 ECE Specialist Instruction Credential regulation text. The text was posted on the Commission Rulemaking webpage on June 15, 2023, and, as noted in the tally below, received 12 written responses. No comments were submitted via the telephone number listed on the 15-Day Notice.

Organizational Opinions

- 2 – In support
- 2 – In opposition

Individual Opinions

- 1 – In support
- 7 – In opposition

Summary and Response to Comments Received During the 15-Day Public Comment Period

Included below are major concerns from each commentor, with responses from the Commission subject matter experts.

From: Pat Lozano, Early Edge California (6/30/23)

Comment: Supports the modifications made to the proposed amendments

Response from Commission

This letter indicates support for revisions related to clinical hours, improved clarity about validation of experiences in preschool setting and practicum equivalency options, inclusion of asset-based and inclusive approaches, and promotion of children’s literacy development in languages other than English in multilingual programs.

From: Patricia E. Chavez, Sobrato Early Academic Language (SEAL) (6/30/23)

Comment: Stated support for the structure of clinical practice; candidate assessment, ECEs aligned closely to CSTPs; requirement for two distinct placement settings.

Response from Commission

This commenter also listed several sections referring to various elements of the proposed credential program. There were no recommended changes to the proposed regulations in this letter.

From: Brandy Jones Lawrence and Lea Austin on behalf of Center for the Study of Child Care Employment (6/30/23)

Comments:

Issue #1: Commenters restated prior concerns regarding equitable pathways to credential for current ECE professionals. They would like to see an option for ECE professionals that parallels the one available to private school educators with six or more years' experience who wish to earn a Multiple Subject Credential. The proposed modifications ease the requirements for current practitioners, but do not provide a clear enough pathway for individuals currently serving as early educators. The commenters cite the cost to earn the PK-3 ECE credential as significant to this workforce and requiring the 200 hours of clinical practice is a financial burden.

Response from Commission

Current California Education Code explicitly identifies an expedited pathway to the Multiple Subject, Single Subject, or Education Specialist credential for individuals with 6 or more years of experience in private school who meet specific criteria. The Commission believes that a change to the California Education Code would be needed to implement this recommendation. Further, these proposed regulations represent an initial step in revising the Early Childhood Education (ECE) Specialist Credential to meet current needs and that Commission will continue to explore this suggestion in future policy discussions.

Issue #2: Will the Commission allow the incumbent workforce to satisfy clinical hours in their current workplace with supervision from a certified California Early Childhood Mentor?

Response from Commission

The proposed regulations allow some of the clinical practice hours to be completed in the candidate's place of employment.

Issue #3: Given the severely low wages that early educators earn nationwide, the National Academies of Science, Engineering, and Medicine have issued recommendations to take specific action to relieve the cost burden for additional education and training; will the Commission and/or partner agencies provide financial and other resources to facilitate participation in credential programs for the incumbent workforce?

Response from Commission

This suggestion is outside of the Commission's purview.

From: Lori DePole on behalf of Decoding Dyslexia California (6/30/23)

Comments:

Concern #1: Specify that Kindergarten does not include TK for clinical practice.

Response from Commission

The requirement in the proposed regulations is clear as currently stated.

Concern #2: Language in §80067(a)(5) designates the passage of the RICA "or a commission approved literacy performance assessment aligned with the requirements outlined in Education Code section 44320.2". Language in §80067.1(f)(1)(D) states the passage of the RICA or "a

Commission approved literacy performance assessment for early childhood education". For clarity and consistency, we are requesting that the language "*aligned with the requirements outlined in Education Code section 44320.2*" be added to §80067.1(f)(1)(D). It is our understanding that a PK-3 literacy TPA is being developed. We are not aware of a separate ECE Literacy TPA. In any case, we are requesting the language in §80067(a)(5) mirror the language in §80067.1(f)(1)(D).

Response from Commission

Commission agrees that this language should be made clearer and more consistent in these two sections. This is a non-substantive change. The proposed change to these sections would read as follows so that they mirror each other:

80067 (a) (5) Passage of either the Reading Instruction Competence Assessment (RICA), or a ~~commission approved~~ literacy performance assessment approved by the Commission for the PK-3 Early Childhood Education (ECE) Specialist Credential that is aligned with the requirements outlined in Education Code section 44320.3

80067.1 (f) (1) (D) Passage of the Reading Instruction Competence Assessment (RICA), or a ~~commission approved~~ literacy performance assessment approved by the Commission for the PK-3 Early Childhood Education (ECE) Specialist Instruction Credential that is aligned with the requirements outlined in Education Code section 44320.3 for early childhood education.

