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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, Item 5A. Proposed Regulations Pertaining to  
Credential Requirements for the PK-3 Early Childhood Education Specialist  
Instruction Credential  
Date: August 23, 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 [5A: Proposed Authorization Statement and Credential Requirements for the PK-3 Early Childhood Education Specialist Credential](#).

Coming out of a process that was on track to provide an equitable pathway for early care and education (ECE) teachers, we are extremely disappointed and disheartened by the final recommendations of Commission staff for the PK-3 credential. The proposal creates unnecessary barriers for experienced, educated ECE teachers to obtain the PK-3 credential and access jobs.

It is important to acknowledge that to teach transitional kindergarten (TK) in California, one can hold a multiple subject credential (MSC), *or*, if this moves forward, the PK-3 specialist credential. The PK-3 credential is not a requirement if you otherwise hold a MSC. An expedited pathway to a MSC credential is available for private school teachers but is not an option for ECE teachers because teaching in an ECE setting is not currently an accepted teacher experience. While a similar path to the PK-3 credential that accepted teaching in an ECE setting was previously recommended by Commission staff, under this new proposal, an equitable pathway for early educators does not exist. The commission has moved backwards in its stated intent to promote equitable policies. This latest proposal instead adds additional requirements to prove worthiness to teach that are not asked of K-12 private school teachers. The one barrier to obtaining the credential that has been partially removed for ECE educators is 200-400 hours of clinical practice. If the Commission limits their authorization of the PK-3 credential to this proposal, and fails to provide a pathway akin to that for K-12 private school teachers, it will cement a deficit perspective of ECE into this public policy and communicate that the experience and education of thousands of women of color with degrees in early childhood education and an average of more than 10 years of experience working with preschool-aged children is deemed as less credible than teaching older children.

Excluding an expedited pathway to credentialing for early educators has great equity implications. Teaching in TK could double or more the salary of early educators,<sup>1</sup> creating life changing opportunities for a workforce that is 70 percent people of color and reflective of the diversity of

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<sup>1</sup> Powell, A., Montoya, E., Austin, L.J.E., & Kim, Y., (2022). Double or Nothing? Potential TK Wages for California's Early Educators. Center for the Study of Child Care Employment, University of California, Berkeley.  
<https://cscce.berkeley.edu/publications/data-snapshot/double-or-nothing-potential-tk-wages-for-californias-early-educators/>

California's children.<sup>2</sup> This is in contrast to 39 percent of TK-12 teachers<sup>3</sup> and 15 percent of private school teachers.<sup>4</sup> Providing an expedited pathway for early educators would also help fill thousands of new TK positions with educators experienced in teaching preschool-aged children and grounded in child development knowledge and pedagogy.

We identified several areas that require attention:

1. The current proposal requires ECE teachers to complete a teacher preparation program, complete clinical hours, and a Teaching Performance Assessment (TPA). The one requirement that is partially waived under the current proposal for program equivalency is 200-400 hours of clinical practice in early learning settings. Meanwhile, private K-12 teachers with six years of teaching in a private school may apply directly for an MSC without completing a preparation program or additional clinical hours, and are not subject to the TPA. These recommendations reflect an assumption that early educators are not getting proper education and training in ECE programs and that early educators' preparation is inadequate and not applicable to TK - grade 3. Based on our research, the majority of ECE bachelor's degree programs in California cover content for children through third grade, across domains of learning and development.<sup>5</sup> Devaluing ECE programs represents a missed opportunity to strengthen and ensure aligned instruction as children progress from preschool to the elementary years and help to remove the artificial boundaries between preschool and elementary school that hinder the progression of student success.
2. Naming only lead teacher ECE experience as a qualification for the program equivalency displays a lack of understanding of how co-teaching and administration in ECE programs works, in which co-teachers and administrators frequently share responsibility. In any proposal, it will be important that a definition of responsibilities be specified, rather than codifying role by job title. Furthermore, by only accepting the experience of those in center-based programs, this proposal would exclude licensed home-based providers, approximately 5,600 of whom have a bachelor's degree in ECE,<sup>6</sup> have on average 17 years of experience teaching and working with preschool aged children, and who are more likely to be women of color (71 percent) and immigrants (42 percent),<sup>7</sup> from accessing an expedited pathway to the credential and contributing their expertise and experience to early learning classrooms including TK.

