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June 30, 2023

To: Christina Villanueva, Commission on Teacher Credentialing

CC: Sandra Burwick

From: Center for the Study of Child Care Employment, University of California, Berkeley

Subject: *Public Comment for "Notice of Modifications and Supplemental Justification to Proposed Rulemaking: Title 5. Education, Division 8, Pertaining to PK-3 Early Childhood Education Specialist Credential" (6/15/23)*

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 proposed amendments to §80067 - Specific Requirements for the PK-3 Early Childhood Education Specialist Instruction Credential. Our comments are focused on the (PK-3 Credential) requirements and pathways.

ECE workforce data compiled in our [California Early Care and Education \(ECE\) Workforce Study](#) reflects that [35% of Assistant Teachers and 24% of Lead teachers in center based ECE settings have attended community college to attain their degrees](#). Therefore, we are pleased to see that the inclusion of explicit language to reflect that practicum courses offered by regionally accredited community colleges will meet clinical practice equivalency requirements for up to 200 commensurate hours served in the practicum.

However, the modified regulations continue to raise several grave concerns for providing equitable pathways to attaining a credential that authorizes one to teach TK for California's incumbent early childhood workforce. **We have raised these concerns in [multiple responses to requests for public comment](#) to the Commission, yet have seen no address of the issues raised in any of the regulatory modifications made.** We therefore re-submit the following concern and recommendations in hopes the Commission

will make the necessary changes to ensure equitable access to the PK-3 Credential for the incumbent early educator workforce.

**Concern: The modified PK-3 Credential regulations privilege educators with potentially little, if any, early childhood experience over incumbent early educators with significant early childhood education and training in attaining the PK-3 Credential.**

We are concerned that there is no pathway to the Multiple Subject Credential (MSC) nor the PK-3 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 holders of the MSC, including those who attained the MSC via the private school teaching route which bypasses the credential program and clinical hours, the PK-3 credential provides an option, not a requirement, for pursuing a position in PK-3 education. Yet, for experienced early educators with bachelor's degrees, completing a credential program and clinical hours is the only option for pursuing a position in PK-3 education. The proposed modifications, while reducing the amount of clinical experience that would be required for incumbent early educators, fall short of providing a pathway that is equivalent with that offered to K-12 private school teachers. Further, it is not reasonable for early educators to opt for the MSC private school pathway rather than the PK-3 Credential as child care centers and family child care homes are not accepted as private school settings, closing this route to the MSC for early educators. Because of these regulatory choices, the Commission offers no feasible pathway to the MSC or the proposed PK-3 Credential that similarly qualifies existing early educators who potentially have decades of experience teaching children birth-age 5 and who meet degree requirements.

**Recommendation: Establish an early educator pathway for attaining the PK-3 Credential that is equivalent to the private school teaching pathway that is available for attaining a Multiple Subject Credential.**

If the state is interested in promoting equitable policies, we continue to suggest that the Commission establish an additional pathway to the PK-3 Credential that aligns with those available to teachers of older children and those with a MSC. For early educators seeking to put their education, experience and expertise to work in PK-3 classrooms, the regulations,

as modified, continue to create barriers to obtaining higher pay and benefits within PK-3 education for a workforce that is grossly underpaid.

As we have previously noted, findings from CSCCE's [2020 California ECE Workforce Study](#) spotlight the vast racial and ethnic diversity, experience, and education of the ECE workforce. 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<sup>1</sup>. Further, among center-teachers with a degree the majority meet or exceed the requirement for TK teachers to complete 24 college units in early childhood education. While we assume the PK-3 Credential architects do not intend for these regulations to be racist, classist, exclusionary or inequitable, ultimately, the outcomes of the policy are what matter. Given the existing pathways that the Commission offers other 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 continue to be excluded from the PK-3 Credential regulations.

The current PK-3 Credential regulations leave out the most straight-forward path to a credential for experienced early educators. Compared to the options early educators had before the current modifications, it may seem to the Commission that requiring degreed and experienced educators to complete 200 clinical hours and a credential program is a feasible requirement. However such a requirement is in fact a significant burden to a workforce that earns one-third of what current TK and Kindergarten teachers are paid. Under the current regulations, many early educators who have already incurred unaffordable debt to earn their degrees would be required to leave their jobs for the equivalent of five weeks, foregoing their already low wages, in order to satisfy these requirements.

In an effort to eradicate barriers to [accessing higher paying PreK and TK teaching positions](#) for degreed and highly experienced early educators, the Commission should offer them an option that is akin to one that is already offered to K-12 teachers seeking to earn a MSC.

**Therefore, we offer a potential equitable and feasible pathway for degreed and**

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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.

**experienced early educators to attain the PK-3 Credential in [Table A](#) of this document for your consideration.**

In the meantime, to open up constructive lines of communication with the Commission and to better understand the Commission's approach to ensuring experienced early educators have access to public school PK-3 teaching positions, we seek answers to the following questions:

- What existing rules or regulations prohibit the establishment of an option for the PK-3 credential akin to the Private School option for the MSC?
- Will the Commission allow the incumbent workforce to satisfy clinical hours in their current workplace with supervision from a certified California Early Childhood Mentor?
- Given the severely low wages that early educators earn nationwide, the [National Academies of Science, Engineering, and Medicine](#) have [issued recommendations](#) to take specific action to relieve the cost burden for additional education and training; will the Commission and/or partner agencies provide financial and other resources to facilitate participation in credential programs for the incumbent workforce?

We look forward to the next iteration of the Commission's important work to establish equitable regulation for the new PK-3 Credential and to address these ongoing concerns and proposed recommendations.

Respectfully submitted,



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**Table 1: CSCCE Proposed Pathways for the PK-3 Credential for Experienced ECE Teachers**

<b>CTC Proposed Requirements for PK-3 Credential</b>	CSCCE Proposal for Early Educator with a BA + 6 years teaching experience in early childhood settings <sup>2</sup>
<b>Bachelor’s degree</b>	Met
<b>Basic Skills</b>	Met requirement through undergrad coursework (as currently allowed for candidates, refer to <a href="#">Table 3</a> ).
<b>Subject Matter Competency</b>	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 route</a> ).
<b>24 ECE Units</b>	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.
<b>Teacher Preparation Program</b>	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> ).
<b>Clinical Hours</b>	Clinical hours for preschool met through experience in ECE settings (aligning with requirement <a href="#">for private school teachers</a> )
<b>Teacher Performance Assessment</b>	Met (Not required for ECE teachers, aligning with <a href="#">requirements for private school teachers</a> with 6+ years of experience).
<b>Reading Instruction Competence</b>	Postpone literacy competency assessment requirement and rely on program level assessments or coursework until the new literacy performance assessment is available (Fall 2025). Allow ECE educators 5 years to meet this requirement, aligning with the timeline for MSC holders to meet the ECE unit requirement.

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<sup>2</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.