

To: Early Childhood Policy Council  
From: Center for the Study of Child Care Employment, University of California, Berkeley  
Subject: Public Comment Submission for Policy Council Meeting  
Date: 4/2/2020

We at the [Center for the Study of Child Care Employment](#), University of California, Berkeley appreciate the opportunity to provide public comment to the Early Childhood Policy Council at this critical time when our state is enacting policy decisions that impact the lives of every Californian during this COVID-19 crisis.

We are anxious to learn more today about the role of this Council as it relates to responding to and influencing state leadership to make swift and prudent decisions to protect the state's child care system and workforce, as well as the ways in which the Council must surely understand the urgency of its role and the goal of the master plan to establish a stable, effective and equitable early childhood system for California. At this moment, first and foremost on our minds is the need to identify child care advocacy and policy positions, and the needed resources that protect programs, early educators, children, and the community.

Our team has been looking closely at guidance, regulations, and proposed resources for ECE across the nation to inform the considerations we put before you today. We cannot emphasize enough how important it is that child care programs and their workers have the proper protections and resources to be able to close now in order to be able to reopen immediately once it is safe to do so.

The fragmentation that characterizes ECE in California has been put on full display in this crisis. As public preschool programs in the state close and cover expenses, including paying staff - as they should be doing - akin to what's happened to K-12 schools, the majority of ECE programs have no such resources and tens of thousands of early educators, mostly low-income women of color, who serve millions of our state's youngest children, face losing their livelihood by closing or otherwise risk their lives by staying open and going to work. This is not hyperbole. This workforce is being expected to serve frontline workers, but aren't understood to be frontline workers themselves. And in reality, there remains confusion on the ground about who can be open and who they are allowed to serve at this time.

We know that [babies, toddlers, and preschoolers do not do social distancing](#), and early educators and young children are at no less risk for exposure to COVID-19 than students in K-12 schools. Yet as schools across the state are closed, there is an expectation for child care

to remain open. We understand that many parents are still working in the midst of this crisis, especially other low wage workers. But the default should not be to expect child care workers to meet everyone else's needs, while their own become secondary. In order to have a child care system that is available on the other side of this crisis, when we must reduce the demand for child care during this time by collectively calling for:

1) workers across occupations, including many of those now expected to work at home to have access to adequate paid administrative leave to care for their children;

2) child care programs to be closed until the emergency is declared over, with replacement income to ensure programs can pay their operational costs, including staff wages, which would also relieve the burden of families who might otherwise be expected to continue paying to hold a spot; and

3) regulations and financial resources that ensure a subset of early care and education providers who opt in to provide emergency services to other essential workers can do so in one-on-one arrangements or in the smallest of groups and with the appropriate protective equipment and supplies.

For a workforce that experienced poverty at a rate that was double that of all other workers in the state before this crisis, it's a false narrative to assume that without financial intervention, programs are choosing to stay open and staff are choosing to show up rather than close or stay home.

We often assume California is too different from other states to undertake the same approaches as smaller communities, but as we are bigger, with more resources, even in a crisis, we must be bolder. And so yes, we can learn from states like Vermont where [lost tuition for child care providers and stabilization payments for private tuition](#) is covered so that programs will be in a better position to reopen at the end of the COVID-19 closure period.

And as emergency child care providers are risking their own lives, we can learn from New Mexico's policy to ensure COVID-19 testing is free for child care workers statewide and includes undocumented child care workers. In California, 39% of the ECE workforce are immigrants, and many of them are likely to be undocumented. It's not clear what's happening to them in this crisis.

Closed, open, or providing emergency child care, the child care industry employs some of our state's lowest-paid workers [who earn a median wage of only \\$13 an hour](#). It is critical not to lose sight that this crisis exacerbates the economic vulnerability of the workforce as well as child care programs as 30% of child care programs nationwide stated that [they would not survive past a two week closure period](#).

Our state leaders need expert advisement and guidance, and we hope the Early Childhood Policy Council sees it's critical role in providing this. As the Council considers its charge, we

urge you, and the other state leaders and stakeholders engaged in this process to uplift and simultaneously address the needs of ECE programs and ECE workers. They are in dire need of clear policies and resources that ensure the health and safety of children and educators, relieve the demand for services during this crisis, and support programs to be ready to reopen once it is safe.