

Date of Hearing: March 26, 2025

ASSEMBLY COMMITTEE ON EDUCATION  
Al Muratsuchi, Chair  
AB 1224 (Valencia) – As Amended March 17, 2025

**SUBJECT:** Teacher credentialing: substitute teachers: days of service

**SUMMARY:** Authorizes substitute teachers to serve in a teaching assignment up to 60 days. Specifically, **this bill:**

- 1) Authorizes any holder of a credential or permit issued by the Commission on Teacher Credentialing (CTC) that authorizes the holder to substitute teach in a general, special, or career technical education assignment to serve in a substitute teaching assignment aligned with their authorization, including for staff vacancies, for up to 60 cumulative days for any one assignment.
- 2) Requires, prior to utilizing this authorization, a local educational agency (LEA) to:
  - a) Employ all available and suitable substitute teachers who hold a Teaching Permit for Statutory Leave if the substitute will serve in a position in which the teacher on record is currently on statutory leave; and
  - b) Make reasonable efforts to recruit a fully prepared teacher for the assignment.
- 3) States that this bill is an urgency in order to address the limited supply of substitute teachers and staffing in nearly all parts of the state, and it is necessary for this act to take effect immediately.

**EXISTING LAW:**

- 1) Establishes the Emergency 30-Day Substitute Teaching Permit, which authorizes the holder to serve as a day-to-day substitute teacher in any classroom, including preschool, kindergarten, and grades 1-12 inclusive, or in classes organized primarily for adults. The holder may serve as a substitute for no more than 30 days for any one teacher during the school year, except in a special education classroom, where the holder may serve for no more than 20 days for any one teacher during the school year. This permit is valid for one year and is renewable. Applicants must hold a baccalaureate or higher degree from a regionally accredited college or university and pass the basic skills requirement and a fingerprint clearance. (Education Code (EC) 44300 and Title 5, California Code of Regulations (CCR), Section 80025)
- 2) Authorizes holders of 30-day emergency substitute teaching permits to serve as substitutes for credentialed special education teachers for not more than 20 cumulative days for each special education teacher absent during the school year. Upon application by the district or county office of education (COE), the Superintendent of Public Instruction (SPI) may approve an extension of 20 schooldays. (EC 56061)
- 3) Authorizes an Emergency Career Substitute Teaching Permit holder to serve as a substitute in any classroom; preschool, kindergarten, and grades 1-12, inclusive; or in classes organized

primarily for adults. Prohibits the holder from serving as a substitute for more than 60 days for any one teacher during the school year. Restricts the permit to the schools operated by the employing agency that requests the permit. States that the permit is valid for no less than one year and expires one calendar year from the first day of the month immediately following the date of issuance. (CCR Title 5, 80025.1)

- 4) Authorizes the CTC to approve a school district request for the assignment of an individual if the district has certified by an annual resolution of the governing board that it has made reasonable efforts to recruit a fully prepared teacher for the assignment. States that if a suitable individual who meets the priorities is not available to the school district, the district, as a last resort, may request approval for the assignment of a person who does not meet that criteria. (EC 44225.7)