Concern #3: Precondition §80067.1(a)(1) references outdated Precondition 2 language in §44259(b)(4), prior to the enactment of SB 488, which previously read "*study of alternative methods of developing English language skills, including the study of reading as described in subparagraphs (A) and (B), among all pupils, including those for whom English is a second language, in accordance with the commission's standards of program quality and effectiveness.*"

This language is referenced in the last sentence of §80067.1(a)(1) states "this restriction may be increased to the equivalent of twelve semester units if the student teaching prerequisites include the ***study of alternative methods of English Language Skills as required by Program Precondition 2.***"

Response from Commission

The Commission agrees that 80067.1 (a) and (b) should use the same language with respect to literacy instruction. This is a non-substantive change. The Commission proposes to change the word "alternative" in 80067 (a)(1) to "effective" to align with 80067.1 (b) and SB 488 (Chapter 678, Stats. 2021). The revised language would read:

80067.1 (a) Limitation on Student Teaching Prerequisites

No college or university shall require candidates to complete more than the equivalent of nine semester units of credential preparation courses prior to allowing candidates to enroll in student teaching in a preschool or elementary classroom. This restriction may be increased to the equivalent of twelve semester units if the student teaching prerequisites include study of ~~alternative~~ effective methods of English Language Skills as required by Program Precondition 2

From: Tony Ayala, Helen Davis, Janet Fish, Nancy Hurlbut, Denise Kennedy, Ayumi Nagase, and Sharon Seidman (6/30/23)

Comments: The commenters express that they felt marginalized in the process of developing this credential and that their concerns were not addressed. They express that the time allotted to speakers at the hearing in April was not adequate for them to fully express their concerns with the credential. Commenters share that as members of the workgroup developing the TPEs for this credential, they did not feel the workgroup addressed their concerns and that their opinions about the credential were misrepresented by Commission staff. They point out the large number (160) of public comments in opposition to this credential.

Response from Commission

There was a lengthy development process for this credential (approximately 3 years) built on even earlier discussions of the state's Master Plan for Early Learning and Care. There were many opportunities for stakeholders and community members to contribute to the process. The Commission has followed appropriate protocol for public comment and involvement at each step of the process. The time allotted for public comments at Commission meetings is at the discretion of the Chair to include all voices.

From: Janet Fish (6/30/23)

Comments:

Concern #1: Concern regarding qualifications of practicum supervisors. Commenter requesting that language be added to require a "faculty member/instructor with ECE-specific degree(s) and trained specifically in child development and early childhood knowledge and pedagogy."

Response from Commission

The Commission reviews qualifications in the accreditation process. To address this concern, the Commission proposes the following clarification to §80067 (d)(2)(B) and §80067.1(g)(2)(B) "...by a qualified faculty member/instructor with expertise in Early Childhood and Child Development pedagogy who provided observation and feedback to the candidate."

Concern #2: Request further definition of what practicum qualifies, requesting that all citations of practicum and field experiences need to specify Child Development/Early Childhood baccalaureate and master's degree program practicum and fieldwork experiences as well as community college.

Response from Commission

The current proposed regulation is sufficiently clear that it includes all practicum at regionally accredited institutions of higher education, including community colleges.

Concern #3: Contesting the Subject Matter equivalency of a credential candidate's completion of any 24 Child Development/Early Childhood units and completion of a baccalaureate in Child Development/Early Childhood. Twenty-four units of any subject matter do not make for a qualified "Specialist" in any field of study.

Response from Commission

There was no change in the proposed regulations in this posting related to the subject matter competency requirement. Further, the comment made is a misrepresentation that indicates the role of the 24 units as the only requirement for the credential, when in fact, it only serves as one option for meeting the subject matter requirement. A candidate must still meet all other requirements for the credential including completing a preparation program and passage of a Teaching Performance Assessment.

Concern #4: The description of Standard 7A (page 29 of the regulation text) describes foundational skills that ignore children's language development skills, the role of family DLL and MLL assets, and the role of candidates' knowledge of and familiarity with family and child linguistic assets and children's language development and emerging literacy development to be assessed and acknowledged and utilized in curriculum planning. Currently, the Standard 7A focuses on print as sole or primary evidence of literacy. This is a subtractive view of literacy and of the essential knowledge, skills, as well as the role of the educator.

Response from Commission

This language is unchanged from the 45-day notice period and there has been no proposed change in the proposed regulations.

From: Helen Davis (6/30/23)

Comments:

Concern #1: Concern that candidates completing a PK-3 ECE Specialist Instruction credential program will only have a Multiple Subject induction program available which would be inappropriate.

Response from Commission

The Commission does not propose any change to the proposed regulations. Induction is now designed as an individualized, job embedded program of mentor and support. Requirements for clearing a credential through induction take into account the specific type of credential the candidate is earning, the setting they are in, the children with whom they are working, and the content they are responsible for teaching. The induction experience is tailored to the individual's needs and based upon the California Standards for the Teaching Profession.

Concern #2: Commenter is suggesting that 80067.2 (c)(1) include options for clinical practice

placements that are more aligned with the equivalency option for professional experience.

Response from Commission

There was no change in the proposed regulations in this posting related to this part of the standard. Commenter is asking that the work experience equivalency section of the regulations and clinical practice requirement be identical. However, they are intentionally different. One section clarifies parameters around the criteria for previous work experience hours to count towards the clinical practice requirement. The other section clarifies the clinical practice experience requirement for all candidates, including those with no work experience. Making these two sections identical would create obstacles for completion for some candidates. At this point in time, no change is being proposed in the regulations.

