



CODED CORRESPONDENCE

DATE:

August 15, 2025

NUMBER:

25-07

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 California Code of Regulations, Title 5, Pertaining to the
PK-3 ECE Specialist Instruction Credential U.S. Constitution Requirement**

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 September 29, 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: Mika Laidler-Rubio, Commission on Teacher Credentialing, 651 Bannon Street, Suite 601,

Sacramento, CA 95811; or submit an email to Mika.Laidler-Rubio@ctc.ca.gov. Alternatively, contact Christina.Villanueva@ctc.ca.gov.

Any written comments received by the closing of the public comment period will be reproduced by Commission 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(h) and 44225(q) authorizes the Commission to adopt the proposed regulations and amendments.

References

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

Information Digest/Policy Statement Overview

Summary of Existing Laws and Effect of the Proposed Action

According to current regulations, there are five minimum requirements for applicants seeking to obtain the preliminary PK-3 Early Childhood Education Specialist Instruction credential. When these regulations were adopted into the California Code of Regulations, the U.S. Constitution requirement was inadvertently left out. The proposed amendment will add the U.S. Constitution requirement pursuant to Education Code section 44335 and Title 5 section 80415. The Education Code and California Title 5 Regulations state the options for meeting this requirement.

Anticipated Benefits of the Proposed Regulations

The broad objectives of this regulation are to ensure integrity, relevance, and high quality in the preparation and certification of the educators who serve all of California's diverse students. In addition, since verification of Constitutional knowledge is required in law for all teachers, the benefit is that there is consistency in the qualifications of teachers in California. Specifically, aligning the PK-3 ECE regulations with statute and the requirements for other credentials ensures parity.

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 regulations that concern the minimum requirements for the preliminary PK-3 Early Childhood Education Specialist Instruction Credential.

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) create or eliminate any jobs, (2) create any new businesses, (3) eliminate any existing businesses (4) expand any businesses currently doing business within the state of California.

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 help improve services to students in grades PK-3 by better preparing California educators to serve in early childhood education settings by ensuring that these new teachers meet the same requirement as all other public school teachers.

The Commission does not anticipate that the proposed regulations will result in an increase in the protection of public health and welfare of California residents, worker safety, or the environment, or an increase in openness and transparency in business.

Small Business Determination

The proposed regulations will not affect small businesses. These regulations establish requirements that only applicants enrolled in a PK-3 Early Childhood Education Specialist program must adhere to.

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, would be as effective and less burdensome to affected private persons 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.

Contact Persons

Inquiries concerning the proposed rulemaking action may be directed to:

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

The backup contact person for these inquiries is:

Christina Villanueva
Commission on Teacher Credentialing
651 Bannon Street, Suite 601
Sacramento, CA 95811
Phone: (916) 327-2967
Email: Christina.Villanueva@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 (STD 399). The rulemaking file for this regulatory action, which contains those items mentioned above, and all information on which the proposal is based (i.e. rulemaking file) is available to the public upon request directed to the department's contact person. Please direct requests to inspect or copy the rulemaking file to the backup contact person listed above, Christina Villanueva.

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.

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 2. Credential Types, Authorizations, and Requirements

§80067. Specific Requirements for the PK-3 Early Childhood Education Specialist Instruction Credential.

(a) Preliminary Credential Requirements: The minimum requirements for the preliminary PK-3 Early Childhood Education Specialist Instruction Credential for applicants shall include:

(1) Possession of a bachelor's or higher degree from a regionally-accredited institution of higher education.

(2) Completion of a professional preparation program pursuant to Education Code sections 44225(h) and 44370 and in accordance with sections 80067.1 and 80067.2 that:

(A) meets the PK-3 ECE Program Standards and Teaching Performance Expectations outlined in sections 80067.1 and 80067.2, including literacy standards and Teaching Performance Expectations outlined in sections 80067.2(g) through (o) and adopted pursuant to Senate Bill 488, Chapter 678, Statutes of 2021,

(B) is approved by the Committee on Accreditation based upon the standards and expectations outlined in sections 80067.1 and 80067.2 for the PK-3 Early Childhood Education Specialist Instruction Credential, and

(C) includes preparation to serve English learners and a 600-hour clinical practice experience with a minimum of 200 hours in a preschool (PK) and/or transitional kindergarten (TK) setting and a minimum of 200 hours in a kindergarten through third grade (K-3) setting.

