

## **Division VIII of Title 5 of the California Code of Regulations**

### **Proposed Amendments and Additions to Title 5 of the California Code of Regulations Pertaining to §80111 to change the renewal requirement for the Child Development Associate Teacher Permit Initial Statement of Reasons**

#### **Problem Statement**

The Commission issues six levels of Child Development Permits, 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 legislative 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.

#### **Statement of Purpose**

Assembly Bill 1930 was chaptered on September 27, 2024, adding Education Code §8301.5 and Welfare and Institutions Code §10383.5, and resulting in changes to the renewal requirements for the Child Development Associate Teacher Permit. The changes include removing the limitation on the number of times this permit can be renewed and aligning renewal requirements to all other Child Development Permits. The bill allows for an individual to renew the permit via 105 professional growth hours, eliminating the renewal requirement of 15 semester units from the initial issuance date of the permit. These changes apply to all previously and currently issued Associate Teacher Permit holders. To mirror the regulatory language of the other five Child Development Permit types, the amendments to §80111 use substantially the same language already established providing uniformity with all six permit levels. The bill requires the Commission to update regulations to reflect this change in statute no later than April 30, 2025. The Commission reviewed and approved the proposed regulation text at the Commission meeting held on December 12, 2024.

#### **Necessity and Rationale for Proposed Provision**

*Amend §80111 (c)*

*Adding shall be issued for five years and renewed for successive five-year periods removes the limitation on the number of times this permit can be renewed, per Assembly Bill 1930 which was chaptered on 9/27/2024.*

*Amend §80111 (c)(1)*

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*Amended to allow a renewal to be submitted. Renewals for any permit or credential require an application to the Commission per §80430. Direct Application: When Permitted.*

*Amend §80111 (c)(2)*

*Allows the educator to renew the permit when an application and required fees are submitted. Each permit or credential application must be accompanied by the necessary application fee per §80451. Fees.*

*Amend §80111 (c)(3)*

*Changing the renewal requirement which allows the educator to renew the permit via 105 professional growth hours and removing the renewal requirement of 15 semester units from the initial issuance of the permit. This change in the renewal requirement for the Child Development Associate Permit aligns it with all other permits.*

*Addition §80111 (d))*

*Adds the language to allow educators holding permits issued prior to April 30, 2025, to renew based on amended requirements. The changes affect all permit holders and allows for equitability. Permit holders would not need to complete the unit requirement, instead professional growth hours can be completed to renew the permit.*

**Fiscal and Economic Impacts of the Regulation**

*Economic Impact Assessment*

Creation or elimination of jobs within the state

The Commission concludes that it is unlikely that the proposal will create or eliminate jobs within the State of California. Currently, the Commission establishes standards for the issuance and renewal of credentials, certificates, and permits. Under existing law, the Child Development Associate Teacher permit authorizes the holder to renew every 5 years instead of only once every 10 years therefore it will not eliminate jobs. The workload for staff would likely not be affected because the proposed changes would not impact the actual number of applications that would be submitted, only how often educators may submit them.

Creation of new businesses or the elimination of existing businesses within the state

The Commission concludes that it is unlikely that the proposal will create any new businesses or eliminate any existing businesses within the State of California. The Child Development Associate Teacher Permit is already established within the State. Educators wishing to renew the permit will need to submit their applications to the Commission which is already an established process for Child Development Permits.

Expansion of businesses currently doing business within the state

The Commission concludes that it is unlikely the proposal would cause the expansion of businesses currently doing business within the State of California since educators will continue

to submit renewals to the Commission for approval. Thus, there will not be a creation of new business or elimination of an existing business.

Benefits of the regulation to the health and welfare of California residents, worker safety, and the state's environment

The Commission anticipates that the proposed amendments will continue to benefit the health and welfare of California residents. Benefits anticipated from this regulatory action include allowing individuals to have an opportunity to renew the permit every 5 years without having to spend additional costs to obtain 15 semester unit. Allowing Individuals to utilize professional growth hours obtained in the field programs may increase the number of individuals that can qualify to renew their permit as it eliminates the financial burden of paying for additional units. In addition, as permit holders will be able to renew via professional growth hours, they will be able to renew online instead of via paper application. This will decrease the number of paper applications for the Associate Teacher permit renewal as they will be allowed to renew online via their educator portal.

*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.

*Business Report*

This proposal does not require a report to be made.

*Effect on Small Business*

The proposed regulations will not have a significant adverse economic impact upon small business. The proposed regulations apply to current, and future, Child Development Associate Teacher Permit holders which are applying for Commission approval to obtain or renew the permit. Business will remain the same and thus will not have an adverse economic impact on small business.

**Documents Relied Upon**

*December 2024 Commission Meeting can be located at:*  
<https://meetings.ctc.ca.gov/Details/212>

**Anticipated Benefits**

It is extremely important that staffing shortages in early learning and care programs are addressed. Associate Teachers provide important support in classrooms and critical care for our children. Allowing educators to renew their permits without a limitation on the number of renewals can contribute to retaining valuable staff. This change improves access to early childhood programs and support individuals in their positions. Removing the restrictions on the Child Development Associate Teacher permit renewals allows employers to retain valuable staff, and for experienced educators to continue to serve our children.

**Alternatives Statement**

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, would be as effective and less burdensome to affected private person than the proposed action, or would be 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.

**Significant Adverse Economic Impact on Business**

The Commission has concluded there is no significant adverse impact on business. As previously stated, these regulations apply to the Commission reviewing and approving educators for the Child Development Associate Teacher permit.