

# PACE

## POLICY ANALYSIS FOR CALIFORNIA EDUCATION

Credentialing in California  
Alternatives for Governance

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## CREDENTIALING IN CALIFORNIA: ALTERNATIVES FOR GOVERNANCE EXECUTIVE SUMMARY

This paper discusses alternative governance structures that could improve the performance of credentialing as well as enhance the teaching profession in California.

After exploring the present governance structure and the issues that surround credentialing, the following alternative governance structures appear feasible.

### 1. The Current Independent Commission.

The present structure holds symbolism for the teaching profession. Standards for teacher preparation and credentialing are the responsibility of the independent commission. Unfortunately, the Commission's inability to set goals, name priorities, address major policy issues and provide leadership for the profession has severely damaged its reputation as a policy making body. Moreover, the Commission acts defensively and knows that it is an easy target for legislative change. Conceivably, the Commission's direction and focus could be changed with legislative mandates.

### 2. A Bureau within the State Department of Education.

Under this structure, credentialing would return to its former status as a bureau where it resided before the Ryan Act (1970). The State Board of Education would regulate credentialing and the bureau would be under the administration of the Superintendent of Public Instruction. Credentialing would be within the mass and inertia of the State Education Department. Lost would be its most important attribute, accessibility to interest groups and individuals.

### 3. A Semi-Autonomous Commission within the State Department of Education

The Commission would move within the State Department of Education under the policy umbrella of the State Board of Education and the administration of the Superintendent. Interest groups and individuals would have access, but their influence would be reduced. The Commission would continue to regulate professional standards and have greater status than as a bureau.

### 4. An Independent Commission Reporting to the

## State Board of Education

Under this model, the State Board could "direct and control" the Commission and the State Superintendent or his representative could be executive secretary. The State Board would provide policy direction and the Superintendent would administer the Commission, but it would be independent of the State Department of Education. Moreover, it would retain its independent status that is symbolically important to the profession.

If a commission is retained in credentialing, other changes could be made. The present twenty-three member Commission could be reduced in size to make it more workable, perhaps by reducing the public members. Education practitioners could be given a majority on the commission to symbolize the importance of teachers controlling their own profession. Commissioners could be appointed by the State Board or the Superintendent. Presumably, appointments more in the interest of education would be made. If the Commission is placed under the direction of the State Board of Education, perhaps goals and priorities would emerge. Hopefully, leadership and an enhanced profession would follow.

In the current mood of reform, an important issue is to be able to attract and retain able teachers in the classroom. If an improved governance structure contributes to an enhanced and more attractive teacher profession, the path to follow is clear.

## Table of Contents

	Page
Introduction . . . . .	1
The Present Structure of Credentialing. . . . .	2
Licensing and Credentialing Problems . . . . .	5
I. Criticisms Concerning Schools. . . . .	6
II. Criticism Concerning the Commission's Performance . . . . .	9
Alternative Governance Structures . . . . .	12
I. The Current Independent Commission . . . . .	12
II. A Bureau in the State Department of Education . . . . .	14
III. A Semi-Autonomous Commission within the State Department of Education . . . . .	15
IV. An Independent Commission Reporting to the State Board of Education and the Superintendent of Public Instruction. . . . .	16
Conclusion . . . . .	19
Appendix 1, Historic Development of Credentialing in California. . . . .	20
Appendix 2, Documents Issued by the Commission on Teacher Credentialing . . . . .	31
Appendix 3, Committee of Credentials Cases Acted on for Unfitness or Incompetence 1980-83 . . . . .	33
Appendix 4, Response by David Levering, Chairman, Commission on Teacher Credentialing . . . . .	34
Appendix 5, Response by the Commission Teacher Credentialing . . . . .	37
Bibliography . . . . .	50

## PREFACE

Understanding the issues that surround credentialing in California is, at best, difficult. The history of credentialing starts before statehood and has never been without complexity, controversy and problems. This tradition continues today. In the several months that I undertook this study, each time I felt some understanding of the issues, a new dimension opened. For this reason, I am not ready to claim the title of "expert." I prefer that of "observer," attempting to find reasonable explanations.

The following page lists the individuals that I would like to thank for helping in the creation of this paper. Everyone that I talked with was responsive and willing to help me understand the issues and problems surrounding credentialing. This is especially true for those commissioners and staff of the Commission on Teacher Credentials with whom I met. They were both cooperative and open in answering my queries. I would like to give special thanks Michael Kirst of Stanford, Ken Lane, James Stone, and David Losk of University of California, Berkeley, my brother-in-law Wadim Kolosovich, and my wife, Ludmila, for their editorial comments and guidance. Judy Snow, PACE secretary, has provided invaluable support. I would like to thank Dayna Davis and Jean Thompson for typing the manuscript. But most of all, I would like to thank James Guthrie for his patience, guidance and encouragement.

The contents of the paper are solely my responsibility, and the opinions, analysis and conclusions cannot be attributed to the PACE Project or its co-directors, Michael Kirst and James Guthrie.

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## INTRODUCTION

Over the next few years, California will require a large number of new teachers. The policies currently in effect and those made in the near future will influence the nature of the future teaching force. Responsibility for attracting and retaining able teachers resides with the State and its associated bodies and agencies which make educational policy. The performance of one of these agencies, the Commission of Teacher Credentialing, is regarded as questionable by policy makers and observers of the education scene. They assert that credentialing can be more effective, especially if the governance structure is modified or changed.

This paper explores the issues and problems surrounding credentialing and the present governance structure. Alternatives are suggested which may improve the Commission's performance, as well as, enhance the teaching profession. The present governance structure is described followed by critics' perception of the Commission on Teacher Credentialing. Then the present and three alternative structures are described. For readers who are interested, a history of the Fisher and Ryan Acts' reform efforts is presented in Appendix 1.

Hopefully, the perceptions and ideas presented will be used to focus on the issues and problems of credentialing and stimulate further discussion. Ideally, positive actions and an enhanced profession will result.

## THE PRESENT STRUCTURE OF CREDENTIALING

Teachers in California currently are credentialed by the Commission of Teacher Credentialing (CTC) which was created by the Licensing Law of 1970 (Ryan Act).<sup>1</sup> The commission is composed of twenty-two members representing various interests and includes five non-voting, ex-officio members. There are seven public representatives, three public school teachers, one counselor, one administrator, two school board members, and three university faculty members, one of whom is a teacher educator. The above members are appointed by the governor and confirmed by the State Senate. The five ex-officio members represent the Trustees of the California State University, the Regents of the University of California, the Association of Independent California Colleges and Universities, the Superintendent of Public Instruction and the California Postsecondary Education Commission.

The Commission is independent of the Superintendent of Public Instruction and the State Department of Education. The State Board of Education has veto powers over the Commission's regulations, but such veto power is rarely used. Presently, there is only ad hoc coordination between the commission and the State Department of Education or the State Board of Education. The ex-officio member appointed by the Superintendent of Public Instruction represents his office. The CTC employs its own executive secretary and determines what policy issues, regulations and research questions will be addressed.

Activities of the commission are financed through credential fees, which have a statutory limit of forty-dollars per credential application. Consequently, revenues are subject to the number of applications received. This year is especially difficult; applications are down thirty percent due to the effects of the California Basic Educational Skills Test (CBEST). CBEST, a credentials requirement since February, 1983, has a thirty percent failure rate for first-time takers.

The Commission has two basic functions; the first is to credential educators, who are then eligible to be employed in California's public schools. The second is to conduct program reviews of California's teacher training institutions and certify that they meet the commission's standards. The CTC does not assure the quality of teachers. Credentialing, as it currently exists, simply verifies that a candidate fulfills minimum

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1. It then had the name of Commission on Teacher Preparation and Licensing. The name was changed to the Commission on Teacher Credentialing in 1983.



specified requirements before a credential is issued. The only assurance of quality is that a candidate has completed an "approved program" at a teacher training institution. Credential technicians, either at the colleges or in Sacramento, determine whether candidates have acquired the necessary college units and degrees, passed relevant tests, and have an institutional recommendation. Fifty-eight credentials, permits and documents can be issued under present statutes. Most have been mandated by the legislature. For teachers who began their training under previous laws, there are 112 additional "grandfathered" credentials that the commission can re-issue. (See Appendix 2 for a list of the credentials that can be issued.) The "grandfathered" credentials account for one-third of the approximately 100,000 credentials (70,000 estimated in 1983/84) issued each year.

The Commission is unable to determine which of its 1.1 million credential holders compose the 240,000 credentialed employees in California's schools. Consequently, it currently is impossible to extract statistics concerning credential types, the depth of training or the fields of preparation of the teaching force. Needless to explain, the numbers of individuals teaching outside their fields or with less-than-full credentials are unknown.

Program review consist of two parts. One part is reviewing subject matter content and the other is approving professional preparation in California's sixty-seven colleges and universities that offer preparation for public schools. Subject matter majors and minors commonly taught in public schools are reviewed as submitted on paper. If a subject matter program meets specified criteria, it is granted an examination "waiver." A teacher candidate who does not graduate from one of the state's 1019 subject matter "waiver" programs must pass the subject matter portion of the National Teachers Examination to obtain a credential.

The other part of program review is approval of professional preparation. This consists of obtaining assurances that such programs meet the minimum standards established by the Commission. Attempts are presently being made to review each of the 705 credential programs every five years. The CTC sends a representative eight weeks in advance to conduct an initial review, mostly of documents which are collected for the review team. During the formal review, as three member team is required to make contact with individuals both within the institution and in the field who are involved with the teacher training program and have hired teachers from the program. Generally, program review focuses on processes within teacher training institutions and not on the quality of performance of its graduates. Perhaps the most effective part of program reviews is that institutions

are forced to assess themselves.

Operating under and appointed by the Commission is the statutory seven-member Committee of Credentials which investigates applicants and credential holders for allegations of unfitness and incompetence. Approximately ten percent of all applications undergo scrutiny for past legal offenses and an increasing number of cases are being acted upon (Appendix 3). Most of the actions taken against present credential holders are for sexual offenses. Complaints concerning incompetence are received, but the difficulty that the districts encounter of collecting legal evidence and the expense of litigation severely limits enforcement activities.

The Commission also performs research. However, this function is limited by a small research staff that must also engage in program review activities and by the CTC's slender computer capability. Currently, there is little coordination with the State Education Department research efforts or with the Consolidated Programs Description Database (CPDD), the State Department of Education's information system. Of the 1.1 million credential holders going back to 1915, only the applicants for the most recent years have been entered on computer tape. Due to the limited staff, limited computer capability, and limited coordination with the State Department, a rich research resource is wasted.

The CTC also conducts research on school curriculum. The information gained is used to advise institutions of higher education of the school curriculum needs and the knowledge required by teachers. Presently, no curriculum planning or coordination takes place with State Department or the Curriculum Commission. Public school policy and decision making are fragmented among several agencies, bodies, and individuals. The State Board of Education, State Superintendent of Public Instruction, State Department of Education, Commission of Teacher Credentialing, Assembly and Senate and their respective education committees, Department of Finance, Legislative Analyst Office, the Governor and his education advisor, all greatly influence public school policy making. Because of its placement in the governance structure, its small size and its ineffective performance in providing leadership and addressing major credentialing issues, policy makers, observers and critics consider the CTC to be a weak policy making body.

## LICENSING AND CREDENTIALING PROBLEMS

Some individuals forcefully argue that the purpose of credentialing is to measure the quality of teacher preparation and to keep poor teachers out of the classroom. Others argue with equal force that credentialing is a means of setting minimum standards and is not designed to monitor the quality of an individual teacher's preparation. Still others would like to model teacher credentialing along the lines of medicine and law licensure and thus encourage teaching to attain full professional status. Unfortunately, there are fundamental differences that separate school teachers from other professions. Among these differences are that teachers do not (1) presently possess a defined body of knowledge that is not generally known to the lay public,<sup>2</sup> (2) control licensure or entry requirements into the profession, (3) have autonomy in decision making about the work environment, and (4) have high social status and economic standing. Moreover, public school teachers are civil servants, public employees, not individually independent practitioners plying their skills like physicians and attorneys. In addition, there is an inconsistency; credentials are legally required to teach in public but not in private schools. At best, teaching currently is a weak or quasi profession.

