



# CODED CORRESPONDENCE

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**DATE:**

January 10, 2025

**NUMBER:**

25-01

**TO:**

All Individuals and Groups Interested in the  
Activities of the Commission on Teacher  
Credentialing

**FROM:**

Mary Vixie Sandy  
Executive Director  
Commission on Teacher Credentialing

**SUBJECT: Proposed Amendments to Title 5 of the California Code of Regulations Pertaining  
to the Child Development Associate Teacher Permit**

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**Summary**

The Commission on Teacher Credentialing (Commission) proposes to take the regulatory action described below after considering all comments, objections, and recommendations regarding the proposed action. A copy of the proposed regulations is included with the added text underlined and the deleted text lined out.

**Notice of Public Hearing**

The Commission has not scheduled a public hearing on this proposed action. However, the Commission will hold a hearing if it receives a written request for a public hearing from any interested person, or their authorized representative, no later than 15 days before the close of the comment period.

**Written Comment Period**

Any interested person, or his or her authorized representative, may submit written comments relevant to the proposed action by fax, through the mail, or by email. The written comment period closes on February 27, 2025. Comments must be received by that time or may be submitted at the public hearing, should one be requested. Interested parties may fax their response to (916) 327-3165; write to the Commission on Teacher Credentialing, Attn: Christina Villanueva, Commission on Teacher Credentialing, 651 Bannon Street, Suite 601, Sacramento,

CA 95811; or submit an email to [Christina.Villanueva@ctc.ca.gov](mailto:Christina.Villanueva@ctc.ca.gov). Alternatively, contact [Mika.Laidler-Rubio@ctc.ca.gov](mailto:Mika.Laidler-Rubio@ctc.ca.gov).

Any written comments received by the closing of the public comment period will be reproduced by the Commission's staff for each member of the Commission as a courtesy to the person submitting the comments and will be included in the written agenda prepared for and presented to the full Commission at the hearing.

### **Authority**

Education Code section 44225(q) authorizes the Commission to adopt the proposed regulations and amendments.

### **Reference**

Education Code §8301.5

### **Information Digest/Policy Statement Overview**

#### *Summary of Existing Laws and Effect of the Proposed Action*

The Commission issues six levels of Child Development Permits (CDP), which authorize the holder to provide service in the care, development, and instruction of children in childcare and development programs. Renewal of the Child Development Associate Teacher Permit currently requires the holder to complete 15 semester units toward earning the Child Development Teacher Permit, and the permit may only be renewed one time. The intent of both parameters is to encourage holders to advance to the next permit within 10 years. However, if these requirements are not met, the Associate Teacher permit expires. In this case, qualified Associate Teacher permit holders who could be providing instructional support in programs at an Associate Teacher level are not able to maintain their Associate Teacher positions. The Associate Teacher permit is the only Child Development permit that requires college coursework instead of 105 hours of verified professional growth to renew. Additionally, this is the only Child Development permit that has a limitation on the number of renewals the Commission can grant. These proposed regulations remove the restrictions on the number of renewals for the Child Development Associate Teacher permit and allow the holder to submit verified hours of professional growth to renew a permit, establishing uniformity across all six permit levels.

#### *Anticipated Benefits of the Proposed Regulations*

The legislature determined that these changes are needed in current regulations in order to address staffing shortages in early learning and care programs. Associate Teachers provide important support in classrooms and critical care for children. Allowing educators to renew their permits without a limitation on the number of renewals is intended by the Legislature to contribute to retaining valuable staff. This change will enable individuals currently working at the level of an Associate Teacher to continue serving in their positions. Removing the restrictions on the Child Development Associate Teacher permit renewals will allow employers to retain staff, and for experienced CDP Associate Teachers to continue to serve our children without the requirement to complete additional education coursework.