**FISCAL EFFECT:** Unknown

**COMMENTS:**

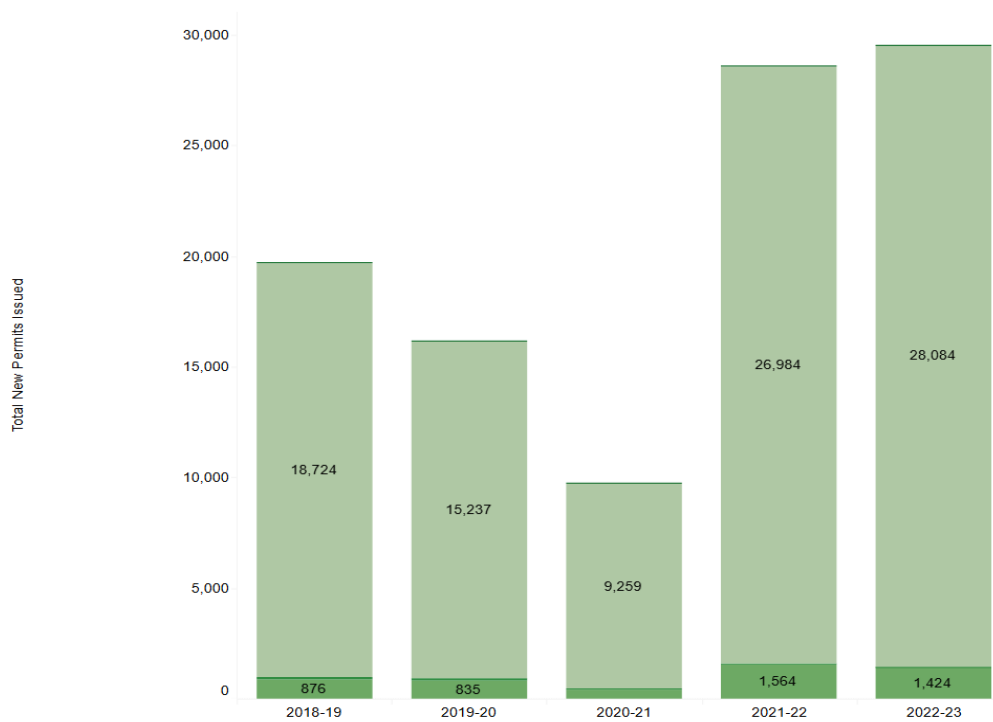
***Need for the bill.*** According to the author, “AB 1224 seeks to provide better continuity for students by allowing substitute teachers to remain in the classroom for up to 60 days. The increased flexibility will reduce classroom instability and learning disruptions that affect students with disabilities the most. With greater stability in the classroom, students are able to establish rapport with their substitute teacher, leading to better educational outcomes. While in recent years the Legislature has made efforts to strengthen the teacher workforce, the persistent shortages exacerbate the demand for substitute teachers. In the face of an unprecedented educational workforce shortage, every tool should be utilized to help provide the best educational outcomes for California’s students.”

***What does this bill do?*** This bill extends the existing authorization for a substitute teacher to teach in one classroom for up to 60 days. The state provided this same authorization during the COVID-19 pandemic, and those provisions sunset on July 1, 2024.

***Requirements for holding a substitute teacher permit.*** The current requirements to earn a substitute teacher permit include:

- 1) Official transcripts showing the conferral of a baccalaureate or higher degree from a regionally accredited college or university;
- 2) Basic skills requirement;
- 3) Completed application and a completed Live Scan receipt; and
- 4) Application processing fees.

**California data on issuance of substitute permits.** The graph below shows the number of new 30-day substitute teaching permits issued. The number of substitute teaching permits issued has increased significantly since 2020-21.



(Source: CTC)

**Teaching Permit for Statutory Leave (TPSL).** In 2016, the Commission developed the Teaching Permit for Statutory Leave (TPSL) to address the teacher shortage. The TPSL allows an employing agency to fill a position where the teacher of record is unable to teach due to a statutory leave (medical or otherwise) with a temporary teacher of record for the duration of the leave. Depending on the individual’s qualifications, a TPSL may be issued with one or more authorizations in the areas of Multiple Subject, Single Subject, and Education Specialist. The permit is renewable upon verification from the employing agency that specific requirements have been completed. TPSL is limited to statutory leave and not for many different types of staffing needs, such as paid admin leave, investigation leave, or vacancy.

**Number of TPSLs Issued.** There was a steady decline in TPSL issuances between 2018-19 and 2021-22. In 2020-21, there were 805 TPSLs issued; the following year, only 474 TPSLs were issued. Conversely, in those same years, emergency permits increased almost proportionately.

**Trend of Teaching Permit for Statutory Leave (TPSL) Issued**  
 The table displays the total and percent change from prior year of TPSLs issued. The color legend displays the range of percent change across the years, specifically indicating the black color as an increase and the red color as a decrease from the prior year.

	Fiscal Year				
	2018-19	2019-20	2020-21	2021-22	2022-23
Total	853	856	805	474	476
Percent Change From Prior Year		0.4%	-6.0%	-41.1%	0.4%

(Source: CTC)

**Teacher workforce shortage.** According to a new report by the Learning Policy Institute (LPI), California is facing persistent teacher shortages, and the number of teacher preparation

completers in California has dropped dramatically over the last two decades. The current number of teachers prepared in traditional teacher preparation programs is now only half the rate at the state's peak in 2004. The report also found that the number of substandard credentials and permits tripled between 2013 and 2023, making up more than half of all new California teaching credentials issued in 2023. Hiring teachers who are not fully credentialed perpetuates shortages since these teachers are more likely to leave their positions and need to be replaced year after year, leaving districts with vacancies. Employers are competing against each other for a very limited pool of highly qualified candidates.