Credentialing traditionally ensures that minimum requirements are met before a credential is issued. Responsibility for the candidates' competence resides with the teacher preparation institution. These institutions are financially rewarded for the quantity, not the quality of their students. With financial and other pressures that exist in teacher education, the quality control function is often overlooked.

Since the beginning of credentialing in the last century, standards for teachers have been continually rising, mostly through increased credential requirements. Most reforms have been based on the "common sense" assumption that teachers who are academically well qualified will produce greater achievement in students. Although this assumption does not have strong links to research, it continues to dominate credentialing reforms. Unfortunately, some of the qualities that are attributed to an effective teacher are not always measurable. Persistence,

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2. Stoddart, Losk and Benson (1984) assert that a defined body of knowledge does exist. Considerable progress has been made in teacher effectiveness, psychology, teaching and learning styles, etc. in the last few years. The present teaching force does not possess much of this knowledge.

organizational ability, personal warmth, a caring attitude and the ability to handle children are not easily amenable to measurement. Nevertheless, educational policy makers continue to pursue the idea of raising the quality of the teaching force through more stringent academic requirements.

Despite the difficulty in designing a structure that will identify potentially good or poor teachers, there are many individuals who perceive that California's licensing structure is less effective than it ought to be. Critics assert that the system should lend itself to inducing able people into the profession, raising the status of teachers, maintaining high academic standards, and structuring a bureaucracy that does not frustrate the profession that it oversees.

The criticisms of the Commission of Teacher Credentialing are based upon a number of interviews and readings, and cannot be attributed to any one individual or group. The conclusions reached are, in the author's opinion, a consensus among observers of the Commission. However, in an effort to be unbiased, the author interviewed several observers and individuals associated with the CTC before attending Commission meetings. Upon subsequent interviews and conversations, the author found some opinions were based on incorrect interpretations or upon impressions made in past years that do not reflect current policies and practices. Consequently, the reader should regard some criticism as perceptions rather than factual statements.

The criticisms are classified into two categories: structure and performance. They are associated with many complex issues that are subjected to the impact of many interest groups. Consequently, criticism from one group could be praise from another. For this reason, some criticisms may seem contradictory.

## CRITICISMS CONCERNING STRUCTURE

### 1. Bureaucratic Structure

Credentialing is too bureaucratic and burdensome. With the file storage of over 1.1 million credential holders, the ability to issue approximately 170 different kinds of credentials, and receiving over 100,000 applications per year, the criticism is not surprising. The records were converted to microfiche during the 1970's and they are slowly being entered on computer tape. Since most credentials were issued for life, the Commission does not know what has happened to most of the individuals or whether they are employed in public schools. Consequently, all the records must be held.

Credentialing regulations have undergone constant revision. Currently, credentials are being issued under the Ryan, Fisher, and pre-Fisher structures. Each new piece of legislation brings changes, and the commission must create new guidelines and regulations, hence confusion. Sometimes the guidelines and regulations are unworkable and new ones must be written. In the past, especially under the Fisher Act, regulations were changing so frequently that few people knew what they were. Unfortunately, the memories of past situations and actions linger. Currently, CBEST is causing problems. Created by the legislature, the commission is responsible for its implementation and is often blamed for the adverse effects. Because of the short supply of substitute teachers who have passed CBEST, it is sometimes difficult to fill classrooms when a teacher is absent. Additionally, as mentioned previously, the effects of CBEST has reduced the number of applications, thereby creating a financial crisis for the Commission.

## 2. Number of Credentials

There are too many credentials. Every major reform effort has been aimed at simplifying the process. The result has been to submerge the various categories and authorizations within classes. At present, there are technically only two kind of credentials, "Teaching" and "Services" credentials. The Fisher Act had five classes and before that, there were fifty-seven separate credentials. Today, there are fifty-eight documents that the Commission can issue if they are categorized by job description or specialties. One reason for the number is that each job description requires different, and often specific, training. Credentialing ensures that the training has taken place. Specific credentials also prevent mis-assignment. Districts are restrained from assigning personnel to areas for which they are unqualified. In theory, at least, teachers cannot teach special education or become counselors without proper credentials. The Fisher and Ryan credentials also attempt to restrict teachers to their area of academic preparation. Teachers who hold pre-Fisher "general" credentials can be assigned to teach any subject. For example, physical education majors can be assigned science and mathematics classes. Generally, administrators and school boards desire great latitude in assigning personnel, whereas practitioners desire restrictions.

## 3. Loopholes

One of the most demoralizing features of credentialing resides in the loopholes or the common practice of letting substandard teachers into the classroom. During the 1982-83 school year, 14,860 emergency credentials were issued of which

67% were for substitutes. This practice is demoralizing for two reasons. First, it makes a mockery of the credentialing process. Figuratively, teachers are told that credentials are important until they are inconvenient to districts and the state. It indicates to teachers that their qualifications and status mean very little to those who authorize emergency credentials.

The second reason is that the practice has allowed districts and the state to ignore fundamental issues concerning working conditions. Instead of addressing the issues of why districts cannot attract teachers or why teachers take so many days off, emergency credentials allow districts to have destructive administrative policies and working conditions and get away with it.

#### 4. The Language

One of the more frustrating dimensions of credentialing is the language. "Credentialese" is foreign to those nurtured outside bureaucracies. Since the language often comes with the legislation, there is not much the commission can do even if it were so inclined. The same style of language used in legislation finds its way into regulations, guidelines, and explanations. Reformers seek to set their reform efforts apart by using broad words such as "general", "standard" and "clear." For those coming in contact with credentialing, these general terms can be confusing and frustrating, especially for teachers. Moreover, some commissioners have admitted that it sometimes takes years to become familiar with the language.

#### 5. Membership of the Commission

Commissioners often are nominated for appointment by state-wide organizations. Additionally, the governor may have political rather than educational priorities when making appointments. Some appointments may be made for the wrong reasons. As a result, commissioners may have their own private agendas or ones which reflect the views of the organization that promoted their appointment. Commissioners sometimes advocate policies of the state-wide organizations (which they may honestly believe in) rather than those which would enhance the profession they are charged to regulate and oversee.

#### 6. Size of the Commission

Some critics assert that the Commission is too large to conduct business properly or to attain consensus on issues. With twenty-two members, it is difficult to promote productive discussion. Linked with the diversity of interests, the large size also makes it difficult to bring consensus. Changing or

reducing the composition of the Commission appears to be difficult. Each constituency wants to protect its interest.

## 7. Research and Investigative Capabilities

While funds that the Commission collects are sufficient to operate the credentialing and record keeping operations, they are insufficient to carry on research, investigative, and enforcement functions with reasonable effectiveness. Considering the amount of data that the Commission collects and the teacher training operations that it oversees, research on personnel, teacher effectiveness and curriculum are vital if education is to improve. The research staff is restricted by its small size, limited computer capability, and by its other duties. Since the CTC has used computers only since mid-1982, most data is still on microfiche. As a result, the CTC has little or no capability of electronically determining the composition of California's credential holders. It seems negligent not to be able to test the underlying assumptions of California's credentialing structure and the focal points of the Fisher and Ryan Acts.

## 8. Coordination

As mentioned before, there is no coordination of research and curriculum efforts between the CTC and other educational agencies. Research efforts are carried on separately without concern for common purposes. Since there are no links between the Commission's data base and State Education Department's management information system, very little is known, or can be known under present conditions, about personnel in California's schools or how they affect achievement.

## CRITICISM CONCERNING THE COMMISSION'S PERFORMANCE

### 1. Policy Issues

One of the principal criticisms of the Commission is its failure to address major policy issues. Many observers believe that the Commission should be enhancing the teaching profession, searching for and finding policies to make the profession more stable, more professional, and more attractive to able people. The CTC, its critics charge, spends too much time with regulations, guidelines and minor policy issues. Some critics find it incredible that a policy making body spends so much time in writing and analyzing guidelines and regulations. Most other policy making bodies leave this task to the staff. This inability to delegate this smaller realm of thinking and action has tended to frustrate policy makers and observers who believe the commissions's mission should be larger, especially in a period of reform.

## 2. Competence

Perhaps related to the above criticism is another concerning the competence of the commissioners. Some appointees come with little or no knowledge of credentialing or the issues which surround credentialing and teacher preparation. Additionally, a few members have neither the inclination nor the time to learn or keep up with the quantity of work that the Commission requires. In public meetings, members sometimes display ignorance about issues and the profession. This behavior, along with members criticizing the legislature in public meetings, makes some of the commissioners appear to be naive which reflects adversely upon the whole commission.

## 3. Goals

It has been theorized that because of the lack of qualifications on part of some of the commissioners, the large size of the Commission, the lack of vigorous leadership, and the diversity of the membership, the Commission is prevented from organizing and taking concerted action. The Commission has not determined major goals or priorities, although such priorities are a definite concern of some of the commissioners and the staff. The inability to establish a sense of mission with clear goals and priorities has hampered the Commission's effectiveness in dealing with other governmental agencies and bodies.

## 4. Leadership

Its critics charge that the Commission does not exercise leadership in teacher education. But issues of leadership and goals are intimately related. Leadership in policy will not emerge without clear goals and priorities. The Commission has attempted some leadership in promoting its own reform legislation for the past three years. At the same time, the reforms arguably do not reflect the drastic changes that are needed if the teaching profession is going to attract academically able teachers. The Commission should be perceived as a leader in promoting excellence in teachers.

## 5. Resolve

Some observers contend that the Commission is being too responsive. Almost every group or individual is allowed to express their views and the Commission attempts to satisfy everyone. Some consider this to be both a major strength and a weakness. The strength is that all parties are allowed access and are heard. The weakness is that the Commission attempts to hear and resolve conflicting points of view without a clear set of goals. In an arena where no one agency will ever satisfy all



demands, the Commission appears unable to assert itself with resolve.

## 6. Interest Groups

Another concern is limited sources of information. Much of the information that the Commission receives comes from special interests either in the form of groups or commission members. With such diverse points of view, efforts to enhance the teaching profession or teacher welfare seem to get lost in the scuffle. In the opinion of many, the articulate members from higher education are the dominant force on the Commission. This is said to be the case even though several higher education members are ex-officio and do not have a vote. Others maintain that the Commission is overly influenced by unions and associations. Whatever the case, some groups and individuals appear to be promoting their own interests before those of teachers and public schools. Whether this is in the best interest of teachers and students is questionable.

## 7. Communications

Another issue related to information is the problem of communication with local levels. Both county offices and colleges and universities maintain various levels credential services. Credentialing has always had difficulty communicating regulations to the local level partly because the regulations appear to be constantly changing. As mentioned above, regulations are not written in a way that can be understood by teachers. Credential technicians in the county offices and teacher training institutions are not always well informed, and as a result, applicants sometimes receive conflicting opinions about credential requirements.

The Commission and its staff are aware of the above criticisms. Many of them cannot be solved easily. Changing the structure alone will not eliminate many of the problems. Some are embedded in tradition, within the institutional memory and in the confidence (or absence thereof) that the Commission has for itself. As an organization, the Commission acts defensively. It knows that it is small and an easy target for criticism and legislative change.

