
3B

Information/Action

Certification Committee

Improving Short-Term Staffing Options to Uphold Instructional Continuity for All Students During Credentialed Teacher Recruitment

Executive Summary: This agenda item responds to the Governor’s veto of AB 1224 by reviewing California’s short-term staffing structure, examining the gaps that arise when substitute assignments exceed current day limits, and presenting preparation-aligned options to support instructional continuity during credentialed teacher recruitment. It summarizes the temporary flexibilities used during and after the COVID-19 emergency, outlines the risks associated with extended assignments without adequate preparation and support, and identifies potential mid-range authorizations that maintain stability for students while preserving the state’s commitment to fully credentialed teachers.

Recommended Action: Staff recommend that the Commission review and discuss the options presented in this item and provide direction to guide the development of a refined proposal for consideration at a future meeting.

Presenters: Adam Ebrahim, Chief Deputy Director; Erin Skubal, Senior Director, Licensing Branch

Strategic Plan Goal

Professional Licensure

- **Goal 5.** Educators are appropriately licensed based on the preparation they completed and the services they will provide.
 - J. Regularly communicate with education partners regarding changes and strategies related to credentialing requirements

Improving Short-Term Staffing Options to Uphold Instructional Continuity for All Students During Credentialed Teacher Recruitment

Introduction

This agenda item responds to the Governor’s veto of AB 1224 by reviewing California’s short-term staffing structure, examining the gaps that arise when substitute assignments exceed current day limits, and presenting preparation-aligned options to support instructional continuity during credentialed teacher recruitment. It summarizes the temporary flexibilities used during and after the COVID-19 emergency, outlines the risks associated with extended assignments without adequate preparation and support, and identifies potential mid-range authorizations that maintain stability for students while preserving the state’s commitment to fully credentialed teachers.

Background

During the COVID-19 emergency, the state temporarily expanded substitute-teaching flexibilities to address widespread staffing disruptions during a global public health crisis. The 2021 Education Omnibus Budget Trailer Bill (AB 167, 2021) authorized credentialed and permitted substitute teachers to serve for up to sixty cumulative instructional days in both general education and special education assignments through June 30, 2022, to address the crisis. In early 2022, Executive Order [N-3-22](#) extended substitute service in general education classrooms to 120 days through March 31, 2022. As staffing challenges continued, subsequent legislation further extended the temporary sixty-day authorization. AB 181 (2022) continued the authorization through July 1, 2023, and SB 141 (2023) extended it again through July 1, 2024. These measures were limited to the COVID period and the immediate years that followed and were explicitly temporary. Additionally, [statewide data indicate](#) that California’s academic recovery from pandemic-related disruptions remains fragile, with persistent gaps for high-need student groups and continued sensitivity to staffing instability. With the conclusion of the pandemic and the return to full in-person learning, the Legislature and Governor discontinued all emergency substitute extensions indefinitely and return to pre-pandemic substitute service limits.

With the expiration of the extensions of COVID period flexibilities, [AB 1224](#), authored by Assemblymember Valencia, was introduced in 2025 to again authorize up to sixty cumulative instructional days of substitute service for individuals holding a Commission-issued substitute permit or credential authorizing day-to-day substitute teaching in both general and special education classrooms. The bill sought to provide temporary flexibility following the expiration of the COVID-era extensions.

In its findings and declarations, AB 1224 stated that the long-term solution to staffing shortages must be a sustained commitment to fully credentialed, appropriately assigned teachers in every

classroom. The bill acknowledged that local education agencies (LEAs) continue to experience vacancies and extended leaves that disrupt instructional continuity and proposed a time-limited extension of the sixty-day authorization during this period.

The section also expressed the author and sponsors' intent that any temporary policy be accompanied by a focused review of the Commission's short-term staffing options. Specifically, the bill encouraged the Commission to examine whether existing options, such as the Teaching Permit for Statutory Leave (TPSL) and the Emergency Career Substitute Permit, could be made more flexible, accessible, or responsive to local education agency needs while maintaining safeguards for instructional quality and equity.

AB 1224 was returned without the Governor's signature and accompanied by the following [veto message](#).

OCT 06 2025

To the Members of the California State Assembly:

I am returning Assembly Bill 1224 without my signature.

Through January 1, 2029, this bill increases the time substitute teachers can serve in general education or special education classrooms to up to 60 days, doubling or tripling current caps.

Research demonstrates that substitute teachers tend to serve classrooms with a disproportionate number of students with disabilities, English learners, and students from low-income families. While this bill requires local educational agencies to offer mentorship, training, and support to substitute teachers, it does not mandate their participation in these programs. As such, this bill would allow individuals to serve our highest-need students for as much as a third of a school year without minimally required training or mentorship.

I recognize the author's goal of providing more continuity in challenging staffing situations. As such, I encourage the Commission on Teacher Credentialing to utilize its existing authority to engage stakeholders and expeditiously reexamine and amend its short-term staffing pathways to support continuity of instruction, and to address the minimum levels of preparation and support required.

Alternatively, the author could introduce legislation that addresses the lack of required training and support for long-term substitute teachers.

For these reasons, I cannot sign this bill.

Sincerely,

Gavin Newsom

The Governor's veto message expresses concern around extended substitute assignments for all classrooms, with specific reference to students with special needs. Past legislative efforts offer additional context for why extending substitute day limits in special education raises

questions beyond staffing flexibility. In 2016, [AB 2336](#) (Olsen) proposed increasing the special education substitute cap from twenty to forty days. The Senate Education Committee analysis observed that [Education Code section 56061](#) sets specific limitations on the use of substitute teachers in special education settings and noted that extending substitute service beyond those limits could raise concerns about alignment with federal expectations regarding the delivery of required services to students with disabilities. [During the hearing](#), California Department of Education staff offered similar caution in oral testimony. AB 2336 did not advance, and the statutory limits for special education assignments remain unchanged. Because section 56061 is set in statute, adjustments to special-education substitute day limits fall outside the Commission’s regulatory authority. The Commission’s work to meet the Governor’s veto message must therefore focus on options that operate within existing statutory boundaries.

