

## Final Statement of Reasons

### Problem Statement

There is no change to the public problem information since the original submission of the Initial Statement of Reasons.

### Statement of Purpose

There is no change to the original purpose of the proposed action since the original submission of the Initial Statement of Reasons.

### Necessity for Proposed Regulations

This rulemaking action proposes updates to the adopted language in section 80692 of Title 5 of the California Code of Regulations (CCR) related to Cost Recovery fees. It is necessary to update and amend the Cost Recovery regulations to reflect the approval of the PK-3 ECE Specialist Instruction Credential. The necessity for the proposed amendments and deletion to the cost recovery regulations is as follows:

Amend Sections 80692(a)(1)(B)(17) - The proposed addition to 80692(a)(1)(B) updates the list of preliminary credentials to include the approval of the *Preliminary PK-3 ECE Specialist Instruction Credential*. As previously noted, the PK-3 ECE Specialist Instruction Credential was approved while the Cost Recovery regulations were still being reviewed by OAL. The Cost Recovery regulations were subsequently approved so it is now necessary to update the cost recovery regulations to reflect the approved credential title of *PK-3 Early Childhood Education Specialist Instruction Credential*.

Amend Section 80692(a)(1)(E)- The proposed addition to 80692(a)(1)(E) updates the list of initial program reviews to include the *Preliminary PK-3 ECE Specialist Instruction Credential* internship program. Additionally, “subject” was added to multiple and single subject programs for clarity. As previously noted, the PK-3 ECE Specialist Instruction Credential was approved while the Cost Recovery regulations were still being reviewed by OAL. The Cost Recovery regulations were subsequently approved so it is now necessary to update the cost recovery regulations to reflect the approved credential title of *PK-3 Early Childhood Education Specialist Instruction Credential*.

Amend Section 80692(a)(1)(C)(4) - In the current regulations, the title of the early childhood instruction credential was listed in 80692(a)(1)(C) as the *Professional Clear Early Childhood Education Specialist Instruction Credential*. In this section, the term for the clear credential has been updated to *Clear PK-3 Early Childhood Education Specialist Instruction Credential*. To create consistency with the other clear programs listed in this section, the term “professional” has been removed from the title as it is no longer being used.

Delete Section 80692(a)(1)(C)(7) - This regulatory action proposes deleting text in 80692(a)(1)(C)(7) as it is a duplication of text found in 80692(a)(1)(D)(2). Section 80692(a)(1)(C)(7) assesses a cost recovery fee of \$1500 per program due to the more complex nature of the programs listed in that section and their initial review. The inclusion of the Adapted Physical Education Added Authorization in section 80692(a)(1)(C) was never intended

and the \$1000 Cost Recovery fee assessed in 80692(a)(1)(D) better reflects the less complex level of initial review required for an Adapted Physical Education Added Authorization program.

Amend Numbering - Finally, to accommodate the aforementioned updates, the numbering of the regulations will also be modified.

Pursuant to the state process for promulgating regulations, the Commission opened a 45-day public comment period on November 22, 2024 regarding these proposed regulations. The 45 days closed on January 6, 2025.

No comments in favor of or opposed to the public announcement were received during the 45-day comment period.

***Written Responses Representing Organizations in Support: None***

***Written Responses Representing Individuals in Support: None***

***Written Responses Representing Organizations in Opposition: None***

***Written Responses Representing Individuals in Opposition: None***

***Total: 0 responses in support***

***Total: 0 responses in opposition***

**Grand Total of Responses: 0**

The following two sections were initially included in the Updated Informative Digest. They have been removed from that document and added below:

### **Consideration of Alternatives**

Since the original rulemaking was initiated, no alternative considered by the agency would be more effective in carrying out the purpose for which the regulation is proposed, would be as effective and less burdensome to affected private persons than the adopted regulation, or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

### **Mandated Costs**

These proposed regulations will not impose a mandate on local agencies or school districts.