(3) Passage of a commission approved teaching performance assessment for multiple subjects in a PK-3 setting, or passage of a commission approved teaching performance assessment for early childhood education. Commission approval of a teaching performance assessment will be in accordance with Education Code sections 44225(i) and (j) based upon the commission's mission to ensure integrity, relevance, and high quality in the preparation and certification of the educators who serve all of California's diverse students.

(4) Completion of the subject matter requirement by one of the following:

(A) Possession of a bachelor's or higher degree from a regionally accredited institution of higher education with a degree major in the field of child development, child and adolescent development, human development, early childhood education, child and family studies, early childhood studies, family science, human development and family science, or child, adolescent, and family studies.

(B) Completion of 24 semester units or the equivalent quarter units of non-remedial, degree-applicable coursework at a regionally accredited institution of higher education in early childhood education and/or child development.

(5) Passage of either the Reading Instruction Competence Assessment (RICA), or a literacy performance assessment approved by the Commission for the PK-3 Early Childhood Education (ECE) Specialist Credential that is aligned with the requirements outlined in Education Code section 44320.3.

(6) Verification of knowledge of the Constitution of the United States, as specified in Education Code §44335, by one of the means described in §80415.

(b) Clear Credential Requirements: The minimum requirements for the clear PK-3 Early Childhood Education Specialist Instruction Credential shall include:

(1) Possession of a preliminary PK-3 Early Childhood Education Specialist Instruction Credential issued based on the requirements outlined in section (a).

(2) One of the following:

(A) Enrollment in and successful completion of a commission approved Teacher Induction program pursuant to Education Code section 44279.1, or

(B) Possession of a valid National Board Early Childhood/Generalist certificate. A qualified applicant holding a valid clear Multiple Subject, Single Subject, or Education Specialist Teaching Credential who has previously completed a commission approved Teacher Induction program shall, upon completion of a preliminary PK-3 Early Childhood Education Specialist Instruction Credential program, be granted a clear PK-3 Early Childhood Education Specialist Instruction Credential without first being required to hold a preliminary PK-3 Early Childhood Education Specialist Instruction Credential or complete an additional induction experience. Such applicants may apply directly to the commission for the clear credential in the same manner as outlined in subsection (h)(2).

(c) Professional Preparation Program Models: For the purposes of this section, professional preparation programs referenced in subsection (a)(2) may include any of the following program models offered by a commission accredited program sponsor pursuant to Education Code sections 44225(h) and 44374 and in accordance with sections 80067.1 and 80067.2:

(1) Integrated undergraduate teacher preparation program, approved by the commission, which may be offered by a regionally-accredited institution of higher education.

(2) Combined community college and baccalaureate or post-baccalaureate teacher preparation program, approved by the commission, which may be offered by a regionally-accredited institution of higher education.

(3) Post-baccalaureate teacher preparation program, approved by the commission, which may be offered by a regionally-accredited institution of higher education.

(4) Teacher residency program, approved by the commission, which may be offered by a regionally-accredited institution of higher education in partnership with one or more LEAs.

(5) Intern teacher preparation program, approved by the commission, which may be offered by a California public school, school district or county office of education, or by a regionally-accredited college or university, that shall include the additional requirements outlined in subsection (A) below. Intern programs are a partnership between the commission accredited program sponsor and the California employing agency that elects to employ an individual as the teacher of record on the basis of an intern credential. The requirements outlined in subsections (A)(i), (A)(ii), and (A)(iii) below must be met prior to the recommendation for and issuance of an intern teaching credential by the accredited program sponsor.

(A) Support and Supervision.

(i) Prior to an intern teacher assuming daily teaching responsibilities, a signed Memorandum of Understanding must be in place between the commission accredited program sponsor and the California employing agency detailing the support and supervision that will be provided.

(ii) The commission accredited program sponsor in cooperation with the California employing agency shall counsel the intern candidate and develop a plan to complete the requirements to earn a credential in the content or specialty area(s) of the intern credential. The commission accredited program sponsor, employing agency, and the intern teacher shall concur on the program planned.

(iii) Prior to an intern teacher assuming daily teaching responsibilities, the California employing agency must identify for the intern teacher a mentor who possesses a valid, corresponding life or clear teaching credential and a minimum of three years of successful teaching experience.

(iv) A minimum of 144 hours of support/mentoring and supervision shall be provided to each intern teacher per school year to coach, model, and demonstrate within the classroom, and to assist with course planning and problem-solving regarding students, curriculum, and effective teaching methodologies. The minimum support/mentoring and supervision provided to an intern teacher who assumes daily teaching responsibilities after the beginning of a school year shall be equal to 4 hours times the number of instructional weeks remaining in the school year. A minimum of two hours of support/mentoring and supervision shall be provided to an intern teacher every five instructional days.