This agenda item responds to both the Legislature’s intent and the Governor’s direction. It examines the existing short-term staffing structure, identifies the gaps that arise when an assignment extends beyond the current thirty-day and twenty-day limits, and describes the instructional, relational, and service-related elements of continuity that must be preserved during extended assignments. It then outlines considerations and potential options for strengthening the state’s short-term staffing pathways in alignment with expectations in both AB 1224 and the Governor’s veto message. Early engagement by Commission staff included representatives of employer organizations, employee groups, and student-focused civil rights advocates. These initial conversations were limited in scope but provided important insight into shared concerns and priorities. Ensuring that students receive high-quality instruction and reliable access to required supports was a value shared across all groups. Broader consultation has begun and will continue into the new year, with additional opportunities for public engagement and Commission discussion planned for February.

Problem Statement

California continues to experience shortages of fully credentialed teachers, with the extent of these shortages varying by region and credential area. These shortages have increased reliance on substitute educators to maintain classroom coverage during extended absences and vacancies, while a fully credentialed teacher can be recruited. Temporary statutory and executive flexibilities allowed substitute teachers to serve for up to sixty days during the pandemic, but these flexibilities expired on July 1, 2024, returning local education agencies to the statutory limits of thirty days in general education and twenty days in special education.

Initial conversations with human resources leaders, educator organizations, and a student-focused civil rights representative revealed several consistent themes. These discussions were expeditious and limited in scope, but they provide early insights into how extended absences and vacancies affect school operations, instructional continuity, and student learning.

Human resources leaders described substantial operational strain. Many LEAs, especially those in rural or hard-to-staff areas, continue to face persistent vacancies, small applicant pools, and difficulty attracting credentialed teachers even after extended recruitment efforts. Maintaining basic classroom functioning often requires reshuffling of staff, reassigning site personnel, or

having administrators provide coverage. These pressures affect school operations every day and can even create turnover pressure for certificated site staff who must support unprepared substitutes.

Employers emphasized that the expiration of the temporary sixty-day flexibility has intensified these challenges. When an absence or vacancy extends beyond the current limits, LEAs must rotate multiple individuals through the same classroom. Employers described this rotation as disruptive and difficult for students, who must repeatedly adjust to unfamiliar adults. They indicated that rotation is not an approach they would choose absent necessity. From their perspective, maintaining a single individual for a longer period helped mitigate some of the instability associated with the broader teacher shortage.

Educator representatives echoed the operational pressures and focused on a different aspect of the larger problem. They emphasized that continuity of the same adult does not guarantee continuity of instruction or student support. Extended assignments require an individual to sustain classroom routines, carry forward instructional plans, implement accommodations and required supports, communicate with families, monitor student progress, and maintain the learning environment. These responsibilities involve fundamental elements of teaching practice that typically develop through extensive structured preparation and guided practice. Education partners noted that these expectations are especially significant in special education settings, where federal and state laws require the consistent provision of services under IDEA and Section 504.

Educator representatives also raised concerns about over-reliance on extended substitute placements. When an individual can remain in a classroom for several weeks with minimal preparation requirements, recruitment for a credentialed teacher may slow as administrators attend to other urgent operational needs. This concern reflects the practical demands of shortage conditions rather than assumptions about employer intent. Educator representatives noted that the use of substitutes in extended assignments creates cost savings because substitutes are paid at a lower daily rate than a fully credentialed teacher with salary and benefits. They emphasized that, in these situations, funding generated by student attendance, including supplemental and concentration allocations, must continue to be used to support instructional stability and advance student learning in the impacted classroom. These dynamics underscore the importance of transparency and accountability during extended temporary placements.

Student-focused civil rights advocates affirmed these concerns, noting that the use of extended temporary placements can affect how funds intended to support equitable learning conditions are used and monitored. The advocates emphasized that schools serving students with disabilities, English learners, and students from low-income backgrounds are the most likely to experience staffing disruptions, and that any expansion of short-term staffing flexibility must therefore be paired with clear requirements for preparation, support, transparency, and documentation. The advocates further emphasized that when extended substitute assignments become necessary, the preferred option should remain placing a fully credentialed teacher,

such as a retired educator or a currently credentialed teacher serving in a substitute capacity whenever available, since these individuals have the preparation and supervised clinical experience needed to maintain continuity and uphold required services during mid-range coverage while a permanent credentialed teacher is identified.

Across all groups, there was broad agreement that supporting student learning and meeting the needs of students most affected by staffing disruptions should remain central in any policy discussion. Although education partners approached the issue from different operational perspectives, they shared a common priority: ensuring that any individual serving beyond short-term limits has sufficient preparation and support to sustain instructional continuity and uphold required services. These conversations also highlighted that small and rural LEAs face unique challenges, because staff often serve multiple roles, which affects how preparation and support can be delivered.

Taken together, these themes point to a central challenge. The current statutory limits require rotation practices that undermine stability, while extended assignments require levels of preparation and support that the existing short-term structure does not provide. Local education agencies need a way to maintain continuity when an assignment extends beyond short-duration limits. Students and families need assurance that individuals placed in these roles are equipped to uphold instructional routines and required supports. The absence of pathways that meet both needs creates the policy gap the Commission must now address.

Current Short-Term Staffing Structure

Table 1: Current Short-Term Staffing Structure

<i>License Type</i>	<i>General Education</i>	<i>Special Education</i>	<i>Purpose</i>
Substitute-Prospective Teachers	30 days	20 days	Day-to-day substitute
Substitute Teacher	30 days	20 days	Day-to-day substitute
Credential Holder Substitute	30 days	20 days	Day-to-day substitute
Career Substitute Teacher	60 days	20 days	Mid-range substitute

<i>Limited Teaching Permits</i>	<i>General Education</i>	<i>Special Education</i>	<i>Purpose</i>
Teaching Permit for Statutory Leave	Up to 1yr	Up to 1yr	Interim teacher of record
Short Term Staffing Permit	Up to 1yr	Up to 1yr	Interim teacher of record
Provisional Internship Permit	Up to 1yr	Up to 1yr	Interim teacher of record

California’s short-term staffing system is built around a set of substitute and temporary teaching permits that were created at different times to address specific operational needs.

Each authorization has its own purpose, day limits, preparation expectations, and renewal rules. Together they provide options for day-to-day substitute coverage and full-year emergency service, but they do not create a coherent pathway for vacancies or temporary leave assignments that extend beyond 30 days in general education or 20 days in special education.

