



December 4, 2023

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Dear Commissioners,

The California Teachers Association (CTA) trusts university faculty, supervisors, and practicing mentors to develop and support aspiring educators. We trust the evidence generated by the activities they facilitate—preparation coursework and assessment, structured improvement cycles, and training in real classrooms—to serve as the basis for Program Sponsors to recommend candidates for credentials. We know through our past surveys of members that the EdTPA and CalTPA are harmful, high-stakes, standardized assessments of low preparatory value that undermine the activities of high preparatory value mentioned above. We have heard our members clearly that the EdTPA and CalTPA damage the mental health and well-being of aspiring educators. We know the harmful consequences of the EdTPA and CalTPA are disproportionately borne by candidates of color. Consequently, we echo New York, New Jersey, Washington, Georgia, and Wisconsin and call for the elimination of high stakes, standardized, performance assessments like the EdTPA and California variant, the CalTPA/CalAPA. For more information on this position, including supporting survey data and open-ended responses from 1,284 CTA members, [please see our letter](#) in response to Agenda Item 2C: Annual Report on the Commission Approved Teaching and Administrator Performance Assessments from the October 2023 Commission Meeting.

We appreciate the responsiveness with which Commission staff has sought to address the issues raised regarding the CalTPA and EdTPA during the October 2023 meeting. Item 2D shows progress, but it does not go far enough to bring the current implementation of the performance assessment requirement into alignment with California Education Code section 44320.2. It does not go far enough to clarify the flexibility available to Program Sponsors to consider a complete picture of candidate readiness as the basis for a recommendation for a credential. While Item 2D clarifies the performance assessment requirement need never have functioned as a single point of denial for candidates to be recommended for a credential (high stakes), it does not go far enough in the manner it proposes extending available flexibilities allowed by law retroactively to start of centralized scoring.

CTA urges Commissioners to expand the framing of the problem described in Item 2D beyond the adoption of a Standard Error of Measurement and consider the real human costs involved for candidates who sacrificed their time, forwent earnings and

alternate opportunities, and invested tens of thousands of dollars only to be denied the recommendation for a credential based solely on EdTPA or CalTPA scores. We urge Commissioners to expand the scope of recommendations under consideration to address the problem. We urge Commissioners to take bold, immediate action to ensure the harm done is corrected and mitigated to the maximum legal extent possible moving forward. We remind Commissioners that the choice to implement the performance assessment requirements in a high-stakes manner has—as demonstrated by data from the Commission’s Annual TPA Reports—disproportionately harmed candidates of color and, by extension, California students who would benefit from their service and affinity.

We present here recommendations for bringing current implementation of the Performance Assessment requirement into full alignment with California Education Code, recommendations to redress the harm done to teacher candidates unnecessarily denied credentials, and our recommendations related to the structure and charge of the Performance Assessment Work Group.

“I attempted the TPA during student teaching during the pandemic. I was observed 12 times during the semester, which was stressful but yielded high results because I could reflect immediately and apply new strategies in the next lesson. The TPA doesn't offer that same cycle of reflection. I was attempting to complete too many things, and it was very overwhelming to ask me to take the TPA as well. My health suffered as well as my personal and family time.” -[CTA TPA Survey](#)

Current Implementation of the EdTPA and CalTPA and California Education Code section 44320.2

The current implementation of the performance assessment requirement is misaligned with California Education Code in numerous respects:

- **Education Code section 44320.2(c)** requires that “A candidate shall be assessed during the normal term or duration of the preparation program of the candidate.” However, in practice, many teacher candidates who have fulfilled all other credential requirements must continue to retake the EdTPA or CalTPA/CalAPA beyond the normal term and duration of their preparation program. **We urge Commissioners to ensure that no candidate is required to take a performance assessment beyond the normal term and duration of their preparation program.**
- **Education Code section 44320.2(e)(1)** explicitly states that “The performance assessment shall be designed to provide formative assessment information during

the preparation program for use by the candidate, instructors, and supervisors for the purpose of improving the teaching knowledge, skill, and ability of the candidate.” However, as implemented, the EdTPA and CalTPA/CalAPA primarily function as high stakes *summative* assessments with no apparent regard for their formative value. The [CTA TPA Survey](#) data shared during the October 2023 Commission meeting indicates that most credentialed teachers who took the EdTPA or CalTPA/CalAPA experienced no formative benefit. More accurately, the survey responses show candidates experienced a *negative* formative benefit, as the performance assessments undermined other valuable preparation activities. **We urge Commissioners to ensure that performance assessments serve a primarily formative role and are blended into preparation programs without undermining the professional expertise and agency of college faculty.**