(v) The following additional support/mentoring and supervision shall be provided to an intern teacher who enters the program without a valid English learner authorization listed on a previously issued multiple subject, single subject, or education specialist instruction teaching credential; a valid English learner authorization or CLAD Certificate issued pursuant to section 80015; or a valid bilingual authorization issued pursuant to section 80015.1:

a. The commission accredited program sponsor shall provide 45 hours of support/mentoring and supervision per school year, including in-classroom coaching, specific to the needs of English learners. The minimum support/mentoring and supervision provided to an intern teacher who assumes daily teaching responsibilities after the beginning of a school year shall be equal to five hours times the number of months remaining in the school year. The support/mentoring and supervision should be distributed in a manner that sufficiently supports the intern teacher's development of knowledge and skills in the instruction of English learners.

b. The California employing agency shall identify an individual who will be immediately available to assist the intern teacher with planning lessons that are appropriately designed and differentiated for English learners, for assessing language needs and progress, and for support of language accessible instruction through in-classroom modeling and coaching as needed. The identified individual may be the same mentor assigned pursuant to (5)(A)(iii) provided the individual

- possesses an English learner authorization and will be immediately available to assist the intern teacher.
- c. An individual who passes the CTEL examinations specified in section 80015.3(a) prior or subsequent to the issuance of the intern credential may be exempted from the provisions of a and b above.
- (d) Professional Preparation Program Equivalency: Commission approved professional preparation programs shall recognize and grant equivalency for prior experience as follows:
- (1) PK-3 Early Childhood Education Specialist Instruction Credential candidates that meet both the requirements outlined in subsections (A) and (B) below shall be granted equivalence for at least 200 hours of the required clinical practice experience in a PK or TK setting and may be granted equivalence for an additional 200 total hours of the required clinical practice experience in a PK or TK setting within the program of professional preparation. Such candidates must complete all other program requirements, including a clinical practice experience of at least 200 hours in a K-3 setting.
- (A) Either 1) hold a valid Child Development Permit at the Teacher level or higher, or 2) verify employment as a lead teacher in a Head Start program, or 3) verify employment as a lead teacher in a childcare and development center serving preschool-aged children.
- (B) Verify six (6) years or more of satisfactory, full-time teaching experience as a lead teacher in a public or private center-based childcare and development program serving preschool-aged children that is either a license-exempt childcare and development center pursuant to California Health and Safety Code section 1596.792(o) or holds a license as defined in section 101152(l)(1), Article 1, Chapter 1, Division 12, of Title 22.
- (i) Satisfactory teaching experience shall be verified by the public or private center-based childcare and development center. Verification shall include a statement by the employer confirming that the teacher's performance was rated satisfactory or better in the following areas:
- The use of developmentally appropriate teaching strategies for preschool-aged children.
 - The ability to establish and maintain developmentally appropriate standards and expectations for student behavior.
 - A demonstration of deep knowledge of the early literacy, early mathematics, and other preschool subjects, and the use of developmentally appropriate teaching and learning approaches that engage students and promote student understanding.
 - An ability to plan and implement a sequence of appropriate learning activities, both teacher and child initiated.
 - An ability to evaluate and assess student learning outcomes.
 - An ability to communicate effectively with young children and their families/guardians.
- (ii) Full-time experience shall be defined as classroom-based teaching for at least three hours per day, for at least 75% of the school year. Part time experience, or experience serving as anything other than a lead teacher, shall not be acceptable.

(iii) Lead teacher means an adult who has direct responsibility for the care and development of children from birth to 5 years of age in a center-based early childhood care setting, and serves in a teaching capacity with 3 or 4 year olds.

(2) Candidates for the PK-3 ECE Specialist Instruction Credential who have completed a practicum course at a regionally accredited institution of higher education, including a community college, shall be granted clinical practice equivalency for these hours commensurate with the number of hours served in the practicum course, up to a maximum of 200 hours, provided that all of the following conditions are met:

(A) The practicum course is credit bearing and degree applicable towards a Teacher Level or higher level Child Development Permit or a degree in early childhood education, child development, child and adolescent development, early childhood studies, or human development.

(B) The practicum hours completed were in a preschool or early childhood setting serving 3-4 year old children and included clinical practice experience that was supervised at minimum by a trained faculty member/instructor with expertise in Early Childhood and Child Development pedagogy who provided observation and feedback to the candidate.

(C) The candidate earned a C or better on the practicum course. Courses earned with a "Pass," or another designation deemed by the institution of higher education to be equivalent to a grade of "C" or higher are also acceptable.