ALTERNATIVE GOVERNANCE STRUCTURES

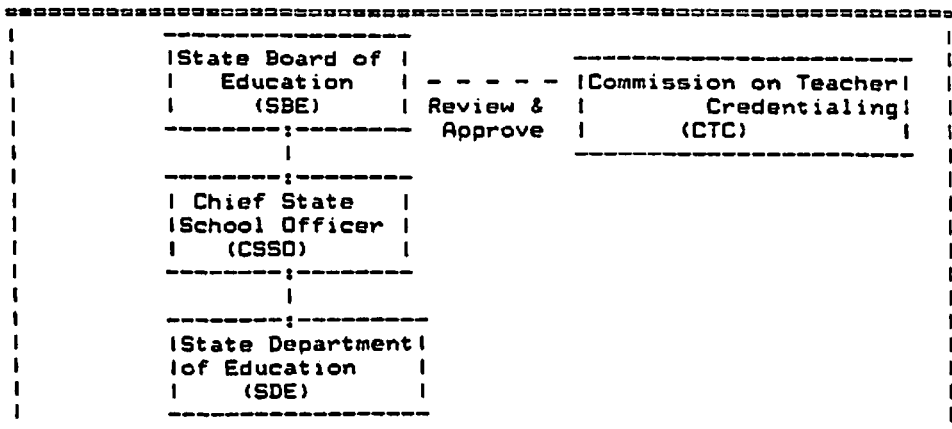
Given California's past practices and current conditions, four governance structures for credentialing appear feasible. One actually is now in practice; three others are useful alternatives. Further ones could be proposed, but the teaching profession requires a solid professional structure with clear goals, priorities, and leadership more than drastic or radical reforms. Thus, we have restricted this discussion to the arrangements which appear most reasonable under existing circumstances. These four structures are:

- 1) leaving the Commission on Teacher Credentialing in its present independent status,
- 2) returning credentialing to the State Department of Education as a bureau,
- 3) placing the Commission within the State Education Department as a semi-autonomous agency, and
- 4) leaving the Commission as an independent agency reporting to the State Board of Education and the Superintendent of Public Instruction.

A discussion of the structures follows.

I. The Current Independent Commission

The current independent commission is a status symbol for teachers (at least to teacher organizations). Removing or weakening this symbol at a time when the teaching profession should be enhanced may prove troublesome. The accessibility of the Commission by interest groups and individuals is considered one of its most positive attributes. Placing the commission in a situation where opinions concerning policy can not be fully expressed may be counterproductive. The maturity of the CTC may be approaching a point at which it can itself productively address some of the major policy issues that confront the profession. Furthermore, some commissioners express willingness to approach this larger realm of thinking. Perhaps this maturation could be expedited.



If the Commission were to retain its present status, steps could be taken to strengthen and expand its authority. The legislature could mandate statutes that instruct the Commission to focus on activities that enhance and increase the attractiveness of the teaching profession, impose rigorous standards, address major policy issues, and establish priorities. Possibly, mechanisms for funding and coordination could be provided to make the research, enforcement and curriculum activities more effective. Provisions could be made for expanded computer capabilities with the State Education Department's management information agency or be included within the realm of the educational information office that Michael Kirst is proposing.<sup>3</sup> Strong curriculum coordination links between the Commission and the Curriculum Commission could be established. Additionally, cooperative enforcement efforts could be supported with the Department of Justice.

The primary disadvantage of leaving the Commission in its current status is the difficulty of overcoming its poor image. Regardless of the improvements that have been or could be made in its operations, the Commission's reputation has been severely flawed by past practices. A portion of the opposition is irrational in nature. Nevertheless, it contains attitudes almost impossible to reverse.

Also, it can be argued that, in reality, strengthening the independent Commission is improbable, even if it makes sense from a public policy point of view. The legislature's poor opinion of the Commission prevents delegation of more discretionary powers. Because other licensing agencies are self-supporting, the precedent of expanding the Commission's activities with general funds is unlikely. Moreover, overcoming the CTC's defensive organizational posture and attitudes, which are embedded in the institutional memory, will be difficult.

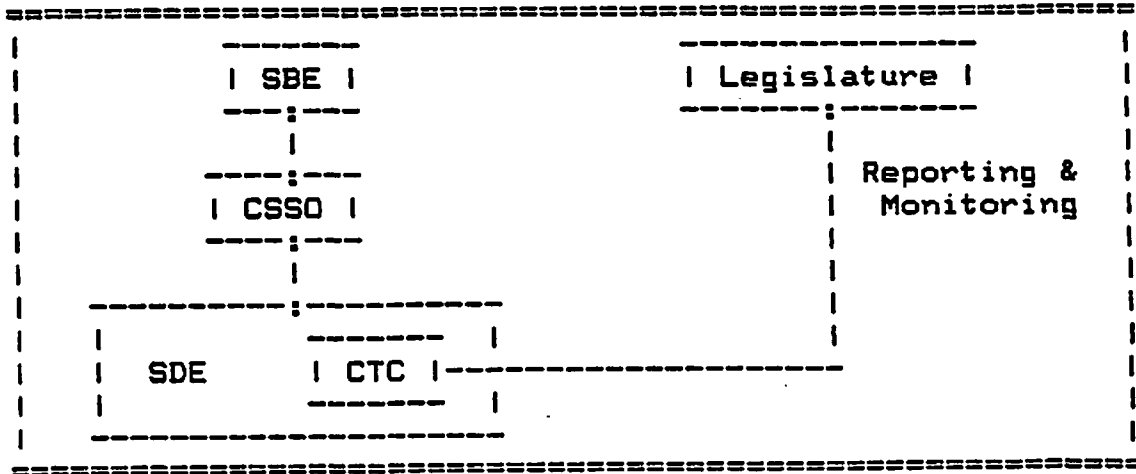
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3. Michael Kirst is proposing an educational data collection agency governed by a policy making board within the State Department of Education.



question.

III. A Semi-Autonomous Commission within the State Department of Education.



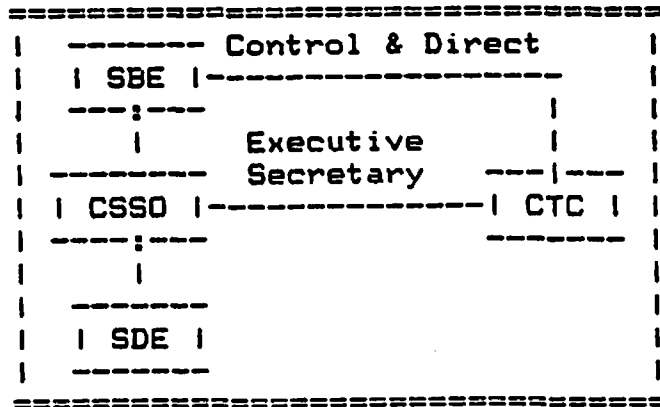
As a semi-autonomous agency within the State Education Department, the Commission again would be under the policy making umbrella of the State Board and the Superintendent and their staffs. The Commission would respond to the larger aims and goals of state educational policy rather than reacting primarily to interest groups and the Commission's staff. The Commission's activities could be coordinated with the State Education Department and other agencies. Present strengths such as accessibility and responsiveness would be retained, and the present weaknesses of setting goals and priorities, providing leadership, and coordinating policy would be strengthened.

Putting the Commission in the State Department encounters a disadvantage similar to that of the bureau. The Commission would be submerged within a large bureaucracy which does not now have a reputation for being responsive or efficient. Whether the Commission is put into the State Department as an agency or a bureau, it will lose some of its accessibility. For this reason, the commission could be given semi-autonomous status. To protect this status, perhaps a "report and monitor" link could be established between the Legislature and Commission. This scenario would help protect it from the State Education Department and the political infighting and administrative whims of the State Board, Superintendent, and their respective staffs.

The Commission could be placed either under the direction of the State Board of Education or under the Superintendent, who

administers State Board policies. Under the Superintendent, the policy would be coming from one person rather from one policy making body to another. Chances would be greater for goals and priorities to be articulated more clearly.

IV. An Independent Commission Reporting to the State Board of Education and the Superintendent of Public Instruction.



In this structure, the State Board of Education would control and direct the Commission on policy issues. Either the Superintendent or his appointee would act as the Executive Director. The Commission would be free of the struggles of the State Education Department and the whims of the staff of the Superintendent. Moreover, the Superintendent would be directly responsible for the administration and implementation of policy. The Commission would partially retain its independent status to symbolize the importance of the profession and gain policy direction that is considered its primary weakness. Strengthening the administrative structure, perhaps, would compensate for the loss of autonomy as a professional symbol.

Moving the Commission under the State Board of Education or the Superintendent in any of the three alternative models could accomplish several purposes. The State Board could "control and direct" the Commission (as originally envisioned by Ryan), define major policy issues to be addressed, and provide goals and priorities. Armed with goals, priorities, and, hopefully, leadership, the Commission would be less vulnerable to interest groups. At the same time, individuals and groups would have access to the commission. Possibly, the Commission would be strengthened, act with resolve, improve its image, and over a period of time, gain the confidence and respect of the profession and the legislature. Perhaps more discretionary powers would follow, acting further to strengthen the Commission. A stronger,

more decisive agency would emerge, enhancing the profession.

Ideally, teachers should have more participation in the setting of standards, the design of training programs, and control of entry into the profession. Generally, teachers have been advocates of higher standards and keeping sub-standard teachers out of the classroom. Under the present structure, practitioners are a minority on the Commission on Teacher Credentialing and believe that they should have more control of their profession.

If the Commission were placed under the State Board of Education, much of the public interest would be represented on that body. Then, by reducing the public members and possibly a school board member, the composition could be changed to give practitioners a majority. The Commission would thus be reduced to a more reasonable size and the probability of consensus would be increased. Moreover, with practitioners controlling standards and entry, the profession would be greatly enhanced.

As mentioned before, some commissioners are appointed for political rather than educational reasons and come to the Commission with little knowledge of the issues of credentialing. Appointments of the commissioners could be made by the State Board of Education or the Superintendent. Presumably, either party would make appointments more intensely in the interest of education than the governor. Furthermore, commissioners also could be chosen from an at-large basis rather than primarily from candidates submitted by state-wide organizations. Potentially, professional priorities would be placed before those of state-wide organizations.

A potential conflict of interest may arise in the above structure. The current independent commission is charged with maintaining standards. However, in times of teacher shortages or in areas where working conditions are poor, school districts may exert pressure to lower standards. If past practices are an example, the State Board and the Superintendent are vulnerable to such political influence. Therefore, the Commission should have a strong and decisive mandate to accept policy direction from the State Board with the exception of diluting professional standards. Such a mandate would mitigate the potential conflict of interests between the State Board, Superintendent, and the Commission.

These alternatives address major governance problems and possible solutions. Partial control of entry and standards could be achieved by a majority of practitioners on the Commission. The size of the Commission could be reduced to achieve consensus. Research, curriculum activities, and enforcement could be better coordinated with Education Department activities and have links

to other agencies. Major policy issues, goals and priorities could be directed. The probability of leadership and resolve would increase. Concerns of a more attractive profession with high standards would be placed before the influence of interest groups. Hopefully, an enhanced profession with increased status would emerge.



## CONCLUSION

At the beginning of this paper, the hope was expressed that the ideas and perceptions presented would stimulate further thought and discussion. Easy panaceas are remote to the complex issues and problems surrounding credentialing. After all, teaching is a human endeavor whose outcomes often depend more on the force of personality than on the goals or mandates of deliberative bodies. Nevertheless, the State has an obligation to require high standards in its public schools. If enhancing the teaching profession, even symbolically, promotes achievement of those goals, then the path to follow is clear. On the other hand, if credentialing is used as a scapegoat for the problems encountered in schools, the result of poor child rearing practices or society's ills, then the teaching profession can be left alone. If California wants an excellent teaching force, it must treat that force in an excellent way.

Ultimately, one must question a policy's effect on students. Will an enhanced governance structure improve the achievement of students? This large question is without a clear answer. If a credential reform will enhance the profession and give teachers pride, there is a likelihood that, along with other improvements, classroom performance will improve. On the other hand, if the probability is small that positive results will occur, reform should be avoided. The last thing that the teaching profession or education needs is another failed policy.