***Teacher shortages increase the demand for substitute teachers.*** Teacher shortages have increased the need and demand for substitute teachers. New strategies for substitute recruitment and retention are rapidly changing. According to a report and survey conducted by EdWeek Research Center, *The Substitute Teacher Gap: Recruitment and Retention Challenges in the Age of Covid-19*, short-term substitute teaching positions have been difficult to fill because of low wages, lack of benefits, and a requirement to hold a bachelor's degree. This report found that, on average, about 250,000 positions are left to be filled daily with substitute teachers, with only 54% of total absences covered by substitute teachers filling in the vacancies. The report also found that 71% of administrators and school board members predict the demand for substitute teachers will increase in the next five years. The report interviewed a California school board member who stated, "Many of those people that we do recruit to become substitutes end up getting hired as fulltime teachers, which is great; however, then we lose them on the substitute teacher roles."

***Substitute teacher compensation.*** According to the Bureau of Labor Statistics, the mean annual wage for a short-term substitute teacher in the U.S. as of 2020 was \$36,090. The Education Commission of the States reports that providing competitive compensation can help states improve the substitute teacher pool by attracting more candidates. In an EdWeek Research Center survey, 65% of school members and administrators said a pay increase would improve the quality of substitute teaching in their districts. Respondents said that, on average, a minimum 26% pay increase would increase the quality of the substitute; however, only 19% of respondents said their substitute teacher rates increased.

***Behind higher pay, professional development is the factor second most likely to improve substitute teaching.*** According to the EdWeek Research Survey, 44% of school board members and administrators say they provide no professional development to substitute teachers. Only 11% of respondents offered training on classroom management. As the demand for substitute teachers increases with teacher absences, the need for training may become even more urgent. Some school districts nationwide are creating new programs for substitute teachers that incorporate and emphasize professional development. One example of such a program is the Central Falls Teaching Fellowship in Central Falls, Rhode Island. The program requires the fellows to commit to a year-long substitute teaching assignment within a single entity in return for daily pay. Professional development includes four days of training prior to the start of the school year and monthly activities. The fellowship program reports that 70-80% of the fellows complete the program's year-long commitment and provide the school district with a reliable source of substitute teachers.

***Recruitment and retention.*** According to the EdWeek Research Survey, close to half of respondents, 47%, said their district does not make any effort to recruit or retain substitute teachers. According to a 2022 report by Education Finance and Policy, *More Than Shortages:*

*The Unequal Distribution of Substitute Teaching*, disadvantaged schools had lower substitute coverage rates. Higher-needs schools are more likely to expect non-covered teacher absences than other schools. The study also found that:

- Substitute teachers consistently preferred one subset of schools while avoiding another subset. The least-preferred schools were middle schools with significantly lower average achievement, a higher concentration of Black and Hispanic students, and higher suspension rates.
- The number of times a school was identified as a most- or least-preferred school accounted for a large share (40% to 50%) of the cross-school variation in substitute coverage rates.
- Lastly, substitute teachers often cited student behavior as an important factor in determining certain schools as least preferable, but mentioned a wide range of factors that can make a school desirable, such as colleagues and familiarity with a school.

***Substitute teacher requirements in other states.*** Due to the acute need to increase the substitute teacher pool, some states have changed the academic requirements needed to earn a substitute teaching permit. For example, Missouri and Oregon temporarily removed their requirement for a bachelor's degree to serve as a substitute teacher during the pandemic.

***Arguments in support.*** The Kern County Superintendent of Schools states, "AB 1224 (Valencia) would extend the allowable duration for the substitute teaching assignments from 30 to 60 days is a practical solution that will help mitigate disruptions for students and staff. By allowing substitutes to remain in the same classroom for a longer period, the bill ensures greater continuity in instruction, which is essential for maintaining the flow of curriculum and supporting student achievement. This continuity is particularly important for students with disabilities who historically are the lowest performing academic group. This vulnerable population deserves continuity and predictable relationships with the staff in their classrooms."

***Arguments in opposition.*** Public Advocates states, "While we recognize the ongoing challenges schools face with staffing shortages, extending substitute teaching assignments from 30 to 60 days indefinitely does not solve the problem and, instead, exacerbates ongoing concerns for student learning and state teacher quality:

**Reduced Teaching Quality:** Substitute teachers are not required to possess specialized subject matter knowledge or pedagogical training comparable to credentialed teachers. They are only required to have a baccalaureate degree in any field, with no requirement for competence in the particular subject they are teaching or any training in how to teach (e.g., lesson planning, grading, differentiated learning styles, classroom management, basic legal obligations, etc.)

