To: California Assembly Blue Ribbon Commission on Early Childhood Education  
From: Center for the Study of Child Care Employment, University of California, Berkeley  
Subject: Comments on the Blue Ribbon Report and Recommendations  
Date: 3/20/2019

We at the Center for the Study of Child Care Employment, University of California, Berkeley are pleased to respond to the request for comments on the draft Blue Ribbon Commission Report and Recommendations.

To achieve an early care and education system that is equitable, efficient and effective for all of California’s children, their families and early educators requires a transformation of early childhood policies, infrastructure, and financing and an embrace of early care and education as a public good. This requires that we think beyond the confines of the existing infrastructure and delivery mechanisms to consider what is needed and what is possible, beyond expanding eligibility and funding of the current, disparate system. The Blue Ribbon Commission (BRC) was charged with a monumental task of soliciting, considering and incorporating input across a range of critical areas and from a broad range of stakeholders. Their diligence and the comprehensiveness of their approach are reflected in the scope of the recommendations. We believe these recommendations can help to inform reform efforts. However, we also urge the BRC to articulate a streamlined and transformative vision for truly universal access, quality, and educator stability and well-being by which any recommendations can be judged.

In addition to this overall recommendation, and given the broad coverage of the recommendations, we limit the focus our specific responses primarily on the recommendations for Workforce & Quality. Following are specific recommendations from CSCCE to strengthen both the vision of a quality early care and education system for California and recommendations to support a skilled and stable workforce.

1. **Be explicit in describing the status of the ECE workforce.** To help the legislature and the public at-large understand the scope of reforms necessary to transform early childhood jobs in California, and the imperative for substantial policy reforms and investments, it is important that they understand the consequences of the current system and the extent
of the inequities. For example, in addition to stating the current wages (p.38), including information about the pay penalty experienced for working with the youngest children, which amounts to a gap of upwards for $6,000 a year\(^1\), and the wage gaps between women of color and their white peers for performing the same job\(^2\), make explicit the need for change. Similarly, drawing upon local studies like those conducted in San Mateo \(^3\) and Alameda Counties\(^4\) that demonstrate high levels of turnover and economic stability among early educators, and worry about things like paying for food for their families helps to underscore the urgency to include workforce policies and investments as a priority for California.

2. Seek a unified system in which qualifications, and workplace and compensation standards are applied across the system. While we understand the importance of the BRC recommendations to implement a permitting or certification system that is competency based (p.42), explicit recommendations about who should have education and training and at what levels are missing from the report. Uneven levels of qualifications will only further entrench existing inequities among educators across the system as compensation recommendations become linked to education. To this end, we call attention to the recommendations related to compensation (p.40). It is stated that a goal is to achieve parity with K-3 teachers for those in ECE with comparable levels of education and experience, yet there is nothing in the recommendations that suggest comparable education is a goal. Further, the recommendations call for competitive compensation for all teaching roles, but it is not clear what this means. Is this competitive with other ECE programs, which, given the depressed market, does little to advance the economic well-being of early educators? We recommend the BRC make explicit recommendations with regard to comparable education across ECE settings, in addition to recommendations on comparable compensation with K-3 educators, as well as explicit recommendations about raising the floor and ensuring that entry level

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educators earn no less than a regionally-based living wage. Further, it is critical that these recommendations apply across settings to disrupt the current inequities that drive occupational churn as educators seek employment in settings with higher wages and better conditions, ultimately creating greater levels of instability for some children and providers more than for others.

3. **Establish recommendations that seek to eradicate inequities that are driven by limited public provision and the mixed delivery system.** The BRC recommends increasing reimbursement rates to increase funding to programs to pay for increased compensation (p.41). Providing greater resources to programs is a must, but the mechanisms and consequences for doing so must be addressed by policy reforms to ensure that existing inequities are not exacerbated. For example, there needs to be a directive and a mechanism, guided by wage standards, to ensure that funds intended for compensation are indeed applied to compensation, rather than identifying compensation as an “eligible use” for increased funds. Implementation of a wage pass-through strategy is an effective way to ensure increases in rates intended for compensation are actually applied accordingly - this is a practice that has been routinely employed by states to support increased compensation in other industries. Additionally, most programs serve a mix of families who receive subsidy and those who do not; many of the non-subsidized families served by these providers are income-eligible for subsidies, but do not have access to them due to limited public funding. By law, rates paid by private fee-paying families cannot be less than the government reimbursement rates. Thus, when the state raises voucher reimbursement rates, which is an important strategy to help programs serving families with subsidies to cover increasing labor costs, programs can only avail themselves of these higher rates if they also charge private fee families the same amount, further burdening families who may not be able to pay more. As a consequence, well-intentioned increases to subsidy reimbursement rates without other policy adjustments exacerbate inequities among low-income families.

4. **Provide supports to higher education programs to strengthen content across critical domains of learning and development.** We found nearly all of the higher education recommendations to be appropriate and aligned with best practices with the exception of item e (p.49). This recommendation implies that programs should develop degrees with a narrow focus in one or some of these areas. Rather, we recommend that degree

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programs be supported to develop content expertise across these domains with the expectation that students be prepared to support children’s development and learning across these areas. Additionally, as we have seen in other states, state’s with degree-based certification for early educators helps to drive the nature of the content and experiences offered throughout the higher education system.

5. **Build upon recent national efforts to articulate California’s vision for early educators and a pathway for implementation.** The two seminal texts, *Transforming the Workforce*\(^6\) and *Transforming the Financing*\(^7\), provide a roadmap for California to establish and advance long-term policies and investments to transform early care and education in California for the workforce, for children, and for families. While every state operates in its own unique context, the development and learning needs of children, the professional and well-being needs of educators, and the access and affordability needs of families are consistent across the nation. The BRC can embrace these commonalities, build upon the incredible work of experts that have already laid the foundation for the roadmap, and utilize these resources to build an implementation plan that aligns with the scientific knowledge and professional wisdom that children from birth to age 5 need access to settings in which their teachers are well prepared, well supported, and well compensated.

In sum, we are encouraged by the BRCs recommendation and would implore the commission to be even bolder by strengthening and clarifying their recommendations for an early care and education system that is effective and equitable for all children, their families and early educators in California.
