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To: Commission on Teacher Credentialing  
From: Center for the Study of Child Care Employment, University of California, Berkeley  
Subject: Public Comment Submission 3H: Update on the Development of the PK-3 Early Childhood Education Specialist Credential  
Date: April 4, 2022

We at the Center for the Study of Child Care Employment, University of California, Berkeley are writing to respond to the request for public comment on item 3H: Update on the Development of the PK-3 Early Childhood Education Specialist Credential. Our comments are focused on the PK-3 Credential requirements and pathways.

As currently proposed, the pathways to teach TK place a greater burden on early care and education (ECE) teachers than Multiple Subject Credential (MSC) holders, despite the extensive experience and education that early educators have teaching preschool-aged children. Examining the proposed PK-3 specialist credential alone ignores the fact that MSC holders are already authorized to teach TK. For MSC holders, this new credential would simply be an option, not a requirement, whereas it stands as the only option for ECE teachers unless they otherwise pursue a MSC. We are concerned that there is no pathway to the MSC or the proposed PK-3 specialist credential that readily accepts the education and experience that early educators already possess, when such options exist for K-12 private school teachers and others with minimal experience, to earn a MSC. For example, private school teachers are able to bypass a MSC preparation program if they have six or more years of experience; child care centers and family child care homes are not accepted as private school settings, closing this route to the MSC for early educators. Yet, there is no pathway to the MSC or the proposed PK-3 specialist credential that similarly qualifies existing early educators. Effectively, this means a private school teacher with 6 years of experience teaching fourth graders could acquire a MSC and be authorized to teach TK, whereas an early educator with a bachelor's degree in ECE and 15 years of experience in a preschool classroom would be deemed unqualified to teach in a TK classroom unless they pursued additional qualifications.

If the state is interested in promoting equitable policies, we suggest that: 1) assumptions and biases about what it means to be a qualified teacher, and whose education, experience and perspective is valued must be examined as part of these processes; and 2) early educators require alternative pathways to credential that align with those available to teachers of older children.

Following, we propose a set of critical questions about the proposed credential and offer a recommendation for the PK-3 ECE Specialist Credential that places ECE preparation and

experience on a par with that of teachers of older children and aligns with alternative pathways to earn other credentials.

### **How are the planning and proposal development processes centering the experiences, intellect and leadership of educators of color in ECE?**

Findings from CSCCE's recent [California ECE Workforce Study](#) spotlight the racial and ethnic diversity, experience, and education of the ECE workforce. For example, about 70% of center-based teachers and family child care providers identify as people of color, they average more than 15 years of teaching experience, and more than half of center-based teachers and nearly a third of family child care providers have a bachelor's degree. Further, among center-teachers with a degree<sup>1</sup>, the majority meet or exceed the requirement for TK teachers to complete 24 college units in early childhood education.<sup>2</sup>

With this in mind, we ask: Who has been consulted in this process? Were early educators a part of this process? What conditions have been in place to facilitate educator involvement (e.g., meeting times, outreach to make people aware of the process and proposals)? Who is missing from decision-making processes?

### **Who benefits and who is marginalized by the proposed requirements and pathways?**

The ECE workforce makes wages that are [barely one-third](#)<sup>3</sup> of what TK and Kindergarten teachers are paid. Are the credential and pathways to teach TK mitigating or creating barriers for a workforce that is grossly undervalued and underpaid? How does this credential and the pathways to obtain it dismantle, reinforce or deepen inequities?

### **Is the proposal more likely to screen in or out one group (early educators) or another (existing multiple subject credential holders) into TK teaching positions?**

Access to public programs and systems are often designed to screen people out by establishing complex eligibility requirements and processes. In this case, rather than the state assuming the burden of change to accept ECE preparation and training, this proposal appears to add additional burdens to teach TK on those whose experience, expertise, and degrees are based in ECE, effectively screening out many experienced ECE teachers, and potentially screening in less experienced ones.

While we assume the architects of the proposal do not intend for this policy to be racist, ultimately, the outcomes of the policy are what matter. Given the many pathways that CTC offers that allow people to earn the MSC and be the teacher of record, such as private school teachers and Peace Corps members, it stands to reason that teachers with the most experience and training working with four-year-olds (the ECE workforce) would be given the same options. Yet, such options are not reflected in the PK-3 specialist credential. Why would private school or Peace Corps experience be

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<sup>1</sup> Kim, Y., Austin, L.J.E., Montoya, E., & Powell, A. (2022). Education and Experience of the California ECE Workforce. Center for the Study of Child Care Employment, University of California, Berkeley. <https://cscce.berkeley.edu/education-and-experience-of-the-california-ece-workforce/>