- **Education Code section 44320.2(e)(2)** includes provisions that performance assessment results “...may serve as one basis for a recommendation by the program sponsor that the commission award a teaching credential to a candidate who has successfully met the performance assessment standards.” In reality, the TPA acts as an absolute gatekeeper; candidates who do not pass are effectively barred from recommendation for a credential. The Commission’s Item 2D clarifies that the law allows Programs Sponsors flexibility to use multiple measures such as observations, coursework, and other embedded assessments to demonstrate classroom readiness for those who do not initially meet the performance assessment standard. We see nothing in Education Code section 44259(b) or § 44320.2, including § 44320.2(d)(5), which requires the Commission adopt a secondary passing score to activate this flexibility for Program Sponsors. **We urge Commissioners to ensure that no candidate is required to retake an EdTPA or CalTPA/CalAPA and to direct Program Sponsors to address needed areas for growth and document improvement with local readiness measures without any requirement that the candidate score within a specific standard error of measurement.**
- **Education Code section 44320.2(e)(3)** indicates that performance assessment results may inform Individual Induction Plans (IIP). Under current practice, if a candidate has not met the standard for satisfactory performance on a performance assessment, they cannot be recommended for a credential based on the totality of readiness measures while flagging areas for continued development through the IIP. **We urge Commissioners to ensure that Program Sponsors have the right to exercise their professional judgment to recommend candidates for credentials who have met all other credential requirements but still need to address areas of**

growth identified by the performance assessment beyond the normal term and duration of their preparation program.

“Personally, there were multiple emotional breakdowns while completing the TPA, as I had to write detailed lesson plans for my program, attend classes, meet with mentor teachers, meet with supervisors, teach a full day, and then also work part-time so I could pay my rent and bills. The amount of work the program already required took the majority of time, and the added stress of writing the TPA caused me to miss work shifts which led to additional stress over the lack of finances I had. The stress and lack of money got so bad the other teachers in the department gave me a tote full of groceries so I could at least bring a lunch.” -[CTA TPA Survey](#)

Recommendations for Alignment with California Education Code section 44320.2

We offer the following specific recommendations to bring current implementation of the performance assessment requirement into stronger alignment with California Education Code section 44320.2.

1. Eliminate centralized scoring immediately and direct Program Sponsors to implement performance assessment tasks locally in a way that is formative, ongoing, and blended into teacher preparation programs. EC § 44320.2(e)
2. For candidates that have already taken an EdTPA or CalTPA/CalAPA, or during any elapsed time required to eliminate centralized scoring, provide guidance for Program Sponsors that:
 - a. No candidate shall be required to retake or revise performance assessments beyond the normal term or duration of their preparation program. EC § 44320.2(c)
 - b. No candidate shall be required to retake the EdTPA or CalTPA/CalAPA and programs must instead use the information formatively for the purposes of improving the knowledge, skills, and abilities of candidates. EC § 44320.2(e)(1)
 - c. No candidate shall be denied a credential based solely on EdTPA and CalTPA/CalAPA scores. EC § 44320.2(e)(2)
3. In the cases where candidates do not meet the standard for satisfactory performance through a performance assessment, programs are to document where a candidate has met the standard through the additional measures as described in Item 2D.

4. Where a candidate does not meet the standard for satisfactory performance through a performance assessment or additional measures, the program is to exercise their judgment as to whether the areas of needed growth can be met as part of the individual induction plan as described in EC § 44320.2(e)(3) or if a denial of a recommendation for a credential is warranted.

“TPA created stress in my personal life. Strain in my marriage and my work relationships. The CalTPA pushed me into counseling and anti-anxiety medication.”

