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# SENATE COMMITTEE ON EDUCATION

Senator Sasha Renée Pérez, Chair

2025 - 2026 Regular

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<b>Bill No:</b>	AB 2490	<b>Hearing Date:</b>	June 24, 2026
<b>Author:</b>	Valencia		
<b>Version:</b>	June 15, 2026		
<b>Urgency:</b>	No	<b>Fiscal:</b>	Yes
<b>Consultant:</b>	Ian Johnson		

**Subject:** Teacher credentialing: emergency career substitute teaching permit: alternative qualifications.

## SUMMARY

This bill expands eligibility for the Emergency Career Substitute Teaching Permit by establishing an alternative pathway based on training, professional development, and mentoring rather than prior substitute teaching experience, and authorizes permit holders who qualify through that pathway to serve up to 70 cumulative days in a single classroom assignment, including special education classrooms.

## BACKGROUND

Existing law:

- 1) Establishes the Emergency 30-Day Substitute Teaching Permit, which generally authorizes service as a substitute teacher for no more than 30 days for any one teacher during a school year, or 20 days in a special education classroom. (Education Code (EC) §§ 44300; 56061)
- 2) Establishes the Emergency Career Substitute Teaching Permit, which authorizes eligible substitute teachers to serve up to 60 days for any one teacher during a school year. (California Code of Regulations (CCR), Title 5 § 80025.1)
- 3) Requires applicants for an Emergency Career Substitute Teaching Permit to verify, among other requirements, at least 90 days per year of substitute teaching service during each of the three years immediately preceding the application. (CCR, Title 5 § 80025.1)
- 4) Authorizes school districts to request assignment approvals when they have made reasonable efforts to recruit a fully prepared teacher but are unable to do so. (EC § 44225.7)
- 5) Authorizes the issuance of a Teaching Permit for Statutory Leave (TPSL) to serve in positions where the teacher of record is absent due to statutory leave and establishes training and support requirements for TPSL holders.

## ANALYSIS

This bill:

- 1) Expands the existing alternative eligibility pathway for the Emergency Career Substitute Teaching Permit by authorizing applicants to qualify based on local educational agency (LEA) verification of specified training, professional development, and mentoring, rather than solely through prior substitute teaching experience.
- 2) Requires applicants serving in special education classrooms to complete at least five hours of special education-focused professional development, receive orientation training covering specified instructional and student support topics, and be assigned a qualified mentor with special education expertise.
- 3) Requires applicants serving in general education classrooms to complete at least five hours of professional development, receive orientation training covering specified instructional and student support topics, and be assigned a qualified credentialed mentor.
- 4) Requires the first renewal of a permit issued through the new pathway to include verification of 30 additional hours of professional development in specified areas.
- 5) Authorizes permit holders who qualify through the new pathway to serve up to 70 cumulative days in a single classroom assignment, including special education classrooms, notwithstanding the existing 20-day special education limit.
- 6) Requires LEAs, before placing such a permit holder, to utilize available TPSL holders when appropriate and make reasonable efforts to recruit qualified individuals for vacant assignments.
- 7) Requires LEAs to notify parents or guardians within 10 schooldays when a classroom is assigned a substitute teacher serving under the new authorization.
- 8) Requires annual public reporting to local governing boards regarding longer-term substitute assignments and annual reporting to the Commission on Teacher Credentialing (CTC) through the California Statewide Assignment Accountability System.
- 9) Specifies that the bill does not alter existing definitions of teacher vacancies or otherwise change assignment accountability requirements under existing law.

## STAFF COMMENTS

- 1) ***Need for the bill.*** According to the author, “AB 2490 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 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. AB 2490 includes mandatory training requirements for substitute teachers and requires

administrators to make every attempt to fill a position with a fully credentialed teacher. 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."