*Determination of Inconsistency/Incompatibility with Existing State Regulations*

The Commission has determined that the proposed regulation amendments are not inconsistent or incompatible with existing regulations. After conducting a review of any regulations that would relate to or affect this area, the Commission has concluded that these are the only current regulations that concern the Child Development Associate Teacher permit and align with other Child Development permits.

**Disclosures Regarding the Proposed Actions/Fiscal Impact**

The Commission has made the following initial determinations.

*Mandate on local agencies or school districts:* None

*Fiscal Impact*

*Costs to any local agency or school district which must be reimbursed in accordance with Government Code sections 17500 through 17630:* None.

*Cost or savings to any state agency:* None.

*Other non-discretionary costs or savings imposed upon local agencies:* None.

*Cost or savings in federal funding to the state:* None.

*Significant effect on housing costs:* None

*Significant Statewide adverse economic impact directly affecting businesses, including the ability of California businesses to compete with businesses in other states:* None.

*Cost Impacts on a Representative Private Person or Business:* The Commission is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

**Statement of the Results of the Economic Impact Assessment**

In accordance with Government Code section 11346.3(b), the Commission has made the following assessments regarding the proposed regulations:

The Commission concludes that it is unlikely that the proposal will (1) eliminate any jobs, (2) create any new businesses, or (3) eliminate any existing businesses or result in the expansion of businesses currently doing business within the state. The proposed regulation will benefit educators seeking to continue their career and role as a Child Development Associate Teacher. Eliminating the requirement that CDP Associate Teachers are only allowed one renewal and must complete an additional 15 units of higher education to renew a second time, and allowing instead the completion of professional growth hours for an unlimited number of renewals will enable CDP Associate Teachers to continue to serve children, and employers to retain experienced staff. This proposed change will expand opportunities for educators to renew their

permit and retain employment to serve the public. The changes allow educators to submit the application and fees for renewal online, which also streamlines the process and aligns with other Child Development permits.

#### *Small Business Determination*

The proposed regulations will not affect small businesses. These regulations establish procedures for individual permit holders of the Child Development Associate Teacher Permit, not small businesses.

#### **Consideration of Alternatives**

In accordance with Government Code section 11346.5, subdivision (a)(13), the Commission must determine that no reasonable alternative it considered or that has otherwise been identified and brought to its attention would be more effective in carrying out the purpose for which the action is proposed, as effective and less burdensome to affected private persons than the proposed action, or more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

The Commission invites interested persons to present statements or arguments with respect to alternatives to the proposed regulations during the written comment period.

#### **Contact Persons**

Inquiries concerning the proposed rulemaking action may be directed to:

Christina Villanueva  
Commission on Teacher Credentialing  
651 Bannon Street, Suite 601  
Sacramento, CA 95811  
Phone: (916) 327-2967  
Email: [Christina.Villanueva@ctc.ca.gov](mailto:Christina.Villanueva@ctc.ca.gov)

The backup contact person for these inquiries is:

Mika Laidler-Rubio  
Commission on Teacher Credentialing  
651 Bannon Street, Suite 601  
Sacramento, CA 95811  
Phone: (916) 327-8697  
Email: [Mika.Laidler-Rubio@ctc.ca.gov](mailto:Mika.Laidler-Rubio@ctc.ca.gov)

#### **Availability of Statement of Reasons, Text of Proposed Regulations, and Rulemaking File**

The Commission will make the entire rulemaking file available for inspection and copying throughout the rulemaking process at the Commission office at the above address. As of the date this notice is published in the Notice of Register, the rulemaking file consists of the Notice of Proposed Action, the proposed text of regulations, the Initial Statement of Reasons, and the Economic and Fiscal Impact Statement. Please direct requests to inspect or copy the rulemaking file to the contact person(s) listed above, Christina Villanueva or Mika Laidler-Rubio.

