

CALIFORNIA LEGISLATURE

STATE CAPITOL
SACRAMENTO, CALIFORNIA
95814

June 13, 2022

Dr. Tine Sloan, Chair
Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento, CA 95811

Dear Dr. Sloan:

We have significant concerns regarding Items 3A and 3B of the Commission's agenda for June 15, 2022, relating to the *Proposed Authorization Statement and Credential Requirements for the PK-3 Early Childhood Education Specialist Credential*. We ask the Commission, if it wishes to pursue this policy, to seek authorization through legislation, rather than taking administrative action. It is our firm belief that any new credential requires statutory authorization.

Item 3A proposes the creation of a new credential authorizing holders to teach multiple subjects in Pre-K through third grade. As the Commission is well aware, the multiple subject credential is established in statute. As we understand the proposed action, the Commission is being asked to administratively create this credential, instead of proposing to establish it in statute. We question the Commission's authority to administratively establish, if not in name certainly in function, a new multiple subject credential.

Further, we have significant concerns regarding the design and function of this proposed multiple subject credential. We question the wisdom of authorizing two multiple subject credentials to teach the same grades, but with differing standards for preparation. We are also troubled by the apparent lowering of preparation standards, particularly for teachers of the primary grades, implied by the proposed teaching performance expectations for this credential, which appear to emphasize provision of "play-based experiences" over rigorous content.

Finally, it is our firm belief that the proposed credential could diminish the qualifications of teachers to teach foundational reading skills by sidestepping the requirements of existing law. The Commission is aware that, in the course of developing SB 488 (Rubio), Chapter 678, Statutes of 2021, the Legislature considered numerous options for replacing the Reading Instruction Competence Assessment (RICA) with a high quality, valid and reliable, and bias-free measure of teachers' competence to teach this critical content. In this process, the Legislature deliberately maintained protections in existing law which require teachers to be prepared to teach specific foundational reading skills.

Establishing a new multiple subject credential administratively, for the very grades in which reading instruction competence is the most important, means that none of the protections in the law would apply. Indeed, the Commission is being asked to consider one of the options (locally developed assessments) which was considered and rejected by the Legislature in its deliberations on this bill as not sufficiently valid and reliable for purposes of licensure.

We understand the urgency the Commission feels to meet the workforce needs of the expansion of Transitional Kindergarten, but it is clear that this proposal needs legislative authorization. It is important to note that the *Master Plan for Early Learning and Care* recommended that, should the state address staffing of classrooms for 4-year olds either through a credential with specialization in early childhood education or the proposed PK-3 credential, that it “advance legislation” to do so.

For these and other reasons we ask the Commission to pursue this policy through legislation rather than through administrative action.

Thank you for your attention to this matter. Please do not hesitate to reach out to our offices if you wish to discuss this further.

Sincerely,



Assemblymember Patrick O'Donnell
Chair, Assembly Education Committee
70th Assembly District



Senator Susan Rubio
22nd Senate District

Cc: Mary Vixie Sandy, Executive Director, Commission on Teacher Credentialing
Nichole Munoz-Murrillo, Deputy Legislative Affairs Secretary, Office of the Governor
Rigel Massaro, Deputy Legal Counsel, State Board of Education