Fully credentialed general education, special education, and services credential holders may substitute for up to 30 cumulative days in general education and 20 days in special education. General Education credential holders have additional flexibility through a Local Assignment Option that can authorize service for up to one year in some general education classroom settings. These flexibilities apply only to individuals who already hold full credentials.

Within the substitute category, the Emergency Substitute Teaching Permit for Prospective Teachers ([5 CCR 80025.2](#)) is designed for college students preparing for a teaching career. It authorizes service in preschool through adult settings for up to 30 days for any one general education teacher and up to 20 days in special education, with a maximum of 90 total workdays per year. Applicants must have completed 90 semester units, be enrolled in a four-year institution, and meet the basic skills requirement. The permit is valid for one year and may be renewed once with completion of an additional 15 semester units.

The Emergency 30-Day Substitute Teaching Permit ([5 CCR 80025](#)) is the ubiquitous substitute authorization for individuals holding a bachelor's degree. It permits 30 cumulative days in general education and 20 days in special education for any one teacher of record and requires an annual Statement of Need filed by the LEA. The permit is valid for one year and may be renewed each year as long as the Statement of Need is submitted.

For experienced substitutes, the Emergency Career Substitute Teaching Permit ([5 CCR 80025.1](#)) allows up to 60 days in general education within a single LEA while maintaining the 20 day limit for special education. Applicants must verify three consecutive years of at least 90 days of substitute service, hold a bachelor's degree, and receive a district endorsement. The permit is valid for one year and may be renewed annually with continued district endorsement.

Beyond substitute permits, several short-term authorizations allow individuals to serve as the teacher of record. The Teaching Permit for Statutory Leave (TPSL) ([5 CCR 80022](#)) authorizes service during statutory leaves with full general education or special education authorization aligned to the assignment. It requires a bachelor's degree, subject-matter competence, 45 hours of preparation aligned with section 80022 ([Appendix A](#)), and weekly support from appropriately credentialed personnel. The TPSL is valid for one year and may be renewed, with early renewals requiring additional preparation consistent with section 80022.

Two other short-term permits address acute staffing vacancies. The Short-Term Staff Permit (STSP) ([5 CCR 80021](#)) may be issued when an LEA encounters an immediate unforeseen staffing need and cannot secure a credentialed teacher or intern eligible candidate. It authorizes service for one school year and requires a bachelor's degree, subject-matter coursework or special

education experience, documentation of a diligent search, local orientation, and ongoing support. The STSP is valid for one year and may only be issued once to any individual.

The Provisional Internship Permit (PIP) ([5 CCR 80021.1](#)) is available when an LEA cannot find a credentialed or intern eligible candidate after a diligent search. Applicants must hold a bachelor's degree and meet subject-matter requirements through coursework or special education experience. LEAs must publicly announce the hiring intent, provide orientation and support, and help the individual move toward intern program enrollment. The PIP is valid for one year and is nonrenewable.

Taken together, these authorizations provide coverage for short absences and for full-year emergency appointments. What they do not provide is a structured, preparation-aligned pathway for assignments that last longer than the short-term limits but do not warrant a full-year authorization. This gap becomes especially visible in prolonged recruiting efforts for a fully credentialed teacher or in multi-week absences, particularly in classrooms serving students with disabilities, English learners, and students from low-income backgrounds.

Gap Analysis

Although California's short-term staffing structure provides several options for day-to-day coverage and full-year emergency assignments, it does not include a coherent pathway for extended substitute service that both maintains continuity and ensures adequate preparation and support. The system functions effectively at the two ends of the staffing spectrum. It offers straightforward authorizations for brief absences, and it provides full-year emergency permits when a district cannot find a credentialed teacher. The Emergency Career Substitute Permit offers a viable option for extended service in general education, but it is intentionally limited to experienced local substitutes and does not address the broader range of extended assignments that arise statewide.

The gap emerges most clearly in assignments that extend beyond thirty days in general education or twenty days in special education but do not warrant a full-year appointment. When these situations occur, LEAs must rotate multiple substitutes, shift staff internally, or move directly to full-year authorizations designed for long-duration service rather than short-range vacancy coverage. This mismatch between available options and staffing realities underscores the need for a mid-range pathway that supports continuity while maintaining appropriate preparation and safeguards.

The gap is most pronounced in vacancies. When no teacher of record is present to anchor instruction, the temporary educator must establish routines, organize instruction, implement supports, maintain communication with families, and uphold the learning environment without guidance from a returning teacher. These responsibilities require foundational preparation and guided practice to carry out effectively. Current substitute permits do not include these expectations, and the full-year authorizations used for vacancies create an imbalance between assignment length and the preparation that is appropriate for short-duration service.

In special education, the gap is shaped further by statutory requirements. Education Code section 56061 establishes the 20 day substitute limit and prescribes procedures for extensions. These limits reflect the heightened responsibilities associated with implementing IEPs, providing accommodations, and ensuring compliance with IDEA and Section 504. When extended service becomes necessary, the next available options are full-year authorizations such as the STSP, PIP, or, in statutory-leave situations, the TPSL. None of these were designed to function as short-duration continuity pathways for temporary vacancies or mid-range assignments that require the consistent provision of required services.

The system also lacks consistent expectations for preparation, support, and accountability when an individual serves beyond short-term limits. LEAs vary in how they communicate extended placements to families, how they verify continued recruitment efforts for fully credentialed teachers, and how they support individuals placed in extended roles. Without a statewide framework that defines minimum preparation, establishes support expectations, and requires transparent use, extended temporary coverage can drift into ongoing staffing patterns without safeguards for instructional continuity or public confidence.

Taken together, these gaps demonstrate that the existing structure does not provide a preparation-aligned, time-limited pathway for extended service in either general education or special education. A revised mid-range option, grounded in defined preparation and support expectations and accompanied by clear accountability and time limits, is necessary to maintain continuity in classrooms while LEAs continue efforts to recruit fully credentialed teachers.

Current Need

The gaps identified above point to a clear need for a structured, preparation-aligned pathway that supports extended temporary service while protecting instructional continuity and ensuring responsible use. When an assignment is designated beyond the thirty-day limit in general education or the twenty-day limit in special education, the responsibilities assumed by the temporary educator shift from short-term coverage to sustaining or establishing the elements of classroom function that affect student learning and access to required support. Addressing this shift requires expectations that go beyond what existing substitute permits were designed to support.