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<sup>2</sup> Williams, A., Montoya, E., Kim, Y., & Austin, L.J.E. (2021). *New Data Shows Early Educators Equipped to Teach TK*. Berkeley, CA: Center for the Study of Child Care Employment, University of California, Berkeley.

<https://cscce.berkeley.edu/publications/data-snapshot/early-educators-equipped-to-teach-tk/>

<sup>3</sup> Ibid.

<sup>4</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>5</sup> Austin, L. J. E., Whitebook, M., Kipnis, F., Sakai, L., Abbasi, F., & Amanta, F. (2015). *Teaching the Teachers of Our Youngest Children: The State of Early Childhood Higher Education in California, 2015*. Berkeley, CA: Center for the Study of Child Care Employment, University of California, Berkeley. <https://cscce.berkeley.edu/publications/report/california-early-childhood-higher-education-inventory/>

<sup>6</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/publications/data-snapshot/education-and-experience-of-the-california-ece-workforce/>

<sup>7</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/publications/data-snapshot/demographics-of-the-california-ece-workforce/>

3. The requirement of 200 hours in a K-3 setting remains a barrier, because it requires early educators who are currently working to leave their places of paid work to complete these hours. For comparison, a private school teacher with six years of experience in 6th grade could be eligible for the expedited pathway to the MSC and to teach TK - grade 3 without completing any clinical hours in a TK or K-3 setting.
4. The requirement for a center to provide a satisfactory assessment of performance could place current teachers in a vulnerable situation - what if their current employer is facing a staffing crisis of their own and is reluctant to support a teacher moving to a different job? What if the person does not want to let their employer know they are considering leaving for TK because they fear losing the job or other issues in the interim? We recommend to make this requirement more expansive to also allow a previous employer within the last two years to provide the assessment of performance, akin to the private school pathway.
5. The proposal requires the establishment of a Committee on Accreditation for the PK-3 Early Childhood Education Specialist Instruction Credential to create standards for and approve preparation programs. After which, colleges can apply to be accredited and begin enrolling students. We would request that this proposal be explicit in accepting coursework completed at WASC (or equivalent) institutions *prior* to the establishment of this committee. This will otherwise, by default, invalidate the education and preparation of early education degree holders as it relates to the credential.

Recommendations we have heard for ECE teachers to utilize the district intern pathway or residency program, while appropriate for new teachers, do not mitigate barriers for highly experienced educators, as both still require teachers to complete a preparation program, and in the case of a residency program, will require teachers to leave their jobs for a stipend (\$25,000 at most) that is less than current median center-based teacher wages.

In places where similar pathways have rolled out, with different expectations for teachers from early learning settings and those in public schools, patterns have emerged that can serve as a cautionary tale for California. For example, in a publicly funded kindergarten program in Ontario, Canada for 4- and 5-year-old children, a co-teaching model has been created with the intent to merge a play-based focus with an “educational” focus, and to provide a path for ECE teachers into public school teaching jobs.<sup>8</sup> The model combines the expertise of early childhood educators and the equivalent of K-12 teachers (Ontario Certified Teachers). Although both groups of educators are considered equal partners through the model, the early educators have “less autonomy, less power, poorer working conditions, and limited status within the school community.” Early educator teacher pay “remains relatively stagnant” and they have limited opportunities for professional growth.

In Ontario, the majority of OCTs are white and middle class compared to the early educators who are “more likely to be racialized and marginalized due to low wages and diminished status as care workers rather than educators.” California can mitigate a similar scenario from the outset by valuing the ECE workforce, and placing the depth and breadth of their education and experience on a par with that of their K-12 counterparts.

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<sup>8</sup> Abawi, Z. (2021). Privileging Power: Early Childhood Educators, Teachers, and Racial Socialization in Full-Day Kindergarten. *Journal of Childhood Studies*, 46(1), 1-12.  
<https://www.proquest.com/scholarly-journals/privileging-power-early-childhood-educators/docview/2505406259/se-2>

We do not object to multiple pathways for people to earn the PK-3 credential, including preparation programs and clinical hours for pre-service and novice teachers. We do however, assess the exclusion of a direct path to the credential, equivalent to that available to private school K-12 teachers, to provide inequitable pathways to teaching for experienced early educators. We ask for answers to the same questions we posed in our [April 4, 2022 submission](#):

- How are the planning and proposal development processes centering the experiences, intellect and leadership of educators of color in ECE?
- Who benefits and who is marginalized by the proposed requirements and pathways?
- Is the proposal more likely to screen in or out one group or another into TK teaching positions?

Respectfully submitted,



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