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To: California Department of Education, Early Education and Support Division
From: Center for the Study of Child Care Employment, University of California, Berkeley
Subject: Comments on the proposed Child Care and Development Fund State Plan
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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 proposed Child Care and Development Fund State Plan.

Established in 1999, the Center for the Study of Child Care Employment (CSCCE) is focused on achieving comprehensive public investments that enable the early childhood workforce to deliver high-quality care and education for all children. To achieve this goal, CSCCE conducts research and policy analysis about the characteristics of those who care for and educate young children and examines policy solutions aimed at improving how our nation *prepares, supports, and compensates these early educators* to ensure young children's optimal development.

We address our comments in particular to Section 6: "Recruit and Retain a Qualified and Effective Child Care Workforce."

Despite increasing expectations of what early educators should know and be able to do, economic insecurity, linked to low wages, remains endemic among those who care for and educate young children from birth to elementary school. This condition has endured despite developmental scientists, economists, and business and labor leaders having widely recognized the importance of early care and education in shaping children's development, promoting the health of families, and building a strong economy, and despite the inextricable link between qualified teachers and quality education. We make the following recommendations to the State Plan based on the premise that efforts to recruit, prepare, and retain a qualified and effective child care workforce must be coupled with simultaneous efforts to improve educator compensation and workplace supports.

Specifically, we recommend the following:

1. Increase investment in workforce data collection and analysis

Accurate planning for the recruitment and retention of a diverse pool of early educators is impossible without data on the current workforce. To that end, CSCCE is pleased to be contracting with the California Department of Education, Early Education and Support Division, for the planning phase of the California Early Care and Education Workforce Study, which will be implemented in 2019. This will be the first statewide collection of workforce data in 13 years. However, in addition to the much-needed data that will be captured in this study, California has a need for an ongoing state-wide data system that captures critical information about the paid workforce across licensed/regulated settings. As the state seeks continuous improvement of the quality of early care and education services, it is critical to

be able to answer questions such as: How many lead teachers have bachelor's degrees? Associate degrees? ECE specific education and training? How does level of education vary according to the linguistic and racial/ethnic characteristics of the workforce? Across regions in the state? How many early educators earn at or above \$15 per hour? Without sufficient data, anecdote — and even bias — drives policy decisions. Without sufficient data, resources could be misdirected to communities that do not need them and away from communities that do. Without sufficient data, we risk repeating mistakes because we don't know how effective a program or policy is. Some of this data could be captured and regularly updated through the California ECE Workforce Registry if funds were available to expand participation and efforts are made across state agencies and with legislators to require those in licensed/regulated settings to enroll (i.e., licensed home and center-based staff, school-based ECE settings, and licensed exempt centers). The Registry is limited (as noted in 7.3.2) and currently operating in just a handful of counties. Therefore, we recommend sufficient investment to scale the Registry statewide, so that all members of the ECE workforce employed in licensed child care settings and in settings receiving public subsidies participate. Further, we recommend funds be earmarked and ongoing to support the Registry and periodic deeper assessments; a good source could be expanded CCDF quality improvement dollars. A fuller discussion of workforce data needs and recommendations for state leaders can be accessed at <http://cscce.berkeley.edu/files/2018/04/The-Workforce-Data-Deficit.pdf>.

2. Expand investments in support for education and training

The State Plan provides for many scholarship, bonus, and stipend programs for attaining education and credentials, and also highlights AB 212 funds that provide some funds for staff retention activities. However, AB 212 has not kept pace with inflation and is worth about 50 percent less than when it was established. Financial resources and targeted supports like AB 212 are required in order to support participation among the workforce in educational opportunities, but at the proposed levels, they have a very limited reach. Absent these supports, the persistently low wages experienced by most early educators, present an unreasonable expectation for the incumbent, and for the foreseeable future, the incoming ECE workforce, to engage in education and training. In recognition of this necessity, the consensus report, *Transforming the Financing of Early Care and Education* included among their recommendations, “the incumbent ECE workforce should bear no cost for increasing practitioners’ knowledge base, competencies, and qualifications, and the entering workforce should be assisted to limit costs to a reasonable proportion of postgraduate earnings, with a goal of maintaining and further promoting diversity in the pipeline of ECE professionals.”

3. Address compensation and benefits directly

Wages and benefits are a key driver of the struggle to recruit and retain child care workers. Median wages for early childhood educators in California are currently \$12.29 per hour for child care workers and \$16.19 per hour for preschool teachers (when adjusted to account for the cost of living in California, these wages are \$9.58 and \$12.62 per hour, respectively). How teachers are viewed and treated can serve as a proxy for how the state values the

development and education of its children. Yet many early educators, even with degrees, are worried about providing food and housing for their own families,¹ and struggle to afford housing in the communities in which they work.² The proposed State Plan falls short in acknowledging this reality. And while bonuses and scholarships mentioned above are helpful and necessary, they do not fundamentally shift earnings of recipients. The State Plan does not provide for any compensation improvements or policies for paid sick and vacation leave, health benefits, or retirement benefits in state-funded programs. California must go beyond AB 212, and bonuses and incentive programs, and address base pay and benefits directly through wage scales or other means. In addition, minimum wage increases across the state are pushing up the wage floor, which could lead to compression. The state needs a concentrated effort to plan for how to address this, and to make necessary reforms to ensure the ECE workforce is included in minimum wage increases and that overburdened parents, especially those eligible for but without access to subsidy, are not negatively impacted. Without addressing compensation and supports, California will continue to struggle to attract and retain a diverse and qualified workforce.

4. Include workplace supports in professional development and training

Work environments can impede or enhance teachers' ability to apply what they know, hone their skills, and continue their professional development. While there is considerable research indicating the predictive role of work environments to the ability of programs to improve and sustain quality teaching and services, these issues are often sidelined and not recognized and incorporated into our professional competencies and definitions of quality or included in QRIS. Teaching staff throughout California continue to work in challenging circumstance without adequate support, including planning time and adequate staffing. Many are fearful of speaking up about their working conditions. The role and importance of workplace supports, as well as [teachers' legal protection](#) from dismissal or discrimination based on reporting of violations, should be included in professional development competencies and standards and in the Quality Counts California Rating Matrix so that teachers and administrators can be well informed of professional expectations and rights, and so that work environments are built into our definition of quality.

In sum, we encourage the California Department of Education to articulate a vision that reflects the strategies and investments necessary to support a skilled and stable current and future workforce, and that identifies how this upcoming CCDF plan and associated funding will act as down payment on achieving that vision.

¹ Whitebook, M., King, E., Philipp, G., & Sakai, L. (2016). *Teachers' Voices: Work Environment Conditions That Impact Teacher Practice and Program Quality*. Berkeley, CA: Center for the Study of Child Care Employment, University of California, Berkeley.

² *San Mateo County Early Childhood Education Teacher Compensation Study* (2017). Retrieved from: http://www.smcoe.org/assets/files/learning-and-leadership/child-care-partnership-council/Committees/San%20Mateo%20ECE%20Teacher%20Compensation%20Study%20wAppendices_11.21.17.pdf.