First, there is a need for a statewide option that allows a single individual to remain with a classroom for a defined, limited period when a vacancy or extended leave occurs, without defaulting to rotation practices that disrupt routines and undermine continuity for students. Such an option must be time-limited and clearly temporary, preserving the expectation that fully credentialed teachers remain the long-term goal for every classroom.

Second, any extended temporary option must include minimum levels of preparation that equip individuals to maintain classroom routines, carry forward basic instructional workflows, and implement required supports for diverse learners. Without foundational training, individuals assigned for several weeks may be unable to sustain the elements of continuity that students rely on, particularly in classrooms serving students with disabilities, English learners, and students with behavioral or instructional support plans.

Education partners also described the need for preparation that is feasible for LEAs to deliver and portable across districts, so that substitutes do not need to be retrained each time they serve in a new setting. Although education partners did not propose a specific model, their feedback highlighted the opportunity for the state, working with partners, to help alleviate local burden by making essential readiness content more widely available for preservice or on-the-job use.

This suggests a use case for a structured micro-certification approach ([Appendix D](#)) aligned with the essential content areas in Title 5, section 80022 and verified locally in the spirit of the TPSL framework. A micro-certification structure would support portability, reduce duplication of training, and allow completed preparation to contribute toward intern preservice requirements, helping ensure that preparation for extended assignments strengthens both immediate staffing stability and longer-term pathways into full credential programs.

Third, individuals serving in extended assignments need access to structured support during the period of service. Short-term preparation alone is not sufficient to ensure that temporary educators can navigate instructional pacing, manage the learning environment, communicate with families, and uphold required services. A coherent support structure helps safeguard students' access to stable, predictable learning conditions throughout the temporary placement.

Fourth, there is a need for transparent and accountable use of extended short-term staffing options. Families, boards of education, and the public expect clarity about when classrooms are staffed by individuals who are not fully credentialed, how long those assignments last, and what efforts the LEA is making to fill the position with an appropriately prepared teacher. Clear expectations for documentation, recruitment, and communication help ensure that extended short-term staffing does not drift into ongoing use.

Finally, any statewide approach must align with federal and state requirements, particularly in special education. Assignments that extend beyond the statutory substitute limits must ensure that students with disabilities continue to receive services consistent with IDEA, Section 504, and California Education Code. This requires preparation and support that enable temporary educators to implement accommodations and behavioral plans reliably.

Together, these needs point toward the development of a mid-range staffing option that is limited in duration, structured in preparation and support, transparent in use, and aligned with statutory and instructional requirements. Such an option would allow LEAs to maintain stability in classrooms during extended absences or vacancies while continuing efforts to recruit fully credentialed teachers.

While some extended assignments will always arise unexpectedly, many can be reasonably anticipated through spring staffing processes, known statutory and medical leaves, and positions that have historically been difficult to fill. The mid-range option contemplated in this item is therefore intended to function primarily as a planned component of short-term staffing strategies, while retaining flexibility for genuinely unforeseen vacancies or emergencies.

Development of the TPSL Framework

When the Teaching Permit for Statutory Leave was developed, employer groups, employee organizations, and student-focused civil rights advocates worked with the Commission to identify the minimum preparation and support expectations needed when an individual temporarily assumes responsibility for a classroom. This collaboration established the structure in [Title 5 section 80022](#). The regulation defines essential content areas needed for service in temporary teaching assignments, such as curriculum and instruction, reading and literacy, pedagogy, human development, classroom management, English learner supports, ethics, health and safety, and the implementation of required services for students with disabilities. This content is designed to be delivered at the local level through three 45-hour modules each year for the TPSL holder's first three years of service ([Appendix A](#)).

During recent engagements with employers, the question arose about the origins of the 45-hour number. The 45-hour preparation baseline was set as the contact-hour equivalent of three semester units during the TPSL development process. It was expressed in hours rather than academic units so that local education agencies could design, implement, and verify preparation locally without relying on higher education credit structures. The weekly support requirement of an average of two hours per week was created to ensure that temporary educators receive consistent guidance from credentialed personnel to maintain routines, uphold student access to instruction, and implement required supports reliably.

Although developed for statutory leave situations, the TPSL framework establishes a practical baseline for the preparation and support expected when a temporary educator serves beyond a short assignment. Of note, many of the same groups that contributed to the development of the TPSL framework later co-sponsored AB 1224 as well as those that opposed it. For that reason, it served as a logical starting point in discussions with education partners.

Recommendations

Extended absences and temporary vacancies create staffing needs that fall between short-duration substitute coverage and full-year emergency authorizations. The following recommendations propose a set of options that together create a structured mid-length staffing spectrum. Each option is time limited, preparation aligned and designed to preserve the expectation that fully credentialed teachers remain the preferred long-term solution in every classroom.

The recommendations below are intended to provide a foundation for Commission discussion. Staff seek Commission guidance on the appropriate levels of required preparation, the semester unit and contact-hour equivalents associated with that preparation, the design of support expectations, and the level of subject-matter alignment needed in extended service, particularly in special education and other high need settings.

Table 2: Proposed Short-Terms Staffing Structure

<i>Current Emergency Permit Type</i>	<i>General Education</i>	<i>Special Education</i>	<i>Level of Responsibility</i>
Substitute-Prospective Teachers	30 days	20 days	Day-to-day substitute
Substitute Teacher	30 days	20 days	Day-to-day substitute
Credential Holder Substitute	30 days	20 days	Day-to-day substitute
Career Substitute Teacher: Experience	60 days	20 days	Mid-range substitute

<i>New Proposed Mid-Range Options</i>	<i>General Education</i>	<i>Special Education</i>	<i>Level of Responsibility</i>
Credential Holder Substitute	60 days	20 days	Mid-range substitute
Career Substitute Teacher: Training	60 days	20 days	Mid-range substitute
Teaching Permit for Vacancy or Leave	60 days	60 days	Interim teacher of record

<i>Current Limited Teaching Permits</i>	<i>General Education</i>	<i>Special Education</i>	<i>Level of Responsibility</i>
Teaching Permit for Statutory Leave	Up to 1yr	Up to 1yr	Interim teacher of record
Short Term Staffing Permit	Up to 1yr	Up to 1yr	Interim teacher of record
Provisional Internship Permit	Up to 1yr	Up to 1yr	Interim teacher of record

Recommendation 1: Expand the 30-Day Substitute Authorization for Credentialed Teachers

Proposal: Allow fully credentialed teachers in substitute assignments to serve up to sixty cumulative instructional days for any one teacher of record in both general education and special education.