**Potential Exploitation of Loopholes:** This expansion of substitute teaching time will likely be used as a loophole allowing districts to fill positions with less-qualified, lower-paid substitutes, rather than investing in and ensuring permanent, fully-credentialed staff are prioritized for assignment.

Harmful Impact on Most Vulnerable Students: Research has consistently shown that students of color and low-income students are more likely to be taught by novice teachers who have less preparation.”

**Related legislation.** AB 1433 (Fong) of the 2023-24 Session, in its introduced form, would have authorized substitute teachers to serve in a teaching assignment up to 60 days during the 2023-24 school year. This bill was substantially amended to a different topic within education.

SB 141 (Committee on Budget), Chapter 194, Statutes of 2023, authorizes, until July 1, 2024, a substitute to teach in a general, special, or career technical education assignment for up to 60 cumulative days for any one assignment; and states that nothing shall preclude a LEA from following the hiring provisions outlined in Section 44225.7 of the Education Code.

AB 181 (Committee on Budget), Chapter 52, Statutes of 2022, authorizes, until July 1, 2023, a substitute to teach in a general, special, or career technical education assignment for up to 60 cumulative days for any one assignment; and states that nothing shall preclude a LEA from following the hiring provisions outlined in Section 44225.7 of the Education Code.

SB 1397 (Borgeas), Chapter 335, Statutes of 2022 waives until July 1, 2024, the basic skills proficiency requirement for the issuance of an emergency 30-day substitute teaching permit.

AB 1895 (E. Garcia) of the 2021-22 Session would have established the Substitute Teacher Support Grant Program under the administration of the CDE and appropriates \$100 million to provide one-time competitive grants to LEAs to develop and implement new or expand existing, locally identified solutions that address local substitute teacher shortages or needs for professional development for substitute teachers. This bill was held in the Assembly Appropriations Committee.

AB 1893 (Cunningham) of the 2021-22 Session would have required, until July 1, 2024, the CTC to waive the basic skills proficiency requirement for the issuance of an emergency 30-day substitute teaching permit. This bill was vetoed by the Governor with the following message:

While I agree with the aim of the proposal, this bill inadvertently overrides an unrelated provision of the final 2022-23 budget agreement contained in Assembly Bill 210, which amended the same code section. This bill seeks, until July 1, 2024, to allow the Commission on Teacher Credentialing to waive the basic skills proficiency requirement for purposes of issuing an Emergency 30-Day Substitute Teaching Permit. I welcome another policy vehicle for this proposal that avoids this technical issue.

AB 1876 (Seyarto), Chapter 113, Statutes of 2022, requires the CTC, when issuing an initial emergency career substitute teaching permit, to accept employment verification for the previous consecutive three year period from one or more California school districts participating in a consortium in determining the accumulated work days per year.

AB 1119 (Eduardo Garcia) of the 2019-20 Session would have required the CTC to establish a Teacher and Substitute Shortage Workgroup to identify steps that can be taken to improve both the substitute pool and the qualified teacher workforce in small school districts, defined as a school district with fewer than 2,501 units of average daily attendance. This bill was held in the Assembly Appropriations Committee.

AB 3149 (Limon) of the 2017-18 Session would have required the CTC, through a stakeholder process, to determine whether there is a need to provide a person who holds an Emergency 30-Day Substitute Teaching Permit, who is otherwise qualified to receive a Teaching Permit for Statutory Leave, expanded pathways for meeting the requirements of the Teaching Permit for Statutory Leave, and to make regulatory changes as necessary, on or before July 1, 2019. This bill was held on the Senate Floor.

## **REGISTERED SUPPORT / OPPOSITION:**

### **Support**

Alameda County Office of Education  
Alameda Unified School District  
Association of California School Administrators  
Berkeley Unified School District  
California Association of School Business Officials (CASBO)  
California Association of Suburban School Districts  
California Charter Schools Association  
California County Superintendents  
California School Boards Association  
Castro Valley Unified School District  
Coalition for Adequate Funding for Special Education  
Dublin Unified School District  
Eden Area Regional Occupational Program  
Eden Area Rop  
Fremont Unified School District  
Kern County Superintendent of Schools Office  
Los Angeles Unified School District  
New Haven Usd  
Office of The Riverside County Superintendent of Schools  
Orange County Department of Education  
Orange County District Superintendents Organization  
Pleasanton Unified School District  
Riverside County Public K-12 School District Superintendents  
San Bernardino County District Advocates for Better Schools (SANDABS)  
San Diego Unified School District  
San Joaquin County Office of Education  
San Juan Unified School District  
Sunol Glen Unified School District

### **Opposition**

Public Advocates

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