## APPENDIX 1

### HISTORIC DEVELOPMENT OF CREDENTIALING IN CALIFORNIA

During the 1950's, critics of public education perceived progressive education with its emphasis on preparation "for complete living" and on "life adjustment" occurring at the expense of academic rigor. Blame for the ills of education was laid at the door of teacher education institutions because most of their courses emphasized methods (how to teach) as opposed to academic content (what to teach). Teacher educators were disparagingly known as "methodologists" and as "educationalists."

On the other hand, some educators were attempting to professionalize the teaching profession by promoting the specialized body of knowledge offered by teacher training institutions and by gaining control over entrance requirements and licensing functions of the profession. This movement was known as the "professional standards movement" and had its roots in the National Education Association (NEA). Members of this movement were called "professionalists" by their critics. The primary antagonists of the "methodologists" and "professionalists" were the advocates of academic subjects or "academics." The now familiar theme that students were not prepared as well as they should be was being strongly espoused by college and university professors of academic subjects. Events such as the Cold War and the launching of the first satellite by the Soviet Union in 1957 set the stage for the Fisher Act in 1961, as academic reform effort.

Most of the controversy surrounding credentialing took place in the 1950's before the Fisher Act. In California, the "professional standards movement" was led by the California Council on Teacher Education (hereafter called the California Council). It was composed of representatives from all of California's teacher training institutions, eighteen professional organizations, and the State Department of Education. In 1954, the Superintendent of Public Instruction, Roy E. Simpson, asked the California Council to study the credentialing structure as a long term project. At that time, California had fifty-seven separate credentials and the structure was considered the most complex in the nation. By agreement, the California Council became the recognized advisory body to the State Department of Education. As a result, the California Council appointed a reform committee, composed mostly of professional educators. The Kinney Committee (its chairman was Stanford Professor Lucian B. Kinney) worked for two and a half years and made its report in 1957.

Although most of the complaints about teacher licensure centered around the large number of credentials and the highly

specific requirements to obtain them, the Kinney committee also addressed the issue of teacher licensure and its underlying assumptions. There were based on three principles: feasibility, professional responsibility, and interdependence. Teacher education was only feasible if conducted by the teacher education institutions considered the most effective agent to perform the function. The profession was responsible for maintaining its own standards. Teacher training programs, accreditation, and certification were all interdependent on each other.

The basic principles of a sound credentialing structure were: (1) the credential should be a badge of membership in the profession indicating that an "approved institution" had selected, screened, and educated the professional; (2) institutions must accept responsibility for careful selection and high standards; (3) proper assignment of staff should be the responsibility of the school districts; (4) credentials should be reserved for those prepared in the field of education; (5) quality would be maintained through accreditation; (6) the credentialing structure should not specify the content of training programs; (7) direct application for credentials without institutional approval should be restricted, and (8) statements about credential requirements should be as general as possible.

In keeping with these assumptions and principles, the Kinney Committee proposed that four credentials replace the existing fifty-seven. Five years of preparation were recommended for elementary teachers (as had been required of secondary teachers since 1906) with all these recommendations were within the philosophy of the "professional standards movement." Some of the Kinney Commission's ideas were to remain a part of the thinking of professional educators to this day.

Superintendent Simpson moved cautiously and held a series of public meeting throughout the state during the 1957-58 school year. Many of the proposals were not received with enthusiasm, and in response, the California Council formed a second committee, the Stone Committee (named for its chairman, University of California, Berkeley Professor James C. Stone), to attempt to rectify the differences of opinion that emerged. When the Stone Committee reported in November, 1958, it proposed even more "drastic" reforms. Among them were reducing the credential types to three, specifying the academic and educational specialties on the credential, requiring additional degree and experience requirements for administrators, and permitting teachers to apply for credentials in serial ways.

The concerns of the time can be perceived in the recommendations. Teacher educators wanted to have as much control over teacher preparation, credentialing, and accreditation as possible. Teachers wanted the option to apply

for a credential without going through an institution and to be protected from mis-assignment by restricting credentials to the subjects and grade levels of their preparation. Administrators and school boards wanted credentials to be as general as possible so they could have wide latitude in assigning teachers classes. Some interest groups also wanted administrators to be more highly educated and to have more experience in the classroom.

As with all past educational reform movements in California, many participants were involved. Although the California Teachers Association (CTA) had been represented on both the Kinney and Stone Committees, it developed a separate set of proposals in 1956. The CTA proposed five types of credentials, restricting teachers to specific grade levels and subject fields, and issuing credentials only on the recommendation of teacher training institutions.

The Northern Section of the Academic Senate, University of California, had a Special Committee on Teacher Education. This group suggested that teacher training put strong emphasis on academic preparation and to restricting a teacher's assignment to the field of preparation. The California Federation of Teachers (CFT) followed the Academic Senate's lead and also suggested barring non-academic majors from school administration, reducing education course requirements, and having the legislature specify the content of the credential programs. The CFT, which was small at the time, also criticized the "administrator dominated" CTA and the "methodologists."

After hearing criticism of the Kinney Committee report, the State Education Department formed a committee of its own to analyze the report. That committee suggested that the changes were too drastic and allowed teachers to teach too many subjects at too many grade levels. Credentials should restrict teacher assignment by specifying fields and levels of preparation. The committee proposed three different credentials as alternatives. Additionally, the State Education Department was unwilling to accept credentialing as a system of professional licensure. Credentials were, in their view, an administrative device to regularize employment practices in public school, not a professional badge of membership.

Another round of public hearings was held during the 1958-59 school year, and the testimony convinced the State Education Department to be wary of the proposals of the California Council and the CTA. Subsequently, the State Education Department's own proposals were unveiled during a California Council meeting in October, 1959. The State Department proposals reflected using credentials to control assignment, but advocated using a "program review" approach to certification, giving teacher training institutions freedom to design their own programs. The State

Department favored a method of direct applications to the state for credentials without institutional recommendation. Superintendent Simpson persuaded the California Council to accept the structure in principle.

As mentioned above, the Cold War, Sputnik, and progressive education brought forth criticism of public schools. Critics accused teacher training institutions of offering courses that were academically soft, overlapping, and redundant. A poll of teachers indicated that aside from student teaching, little else was of value to potential teachers. The issues were hotly debated in books and articles. Most influential among national organizations was the 3000-member, non-profit, lay-oriented Council for Basic Education, dedicated to quality in education. One-sixth of its membership resided in California.

In 1958, in response to Soviet space achievements, the legislature appointed a Joint Interim Committee on Public Education. The Joint Committee in turn appointed a distinguished twenty-seven member Citizens Advisory Commission. Significantly, six of the commission's members belonged to the Council for Basic Education. The Commission toiled for two years, held fifty public hearings, heard two hundred and fifty people and compiled 5000 pages of testimony. The committee report stated that credentialing should be a joint responsibility of academic departments, schools of education, teachers and administrators. The candidates' academic ability would be certified by academic departments, professional preparation by the department of education, and teaching ability by the master teacher. Content of education courses was to be the responsibility of the whole institution, methods courses were to be kept to a minimum, and practice teaching was to take place early in training. A fifth year paid internship was proposed with few or no education courses. For elementary teachers, the undergraduate major was to be eliminated and a fifth year of preparation added. Secondary teachers were to have an academic major and minor and be restricted to teaching in their field of preparation. Five years of teaching experience were recommended as a requirement for administrators.

In 1960, shortly after the State Education Department made its final proposals and they were approved by the State Board of Education, the State Senate formed a Fact Finding Committee to hold hearings on the proposals. Hearings were held in San Francisco in April. Although Senator Hugo Fisher was the only senator to attend, almost every interest was present. The Citizens Advisory Commission made its report, and eventually most of its recommendations became legislation. Many of the teacher preparation positions were presented by various groups. In a suggestion that would have future significance, the CTA proposed creating a commission on credentials under the State Board of

## Education.

In January, 1960, the State Board of Education was advised by the staff of the State Education Department that if it did not propose a new credentialing structure, the legislature probably would create its own without the Board's guidance. At the February meeting, after three new members took office, a discussion ensued about the proposed credential structure. One of the new members suggested that the word "academic" should be inserted in front of "subject matter preparation." This change would require teachers to have an academic major or minor in order to obtain a "standard" (full) credential and would relegate "non-academic" preparation to a "designated subject" credential. Moreover, a "standard" credential (or academic preparation) would be required to obtain an administrative credential. The suggestion was adopted over the objections of the State Department staff who recognized the turmoil such a distinction would create. Later in the year, the State Board proposed a credentialing structure that took the form suggested by the Citizens Advisory Commission. At the November meeting, the State Board of Education was asked whether it wanted bills drafted for enabling legislation or for detailed legislation. Enabling legislation would give the State Board wide discretionary powers to create credentialing regulations whereas detailed legislation would leave very little discretion to the State Board. The State Board stated it preferred the enabling legislation, but instructed that both bills be written. Events that transpired in the interim are unclear, but in January, Senator Fisher introduced the detailed prescriptive legislation. This event marked the legislature's first extensive intervention into credentialing. The legislature was unable to trust the educational establishment to carry out the desired academic reforms.

Senator Fisher stated that he was motivated by testimony heard on the Senate Fact Finding Committee and by an experience with his son's high school civics class. Half of the class covered economics. Every section of the class was being taught by physical education majors, and Senator Fisher asserted that something was wrong with a system that allowed this practice.

There were other forces for change at work also. Governor Edmond G. "Pat" Brown and his staff had taken an interest in credential reform, and, perhaps seizing a political opportunity, stated in a joint session of the legislature in January, 1960, that improvement in education was his number one priority.

Senator Fisher's bill was amended 150 times and went through eight major printings. It had a difficult passage through both houses of the legislature and it generated much controversy. Bitter battles developed over the definition of "academic"

subject. Unable to come to an agreement, the legislature passed the responsibility for defining "academic" to the State Board. The inability of the State Board to make clear the academic/non-academic distinction was the primary reason that the Fisher legislation gave them "second class" status. The fifth year requirement for elementary teachers was eliminated at first because of the potential increase cost of teacher's salaries. Later, it was introduced for political reasons. Instead of de-emphasizing education courses and methodology, the bill was amended to instruct the State Board to emphasize equally subject matter preparation, education courses and student teaching. The bill passed the Assembly Education Committee by only one vote. After that, Governor Brown threw his influence behind the bill. The legislature held a final vote on June 12, and Governor Brown signed the Fisher Act on July 24, 1961. It was to become operative on July 1, 1963.

According to many observers, political educators had been defeated. The California Council and the CTA, which had previously carried considerable influence, probably suffered most. The conflicts had been largely fought over the issues of academic emphasis versus teacher education courses. The professional educators had mis-read the political mood of the legislature, which decided to take matters into its own hands. The legislature contended that strong action was necessary and the traditional educational establishment could not be trusted to revolutionize itself.

Among the major changes that the Fisher Act brought about were the following: (1) subject matter requirements were increased at the expense of professional preparation; (2) teaching assignments were limited to areas of academic preparation; (3) a distinction was made between academic and non-academic preparation; (4) the undergraduate education major was no longer recognized; (5) elementary school teachers were to have five years of preparation; and (6) preparation in an academic field was required for administrators.

Soon after the passage of the Fisher Act, Superintendent Simpson appointed a committee of professional educators to oversee its implementation. The State Board, under the leadership of Thomas Braden, a strong supporter of the Fisher Act, perceived the new committee as a threat to the intent of the legislation. Braden formed a sub-committee of State Board members which undertook the task of writing the regulations. Complex and intricate regulations resulted, which the State Board sought to correct by making minor changes whenever problems arose. By the mid-60's, eighty-one changes had been made and very few individuals or institutions could cope with them. Elementary teacher shortages developed and the State Board was besieged with requests for emergency credentials. With the

additional requirements of a fifth year and an academic major required for elementary teachers, many students were opting for secondary preparation. Complex regulations were making out-of-state recruitment difficult. The State Board soon relented on the definition of "academic" and "non-academic." The first to become "academic" was speech. A board member was a speech major. University of California, Berkeley then requested that physical education at that campus be declared "academic," and University of California, Davis soon followed with home economics and agriculture. Distinctions crumbled.

