



November 15, 2019

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

RE: Agenda Item 4B ~ Proposed Additional Requirements for the Issuance of an Eminence Credential (pgs. EPC CC 4B-1 through CC 4B-5 Certification Committee)

Dear Chair Sloan:

On behalf of the EdVoice Board of Directors, I write regarding the proposed additional requirements for the Eminence credential and the Commission potentially sponsoring legislation to obtain authority to enact new additional barriers to teachers with high levels of content expertise and experience as suggested in Item 3D.

As the staff report to the Certification Committee itself notes (at pg. CC 4B-5), the authority to add additional requirements to the Eminence credential falls squarely within the legislature's purview and does not rest with the Commission in the absence of express legislative delegation. Education Code Section 44262 explicitly established qualifications to obtain the Eminence credential, and authorized a bottom-up process with school districts sponsoring candidates and the Commission's authority limited to determining the setting, subjects and levels of teaching and services authorized to be provided by the credential holder. The existing process enables outstanding individuals who have obtained "eminence in a field of endeavor taught or service practiced," to become licensed to practice in California K-12 classrooms for periods of time, as specified.

Teacher effectiveness is indeed an important policy issue. However, the proposed additional requirements are entry qualifications, which would create additional barriers to teacher entry for content experts recommended by local school districts' governing boards, without any filter for effectiveness. Eminence credential holders are not displacing highly effective 20-year veteran educators. In nearly all cases they are merely filling a vacancy that would otherwise be filled with an unqualified substitute, wavier or out-of-field educator.

California school districts are facing teacher shortages across the state in many STEM fields, and acutely in math and computer science. Now is not the time to erect additional barriers to entry to teach in public schools that would obviously deter professionals with high levels of content expertise from considering a career change that would benefit students in classrooms with unqualified adults who have no evidence of content mastery.

Rather than seeking to make things more difficult for California school districts to hire qualified subject-matter experts, the Commission should support the effectiveness and development of Eminence credential holders by exercising its authority to better align the authorization with the setting and level taught, and work with the legislature to determine under what circumstance(s), if any, prospective Eminence credential holders should receive additional pedagogical support and mentoring by a sponsoring school district prior to earning a clear credential.

Thank you for the opportunity to provide input, and your consideration of these comments. If I can be of any further assistance, or if you have any questions, please do not hesitate to contact me directly.

Respectfully,



Bill Lucia
President & CEO

Cc: Members, California Commission on Teacher Credentialing
Mary Sandy, Executive Director, Commission on Teacher Credentialing
Jennifer Johnson, Deputy Legislative Affairs Secretary, Office of the Governor
Jeff Bell, Program Budget Manager, Department of Finance
Lynn Lorber, Chief Consultant, Senate Education Committee
Roger Mackensen, Republican Policy Consultant, Senate Education Committee
Tanya Lieberman, Chief Consultant, Assembly Education Committee
Robert Becker, Republican Policy Consultant, Assembly Education Committee