(D) The candidate provides to the Commission-approved PK-3 ECE Specialist Instruction program verification of the hours served through transcripts and other documentation as determined by the Commission-approved program.

(3) Candidates who have completed both a verified work experience as outlined in paragraph (d)(1) above and a qualified practicum experience as outlined in paragraph (d)(2) above may be granted a maximum of 400 hours total toward the clinical practice requirement and shall complete the remaining 200 hours of clinical practice in the teacher preparation program.

(e) Multiple Subject Teaching Credential Holder Equivalencies: PK-3 Early Childhood Education Specialist Instruction Credential candidates that also hold a valid Multiple Subject Teaching Credential with an English learner authorization who have met statutory requirements for the Multiple Subject Teaching Credential are exempt from the professional preparation program requirements outlined in subsection (a)(2) and (a)(3) above. Such candidates may apply directly to the commission by submitting all of the following, and will be issued a PK-3 Early Childhood Education Specialist Instruction Credential with a term of preliminary or clear based upon and in alignment with the term of their valid Multiple Subject Teaching Credential:

(1) Official transcripts verifying completion of the subject matter requirement outlined in subsection (a)(4), and

(2) A completed application as defined in section 80002; the processing fee as specified in section 80487(a)(1); and fingerprint clearance as specified in section 80442.

(f) Authorizations and Scope: The authorization for the PK-3 Early Childhood Education Specialist Instruction Credential shall be as follows:

(1) The authorization for teaching services shall be issued with the following statement: "This credential authorizes the holder to teach all subjects in a self-contained general education

classroom setting and, as a self-contained classroom teacher, to team teach or to regroup students across classrooms, in preschool through grade three.”

(2) The authorization for English learner services shall be issued with the following statement:

“The following instructional services may be provided to English learners in the settings and content area(s) specified on this document: (1) English language development defined as instruction designed specifically for limited-English-proficient students to develop their listening, speaking, reading, and writing skills in English; and (2) specially designed content instruction delivered in English defined as instruction in a subject area, delivered in English, that is specially designed to meet the needs of limited-English-proficient students. This English learner authorization also covers classes taught on the basis of other valid, non-emergency credentials or permits held within the settings or content/specialty area(s) listed at the grade or age levels authorized.”

(3) In addition to the teaching authorizations provided in subsections (f)(1) and (f)(2) above, an intern credential shall be issued with the following statement: “This individual has completed the intern preservice preparation, which included specific instruction on the teaching of English learners and is participating in a Commission approved intern preparation program. The individual must be supported by both the commission accredited program and the employer in the area(s) listed and in their work with English learners and must make satisfactory progress toward program completion for the duration of the intern credential.”

(4) An intern credential shall also be restricted to service with the California employing agency identified by the commission accredited program sponsor.

(g) Credential Validity: Period of validity for PK-3 Early Childhood Education Specialist Instruction Credential shall be as follows:

(1) An intern credential issued pursuant to this section shall be initially issued for two years.

(2) A preliminary credential issued pursuant to this section shall be initially issued for five years.

(3) A clear credential issued pursuant to this section shall be valid for five years.

(h) Submission of Applications: Issuance of the PK-3 Early Childhood Education Specialist Instruction Credential shall require the following:

(1) For the preliminary credential candidate that has met all requirements outlined in section (a), submission by the program sponsor of a formal online recommendation including submission of an application as defined in section 80002; the processing fee as specified in section 80487(a)(1); and fingerprint clearance as specified in section 80442.

(2) For the clear credential candidate that has met the requirement in section (b)(2)(i), submission by the program sponsor of a formal online recommendation including submission of an application as defined in section 80002; the processing fee as specified in section 80487(a)(1); and fingerprint clearance as specified in section 80442.

(3) For the clear credential candidate that has met the requirement in section (b)(2)(ii), the candidate may apply directly to the commission by submitting an application as defined in section 80002; the processing fee as specified in section 80487(a)(1); and fingerprint clearance as specified in section 80442.

(4) For the intern program candidate that is enrolled in the program and has met the provisions of section (a) and subsection(c)(5)(A), submission by the program sponsor of a

formal online recommendation including submission of an application as defined in section 80002; the processing fee as specified in section 80487(a)(1); and fingerprint clearance as specified in section 80442.

Credits

Note: Authority cited: Section 44225(h) and 44225(q), Education Code. Reference: Sections 44225(b) and 44225(e), 44256(c), 44265, 44279.1 and 44370, Education Code.