In January, 1963, the articulate and conservative Max Rafferty was elected Superintendent of Public Instruction. Since the State Board had endorsed Mr. Rafferty's opponent, the relationship was uneasy. In addition, an open feud broke out between board president Thomas Braden and Rafferty. Rafferty recommended that the academic/non-academic distinction be dropped as an artificial and meaningless division. This "anti-intellectual" recommendation made Mr. Rafferty suspect both with the State Board and the legislature. Rafferty started exchanging open criticisms with Governor Reagan and subsequently, lost the governor's political support. Rafferty's complaints found support from superintendents who called the law "unworkable." Professional educators and the superintendents soon turned to the legislature for solutions to their problems.

By 1965, bills were being already introduced to repeal the Fisher Act, academic/non-academic distinctions, academic majors for elementary teachers, et cetera. The only bill to become law was one allowing a diversified major for elementary teachers. Another important event in 1965 was the creation of the Assembly Committee on School Personnel and Teacher Qualifications with Leo Ryan as chairman. Ryan, arriving as a teacher from Nebraska years earlier, had been denied a California credential because he lacked some minor requirement. He had lost income while making up the requirement and in the process, developed a hatred of educational bureaucracy.

The committee held hearings for a year and a half and, not surprisingly, issued a report critical of the State Department of Education because the implementation of the Fisher Act had been poorly handled. Hearings also revealed that colleges were delaying student teaching by requiring numerous methods courses before student teaching. Concern was expressed over the declining status of teachers and this decline was attributed to the exodus of the best teachers into higher paying administrative jobs.

Merit pay was proposed as an alternative. Ryan introduced bills in 1965 and 1967, but concern over who would do the evaluating prevented passage. Rather than enhance



professionalism through professional control, the committee suggested the profession be enhanced by reducing class sizes, limiting administrator positions, making the classroom more attractive, and through merit pay.

The report also exposed some of the administrative policies and practices of Max Rafferty and his staff. Relationships between the State Department, the Superintendent, and the legislature became more strained. The legislature reacted by moving various functions outside of Rafferty's reach. State colleges and community colleges were each given their own governing bodies. Because of poor practices, the Investigative Office of the Bureau of Credentials was abolished and the function was removed to the California Office of Criminal Identification and Investigation. During the same period, the Legislative Analyst's office published a report critical of credentialing procedures and cited many inefficiencies. The report also suggested state-wide examinations, that the bureau remain self-supporting, that comprehensible leaflets be produced, and that modern office procedures be adopted.

In early 1969, the Joint Committee on Teacher Credentialing Practices was created and Assemblyman Leo Ryan made chairman. The social and political climate had changed and academic rigor was no longer as important as it had been in 1961. Institutions of all kinds were under scrutiny, especially the weak ones such as credentialing. The Fisher Act was becoming so burdensome that some concerned individuals thought it would soon collapse. Almost everyone agreed that changes had to be made.

The structure of the legislature had changed during the 1960s. Legislators and the standing committees had gained permanent consultants and the style and procedures changed with the consultants, sometimes exerting considerable influence over legislation. Denis Doyle became consultant to the Assembly Education Committee, exerted considerable influence over the future Ryan Act. The committee held two public hearings as well as traveling to the East Coast to become informed regarding the national trends. Although many of the arguments and complaints were similar to those of the Fisher Act hearings, "non-academic" interests were especially vehement. The Bureau of Credentials came under attack for its frequently changing and confusing regulations, inefficiency, and the "mental suffering" it allegedly inflicted on credential applicants. Legislators were warned that if action was not taken, the system would collapse. Characteristically, the CTA wanted a flexible credentialing structure with the details left to the institutions of higher education and subject only to state accreditation standards. The CFT maintained its position for strong academic preparation. The California School Boards Association (CSBA) was the first to suggest a commission composed of representatives from the State

Department, school administrators, the two teacher organizations, and school boards. It was suggested that the commission be directly responsible to the State Board and for program standards and accreditation. This "approved program" approach would eliminate the need for detailed transcript analysis. The Joint Committee was not receptive to the idea initially, but when similar proposals were made later by the CTA and supported by James Koerner of the National Council for Basic Education, the idea gained wider acceptance.

By the second public hearing, the professional organizations had formed a loose alliance called the Cooperative Committee on Credentials, in hopes of presenting a united front. This committee advocated elimination of the academic/non-academic distinction, easing the major and minor requirements, a diversified major, and requiring three instead of five years of teaching experience to be an administrator. Additional education courses for elementary teachers were recommended and the practice of giving life credentials to teachers who had just completed their fifth year requirements was criticized.

The Joint Committee soon realized that the problems of credentialing were not confined to California. While looking for information in other states, the Joint Committee came under the influence of two critics of credentialing at the time, James B. Conant, president emeritus of Harvard and James D. Koerner, formerly of M.I.T. and executive secretary of the National Council for Basic Education. Conant proposed placing responsibility of licensure with the president of the preparing institution, not the department of education, in certifying the candidate. This was similar to the "approved program" approach. James Koerner, on the other hand, was skeptical of the ability of institutions of higher education to monitor themselves. He contended that they would become captive of the education departments. Koerner proposed a licensing board that would be independent of the State Board of Education. This board would consist of several groups which would act as checks and balances against each other. Mr. Koerner advocated reducing the influence of teacher educators who he called "educationalists." He considered them responsible for the deficiencies in American education. Leo Ryan and the Joint Committee consultant communicated with James Koerner, met with him on the committee's East Coast tour, and continued communicating with him extensively thereafter.

The East Coast tour aided the committee to concentrate on its objectives, and in January, 1969, it had a draft bill that included a limitation on the number of education units required for a credential. It required passage of a subject matter examination and allowed seven years for teachers to complete their fifth year requirement. Also included was a proposed

fifteen member independent commission.

In March, Ryan's bill was introduced. Its preamble stated that purpose of the commission was to relieve the State Board of the licensing burden and to create a system that was realistic, flexible, responsive and simple. The proposed legislation was controversial, especially its proposed use of examinations, on which minorities did not perform well. Some legislators insisted that there had to be an alternative path. As a result, a compromise was reached in which the examination could be "waived," based on the completion of an approved subject matter program.

The odyssey of Ryan's bill was marked with opposition, compromise, negotiation, and persistence. Many amendments were required to keep the bill alive. Eventually, Ryan accepted enough amendments to placate opposition, or in CTA's case, enough that to oppose the bill would have been awkward. The bill made it to Governor Reagan's desk in August, only to be vetoed in September. Reagan agreed that reform was needed and should not be discouraged. But he stated that more consensus was needed. Much of the opposition had come from a Commission on Educational Reform that Governor Reagan had created in 1969. The commission later made its report in December, 1969, and it suggested a commission similar to Ryan's in which professionals would hold a majority over the public members.

Among the other proposals of the Reagan Commission was the implementation of a series of teaching "ranks," the lowest being an assistant which did not require a credential, and eliminating credentials for non-teaching positions. Other suggestions would have statewide organizations submit names to the governor for consideration for the commission, and making the commission subject to "review and approval" of the State Board instead of "control and direction." Also proposed was abolishing the life credential. Although Ryan was philosophically in agreement with Reagan's commission, he thought that abolishing the life credential was politically too hot to handle. It took Senate Bill 813 in 1983 to accomplish that task.

Again in the 1970 session, Ryan's new bill underwent another round of amendments, but there were several significant demands to which Ryan did not yield. The CTA wanted more practitioners on the commission and the School Boards Association wanted more public members. The State Board wanted exclusive power over all the commission's activities. Ryan also resisted removing the requirement that administrators pass a multiple subject (elementary subject matter) examination.

Finally, after three years of deliberation, Ryan had placated or disarmed his critics sufficiently to again win

passage of his bill. He used intense efforts on every front including personal letters, the media, lobbying, and enlisting the support of national spokesmen, such as James Koerner. The bill finally attracted the support of conservative Republicans and the California Taxpayers Association because of the money that the independent commission would purportedly save.

The bill went to Governor Reagan on July 21, 1970, and was signed into law on July 30. The new Commission for Teacher Preparation and Licensing was to deal exclusively with teacher credentialing and preparation. Many teacher educators predicted that the legislation would be unworkable. Ryan's attitude of letting the technical problems work themselves out would later severely test the philosophy of the bill.

Some of the early problems of the commission were created with the intent of the legislation and the nature of Governor Reagan's appointments. The intent of the legislation was to reduce the influence of professional educators. As a result, some commissioners were openly hostile to teacher educators which promoted distrust between the two groups. A second factor that advanced mistrust was that the initial appointments were made more for political reasons than for educational ones. There was ideological infighting on the commission and some of the commissioners were suspicious of the staff and each other.

The situation changed in 1973 when more moderate commissioners were appointed. The first executive secretary, George Gustafson, who was reflective of the defensive and hostile early commission, soon left after the more moderate group came to power. Under the second executive secretary, Peter LoPresti, an era of cooperation and trust developed between the commission and higher education. In 1979, the composition of the commission was changed and expanded to seventeen voting members to provide the public and school board members with a majority.

Appendix 2

DOCUMENTS ISSUED BY THE COMMISSION ON TEACHER CREDENTIALING

The Education Code, Section 22450, names the credentials which the Commission is authorized to issue:

44250. Types of credentials. The Commission shall issue only the following two types of credentials, which authorizations as hereinafter defined:

- (a) A teaching credential      (b) A services credential

The following is a list of the fifty-eight credentials, permits and documents issued by the CTC under present statutes.

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Teaching Credentials

1. Single Subject
2. Multiple Subject
3. Specialist:
  - Agriculture
  - Bilingual/Cross Cultural
  - Early Childhood Education
  - Health Science
  - Language Development
  - Mathematics
  - Reading
  - Special Education:
    - Communication Handicapped
    - Gifted
    - Learning Handicapped
    - Physically Handicapped
    - Severely Handicapped
    - Restricted Severely Handicapped
    - Visually Handicapped
4. Designated Subjects:
  - Adult
  - Vocational
  - Special Subjects
- 4A. Limited Driver Training
5. Eminence
6. Exchange
7. Sojourn

Services Credentials

1. Administrative
2. Librarianship
3. Health:
  - School Nurse
  - Physician
  - Dentist
  - Dental Hygienist
  - Optometrist

4. Clinical-Rehabilitative:
  - Language, Speech & Hearing
  - Audiology
  - Orientation & Mobility
5. Pupil Personnel:
  - Basic Pupil Personnel Serv.
  - School Psychology
6. Eminence
7. Exchange

Special Authorization

1. Resource Specialist
2. Designated Subjects:
  - Supervision & Coordination
3. Adapted Physical Education

Permits

1. Children's Center (1961-66)
2. Children's Center (1966-74)
3. Child Development Programs
4. Children's Center (present)
5. Special Center

Emergency Credentials

1. Teaching, Single & Mult.
2. Biligual, Single & Mult.
3. Specialist
4. Clinical-Rehabilitative
5. Health Services
6. 30-day Substitute
7. Limited Assignment Sub.
8. Children's Center Permit
9. 1-year Non-renewable

Miscellaneous Documents

- Miller-Unruh Reading Specialist
- Bilingual Cert. of Competence
- Certificate of Clearance
- Teacher Trainee Certificate

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Source: Credential Handbook, CTC I

TYPES OF PRE-RYAN CREDENTIALS

No. GT - "General Teaching Credential"

Pre-Fisher

1. Kindergarten-Primary
2. Elementary
3. Junior High
4. Junior College
5. Secondary
6. Exchange (Replaced by TC)
7. Very old type combination General Secondary, including Elementary and other General Teaching