Rationale: Credentialed teachers are the individuals best prepared to maintain continuity when short-term limits are exceeded. They have completed a state-approved preparation program that includes supervised clinical practice and coursework in curriculum and instruction, pedagogy, human development, literacy, and the needs of diverse learners. Expanding their substitute authorization provides a low-risk and high-stability option without compromising instructional quality.

- Support Expectations: Local education agencies shall ensure that credentialed teachers assigned for extended substitute service receive basic site-level support sufficient to sustain routines and meet local expectations, with particular attention to serving English learners and students with disabilities.

Recommendation 2: Establish an Alternate Pathway for the 60-Day Career Substitute Permit

Proposal: Create a new path to earn a 60-Day Career Substitute Permit for individuals holding a bachelor's degree to serve up to sixty cumulative instructional days for any one teacher of record in general education assignments. This permit would serve as an alternative pathway to the existing Emergency Career Substitute Permit, providing a 60-day option for individuals who do not yet meet the Career Substitute Permit's three-year experience requirement but are needed for mid-range assignments.

Rationale: A 60-day option with structured preparation and support provides a preparation-aligned route for individuals who can help maintain stability in mid-range substitute assignments but do not yet qualify for the Emergency Career Substitute Permit. This approach preserves the value of the Career Substitute authorization while creating an additional readiness-oriented pathway for LEAs facing extended absences or vacancies when there are not sufficient numbers of substitutes in a local area with the requisite experience to qualify for the permit through the experience route.

Many of the assignments that would rely on this option can be anticipated. Long-term leaves and unfilled positions identified after the hiring season allow local education agencies to arrange preparation and support in advance, although the permit is sufficiently flexible for unexpected vacancies that require immediate continuity.

- Proposed Preparation Requirements: Fifteen hours of preservice preparation aligned with the Title 5 section 80022 content areas covering essential readiness topics including classroom management, mandated reporting, local procedures, health and safety, and basic instructional routines. Thirty hours of on-the-job training aligned with the Title 5 section 80022 content areas at a scope and depth appropriate for substitute service to be completed after initial issuance of the permit.

See [Appendix B](#) for an example of how the preservice and on-the-job learning could be organized.

- Support Requirements: An average of two hours per week of support that may be provided flexibly by site-based certificated staff. Support may include coaching, check-ins, modeling of routines, or assistance with instructional planning.

See [Appendix C](#) for a sample schedule of flexible support. Note: Where the flexible support aligns with Title 5 section 80022 content areas, it could contribute to the on-the-job learning requirements.

- Subject Matter: No separate subject-matter requirement would be recommended for this permit. Instructional alignment will be supported through preservice preparation, on-the-job training, and the required system of support.
- Designated Subjects Career Technical Education: Because the Designated Subjects Career Technical Education 30-day substitute permit shares the same statutory day limits, this 60-day option would also be extended to CTE assignments, with details adapted to the

Designated Subjects structure. The intent is parity with general-education expectations while honoring the requirements of the CTE system.

- A holder who completes the required preservice preparation and receives continued local support may serve in additional 60-day substitute assignments within the same year, provided each assignment meets the criteria for extended service. For reissuance beyond the initial year, the individual must complete the next level of preparation aligned with the Title 5 section 80022 content areas and the LEA must verify continued need, continued support, and a new assignment determination.

Recommendation 3: Create a 60-Day Limited Teaching Permit for Vacancies

Proposal: Create a 60-Day Limited Teaching Permit for Vacancies authorizing service in both general education and special education settings when no teacher of record is available. This permit is intended for situations in which a classroom lacks an anchoring, fully credentialed teacher and requires a temporary educator who can uphold instructional routines, required services, and legal obligations.

Rationale: Vacancy assignments carry the highest level of risk to students because no fully credentialed teacher anchors instruction. In these situations, students must still receive required services under IDEA, Section 504, and state law, and they must experience stable routines, aligned instruction, and consistent implementation of supports. Full alignment with section 80022 ensures that temporary educators have the foundational preparation and structured support required to uphold these expectations. The 60-day limit reinforces that this authorization is a short-term bridge while recruitment efforts continue, not a replacement for a fully credentialed teacher.

- Preparation Requirements: Forty-five hours of preservice preparation meeting all Title 5 section 80022 content expectations prior to issuance of the permit. This includes foundational readiness in ethics, health and safety, curriculum and instruction, reading and literacy, pedagogy, human development, supports for English learners, and the implementation of IEP requirements.
- Support Requirements: An average of two hours per week of support aligned with section 80022. Support must include participation from at least one appropriately credentialed educator in the assignment area to ensure accurate implementation of curriculum, accommodations, and required services. Site-based certificated personnel may provide additional support consistent with local staffing models.
- Subject Matter: Basic subject-matter knowledge—not full subject matter readiness—is required for the permit holder. In multiple subject settings, this can be met through Multiple Subject coursework, exams, or degree major; in single subject settings, through the corresponding Single Subject options. In special education settings, subject-matter knowledge may be shown through either the multiple or single subject routes, or through relevant coursework or experience working with students with disabilities. These expectations provide a basic level of subject-matter familiarity without requiring the full subject-matter demonstration of a credentialed teacher.

- **Renewal:** This authorization would not be renewable for the same vacancy. Education Code section 56061 sets statutory limits on substitute service in special education and reflects the heightened responsibility associated with IEP implementation and federally required services. To remain aligned with these statutory boundaries, the 60-Day Limited Teaching Permit for Vacancies may only be issued once per vacancy. Any subsequent use would require a new vacancy determination and a new request from the employing agency. This ensures that the authorization functions as a short-term continuity option rather than a standing assignment or de facto extension of the statutory substitute limits governed by Education Code section 56061.