Concern #3: Concern about the general nature of the 24 units of ECE/CD courses candidates may use to meet subject matter in section 80067. The concern is that this requirement is not sufficient and that the content does not prepare candidates thoroughly to teach young children.

Response from Commission

There was no change in the proposed regulations in this posting related to the subject matter competency requirement. Further, this misrepresents the role of the 24 units as the only requirement for the credential, when in fact, it only serves as one option for meeting the subject matter requirement. A candidate must still meet all other requirements for the credential including completing a preparation program and passage of a Teaching Performance Assessment.

From: Janet Fish, Nancy Hurlbut, Denise Kennedy, and Ayumi Nagase (6/29/23)

Comments:

Concern #1: Commenters feel that the proposed modifications are not in accordance with any other California credentials. In other credentials, subject matter is specifically and clearly defined (and aligns with specific domains and subdomains) or specifically demonstrated by the passage of an aligned CSET. In the PK-3 Early Childhood Education Specialist Instruction Credential (PK-3 ECE Credential), CTC regulations do not specify any designated domains, subdomains, or aligned CSET, only lower division 24 units, so they feel it is insufficient in providing high-quality pedagogical skills and developmental knowledge for future TK-3rd grade teachers, students, and families in California. Commenters state that there is a core body of appropriate knowledge, skills, and dispositions that early childhood educators must demonstrate to effectively promote the development, learning, and well-being of all young children, and CD/ECE higher education programs have the expertise and are committed to provide effective trainings to future teachers with young children.

Response from Commission

There was no change in the proposed regulations in this posting related to the subject matter competency requirement. Additionally, the subject matter requirement is one requirement for

the credential, and it is not the subject matter requirement, but rather the preparation program that will provide developmental pedagogical and content preparation. The program will require candidates to demonstrate competencies in specific areas.

Concern #2: Comments relate to apportionment for transitional kindergarten classrooms.

Response from Commission

This is beyond the purview of the Commission and is not relevant to the proposed regulations.

From: Rob Weisskirch (6/16/23)

Comment: The degrees listed for the practicum do not match the degrees for subject matter competency.

Response from Commission

Two different requirements are being referenced – one for completion of the subject matter requirement, which is a wider list of degrees, while the other is for granting equivalency for practicum experience. Practicum courses fall under the general areas of Early Childhood and Child Development, and therefore no changes will be proposed at this time to the regulations.

From: Amanda Andrade (6/20/23)

Comment: Commenter thanked the Commission for including community college practicum hours as eligible for clinical practice equivalency.

Response from Commission

The comments support the proposed regulations.

From: Sabine Chiclar (6/21/23)

Comment: Commenter is requesting a pathway for individuals who hold a higher-level child-development permit such as a Site Supervisor Permit, have many years of experience in Early Childhood Education, and hold a bachelor's degree in Early Childhood Education to be able to teach PK-K in a public school.

Response from Commission

The proposed regulations include an expedited pathway for someone with a teacher level or higher permit to obtain equivalency for the clinical practice requirement. The Commission does not propose “waiving” a preparation program and the other requirements for candidates with experience teaching in early education settings. There is no proposed change to these regulations.

From: Kimberly Barker (6/16/23)

Comments:

Concern #1: The commenter would like the Commission to define what qualifies the faculty member/instructor as trained in the following statement "trained faculty member/instructor."

Response from Commission

The Commission reviews qualifications in the accreditation process. The Commission proposes the following clarification to § 80067(d)(2)(B) and § 80067.1(g)(2)(B) “...by a qualified faculty member/instructor with expertise in Early Childhood and Child Development pedagogy who provided observation and feedback to the candidate.”

Concern #2: Commenter expresses concern that candidates who hold Multiple Subject credentials would not be required to take any Early Childhood Education courses. Commenter copied directly from the regulations (80067 (e) Multiple Subject Teaching Credential Holder Equivalencies).

Response from Commission

Per §80067 (e) Candidates for the PK-3 ECE Specialist Instruction credential who hold a valid Multiple Subject teaching credential with an English learner authorization who have met statutory requirements for the Multiple Subject Teaching credential who are seeking the PK 3 Early Childhood Education Credential are required to complete the subject matter requirement outlined in subsection (a)(4) and to provide the program with their official transcripts.

Concern #3: Referring to one of the options for meeting subject matter requirement, commenter is concerned that any 24 units in Early Childhood Education is not adequate, and that meeting the subject matter requirement in this manner would not justify the title of “specialist”. Commenter feels this is further marginalization and trivialization of all Developmentalist and Early Learning Specialists who have worked for years to become "qualified/highly qualified" in the field of Early Childhood Education.

Response from Commission

There was no change in the proposed regulations in this posting related to the subject matter competency requirement. Further, this misrepresents the role of the 24 units as the only requirement for the credential, when in fact, it only serves as one option for meeting the subject matter requirement. A candidate must still meet all other requirements for the credential including completing a preparation program and passage of a Teaching Performance Assessment.