- 2) **California's Substitute Teacher Staffing Framework.** California law currently provides multiple mechanisms to address teacher absences and staffing shortages, including the Emergency 30-Day Substitute Teaching Permit, the Emergency Career Substitute Teaching Permit, the TPSL, internship credentials, short-term staff permits, provisional internship permits, and various waiver authorities. Each pathway reflects an effort to balance staffing flexibility with instructional quality by establishing differing eligibility requirements, preparation expectations, assignment limitations, and oversight mechanisms.

The Emergency Career Substitute Teaching Permit occupies a unique position within this framework. Unlike a standard substitute permit, which generally limits service to 30 days in a single assignment, the Emergency Career Substitute Teaching Permit authorizes service for extended periods but currently requires substantial prior substitute teaching experience. This bill would establish an alternative pathway based on professional development, orientation training, and mentoring. In doing so, the bill reflects a broader discussion occurring throughout California's educator workforce system regarding how best to prepare substitute teachers for longer-term assignments when staffing shortages make classroom continuity difficult to maintain.

- 3) **AB 1224, the Governor's Veto, and the Evolution of this Proposal.** This bill builds upon efforts undertaken in the previous legislative session through AB 1224 (Valencia, 2025). That measure sought to restore and make permanent a temporary pandemic-era flexibility that allowed substitute teachers to serve in a single assignment for up to 60 cumulative days. While Governor Newsom acknowledged the challenges associated with staffing classrooms and maintaining instructional continuity, he vetoed the bill, expressing concern that the proposal would allow individuals to serve students for extended periods without required training, mentoring, or other supports.

In his veto message, the Governor encouraged the CTC to utilize its existing authority to engage stakeholders, reexamine California's substitute staffing pathways, and address the minimum levels of preparation and support required for long-term substitute assignments. This bill can largely be viewed as a response to that directive. Rather than simply extending assignment limits, the bill establishes professional development requirements, orientation requirements, mentoring requirements, recruitment expectations, parent notification provisions, and reporting requirements intended to support substitute teachers serving in longer-term assignments.

- 4) **The CTC Regulatory Process Provides Important Context.** Following the Governor's veto of AB 1224, the CTC undertook an extensive stakeholder process to evaluate potential changes to California's substitute teacher permitting structure. Earlier this year, the CTC approved proposed regulatory amendments establishing an alternative pathway to the Emergency Career Substitute

Teaching Permit for individuals who are unable to satisfy the existing experience requirements. The proposal would require employer verification of pre-service preparation, ongoing support, mentoring, and additional professional learning as conditions of permit issuance and renewal.

The CTC's proposal reflects many of the same underlying policy concepts found in this bill. In both cases, the goal is to create a pathway that allows greater continuity of instruction while pairing extended substitute assignments with preparation and support requirements that exceed those traditionally required for day-to-day substitute teaching. The CTC has stated that California's existing substitute staffing pathways do not always provide a clear solution for assignments that extend beyond traditional substitute limits but remain temporary in nature, such as prolonged teacher absences or lengthy recruitment efforts for fully credentialed teachers.

The CTC is currently seeking amendments to this bill. While expressing appreciation for the author's efforts to address concerns raised during the Assembly process, the CTC continues to seek greater specificity regarding the minimum amount of orientation and mentoring support required for permit holders serving in extended assignments.

- 5) ***Alignment with Other Workforce Policies.*** Recent amendments to the bill increase the maximum assignment length authorized under the alternative pathway from 60 days to 70 days. The amendment appears intended to align the substitute teaching authorization with the anticipated implementation of paid pregnancy disability leave policies currently under consideration through the state budget process. If enacted, such policies could increase the frequency of teacher absences lasting approximately 14 weeks, creating situations in which schools may seek to maintain continuity of instruction through a single substitute teacher rather than rotating multiple substitutes through the same classroom assignment.

The recent author amendment highlights that the bill is not solely a response to teacher shortages. It also reflects broader workforce policy discussions regarding how schools maintain instructional continuity when employees take extended protected leaves while preserving the state's longstanding preference for fully credentialed teachers whenever possible. As policymakers continue to consider educator recruitment, retention, leave policies, and staffing flexibility, the bill raises questions regarding the extent to which California's substitute teacher framework should adapt to accommodate longer-term absences while continuing to support instructional quality and stability for students.