No. ST - "Special Teaching Credential"

Pre-Fisher

1. Secondary (Art)
2. Secondary (Aviation)
3. Secondary (Vocational Agriculture)
4. Secondary Limited in Designated Subjects
5. Secondary in Business Education
6. Secondary Limited in Vocational Business
7. Secondary (Blind)
8. Secondary (Deaf)
9. Secondary (Homemaking)
10. Secondary in Industrial Arts
11. Secondary Limited in Industrial Arts
12. Secondary Limited Part-time in Industrial Arts
13. Secondary (Lip Reading)
14. Secondary (Music)
15. Secondary Limited in Music
16. Secondary (Nursing Education)
17. Secondary (Partially Sighted Child)
18. Secondary (Physical Education)
19. Secondary (Public Safety and Accident Prevention Including Driver Education and Driver Training)
20. Secondary (Sciences Basic to Medicine)
21. Secondary (Speech Arts)
22. Secondary (Correction of Speech Defects)
23. Secondary Vocational Class A
24. Secondary Vocational Class B
25. Secondary Vocational Class C1
26. Secondary Vocational Class C2
27. Military Science and Tactics
28. Adult Education in Designated Subjects
29. Adult Education (Lip Reading to Hard-of-Hearing Adult)
30. Adult Education for Short Unit Courses
31. Class D Vocational
32. Secondary Vocational Part-time in Business Subjects
33. Secondary (Mentally Retarded)
34. Exceptional Children:
  - Visually Handicapped
  - Deaf or Hard-of-Hearing
  - Speech Correction and Lip Reading
  - Mentally Retarded
  - Orthopedically Handicapped, Including the Cerebral Palsied
35. Any "very old" type Special or Limited Teaching Credential
36. Exchange (Replaced by TC)

No. GS - "General School Services Credential"

Pre-Fisher

1. Child Welfare and Supervision of Attendance
2. Health and Development:
  - School Nurse
  - School Physician
  - School Dentist
  - School Audiometrist
  - Dental Hygienist
  - School Optometrist
  - Etc.
3. Librarianship
- 4.
5. Elementary School Administration
6. Elementary School Supervision

No. GS - (Continued)

7. Secondary School Administration
8. Secondary School Supervision
9. Special Subject Supervision
10. General Administration
- 11.
- 12.
13. Secondary School Administration in Trade and Industrial Education
14. Supervising School Budgets
15. General Supervision
16. School Psychometrist
17. School Psychologist
18. The Supervision
19. Pupil Personnel Services:
  - Basic: Basic Pupil Personnel Services and Supervision thereof.
  - Basic + 1: Basic Pupil Personnel Services plus Psychometry and Supervision thereof.
  - Basic + 2: Basic Pupil Personnel Services plus Psychology and Supervision thereof.
20. "Very old" type credentials in service are such as School Executive
21. Children's Center Permit (Replaced by P)
22. Development Center Permit (Replaced by P)
23. Exchange (Replaced by SC)

No. STC - "Standard Teaching Credential"

- A. Elementary
- B. Secondary
- C. Early Childhood Education
- D. Junior College
- E. Limited Specialized Preparation:
  - Mentally Retarded
  - Speech and Hearing Handicapped
  - Deaf and Severely Hard-of-Hearing
  - Orthopedically Handicapped, Including the Cerebral Palsied
  - Visually Handicapped
  - Librarianship
- F. Restricted Special Education:
  - Deaf-Blind
  - Deaf and Severely Hard-of-Hearing
  - Educable Mentally Retarded
  - Visually Handicapped in Mobility
  - Orthopedically Handicapped, Including the Cerebral Palsied
  - Speech and Hearing Therapy
  - Trainable Mentally Retarded
  - Visually Handicapped
- G. Miscellaneous Credentials:
  1. Probationary Teacher
  2. Reading Specialist (Replaced by MU-RS)
  3. Sojourn Credential (Replaced by TC)

No. SDT - "Standard Designated Teaching Credential"

- A. Basic Military Drill
- B. R.O.T.C.
- C. Adult Education
- D. Business Education
- E. Public Safety and Accident Prevention, Including Driver Education and Driver Training
- F. Modern Foreign Language
- G. Industrial Arts and Occupational
- H. Vocational Trade and Technical
- I. Aviation
- J. Outstanding Eminence (Replaced by TC)
- K. Eminence (Replaced by TC)
- L. Vocational Agriculture
- M. Afro-American Studies

No. SSC - "Standard Services Credential"

- A. Pupil Personnel Services
- B. Health Services
- C. Supervision
- D. Administration

APPENDIX 3

COMMITTEE OF CREDENTIALS  
 CASES ACTED ON FOR UNFITNESS OR INCOMPETENCE

	FISCAL YEAR		
	1980-81	1981-82	1982-83
1. Number of active cases	4328	4433	4902
2. Cases received for investigation	3525	2681	2726
3. Number of active cases closed administratively	2576	2257	2588
4. Number of cases sent to administrative proceedings	71	182	300
5. Number of sanction invoked			
a. Application denial	4	58	72
b. Credential suspension	19	39	67
c. Credential Revocation	54	93	90
d. Admonition for cause	-	44	142
e. Other (grants, recend action, etc.)	10	9	26
Total CTC Sactions	87	243	397
Percent increase per year		179%	63%

Sources: Eleventh Annual Report 1981-82, Twelfth Annual Report 1982-83, Commission on Teacher Credentials, Sacramento, California

PACE has sponsored several papers that deal with some of the most critical--and sometimes controversial--problems in California education. Although PACE expects and encourages the authors of its reports to draw conclusions from their analyses and make policy recommendations, PACE itself does not thereby endorse or otherwise take a position on any of the conclusions or recommendations made. Rather, our mission is to stimulate and inform productive debate over some of the more pressing problems in education. To this end, we have appended the following reaction to the present paper. Since the following pages contain frequent statements that imply PACE's endorsement of the conclusions of this paper, we would once again like to remind the reader that PACE reports do not necessarily reflect the opinion of the directors of PACE or of the William and Flora Hewlett Foundation.



APRIL 13, 1984

TO: RALPH BROTT

FR: DAVID LEVERING

RE: RESPONSE TO DRAFT OF "CREDENTIALING IN CALIFORNIA: ALTERNATIVES FOR GOVERNANCE

I THOUGHT MANY OF THE SPECIFIC CRITICISMS YOU MADE OF THE PRESENT OPERATION OF THE CTC WERE WELL TAKEN:

1. THERE IS NO QUESTION THAT THE COMMISSION PRESENTLY LACKS THE RESOURCES, BOTH IN EQUIPMENT AND STAFF, TO PERFORM THE RESEARCH AND RETRIEVAL FUNCTIONS THAT APPEAR NECESSARY TO A PROPER DISCHARGE OF THE TASKS ASSIGNED IT.

2. THERE IS SOME POSSIBILITY THAT ALTERING THE COMPOSITION OF THE COMMISSION TO CREATE PARITY OR A MAJORITY OF PROFESSIONAL REPRESENTATIVES (AS AGAINST PUBLIC REPRESENTATIVES), MIGHT HELP OVERCOME SOME OF THE IMAGE PROBLEMS YOU INDICATE.

3. THERE SURELY SHOULD BE MORE COORDINATION WITH VARIOUS SDE OFFICES AND OTHER AGENCIES (ALTHOUGH IT IS MY IMPRESSION THAT MORE COORDINATION GOES ON THAN IS ACKNOWLEDGED IN THE DRAFT REPORT),

4. WERE THE COMMISSION MEMBERS APPOINTED THROUGH THE EDUCATIONAL BUREAUCRACY RATHER THAN BY THE GOVERNOR, ONE MIGHT EXPECT GREATER CONTINUITY OF INTEREST, BUT WOULD THERE NECESSARILY BE LESS POLITICAL INFLUENCE OPERATIVE (CONSTITUENT GROUPS WOULD STILL BE INTERESTED IN TURF PROTECTION)

5. PROBLEMS OF JARGON, THE PRESENCE OF "TOO MANY CREDENTIALS," BUREAUCRATIC DIFFICULTIES OCCASIONED BY LEGISLATIVE ACTION AND VARIOUS UNFORSEEN DEVELOPMENTS WILL, I FEAR, BE WITH US EVEN AFTER THE POOR ARE GONE.

WHILE I AM GRATEFUL FOR THE ARTICULATION AND ORGANIZATION OF THE CRITICAL COMMENTS, RALPH, I AM ESPECIALLY SO FOR YOUR APPRECIATION OF THE CONTEXT OUT OF WHICH MUCH OF THAT CRITICISM COMES: "THE CRITICISMS ARE ASSOCIATED WITH MANY COMPLEX ISSUES THAT ARE SUBJECTED TO THE IMPACT OF MANY INTEREST GROUPS, CONSEQUENTLY, CRITICISM FOR ONE GROUP COULD BE PRAISE FOR ANOTHER." (PP 10-11) FURTHER, I DO NOT SEE HOW ANY OF THE CRITICISMS MENTIONED ABOVE (OR SOME OF THE OTHERS YOU MENTION WHICH I HAVE NOT DISCUSSED) WOULD BE SIGNIFICANTLY OVERCOME BY THE KIND OF STRUCTURAL CHANGE THAT IS DISCUSSED IN THE ALTERNATIVE OPTIONS PRESENTED IN THE REPORT. THE MORE GENERAL CRITICISM, WHERE STRUCTURE IS CLEARLY AN ISSUE, IS THAT OF "LEADERSHIP" (OR THE COMMISSION'S FAILURE TO PROVIDE SAME). THE MODELS YOU DESCRIBE SUGGEST TWO APPROACHES OR THEORIES IN THIS AREA.

THE FIRST IS REFLECTED IN THE PRESENT STRUCTURE OF THE COMMISSION. IT INVOLVES THE PROCESS (SLOW AND PAINFUL, TO BE SURE) OF HAMMERING OUT CONSENSUS, OF NEGOTIATING POSITIONS AMONG REPRESENTATIVES OF CONSTITUENT GROUPS THAT COMPRISE THE COMMISSION AND OTHER REPRESENTATIVES THAT HAVE ACCESS TO ITS DELIBERATIONS. AS YOU INDICATE IN YOUR DISCUSSION OF THE PRESENT ARRANGEMENT, INCREASING "MATURITY" OF THE EXISTANT MODEL MIGHT SATISFACTORILY MEET MOST OF THE PRESENT CRITICISMS.

THE SECOND APPROACH TO LEADERSHIP IS REFLECTED VARIOUSLY IN THE REMAINING MODELS, NUMBER FOUR OF WHICH, I TAKE IT, IS THE ONE YOU PREFER. INDEED, THIS MODEL DOES SUGGEST THE PROBABILITY OF GREATER "STRENGTH," BUT ONE WONDERS IF THE PURCHASE PRICE WOULDN'T BE TOO HIGH. IS IT AT ALL PRACTICABLE OR EVEN DESIREABLE TO BY-PASS CONSENSUS POLITICALLY ARRIVED AT (HOWEVER SHORT OF THE IDEAL SUCH CONSENSUS MIGHT BE) FOR A CLEAR, DECISIVE POLICY THAT DEPENDS FOR ITS IMPLEMENTATION THOSE CUT OUT OF THE FORMULATION PROCESS?

LET ME AMPLIFY THIS QUESTION BY RAISING SOME ADDITIONAL ONES IN RESPONSE TO YOUR EXPLICATION OF MODEL #4:

1. SHOULD THE STATE BOARD CONTROL POLICY AND THE SUPERINTENDENT ADMINISTER THE COMMISSION, IT WOULD SEEM POSSIBLE TO BY-PASS THE SDE BUT WHY WOULD THE COMMISSION BE EXEMPT FROM THE "WHIMS OF THE STAFF OF THE SUPERINTENDENT" ESPECIALLY IF THE DIRECTOR WERE (AS HE/SHE WOULD MOST CERTAINLY BE) AN APPOINTEE OF THE SUPERINTENDENT (I.E. STAFF)?