<sup>2</sup> Powell, A., Kim, Y., & Montoya, E. (2021). Demographics of the California ECE Workforce. Center for the Study of Child Care Employment, University of California, Berkeley. <https://cscce.berkeley.edu/education-and-experience-of-the-california-ece-workforce/>

<sup>3</sup> McLean, C., Austin, L.J.E., Whitebook, M., & Olson, K.L. (2021). *Early Childhood Workforce Index – California State Profile*. Center for the Study of Child Care Employment, University of California, Berkeley. <https://cscce.berkeley.edu/workforce-index-2020/states/california/>

more acceptable than direct experience teaching young children from a teacher holding a bachelor's degree in ECE? Data shared by the [Peace Corps](#)<sup>4</sup> shows that only 34% of members are people of color and 65% are women. The most recent private school data from the [National Center for Education Statistics](#)<sup>5</sup> shows that only 15% of private school teachers are people of color. Compared to the ECE workforce in California in which 97% are women and about 70% are people of color.<sup>6</sup> The ECE workforce in California is not only more diverse than the Peace Corps, teachers currently working in private schools, and MSC credential holders, they are also more reflective of the diversity of the children in California.

### **An Equitable Path to the PK-3 Credential**

TK expansion holds the promise of providing good jobs for early educators, highly qualified ECE teachers for children, and modeling how public investments can be used to seed structural reforms necessary to ensure an effective and equitable ECE system. However, the plan outlined in 3H leaves out the most straight-forward path to a credential for experienced early educators, valuing the experience and education of teachers of elementary school-aged children more than that of educators already working with the very four-year-olds that TK will serve.

To eradicate, and not erect barriers for early educators to access TK teaching positions, we urge California authorities to establish pathways that leverage the extensive practical experience and education that thousands of early educators already possess. To this end, we offer for consideration the following recommendations for an ECE educator pathway to the PK-3 credential for experienced educators:

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<sup>4</sup> Peace Corps. (2019). Fast Facts. Peace Corps. <https://www.peacecorps.gov/news/fast-facts/>

<sup>5</sup> National Center for Education Statistics. (2020). *New Data on Public and Private School Teacher Characteristics, Experiences, and Training*. National Center for Education Statistics. <https://nces.ed.gov/blogs/nces/post/new-data-on-public-and-private-school-teacher-characteristics-experiences-and-training#:~:text=Among%20private%20school%20teachers%2C%2085.the%202017%E2%80%9318%20school%20year>

<sup>6</sup> Powell, A., Kim, Y., & Montoya, E. (2021). Demographics of the California ECE Workforce. Center for the Study of Child Care Employment, University of California, Berkeley. <https://cscce.berkeley.edu/education-and-experience-of-the-california-ece-workforce/>

### CSCCE Proposed Pathways for the PK-3 Credential for Experienced ECE Teachers

CTC Proposed Requirements for PK-3 Credential	CSCCE Proposal for Early Educator with a BA + 6 years teaching experience in early childhood settings <sup>7</sup>
Bachelor's degree	Met
Basic Skills	Met requirement through undergrad coursework (as currently allowed for candidates, refer to <a href="#">Table 3</a> ).
Subject Matter Competency	Met through completion of a degree major from a regionally-accredited college or university. The degree major must be in ECE, Child Development, or an interdisciplinary major (aligns with <a href="#">option 3d for traditional MSC candidates</a> and <a href="#">3e for private school</a> route).
24 ECE Units	Met - by virtue of teaching experience and satisfying subject matter competency; this would align with route to a multiple subject credential for private school teachers.
Teacher Preparation Program	Met (through 6+ years of ECE teaching in center, school and/or home-based settings in lieu of a teacher preparation program, aligning with requirements <a href="#">for private school teachers</a> ).
Clinical Hours	Clinical hours for preschool met through experience in ECE settings (aligning with requirement <a href="#">for private school teachers</a> )
Teacher Performance Assessment	Met (Not required for ECE teachers, aligning with <a href="#">requirements for private school teachers</a> with 6+ years of experience).
Reading Instruction Competence	<p>Postpone literacy competency assessment requirement and rely on program level assessments or coursework until the new literacy performance assessment is available (Fall 2025).</p> <p>Allow ECE educators 5 years to meet this requirement, aligning with the timeline for MSC holders to meet the ECE unit requirement.</p>

Respectfully submitted,



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<sup>7</sup> Note: We are proposing that early educators need not have a CDP; we know that many early educators with a BA have 24 ECE units but do not hold a CDP. Because the CDP is required only for certain subsidized programs, imposing this requirement creates inequities and an additional burden on educators who do not hold a permit that is not a requirement for the majority of ECE settings in CA.