-[CTA TPA Survey](#)

Recommendations to Redress Harm Done to Affected Candidates

We offer the following specific recommendations to address the harm done to candidates, extending back to the beginning of centralized scoring, who completed all other credential requirements but were ultimately denied a credential based solely on EdTPA or CalTPA/CalAPA scores.

1. Immediately direct Program Sponsors to notify all candidates who completed all credential requirements but were denied a recommendation for a credential based solely on performance assessment results (affected candidates) that they will be recommended for a credential and the recommendation will be approved by the Commission.
2. Direct and support Program Sponsors to work with Local Education Agencies (LEA) to identify certificated job placements for affected candidates.
3. Direct and support Program Sponsors and LEAs to co-create an IIP with affected candidates, to address any areas for continued growth identified by the performance assessment, and ensure the assignment of a mentor teacher to support the candidate through clearing their credential. Further ensure that affected candidates are provided consultation with their bargaining unit representatives to apprise them of their rights.
4. Establish an accountability system for identifying all affected candidates, ensuring they have been affirmatively contacted and apprised of their right to be recommended for a credential. Track their placement with an LEA, document and review their IIP, and track their progress through the clearing of their credential. Require Commission staff report back to Commissioners regularly on this accountability system. All data collected as part of this system should include the race and ethnicity of affected candidates for the purposes of transparent, disaggregated reporting.

Recommendations for the Performance Assessment Work Group

We offer the following specific recommendations to help ensure the Performance Assessment Work Group (WG) produces a plan for action by Commissioners by the June 2024 meeting.

1. Ensure the majority of WG members are classroom teachers and ensure that a majority of all WG members have completed a performance assessment in fulfillment of a credential requirement, or directly supported candidates to complete a performance assessment. The WG should also include administrators, teacher candidates, and professors who actively teach preparation courses for candidates.
2. At least half of the WG members and Commission staff who support the WG should be Black, Indigenous, and/or People of Color (BIPOC).
3. The WG should have an explicit charge to develop recommendations for the implementation of the performance assessment requirement in accordance with the law, including provisions that any performance assessment:
 - a. Take place during the normal term and duration of a prep program. EC § 44320.2(c)
 - b. Be ongoing and blended into the preparation program. EC § 44320.2(e)
 - c. Function formatively. EC § 44320.2(e)(1)
 - d. Work as part of a system of multiple measures. EC § 44320.2(e)(2)
 - e. Allow areas of needed growth to be addressed during induction. EC § 44320.2(e)(3)
4. The WG should also be charged with identifying root causes that inhibited innovation in the development of local performance assessment alternatives as allowed in statute, including a review of the assessment quality standards.
5. Pearson Evaluation Systems should be fully excluded from all WG meetings and processes.
6. The WG timeline should be accelerated so that the recommendations are available for action by Commissioners during the June 2024 Commission meeting. The timeline and activities for the WG should be presented to Commissioners during the February 2024 Commission meeting and a report on the Work Group's progress should be presented to Commissioners during the April 2024 Commission meeting.

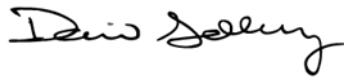
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7. The Commission should work collaboratively with representatives from Institutes of Higher Education, employer groups, labor representatives, and staff from relevant state agencies and research institutions to ensure transparency of the WG process and for the purposes of coordinating other priorities and initiatives in educator recruitment, development, and retention.

The California Teachers Association stands ready to help ensure that the harm done to candidates, disproportionately candidates of color and the students that would have benefited from their affinity and service, is discontinued, redressed, and fixed for future aspiring educators.

A handwritten signature in black ink that reads "David Goldberg". The signature is written in a cursive, flowing style.

David Goldberg, President
California Teachers Association

C: CTA Executive Officers

Teri Holoman, Associate Executive Director, CTA Governmental Relations

Lori Easterling, Manager, CTA Legislative Relations

Commissioners, California Commission on Teacher Credentialing

Mary Vixie Sandy, Executive Director, California Commission on Teacher Credentialing

CTA Liaisons to the California Commission on Teacher Credentialing

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