2. WOULD "PARTIAL" RETENTION OF INDEPENDENCE PROVIDE MUCH OF A SYMBOL? THE GAIN IN ADMINISTRATIVE STRENGTH AS A TRADE OFF FOR LOSS OF AUTONOMY SEEMS PROBLEMATIC.

3. HOW COULD THE IMAGE OF THE COMMISSION BE IMPROVED IF IT RECEIVED ITS DIRECTION, GOALS AND PRIORITIES FROM THE STATE BOARD? WOULD IT NOT BECOME, ON THE CONTRARY, MORE OF A FACELESS MECHANISM (A SORT OF APPENDIX IN THE EDUCATIONAL BODY POLITIC)?

4. WHAT GOOD WOULD ACCESS TO THE COMMISSION BE IF GOALS AND PRIORITIES WERE THE PROVINCE OF THE BOARD? WOULD NOT PEOPLE INTERESTED IN "LEADERSHIP" FIGURE THAT THE ACTION WAS AT THE BOARD LEVEL?

5. WOULD NOT CONTROL OVER THE COMMISSION BE A PYRRHIC VICTORY FOR TEACHERS? IF CONTROL AND DIRECTION WERE THE PROVINCE OF THE BOARD AND THE SUPERINTENDENT, HOW COULD TEACHERS PERSUADE THEMSELVES THAT THEY EXERTED CONTROL OVER THEIR PROFESSION?

6. HOW WOULD VESTING THE POWER OF COMMISSION APPOINTMENTS IN THE BOARD OR THE SUPERINTENDENT'S OFFICE ELIMINATE POLITICS AND AVOID DEALING WITH STATE ORGANIZATIONS? WOULD THE BOARD AND THE SUPERINTENDENT KNOW WHERE ALL THE PUBLIC SPIRITED FOLKS ARE?

7. FINALLY, TO SUGGEST THAT IN MAKING THE COMMISSION SUBSERVIENT TO THE SUPERINTENDENT AND THE BOARD IN EVERYTHING BUT THE SETTING OF STANDARDS AND EXPECT THAT SUCH A BODY WOULD PLUG LEAKS IN THE DIKE WHICH WOULD BE TOO MUCH FOR THE PARENT BODIES TO STOP--THE PRESSURE TO INSTALL SUBSTANDARD TEACHERS IN TIMES OF EMERGENCY--IS TO PUT PERHAPS EXCESSIVE CONFIDENCE IN "CONSTITUTIONALISM."

IN SUM, RALPH, IT SEEMS DUBIOUS TO ME THAT ALTERNATIVE MODELS WILL BE MORE SUCCESSFUL IN MEETING THE CRITICISM THAN THE PRESENT ONE. IT ALSO APPEARS THAT THEY SACRIFICE THE ESSENTIAL STRENGTH OF THE PRESENT ARRANGEMENT WHICH LIES IN THE AUTONOMY AND REPRESENTATIVE NATURE OF THE COMMISSION. I WOULD HOPE THAT WE MIGHT FOLLOW YOUR SUGGESTIONS IN THE DISCUSSION OF THE PRESENT MODEL: BUILD ON WHAT WE HAVE, AUGMENT ITS STRENGTHS, MINISTER TO ITS WEAKNESSES, OVERCOME ITS DEFICIENCIES, RATHER THAN LOOK FOR QUICK FIXES IN STRUCTURAL CHANGES. IT MAY BE TRUE AS YOU SAY : ON PAGE 17 THAT THE COMMISSION'S POLICY RECOMMENDATIONS MADE OVER THE PAST SEVERAL YEARS ARE "MODERATE AND DO NOT REFLECT THE DRASTIC CHANGES THAT ARE NEEDED..." BUT BE IT REMEMBERED THAT EVEN THOSE MODERATE PROPOSALS HAVE NOT BEEN ADOPTED IN TOTO. ALAS, THE CONSTRUCTION OF ROME MAY BE A PROTRACTED UNDERTAKING.

APPENDIX V

Commission on Teacher Credentialing  
State of California  
August 1984

Analysis and Critique of  
"Credentialing in California:  
Alternatives for Governance"

Prepared by:  
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Analysis and Critique of  
"Credentialing in California: Alternatives for Governance"

In March, 1984, a report entitled "Credentialing in California: Alternatives for Governance" was completed by Ralph Brott, a graduate student in education at the University of California, Berkeley. Brott's report outlined the current structure in which licenses are awarded to public school personnel, described several criticisms of this structure, and discussed the advantages and disadvantages of alternative structures. The report was sponsored by Policy Analysis for California Education (PACE), which adopted the report in April.

The present paper provides an analysis and critique of the PACE report by the Commission on Teacher Credentialing. The Commission is the chief subject of the PACE report, and is grateful to PACE for the opportunity to respond to it. This paper attributes several of Mr. Brott's findings and proposals to PACE for the sake of brevity; the Commission recognizes that the PACE directors do not necessarily endorse Mr. Brott's analyses or recommendations. The paper treats the same topics as the PACE report: (1) the present structure, (2) criticisms of the Commission, and (3) alternative structures.

The Present Structure

In three pages, the PACE report provides a succinct overview of the present structure for licensing public school practitioners. For the most part, this portion of the report is accurate and balanced. However, one important function of the present structure is overlooked, and another vital function is distorted.

Overlooked is the use of examinations in licensing teachers and specialists. Under state law, the Commission administers the California Basic Educational Skills Test (CBEST), and uses twenty-two standardized tests of subject matter competence. Examinations of bilingual competence are also administered to teachers, and additional examinations of bilingual competence are being

developed by the Commission. Approximately 100,000 persons have taken these exams during the past two years, so the Commission's use of examinations should have been included in the PACE report's overview of the current structure.

The report also distorts the mechanisms of quality control in teacher licensure. When the Commission evaluates programs of professional preparation, its evaluators investigate the quality of programs by interviewing candidates, supervisors, recent graduates and their employers in the schools. The evaluators ask questions like, "How well do graduates of this program manage student activities in K-12 classrooms?" If the evaluators determine that candidates in a program do not become competent practitioners, the Commission either terminates the program or obligates the university to improve the program within one year. The PACE report distorted the current licensing system by stating that "program review focuses on processes within teacher training institutions and not on the quality of performance of its graduates" (page 7).

On the question of quality assurance, the report contradicts itself. It begins with the overgeneralized conclusion that "the CTC does not assure the quality of teachers" (page 6), but then goes on to say that "the only assurance of quality is that a candidate has completed an 'approved program' at a teacher training institution" (page 7). Under the law, in fact, quality assurances are provided by all of the statutory requirements for earning a credential: (1) possession of a baccalaureate degree from an accredited institution; (2) passage of the CBEST exam; (3) passage of a subject matter exam or its waiver; and (4) completion of a professional preparation program whose quality is periodically evaluated by the Commission. Of course, many readers would conclude that these quality assurances are inadequate. But all readers deserve to find in the report an accurate and complete presentation of existing assurances of teacher quality.

#### Criticisms of the Commission

Seven pages of the PACE report identify the criticisms that some observers have leveled at the Commission. Generally, the author reports these criticisms

carefully and judiciously. The Commission has long acknowledged some of the criticisms, has successfully overcome many problems that existed in years past, and has sought relief from some of the conditions that cause the agency to be less than fully effective. The following paragraphs provide responses to some of the criticisms, and identify several significant problems that the Commission would like to resolve. First, however, some defects in the PACE report need to be addressed.

The author of the report apparently interviewed four members of the Commission, four members of the Commission staff, and fifteen unaffiliated observers of the Commission. He also attended several Commission meetings. As a result of attending the meetings and interviewing Commissioners and staff members, "the author found some opinions (of the critics) were based on incorrect interpretations or upon impressions made in past years that do not reflect current policies and practices" (page 10). However, the report does not indicate which criticisms are well founded, or which ones are poorly founded.

Moreover, readers of the PACE report are denied the opportunity to fully evaluate the information because the criticisms are not "attributed to any one individual or group" (page 10). Citizens who are concerned about teacher quality have a legal right to know how individual Commissioners vote on policy issues. Don't they also deserve to know the sources of criticisms of the Commission, its practices and policies? To cite allegations without citing sources is a characteristic of poor research in any discipline of inquiry.

The report states the allegation that "credentialing is too bureaucratic and burdensome" (page 10), but does not adequately put this criticism in context. The "170 different kinds of credentials" that the Commission issues have been established by a succession of state laws during the past thirty years. The period when "regulations were changing so frequently that few people knew what they were" (page 11) occurred before the Commission was established, when teacher licensing was a function of the State Department of Education. The report does not mention the laws that prescribe the Commission's regulatory procedures, which make credentialing more



bureaucratic than any other factor. The Commission would welcome a measure of relief from these procedures that are required by state laws.

The report also states the allegations that "there are too many (kinds of) credentials," too many loopholes in licensing laws, and the language of teacher licensing ("credentialese") confuses many observers. Regarding the number of different credentials, the Commission agrees that

one reason for the number is that each job description requires different, and often specific, training. Credentialing ensures that the training has taken place. Specific credentials also prevent misassignment. Districts are restrained from assigning personnel to areas for which they are unqualified. In theory, at least, teachers cannot teach special education or become counselors without proper credentials. The Fisher and Ryan credentials also attempt to restrict teachers to their area of academic preparation (page 11).

The number of credentials is a result of the efforts of specialty groups in education; attempts to reduce the number will inevitably contend with these groups.

The Commission also agrees that "the common practice of letting substandard teachers into the classroom" is "one of the most demoralizing features of credentialing" for teachers (page 11). The Commission would welcome inquiries into the reasons "why districts cannot attract teachers" (page 12), and has sponsored legislation to raise the legal standards for emergency certification. Similarly, the Commission has sought to clarify the language of licensing laws, in order to make that language more consistent and comprehensible. The agency is therefore comfortable with the PACE report's treatment of the number of credentials, loopholes and "credentialese."

The report states several allegations about the quality of Commissioners as policymakers. Perhaps "a few members have neither the inclination nor the time to learn or keep up with the quantity of work that the Commission requires" (page 14). However, to provide a balanced picture, readers should also be informed that many Commissioners are motivated by a desire to serve the general public, and that conscientious Commissioners spend great amounts of time becoming well informed about teacher preparation and certification issues.

PACE suggests that "the Commission is too large to conduct business properly" (page 12). Perhaps the number of seats on the Commission would prove to be too large if all of the existing seats were occupied for a period of time. In reality, however, vacant seats have always existed because the gubernational appointive process has been slow. As a result, the number of "filled" seats has rarely exceeded sixteen, and often remains at twelve or fourteen for extended periods of time. As long as the appointive process moves slowly, a reduction in the number of seats could leave important constituencies unrepresented for months at a time.

According to the PACE report, the Commission's resources "are insufficient to carry on research, investigative and enforcement functions with reasonable effectiveness" (page 13). The agency's effectiveness would be enhanced substantially by augmentations to its research staff, facilities and funding, because "the research staff is restricted by its small size, limited computer capability, and its other duties" (page 13). The report accurately characterizes these existing constraints, but does not mention any of the research studies that the Commission has conducted in spite of the existing constraints. Studies of subject matter preparation, pedagogical preparation, the beginning years of teaching, ongoing professional development, teacher supply and demand, and the licensing policies of other states and professions are a few examples. These and other studies have been conducted by staff members who were also responsible for evaluating programs, overseeing examinations, and planning agency goals and activities. A balanced treatment of the Commission's research capability would have included this information. The report leaves readers with a mistaken impression that the Commission collects no data and conducts no policy research.