- 6) ***Special Education Assignments Present Distinct Legal and Policy Considerations.*** The bill would authorize certain Emergency Career Substitute Teaching Permit holders who qualify through the newly established pathway to serve up to 60 cumulative days in a special education classroom. Proponents argue that this flexibility may help reduce classroom disruptions and provide greater continuity for students with disabilities, particularly in areas experiencing persistent staffing shortages.

At the same time, special education classrooms operate within a distinct legal and instructional framework. Federal law establishes specific personnel qualification requirements for special education teachers and places significant responsibilities on school personnel to implement individualized education programs (IEPs) and provide the accommodations, modifications, and services required under federal law. These considerations have historically informed California's more restrictive limits on substitute teaching assignments in special education settings.

Current law also provides a mechanism for extending substitute assignments in special education classrooms beyond the standard 20-day limitation. Upon application by a school district or county office of education, the Superintendent of Public Instruction may authorize an additional 20 days of service and may approve assignments beyond 40 days in extraordinary circumstances. AB 2490 would establish a more standardized pathway for extended special education substitute assignments rather than relying on case-by-case approvals.

As the bill moves forward, the Committee may wish to continue examining how the proposed authorization interacts with existing federal personnel qualification requirements, existing state flexibility, and California's longstanding goal of ensuring that students with disabilities receive instruction and services from appropriately prepared personnel.

- 7) ***Stakeholders Continue to Seek Amendments as the Bill Evolves.*** This bill has undergone substantial revisions since its introduction and since the Governor's veto of AB 1224 (Valencia, 2025). The current version of the bill includes professional development requirements, orientation requirements, mentoring provisions, parent notification requirements, annual reporting requirements, and recruitment expectations that were not included in prior proposals. These changes have narrowed some of the concerns previously raised by education stakeholders.

The CTC, which is currently seeking amendments, has expressed appreciation for the author's efforts to address concerns raised during both the Assembly policy process and the CTC's stakeholder discussions following the veto of AB 1224. They indicate that their remaining concerns primarily relate to establishing clearer minimum expectations regarding orientation and mentoring support for permit holders serving in extended assignments. According to the CTC, greater specificity may help ensure more consistent implementation across LEAs and provide greater assurance that substitute teachers receive adequate preparation and support.

The California Teachers Association (CTA), which remains opposed unless amended, similarly acknowledges that the bill has moved closer to the framework currently being pursued through the CTC's regulatory process. However, CTA continues to express concerns regarding the use of substitute teachers in special education assignments, arguing that existing law already provides multiple mechanisms for addressing staffing challenges in those settings and raising questions regarding the interaction between the bill and federal special education requirements.

Committee staff understands that the parties continue to engage in discussions regarding these issues. While stakeholders have identified areas where additional refinement may be warranted, there appears to be general agreement that extended substitute assignments should be accompanied by meaningful preparation, support, and oversight. The Committee may wish to encourage continued discussions among the author, the CTC, employee organizations, and other stakeholders regarding whether additional clarification related to mentoring requirements, orientation requirements, and special education assignments would improve implementation of the bill.

**SUPPORT**

Association of California School Administrators (co-sponsor)  
California Association of School Business Officials (co-sponsor)  
California County Superintendents (co-sponsor)  
California School Boards Association (co-sponsor)  
Alameda County Office of Education  
Association of California County Boards of Education  
California Alliance of Child and Family Services  
California Association of Suburban School Districts  
California State PTA  
Central Valley Education Coalition  
Coalition for Adequate Funding for Special Education  
Fresno Unified School District  
Los Angeles Unified School District  
Office of the Riverside County Superintendent of Schools  
Orange County Department of Education  
San Diego Unified School District  
San Francisco Unified School District

**OPPOSITION**

California Teachers Association  
Public Advocates and Disability Rights Education & Defense Fund

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