Accountability and Transparency

Extended substitute assignments and temporary vacancy placements carry significant responsibility. Even when used appropriately and for short periods, these assignments place an uncredentialed or partially prepared educator in front of students who rely on consistent routines, aligned instruction, and required services. For this reason, any 60-day authorization must be used only as an emergency stopgap, transparently, and with continued attention to placing a fully credentialed teacher as soon as possible. Accountability expectations help ensure that these authorizations function as short-term bridges rather than longer-term workarounds.

When an LEA determines that an extended assignment is necessary, a brief verification from the superintendent or designee should confirm the staffing need, the steps taken to recruit a fully credentialed or intern eligible educator, and the plan to continue recruitment while the temporary authorization is in use. This verification is not intended to be burdensome. Rather, it provides a simple acknowledgement that extended placements are exceptional and that efforts to secure a permanent, fully prepared teacher remain active.

Because the use of extended authorizations reflects real staffing conditions in schools, LEAs should also share this information with their local governing boards through a public item. This allows communities to understand how many classrooms required extended coverage, how long the placements lasted, and the preparation and support provided to the individuals serving in those roles. This process also allows policy makers to understand the nuances of teacher shortage in local areas, providing opportunity to craft policies that may help mitigate the challenges. These expectations follow the same spirit as existing reporting for emergency permits and help maintain public visibility into how schools are managing vacancies and extended absences.

An annual summary of the use of emergency permits to cover assignments beyond 20 or 30 days at the end of the school year can support this transparency. By reviewing the full set of extended assignments used across the year, LEAs can better understand patterns in vacancies, progress toward filling open positions, and the types of supports that were most helpful to temporary educators. This end-of-year reflection also provides boards and communities with a clearer picture of local staffing challenges.

At the state level, the Commission should track the issuance and use of 60-day authorizations to inform future policy work. Statewide patterns can help identify credential areas and regions

experiencing persistent shortages and can contribute to broader workforce development efforts.

Overall, these accountability measures reinforce the expectation that extended service remains temporary and closely supported. They help maintain public confidence and ensure that students in high-need settings are not disproportionately assigned temporary personnel without preparation, support, or oversight. They also reflect a shared commitment among employers, educators, and civil rights partners to keep the needs of students at the center of any extended staffing solution.

Staff Recommendation

Staff recommend that the Commission review and discuss the options presented in this item and provide direction to guide the development of a refined proposal for consideration at a future meeting. In particular, staff seek input on the minimum preparation and support expectations that should accompany extended short-term assignments. Areas for Commission guidance include:

- the appropriate level of preparation for individuals serving in vacancy roles, expressed in semester-unit or contact-hour equivalents aligned with the essential content areas in Title 5 section 80022,
- the appropriate amount and structure of preservice preparation and on-the-job learning for individuals serving in extended substitute assignments,
- the design and flexibility of the required support structure for temporary educators, including expectations for frequency, focus, and the role of site-based certificated staff, and
- the degree of subject-matter alignment needed in extended service, particularly in special education and other high-need settings.

Staff also request direction on the limitations, reporting expectations, and time limits for any new authorization, and on whether preparation completed under these options should count toward intern preservice requirements.

Next Steps

Staff will continue engagement with education partners and return to the Commission with a refined proposal informed by the Commission's discussion and by additional listening and learning scheduled in the coming months.

Appendix A

Support System and Training Topics Required by Title 5, section 80022

These training topics reflect the collaboratively developed TPSL framework, in which employers, educators, and student-focused advocates identified the minimum preparation and support requirements now codified in Title 5 section 80022.

Support System

“(12) The employing agency shall provide on-the-job support and mentoring to the permit holder. Support shall be provided by a certificated employee selected by the school district superintendent or designee. Support shall include guidance, assistance, and feedback in relation to the permit holder’s instructional practice, classroom management, and other activities assigned to the permit holder.”

Preparation Topics

(2) The term "**Best Practices in Instruction and Individualized Education Programs**" as used in this section shall mean the following: federal disability category definitions and specific best practices; basic explanation of individualized education programs and other special education acronyms; how to interpret an individualized education program goal and collect data; how to interpret and implement a behavior plan; differentiated instruction and universal design for learning including visual supports, applied behavior analysis and positive behavioral interventions and supports; communication with parents; working with related service providers and paraeducators.

(3) The term "**Classroom Management and the Learning Environment**" as used in this section shall mean the following: research-based strategies for creating and maintaining effective learning environments; classroom organization; behavior management plans that support student engagement and learning; positive behavior supports; and local context (e.g., school-wide behavior management systems, Positive Behavioral Interventions and Support (PBIS), Multi-Tier Systems of Support (MTSS), Response to Instruction and Intervention (RTI2), Restorative Justice Approach).

(4) The term "**Curriculum and Instruction**" as used in this section shall mean the following: preparation in developing, implementing, adapting, modifying, and evaluating a variety of pedagogical approaches to instruction; using and developing instructional sequences and lesson plans that provide all students with equitable access to the content and experiences found in the state-approved core curriculum.

(6) The term "**Ethics**" as used in this section shall mean the following: confidentiality regarding student information; mandated reporting and child abuse prevention; Americans with Disabilities Act of 1990 (ADA); Individuals with Disabilities Education Act (IDEA); Section 504 of the Rehabilitation Act of 1973; non-discrimination; universal access, designing and implementing equitable and inclusive learning environments for all students.

(8) The term "**Health, Safety and Hygiene**" as used in this section shall mean the following: emergency behavior interventions and de-escalation strategies; establishing a physically, socially, and emotionally safe classroom environment; specialized health care procedures;

injury and illness prevention; lifting, carrying, and use of mechanical lifts and equipment; general and specialized ergonomics; blood-borne pathogens and universal precautions.

(9) The term "**Human Development**" as used in this section shall mean the following: comprehensive knowledge of typical and atypical human development from the prenatal stage through adulthood; knowledge of developmental stages and development associated with various disabilities and risk conditions (e.g., visual impairment, autism spectrum disorders, cerebral palsy); resilience and protective factors (e.g., attachment, temperament) and their implications for learning.

(11) The term "**Local Context**" as used in this section shall mean the following: employer-specific software or programs used for attendance, grading, and individualized education program tracking; school expectations; local educational programs.