PACE states that "there is no coordination of research and curriculum efforts between the CTC and other educational agencies," and "there are no links between the Commission's data base and the State Education Department's management information system" (page 13). In fact, several research and curriculum efforts have been conducted collaboratively by the CTC and the Education Department. In one of these, the CTC utilized SDE curriculum data to modify the subject matter preparation of prospective secondary teachers. A cooperative study of teacher supply and demand, and participation by CTC

staff in designing the licensure element of the SDE's "management information system," are two further examples of collaborative research and curriculum efforts. Overall, the CTC and SDE have collaborated on more than thirty inter-agency projects since 1980 alone. A more balanced report would conclude that efforts to coordinate the activities of state education agencies need to be strengthened, not that such efforts do not exist.

The report also alleges that "the Commission has not determined major goals or priorities," fails "to address major policy issues," and "does not exercise leadership in teacher education" (pages 13-14). It is true that the agency spends time adopting guidelines and regulations to administer state laws, and that the Commission's regulatory, administrative responsibilities consume much of its attention. It is also clear that the mundane decisions of statewide policy require extensive deliberation when they are the product of consensus among several policymakers. In spite of these conditions, however, the Commission has set long range goals for itself, regularly prioritizes its many commitments and plans, often confronts and resolves major policy issues, and occasionally exerts leadership in professional affairs. Even the PACE report acknowledges that "the Commission has attempted some leadership in promoting its own reform legislation for the past three years" (page 14). But, the author continues, "the (proposed) reforms arguably do not reflect the drastic changes that are needed ..." Perhaps the critics and the author would like the Commission to pursue different goals, priorities, policies or leadership directions. It is misleading, though, to allege that the Commission has no goals, priorities, policies or leadership functions.

PACE reports that "the Commission is ... too responsive ... and attempts to satisfy everyone" (page 14). Also, much of the Commission's information comes from selected groups and individuals, so Commissioners are unduly influenced by special interests and "the Commission is unable to assert itself with resolve" (page 15). The Commission believes that consensus building is a slow process that is likely to yield effective policies because of the involvement of people who are affected by the policies. However, the process also frustrates many observers, who would like policymakers to settle issues quickly and resolutely, particularly when the resulting policies coincide with the critics' preferences. In the course of the consensual process, it is legitimate for special concerns

and interests to be expressed to Commissioners. The Commission adopts many policies, but few of its policies satisfy all individuals and groups who express special interests and concerns. The PACE report misleadingly suggests that the Commission is paralyzed by its sensitivity and responsiveness to interests and concerns whose legitimacy is suspect.

Finally, the PACE report describes "the problem of communication with local levels" (page 15). However, the Commission's efforts to communicate credential requirements to applicants, colleges, universities and school districts are not mentioned. As a result, the report leaves the mistaken impression that the communication problem exists because of Commission negligence, not in spite of the Commission's many dissemination efforts.

Overall, the Commission acknowledges that significant problems characterize teacher preparation and licensing. Readers of the PACE report deserve to learn about the underlying sources of these problems, and the contexts in which they exist, as well as the Commission's many efforts to overcome the problems. Unfortunately, the report's incomplete and unbalanced treatment of the problems (1) misleads readers and (2) led the author to propose solutions that would not be effective in solving the existing problems.

#### Alternative Governance Structures

In seven pages, the PACE report discusses the advantages and disadvantages of four alternative structures for governing the state's licensure function. The first of these alternatives is the existing structure. In the three remaining structures, the licensure function would be moved to the State Board of Education, the State Superintendent of Public Instruction and the State Department of Education. These three structures vary in the extent to which the SBE, the SSPI and the SDE would control licensing. Because of their inherent similarities, the three alternative structures are treated together in the following analysis.

The report states the many reasons why California should retain an independent licensing agency like the present Commission. "The current independent Commission is a status symbol for teachers;" to weaken it would send a demoralizing signal to teachers.

The accessibility of the Commission by interest groups and individuals is considered one of its most positive attributes. Placing the Commission in a situation where opinions concerning policy cannot be fully expressed may be counterproductive. The maturity of the CTC may be approaching a point at which it can itself productively address some of the major policy issues that confront the profession (page 16).

PACE also suggests several significant "steps (that) could be taken to strengthen and expand (the Commission's) authority" (page 17). For example, "mechanisms for funding and coordination could be provided to make the research, enforcement and curriculum activities more effective," and "provisions could be made for expanded computer capabilities with the State Education Department's management information system" (page 17). The Commission strongly believes that these measures and other needed changes would alleviate and resolve many of the problems of teacher licensing in the state.

On the other hand, the report misinterprets the disadvantages of the present structure. The author acknowledges that "a portion of the opposition (to the Commission) is irrational in nature," that many critics have "attitudes almost impossible to reverse," and that "the Legislature's poor opinion of the Commission prevents delegation of more discretionary power" (page 17). In spite of these caveats, the report suggests that "strengthening the independent Commission is improbable, even if it makes sense from a public policy point of view" (page 17). The conclusion is a "Catch-22" because no matter how well the public and the profession would be served by a strengthened Commission, the author chooses to be dissuaded from this course by the "irrationality" of the critics.

The report's treatment of alternative structures is also seriously flawed. The author favors a shift of licensing authority to the State Department of Education in spite of the irresistible disadvantages of such a shift. In the State Department, teacher education and licensing "would be submerged within a large bureaucracy which does not now have a reputation for being responsive or efficient" (page 19). The policymaking body would "lose some of its accessibility," and

the high visibility and status that credentialing presently enjoys as an independent Commission would be lost. Like before the Ryan Act, the State Board would be unable to devote the necessary time to the complex issues and details associated with credentialing. Additionally, the need for the board to become educated on credentialing issues would, at least initially, weaken this structure. Although returning credentialing to a bureau (in the SDE) may appear attractive, important functions would be reduced or eliminated. Analyzing the myriad of proposed and enacted legislation, holding public hearing (sic) on proposed regulations, analyzing the implementation of programs, and attempting to accommodate various interest group (sic) are just a few such activities. All are complex and time consuming and must be performed on a continuing basis (page 18).

The Commission strongly believes that the public and the profession cannot afford to pay these costs of abolishing the independent licensing agency.

PACE, however, would apparently have the state pay these costs. And for what advantage? Perhaps the most striking feature of the report is the likelihood that the proposed solution to the problem would not accomplish its stated purposes. According to the PACE report, the immediate purpose of shifting the certification function to the State Board of Education would be to enable the Board to "define major policy issues to be addressed, and provide goals and priorities" for the Commission to pursue (page 20). Eventually, the long range purpose would be to enable the Commission to exert leadership in teacher education. "The Commission would be strengthened, act with resolve, improve its image, and over a period of time, gain the confidence and respect of the profession and the Legislature" (page 20). In fact, PACE's purposes would not be realized: it is inherently contradictory to expect the Commission to follow the Board's priorities and exert leadership in the profession. The Commission's constituents would know that key decisions were being made by the Board, not the Commission, which would weaken the image of the Commission in the profession, in teacher education, and among the concerned public. PACE would have the Commission (1) lead and (2) follow at the same time, which could not work effectively because the two expectations are contradictory.

Other contradictions occur in the proposal to make the Commission an "adopted stepchild" of the State Board. The report proposes a structure in which "the

State Board of Education would control and direct the Commission" (page 20), in spite of the earlier observation that

under the Superintendent, the policy would be coming from one person rather than from one policymaking body to another. Chances would be greater for goals and priorities to be articulated more clearly (page 20).

Why does the report settle for a structure in which goals and priorities would not, by its own account, be articulated clearly?

Similarly, PACE expects that "the Commission would be free of the struggles of the State Education Department and the whims of the staff of the Superintendent" (page 20). But "the Superintendent would be directly responsible for the administration and implementation of policy," and "the Superintendent or his appointee would act as the Executive Director" (page 20). Once the Commission's staff was placed in the State Department of Education, licensing policies and actions would inevitably be subject to the struggles and whims of the larger organization; it is unrealistic to expect otherwise.

PACE claims that under the State Board's control and direction "the Commission would respond to the larger aims and goals of state educational policy rather than reacting primarily to interest groups and the Commission's staff" (page 19). Would the State Board be immune from the pressures of constituent organizations or SDE staff members? To the contrary, "interest groups and individuals would move the political process to the State Board" (page 18). One fails to see how the proposed structure would insulate policymaking from political pressures.

The report also proposes that "appointments of the Commissioners could be made by the State Board of Education or the Superintendent. Presumably, either party would make appointments more intensely in the interest of education than the Governor" (page 21). But the author provides no rationale or evidence for this presumption. What is its basis?

The author admits that "the State Board and the Superintendent are vulnerable to (the) political influence (of) school districts (which) may exert pressure to lower standards ... in times of teacher shortages or in areas where working conditions are poor" (page 21). To counteract this political vulnerability of the Board and the Superintendent, PACE recommends that "the Commission should

have a strong and decisive mandate to accept policy direction from the State Board with the exception of diluting professional standards" (page 21). According to this proposal, Commissioners would be appointed by the Board or the Superintendent, and would accept policy direction from the Board or Superintendent. When the Board or Superintendent directed the Commission to dilute professional standards, however, the Commission would be required to resist the mandate of the appointive power. The improbabilities of such resistance seem obvious, but if the Commissioners were to conflict with the appointive authority over a policy directive, who would arbitrate the dispute? The courts? The Legislature? The Governor? Or the public at large?

Finally, PACE argues that

teachers should have more participation in the setting of standards, the design of training programs, and control of entry into the profession. Generally, teachers have been advocates of higher standards and keeping sub-standard teachers out of the classroom. Under the present structure, practitioners are a minority on the Commission on Teacher Credentialing and believe that they should have more control of their profession (page 21).

To accomplish this change, the report proposes to make the Commission subservient to the State Board, on which "the public interest (is) represented."

Then, by reducing the public members and possibly a school board member, the composition (of the Commission) could be changed to give practitioners a majority ... With practitioners controlling standards and entry, the profession would be greatly enhanced (page 21).

But would practitioners actually control standards or entry if the Commission's policies and practices were "controlled and directed" by the State Board, whose members do not necessarily include any practitioners? The proposal would more likely be a "net" loss in the extent of self-governance by the profession.

On the one hand, then, the PACE proposal would fail to accomplish its purposes. At the same time, the recommended solution would bear costs that the report accurately states: licensing matters



would be within the mass of State Education Department bureaucracy. The access that individuals and interest groups currently have would be drastically reduced or lost. Moreover, interest groups and individuals would move the political process to the State Board, a process that is currently venting itself at the Commission. Also, the high visibility and status that credentialing presently enjoys as an independent Commission would be lost. Like before the Ryan Act, the State Board would be unable to devote the necessary time to the complex issues and details associated with credentialing. Additionally, the need for the board to become educated on credentialing issues would, at least initially, weaken this (proposed) structure (page 18).

Overall, then, the PACE report acknowledges the significant costs and negative consequences of its preferred structure, but does not convincingly demonstrate that the proposed structure would accomplish its stated purposes.

#### Conclusion

The Commission on Teacher Credentialing welcomes the interest and concerns of policymakers at all levels in statewide licensing issues. The governance of teacher certification is a matter of significant importance to the schools, the public and the teaching profession. The Commission believes that researchers and policy analysts should examine alternatives to the present governance structure. Alternatives to (1) the present size and composition of the Commission, (2) the mechanism by which Commissioners are appointed, and (3) the agency's statutory links to other state agencies, must be examined. At the same time, the research resources, fiscal stability and policymaking authority of the governing agency must be strengthened so the public welfare can be served most effectively. The Commission is therefore disappointed that the PACE report critiqued the present structure incompletely and misleadingly, and that its proposed solution would bear significant costs and losses while failing to achieve its own purposes and goals. The Commission urges PACE and other policy analysts and authorities to consider and pursue other alternative paths to a stronger, more effective structure for governing the preparation and certification of professional educators.

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