**Availability of Changed or Modified Text**

After considering all timely and relevant comments received, the Commission may adopt the proposed regulations substantially as described in this notice. If the Commission makes modifications that are sufficiently related to the originally proposed text, it will make the modified text (with the changes clearly indicated) available to the public for at least 15 days before adopting the regulations as revised. Please direct requests for copies of any modified regulations to the contact person(s) listed above. If substantive modifications are made, the Commission will accept written comments on the modified regulations for the duration of the period of public availability.

**Availability of Final Statement of Reasons**

Upon its completion, the Commission will make copies of the Final Statement of Reasons available. Please direct requests for copies to the contact person(s) listed above.

**Availability of Documents on the Internet**

Copies of the Notice of Proposed Action, the Initial Statement of Reasons, and the text of the regulations with modifications highlighted, as well as the Final Statement of Reasons, when completed, and modified text and notices thereof, if any, may be accessed via the Commission's website at <http://www.ctc.ca.gov/notices/rulemaking.html>.

The Commission on Teacher Credentialing has illustrated changes to the original text in the following manner: text proposed to be added is displayed in underline type; text proposed to be deleted is displayed in ~~striketrough~~ type.

**CALIFORNIA CODE OF REGULATIONS  
TITLE 5. EDUCATION  
DIVISION 8. COMMISSION ON TEACHER CREDENTIALING  
CHAPTER 1. Credentials Issued Under the Teacher Preparation and Licensing Law of 1970  
Article 5. Permits Authorizing Service in Child Care and Development Programs**

**§ 80111. Child Development Associate Teacher Permit**

a) Requirements. Each applicant for a Child Development Associate Teacher Permit shall comply with the procedure prescribed for application in Section 80107 and shall meet one of the following:

(1) All of the following:

(A) Completion of a minimum of 12 semester units of coursework in early childhood education/child development (exclusive of field work used to satisfy Section 80111 a. 1. B) including at least one course in each of the following core areas: child/human growth and development; child, family and community, or child and family relations; programs/curriculum; and

(B) Fifty days of experience in an instructional capacity in a child care and development program, working at least three hours per day within the last two years.

(2) Completion of the Child Development Associate (CDA) Credential.

(3) Completion of equivalent training approved by the Commission on Teacher Credentialing. Equivalent training may include traditional coursework taken through a regionally accredited institution of higher education and Commission approved alternative education programs.

(b) An individual may apply for this permit with a "School-Age Emphasis" by completing half of his/her units in school-age coursework.

~~(c) Term and Renewal. A Child Development Associate Teacher Permit shall only be renewed once, and may only be held for a total of ten years. Upon expiration of the renewed Child Development Associate Teacher Permit, the applicant must qualify for the Child Development Teacher Permit.~~

~~(1) In order to renew the Child Development Associate Teacher Permit, the applicant must have completed at least fifteen (15) semester units toward the Child Development Teacher Permit.~~

~~(2) At the end of the five year renewal period, the applicant must meet all requirements for a Child Development Teacher Permit. The Child Development Associate Teacher Permit may not be renewed a second time.~~

~~(3) An application for renewal must be accompanied by the required fees and verification that all renewal requirements have been met.~~

(c) Term and Renewal. The Child Development Associate Teacher Permit shall be issued for five years and renewed for successive five-year periods upon submission of:

(1) an application for renewal;

(2) required fee; and

(3) verification of completion of 105 hours of professional growth.

(d) The renewal requirement outlined in subsection (c) shall be applicable to all Child Development Associate Teacher Permits, regardless of issuance date.

(e) Authorization.

(1) A Child Development Associate Teacher Permit authorizes the holder to provide service in the care, development, and instruction of children in a child care and development program and supervise a Child Development Assistant Permit holder and an aide.

(2) The Child Development Associate Teacher Permit With School-age Emphasis authorizes the holder to provide all of the services authorized for the Child Development Associate Teacher Permit holder as well as provide services in the care, development, and instruction of children in before-school, after-school and other school age child care programs.

**Credits**

NOTE: Authority cited: Section 8301.5, Education Code.