(14) The term "**Pedagogy**" as used in this section shall mean the following: introductory coursework in planning and delivering content-specific instruction consistent with state-adopted academic content standards for students and curriculum frameworks; knowledge of the full range of the service delivery system, including special and general education, diversity of grades/ages, and federal disability categories.

(17) The term "**Reading and Language Arts**" as used in this section shall mean the following: systematic instruction in reading, writing, listening, and speaking aligned to the state-adopted English Language Arts Content Standards and the Reading/Language Arts Framework that meets the needs of the full range of learners including struggling readers, students with special needs, typologies of English language learners, speakers of non-standard English, students who have no communication/language system, and advanced learners who have varied reading levels and language backgrounds.

(18) The term "**Relationships Between Theory and Practice**" as used in this section shall mean the following: exposure to the relationships between foundational issues, theories, and professional practice in relation to the principles of human learning and development, pedagogical strategies, curriculum, instruction, assessment, student accomplishments, attitudes, and conduct.

(20) The term "**Teaching English Learners**" as used in this section shall mean the following: principles of linguistic development; language acquisition; assessment of language proficiency; academic delivery and building strategies for English language learners; knowledge of educational equity, diversity, cultural and linguistic responsiveness and their implementation in curriculum content and school practices for all students.

(21) The term "**Using Technology in the Classroom**" as used in this section shall mean the following: knowledge in the basic principles of operation of computer hardware and software; use of technology to facilitate the teaching and learning process; legal and ethical issues related to the use of technology; best practices and research on the use of technology to deliver lessons that enhance student learning; integration of technology-related tools into the educational experience.

Appendix B

Title 5, §80022 Topics for Essential Preparation

The following tables illustrate how the Title 5, §80022 preparation topics could be organized into a 15-hour preservice component and a 30-hour on-the-job training sequence within a *Title 5, §80022* system of support. This breakdown is provided solely for illustrative purposes.

Example Pre-Service Essential Preparation: Title 5, §80022 Topics for a 60-Day Substitute Permit

When?	Title 5, §80022 Topics	Title 5, §80022 Description	Hours	Credit Equivalent
Preservice	Ethics	Confidentiality, mandated reporting, ADA/IDEA/504, nondiscrimination, and all legal duties that must be understood before teaching.	2.5	0.17
Preservice	Health, Safety, Hygiene	Emergency interventions, de-escalation, illness/injury prevention, specialized procedures, and safety protocols required for student protection.	2.5	0.17
Preservice	Local Context	District/site systems for attendance, grading, IEP tracking, and the operational expectations teachers must follow from day one.	2.5	0.17
Preservice	Best Practices in Instruction & IEPs	Basic understanding of IEPs, disability categories, goal interpretation, required data collection, and behavior plan implementation.	2.5	0.17
Preservice	Classroom Management & the Learning Environment	Essential supervision, structure, and behavioral expectations needed to keep students safe and classrooms stable immediately.	2.5	0.17
Preservice	Crash Course in Curriculum & Instruction	A survival-level orientation to curriculum, pacing guides, lesson components, and delivering prepared instructional materials accurately.	2.5	0.17
		Total	15	1.00

On-the-Job Foundational Preparation: Title 5, §80022 Topics for a 60-Day Career Substitute Permit

When?	Title 5, §80022 Topics	Title 5, §80022 Description	Hours	Credit Equivalent
On-the-Job	Curriculum & Instruction	Ongoing cycles of lesson design, adapting instruction, adjusting pacing, and assessing learning as the teacher encounters new units and student needs.	5	0.33
On-the-Job	Reading & Language Arts	Repeated practice with structured literacy routines, reading interventions, and data-based adjustments as teachers work with readers who progress differently, including students with language-based reading challenges.	5	0.33
On-the-Job	Pedagogy	Gradual development of instructional strategies and differentiation techniques that respond to diverse learners, including those who benefit from scaffolded or alternative approaches.	5	0.33
On-the-Job	Human Development	Applying developmental knowledge to real students, noticing how individual learning profiles—including processing, attention, and language differences—shape academic and behavioral needs.	5	0.33
On-the-Job	Teaching English Learners	Continual adjustment of language supports as teachers learn to navigate overlapping needs among multilingual learners and students who require additional learning supports.	5	0.33
On-the-Job	Using Technology in the Classroom	Iterative integration of digital tools to support instruction, including technology that can help with reading, writing, organization, or access for students who benefit from these supports.	3	0.20
On-the-Job	Relationships Between Theory & Practice	Reflective cycles that help teachers connect what they’ve learned about learning, development, and instructional design to the patterns they observe in real students throughout the year.	2	0.13
		Required Total	30	2.00

Appendix C

Title 5, §80022 Example Weekly Support Plan for a 60-Day Substitute

The following table provides a simplified example of a 12-week support plan for a 60-day substitute or a 60-day Limited Teaching Permit. Note: the preservice **is not** counted in the 2-hour average weekly support requirement from Title 5, §80022.

