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California Commission on Teacher Credentialing  
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Sacramento, California  
95811-4213

Dr. Mary Vixie Sandy  
Executive Director  
California Commission on Teacher Credentialing  
1900 Capitol Avenue  
Sacramento, California  
95811-4213

February 26, 2013

Dear Chair Darling-Hammond and Executive Director Sandy:

As organizations deeply committed to improving outcomes in education for all children and families in California, we write to express our concern about the California Commission on Teacher Credentialing's ("the Commission") decision to reconsider its current practices related to the Intern Credential and the authorization to teach English learners. Current law explicitly allows Intern Credentialed teachers to teach EL students and in bilingual classrooms, and the Commission has a longstanding history of abiding by that law and the clear intent of the legislature. Likewise, the law is clear on the process by which districts and schools hire intern teachers, and the Commission should continue to operate in accordance with it.

Without going into the literally dozens of unambiguous citations in the California Education Code which make it abundantly clear that the legislature envisions interns teaching English learners and in bilingual classrooms, we assert that any suggestion that intern credentialed teachers should not be authorized to teach English learners is a clear misreading of the statutes. Put very simply, the Commission's longstanding practice of issuing authorizations to allow intern credentialed teachers to teach EL students and in bilingual classrooms is consistent with the law and the Legislature's recognition of the importance of intern programs in California. That practice should not be reversed. To change the current practice would be contrary to prevailing law and will produce unwanted and unfavorable consequences for districts, schools and students.

To note, one option being urged by opponents to the current practice, mandating that Intern Credential-holders obtain an EL "waiver," does nothing to improve the quality of teachers serving students in EL classrooms. Moreover, such a practice would undermine the Legislature's explicit decision to preference the Intern Credential above teachers who obtain waivers within the hierarchy of credentials and the clear intent to permit interns to teach in California classrooms. The practical effect of requiring waivers would be to water down the Intern Credential, entangle this issue with federal matters which would further complicate the ability of districts and schools to hire intern teachers, and add an unnecessary layer of bureaucracy that would impede the ability of intern teachers to teach.

In short, it is our strong belief that the Commission should discontinue any pursuit of an expedient but misguided and unlawful policy such as waivers, and instead focus on ensuring that it continues to implement an approach that is consistent with applicable law. At the same time, we look forward to the Commission's articulated prioritization of building the systems needed to have transparent information regarding the effectiveness of and outcomes attained by all of California's teacher preparation programs, particularly insofar

as new teacher effectiveness with EL students is concerned, given that we all share the goal of ensuring that EL students are served by capable and effective teachers.

Additionally, the Education Code does not provide any basis to change the current policy of allowing districts to hire Intern Credentialed teachers without a declaration of need or an individualized verification of need and the policy should not be changed to require districts to provide either one. As an initial matter, those that would argue that the Commission must require districts to adhere to a strict and rigid hiring hierarchy, without regard to whether a teacher is suitable, before being allowed to hire teachers on an Intern Credential, base their argument on a misreading of the applicable law. This argument blurs the lines between the California Education Code provisions applicable to teachers teaching on a waiver or permit from those teachers teaching pursuant to an Intern Credential. As previously stated, the Education Code provisions make clear that teachers with the intern credential are to be prioritized in hiring over teachers hired based on a waiver or permit. The law treats these classifications differently and does not require the same showing of need by a district that wants to hire an intern teacher as it does for a district that is seeking to hire a teacher on a waiver or permit.

In closing, as required by the California Education Code, the Commission has shown a longstanding commitment to credentialing intern teachers and enabling them to teach in settings which include bilingual and English learner students and to facilitating their employment by those districts and schools that seek to hire them. We agree with the Commission—and the many interested parties—on the need to ensure that high quality and effective teachers are serving all students. However, hastily adopting regulations which do not align with a longstanding understanding of the law regarding Intern Credentials is both unwarranted and invites unnecessary future action. In our work in schools, districts and communities across California, we see firsthand the great diversity, skill and ability of these Intern Credentialed teachers, and know that they are expanding opportunity for students across California. And, what we also see, time and time again, is that many of the strongest new teachers—in bilingual classrooms, in classrooms with English Learners, and in many other contexts across California—are holding the Intern Credential. We thank the Commission for your past and continued support for teachers holding this credential, the schools and districts which hire them, and—most importantly—the students they teach.

We look forward to meeting with you and other Commission members to further discuss these issues, to share our analysis, and to work together to bring this to resolution.

Sincerely,



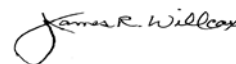
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Ilene Straus, Member, State Board of Education/Liaison to CCTC  
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