



June 23, 2025

Commission on Teacher Credentialing
651 Bannon St., Suite 600
Sacramento, CA 95811

RE: June CTC Agenda Item 3A: Assignment Monitoring: System of Identification, Support and Improvement

Dear Chair Marquita Grenot-Scheyer and Commission Members:

On behalf of the California School Boards Association (CSBA), which represents nearly 1,000 school districts and county boards of education statewide, we write to provide our comments in response to Item 3A.

We want to first thank the Commission on Teacher Credentialing (CTC) staff for reaching out to our organization to request our input and feedback on the proposed regulations. The current and unprecedented teacher shortage school districts and county offices of education face today are substantial and require thoughtful and responsive approaches to addressing this crisis. CTC staff have been earnest in this effort, and we appreciate their work.

Regarding the item, we remain significantly concerned about the basis and approach the CTC is taking to address the misassignment of teachers and believe that further research, evaluation and assessment are needed before any formal action is taken. Paramount to any approach in addressing this or any derivative associated with the state's educator staffing shortages are greater evaluation, data and assessment.

Any effort to address this issue must recognize the staffing challenges facing school districts and county offices of education, which must include recognition of the real-time challenges our local educational agencies face in recruiting and retaining a qualified workforce. This is most evident with our small school districts (defined as 2,500 ADA or less) and in special education classes.

In response to Item 3A, CSBA urges the following:

- **Table the current item until additional qualitative information is made available to commission members.** As noted in our April 17 letter on April Item 5B, CTC is assessing this issue based upon quantitative data only. Nowhere in this item is the commission informed as to the reasons why a local educational agency (LEA) may have misassigned teachers, whether it is due to the current and unprecedented teacher shortage, or whether there are any unique or unpredictable challenges they may be facing. The item does not identify the number and nature of LEAs that could be subject to these regulations.

Using only quantitative data does not provide a clear picture, nor does it give the commission an understanding of whether the proposed sanctions will be effective in addressing the root causes of teacher misassignment.

The item also does not provide a potential list of LEAs that would be identified under the proposed regulations. This further speaks to our concerns that this approach does not consider the circumstances and reasons why a LEA may have misassigned teachers. Without this information, the commission and the public are not provided with the opportunity to better understand how the regulations will impact LEAs and what additional contextual information is needed to make an informed decision.

Responsive governing requires a thorough and thoughtful collection of data – both quantitative and qualitative to ensure that accountability decisions are rooted in positive and helpful outcomes for LEAs rather than taking a compliance oriented and interventionist approach. Doing so helps to ensure that the state is taking positive and productive actions to assist LEAs.

- **The regulations fail to acknowledge types of school districts, especially whether they are a small school district.** Small school districts face unique challenges different than their medium and larger counterparts, where the regulations could inadvertently impact small school districts disproportionately. In many cases, just one or two misassignments of teachers could automatically trigger a small school district into the third tier of sanctions. The regulations must consider the size and type of the district.
- **The use of one charter school as the impetus for this action does not match sound policy reasoning to apply it statewide.** We continue to remind the commission that this approach was born from the 2024-106 Highlands Community Charter and Technical Schools report from the California State Auditor. There are 58 county offices of education and nearly 1,000 school districts in California. A singular audit focused on one charter school is being used as the policy basis to implement corrective actions statewide without greater consideration of the circumstances and challenges facing school districts and county offices of education across the state.

In sum, we do not believe that the regulatory package is ready for submittal to the Office of Administrative Law for final consideration. It should also be noted that once submitted, there is not much opportunity for significant adjustments. The opportunity to make needed adjustments sits with the commission.

We appreciate the work of CTC staff and of the commission on this issue and urge the commission to table this item to allow for further data and information collection to occur

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to allow for a more informed and robust discussion about what school districts and county offices of education need.

If you have questions regarding our recommendations, please do not hesitate to contact me at creefe@csba.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Reeve". The signature is fluid and cursive, with the first name "Chris" and last name "Reeve" clearly distinguishable.

Chris Reeve

Legislative Director

Office of Governmental Relations