Office of Senate Floor Analyses
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THIRD READING

Bill No: AB 1009
Author: Blanca Rubio (D)
Amended: 9/4/25 in Senate
Vote: 21

SENATE EDUCATION COMMITTEE: 6-0, 6/11/25
AYES: Pérez, Ochoa Bogh, Cabaldon, Choi, Cortese, Laird
NO VOTE RECORDED: Gonzalez

SENATE APPROPRIATIONS COMMITTEE: 7-0, 8/29/25
AYES: Caballero, Seyarto, Cabaldon, Dahle, Grayson, Richardson, Wahab

ASSEMBLY FLOOR: 69-0, 5/8/25 (Consent) - See last page for vote

SUBJECT: Teacher credentialing: administrative services credential: occupational and physical therapists

SOURCE: California Physical Therapy Association
Occupational Therapy Association of California

DIGEST: This bill authorizes occupational therapists (OTs) and physical therapists (PTs) who meet specified requirements to be eligible for a preliminary administrative services credential.

Senate Floor amendments of 9/4/25 incorporate chaptering-out language to avoid conflicts with AB 959 (Hadwick, 2025). Specifically, the amendments provide that the changes made by this bill will only become operative if both this bill and AB 959 are enacted and this bill is enacted last.

ANALYSIS:

Existing law:

1) Specifies the following minimum requirements for obtaining a preliminary administrative services credential. (Education Code § 44270)

2) Possession of one of the following:

   a) A valid teaching credential, including student teaching.

   b) A valid designated subjects credential in career technical education, adult education, or special subjects with a bachelor's degree.

   c) A valid services credential in pupil personnel, health, clinical or rehabilitative services, or as a teacher librarian.

   d) A credential issued prior to December 31, 1971, authorizing services similar to those above.

3) Completion of three years of successful full-time experience in classroom teaching, pupil personnel, health, clinical or rehabilitative services, or as a librarian.

4) Completion of an approved specialized administrative preparation program or internship.

5) Current employment in an administrative role post-preparation.

6) Requires that a preliminary administrative credential is valid for five years and nonrenewable.

This bill:

1) Adds a valid occupational therapy license (issued by the California Board of Occupational Therapy) or physical therapy license (issued by the Physical Therapy Board of California) as a pathway to qualify for a preliminary administrative services credential.

2) Specifies that a preliminary administrative services credential issued based on this bill shall not authorize the supervision or evaluation of teachers unless the employing local educational agency (LEA) makes a determination, as specified.

3) Allows five years of experience as a school-based OT or PT to satisfy the existing experience requirement for a preliminary administrative services credential.

4) Authorizes an LEA to request a waiver of up to two years of the experience required for specified candidates.

5) Makes various changes to avoid conflicts with AB 959 (Hadwick, 2025). Specifically, the amendments provide that the changes made by this bill will only become operative if both this bill and AB 959 are enacted and this bill is enacted last.

Comments

1) *Need for this bill.* According to the author, "Occupational Therapists (OTs) and Physical Therapists (PTs) have been providing related services to students in public schools since the 1970s and are the only Individuals with Disabilities Education Act (IDEA) mandated professionals not included in a credential opportunity afforded to teachers and all other related services providers. This is based on a statute that was written at a time prior to IDEA and districts' employment of OTs and PTs. Currently, OTs and PTs working in school systems are not authorized to obtain a base credential, thereby rendering them ineligible to pursue an administrative services credential or participate in many higher-level positions. Creating a pathway for OTs and PTs who desire to obtain an administrative services credential will allow qualified personnel an opportunity to move into administrative roles and share their unique expertise at a leadership level."

2) *Historical Credentialing Gap.* This bill addresses a credentialing gap arising from historical frameworks that predate widespread school-based employment of OTs and PTs. While these professionals are mandated by federal IDEA law to provide specialized support services, unlike similarly situated professionals—such as school psychologists, nurses, counselors, and speech-language pathologists—they remain excluded from credential eligibility. Establishing an administrative credential pathway aligns the credentialing opportunities for OTs and PTs with other specialized service providers already eligible for administrative roles.