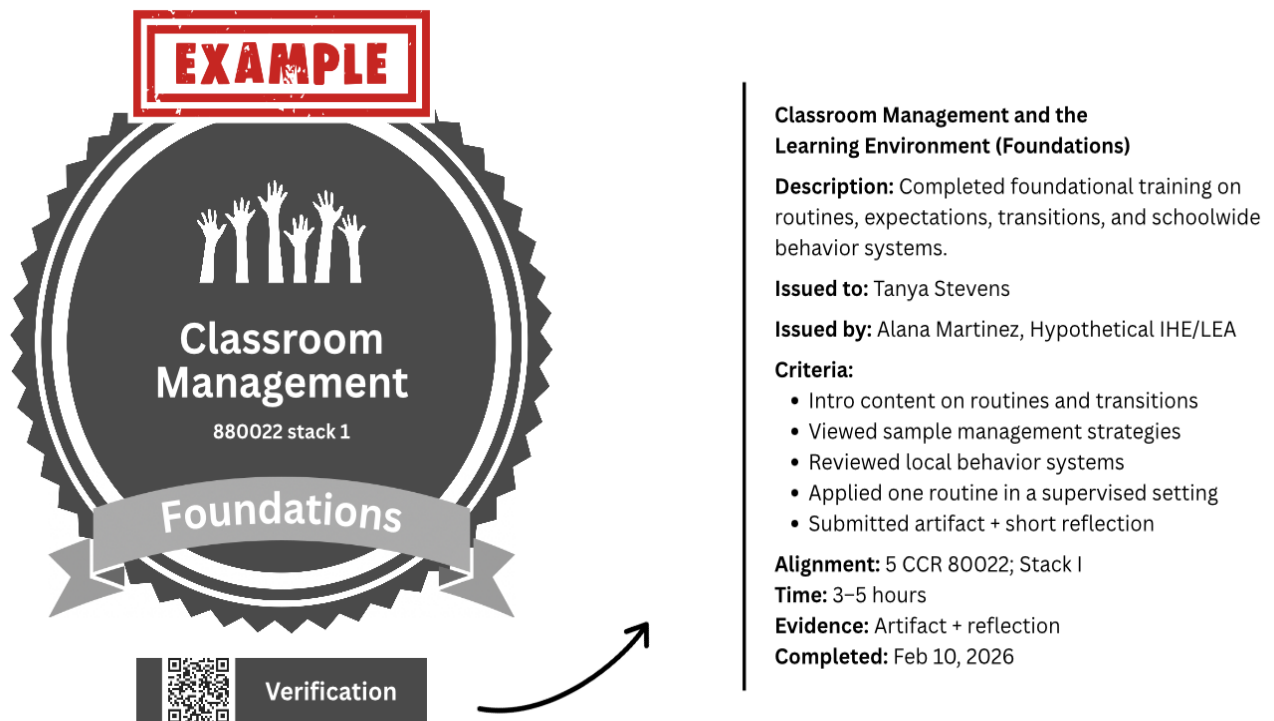
	Support: Site Mentor	Support: Instructional Coach	Support 3: Assistant Principal	Weekly Total Hrs.
Preservice	5 hours	5 hours	5 hours	15 hours
Week 1	45 minutes	45 minutes	30 minutes	2 hours
Week 2	45 minutes	45 minutes	30 minutes	2 hours
Week 3	45 minutes	45 minutes	30 minutes	2 hours
Week 4	45 minutes	45 minutes	30 minutes	2 hours
Week 5	45 minutes	45 minutes	30 minutes	2 hours
Week 6	45 minutes	45 minutes	30 minutes	2 hours
Week 7	45 minutes	45 minutes	30 minutes	2 hours
Week 8	45 minutes	45 minutes	30 minutes	2 hours
Week 9	45 minutes	45 minutes	30 minutes	2 hours
Week 10	45 minutes	45 minutes	30 minutes	2 hours
Week 11	45 minutes	45 minutes	30 minutes	2 hours
Week 12	45 minutes	45 minutes	30 minutes	2 hours
			12-week support total	24 hours
			12-week support average	2 hours

Appendix D

Example Title V, Section 80022 Micro-Certification Use Case

This appendix provides a brief, illustrative example of how training required under Title 5, section 80022 could be organized using a micro-certification structure. Commissioners and education partners have expressed interest in whether modern documentation tools could help local education agencies improve access to consistent training, support continuity during temporary staffing disruptions, and reduce duplication for individuals who serve across multiple districts. The concept described below is hypothetical and is offered only to illustrate one possible design approach.

Figure 1: Example digital badge and associated metadata



A micro-certification is a short, structured set of learning activities organized around a specific topic. Each micro-certification could include core content, a simple applied task, a brief artifact demonstrating what was completed, and a short reflection. When the activities are finished, a local verifier reviews the evidence and issues a digital badge. The badge is conferred and the held by the completer. The badge contains metadata identifying the topic, the activities completed, the date of completion, and the individual who verified the work. A micro-certification does not authorize service and does not replace any credential or permit. It provides portable documentation that required training has been completed. The term micro-certification is used here to avoid confusion with California’s credentialing structure, since the term credential refers to a state authorization and should not be associated with short training modules.

The preparation expectations in Title 5 section 80022, lend themselves naturally to a modular structure of this kind. The regulation identifies essential content areas and organizes them across three 45-hour blocks of preparation. A micro-certification approach could group these required activities into “stacks” or curated collections of short micro-certification modules aligned with the Foundational, Intermediate, and Proficient levels specified in regulation. Each module would reflect the depth required at that level, and together they would document completion of the full Title 5, section 80022 training sequence.

A Commission-approved intern program sponsor could determine whether the completed sequence aligns with its own preservice expectations. Alternatively, the Commission could explore granting equivalence through other means. Local education agencies that are not program sponsors could still use the micro-certification sequence for their own verification needs, including documentation of training required for the Teaching Permit for Statutory Leave or for any future authorization that relies on section 80022 preparation.

A minimum viable micro-certification model could consist of a version-controlled set of shared training resources aligned to Title 5, section 80022, combined with a simple local process for verifying completion. LEAs would determine how learning is delivered, how evidence is reviewed, and who may serve as verifiers. Verification could then be used to generate a digital badge or completion record. Additional iterations could evolve the model and incorporate features that respond to user feedback and local implementation experience. Any such development would depend on future direction and available resources, as there is no current funding or staffing dedicated to this work.

The table below shows, for illustrative purposes, how the topics in section 80022 could be distributed across the three levels while still following the required regulatory sequence.

Title 5, section 80022 topics as micro-certifications			
Legend: F = Foundational; I = Intermediate; P = Proficient			
Micro-certification	Stack 1	Stack 2	Stack 3
Health, Safety, and Hygiene	F, I, P		
Ethics	F, I, P		
Local Context	F, I, P		
Curriculum and Instruction	F	I	P
Reading and Language Arts	F	I	P
Pedagogy	F	I	P
Human Development	F		I, P
Teaching English Learners	F	I	P
Best Practices in Instruction and IEPs	F	I	P
Classroom Management and Learning Environment	F	I	P
Relationships Between Theory and Practice		F	I, P
Using Technology in the Classroom		F, I	P

This appendix is intended only to illustrate how a modular documentation structure could help organize required preparation, support portability for educators working across LEAs, and

provide a clearer record of training in situations where continuity of instruction is essential. It does not propose changes to section 80022 or establish new requirements. If Commissioners are interested in further exploration of this concept, staff could bring a more fulsome elaboration to a future meeting.