   Under current law, there is no credential required or offered specifically for OTs and PTs to provide mandated related services in schools. Consequently, OTs and PTs cannot meet the current statutory credential requirement to pursue administrative services credentials, thereby limiting their career advancement into formal leadership roles.

3) *Credential Requirement vs. Credential Opportunity.* The Governor's prior veto message on AB 2725 (Rubio) of 2024, a substantively similar measure, raised an important distinction: there is currently no explicit state requirement that OTs and PTs must hold an administrative services credential to assume supervisory or administrative roles in school districts. School districts retain

local discretion to create supervisory roles or assign administrative duties to these professionals based on human resources policies or collective bargaining agreements. However, this flexibility has not resulted in uniform professional recognition, equitable salary schedules, or clear pathways to certificated administrative positions for OTs and PTs across the state.

4) *Professional Equity and Career Mobility.* Given its context, this bill appears primarily motivated by goals of professional equity and career advancement. By providing OTs and PTs access to the administrative services credential, this bill seeks to enable these professionals to advance into certificated leadership roles, fostering greater parity with other related-service providers. This change may also have ancillary benefits, such as improved retention and recruitment of highly skilled therapists within the public education system, ultimately enhancing student support through more diversified administrative expertise.

5) *Addressing Prior Legislative Concerns.* Although this bill seeks to address professional equity, the Governor's veto of the substantively similar AB 2725 (Rubio of 2024) expressed skepticism about the need for a legislated statewide credential pathway for OTs and PTs. The veto message emphasized that there is no state requirement for these professionals to hold an administrative services credential in order to serve in supervisory roles, and encouraged the Commission on Teacher Credentialing (CTC) to develop distinct pathways for license holders without traditional teacher preparation backgrounds.

FISCAL EFFECT: Appropriation: No Fiscal Com.: Yes Local: No

According to the Senate Appropriations Committee, the CTC estimates General Fund costs of $127,000 each year for 1.0 position to create resources, provide technical assistance to local educational agencies (LEAs) and the public, and process additional applications.

SUPPORT: (Verified 9/4/25)

California Physical Therapy Association (co-source)
Occupational Therapy Association of California (co-source)
Association of California School Administrators
California School Employees Association
California State Council of Service Employees International Union
National Board for Certification in Occupational Therapy
Physical Therapy Board of California
San Francisco Unified School District
SELPA Administrators of California

OPPOSITION: (Verified 9/4/25)

None received

ASSEMBLY FLOOR: 69-0, 5/8/25
AYES: Addis, Aguiar-Curry, Ahrens, Alanis, Alvarez, Ávila Farías, Bains, Bauer-Kahan, Bennett, Berman, Bonta, Bryan, Calderon, Caloza, Castillo, Chen, Connolly, Davies, DeMaio, Dixon, Elhawary, Ellis, Fong, Gabriel, Garcia, Gipson, Mark González, Hadwick, Haney, Harabedian, Hart, Hoover, Jackson, Kalra, Krell, Lackey, Lee, Lowenthal, Macedo, McKinnor, Muratsuchi, Nguyen, Ortega, Pacheco, Papan, Patel, Patterson, Pellerin, Petrie-Norris, Quirk-Silva, Ramos, Ransom, Michelle Rodriguez, Rogers, Blanca Rubio, Schiavo, Schultz, Sharp-Collins, Solache, Soria, Stefani, Ta, Tangipa, Valencia, Ward, Wicks, Wilson, Zbur, Rivas
NO VOTE RECORDED: Arambula, Boerner, Carrillo, Flora, Gallagher, Jeff Gonzalez, Irwin, Celeste Rodriguez, Sanchez, Wallis

Prepared by: Ian Johnson / ED. / (916) 651-4105
8/16/26 14:34:17

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