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To: Commission on Teacher Credentialing  
CC: Monica Martinez, Committee Chair and the Educator Preparation Committee  
From: Center for the Study of Child Care Employment, University of California, Berkeley  
Subject: Public Comment Submission about Pathways for the Early Education Workforce  
Date: September 28, 2021

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 2A Establishing Multiple, Accessible Pathways to a Permit or Credential Authorizing Service in State Preschool and Transitional Kindergarten.

We are pleased to see that the Commission is considering both an early education credential and multiple pathways to obtain such a credential. We appreciate that our latest research and data snapshot "[New Data Shows Early Educators Equipped to Teach TK](https://cscce.berkeley.edu/early-educators-equipped-to-teach-tk/)"<sup>1</sup> was reflected in item 2A to highlight the need for as many as 8,000-11,000 additional lead TK Teachers. In the brief, we spotlight the racial and ethnic diversity, experience, and education of the early care and education (ECE) workforce, highlighting for example that, among center-based teachers 70% identify as people of color, which closely reflects the child population, they average 15 years of teaching experience, and at least 37% meet or exceed the requirement for TK teachers to complete 24 college units in early childhood education. Yet, this workforce remains grossly undervalued and underpaid with wages that are [barely one-third](#)<sup>2</sup> of what current TK and Kindergarten teachers are paid.

TK expansion holds the promise of providing good jobs for early educators and modeling how public investments can be used to seed structural reforms necessary to ensure an effective and equitable ECE system. To this end, we offer the following recommendations for consideration.

**Recommendation 1: Establish the ECE Specialist credential as a Birth to Grade 3 credential.**

The recommendation in 2A states, "In short, the ECE Specialist credential could become the vehicle for recognizing the specific, tailored additional preparation needed for MS credential holders and CDP teachers to teach in PK-3." We encourage the Commission and state leaders to be forward-thinking and anticipate the need for a credential that spans the full ECE age continuum;

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<sup>1</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/early-educators-equipped-to-teach-tk/>

<sup>2</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/>

[two-thirds of states](#)<sup>3</sup> already have such a certification, according to the “*Early Educator Preparation Landscape 2020 Report*”, that is equivalent for those teaching older grades. Establishing a birth-through-age-eight certification is aligned with recommendations from the National Academies of Sciences, Engineering and Medicine,<sup>4</sup> and will disrupt the perception that educators working with children 0-3-years old have less expertise than those working with children in TK-3 settings--perceptions that fuel fragmentation across ECE systems and services. As an immediate measure while such a credential is developed, reactivating California’s existing [standard early childhood credential](#)<sup>5</sup> for preschool through 3rd grade, with field experience and residencies focused on this specific age group, would provide more immediate access for the current ECE workforce to gain access to TK qualifications.

**Recommendation 2: Ensure the extensive preparation and practical experience early educators possess is acknowledged and a central focal point for innovative pathways to credentialing.**

As it currently reads, the plan outlined in 2A is TK teacher/Multiple Subject (MS) Credential holder-centric, placing a greater burden on Child Development Permit (CDP) holders to qualify for the ECE Specialist credential. Whereas the preparation experiences undertaken for the MS credential are deemed acceptable for holders to teach in TK or below, there is no such accommodation to accept ECE preparation and experience as acceptable to teach in K-3. For example, the preparation requirements for CDP holders ignore that some early education bachelor’s degree programs cover pedagogical content and clinical experiences across the birth through age 8 continuum. Further, the K-3 clinical practice requirement for CDP holders would likely require they leave their current ECE employment in order to fulfill this requirement; there is no such clinical practice requirement in TK for MS credential holders.

Therefore, to help eradicate, and not erect barriers for early educators to access TK teaching positions, we encourage California authorities to establish new pathways that leverage the extensive practical experience that thousands of CDP holders already possess. Specifically:

- The [Requirements for Teachers with Private School Experience](#)<sup>6</sup> can serve as a possibility model in that it allows teachers to count three to five years of teaching experience in lieu of student teaching or 6 or more years of teaching experience in lieu of completing a credentialing program and student teaching; and

<sup>3</sup>Center for the Study of Child Care Employment, Bellwether Education Partners, and National Institute for Early Education Research. (2020). Early Educator Preparation Landscape. Early Educator Investment Collaborative.

[https://earlyedcollaborative.org/assets/2020/12/EEIC\\_Report\\_EarlyEducatorPreparationLandscape\\_2020.pdf](https://earlyedcollaborative.org/assets/2020/12/EEIC_Report_EarlyEducatorPreparationLandscape_2020.pdf)

<sup>4</sup>National Research Council. (2015). Transforming the workforce for children birth through age 8: A unifying foundation.

<sup>5</sup>California Commission on Teacher Credentialing. (2014). *Early Childhood Credentials/Permits Issued by the Commission*.

[https://www.ctc.ca.gov/docs/default-source/educator-prep/early-care-files/ece-cred-types.pdf?sfvrsn=4f4fed04\\_0](https://www.ctc.ca.gov/docs/default-source/educator-prep/early-care-files/ece-cred-types.pdf?sfvrsn=4f4fed04_0)

<sup>6</sup>California Commission on Teacher Credentialing. (2021a). Requirements for Teachers with Private School Teaching Experience. [https://www.ctc.ca.gov/credentials/leaflets/Single-Multiple-Subject-Credentials-\(CL-834\)](https://www.ctc.ca.gov/credentials/leaflets/Single-Multiple-Subject-Credentials-(CL-834))

- The [district intern credential](#)<sup>7</sup> is another model to build from to create new pathways for early educators with a bachelor's and/or graduate degrees that eliminate the need for early educators to leave their current employment and instead use current employment to satisfy full-time student teaching requirements.

Lastly, we wanted to address the tension between opening pathways for ECE educators to TK jobs and the repercussions for the rest of the ECE system. From a workforce perspective, it is likely that creating paths for early educators to become TK teachers-- good jobs with living wages and benefits- will cause a drain of teachers from the rest of the system. The reality is that this could both create life-changing opportunities for many early educators, most of whom are women of color, and who are now among the lowest-paid workers in California, *and* at the same time further destabilize an already fragile ECE system. But we caution against this destabilization as being an argument to limit the scope of pathways to TK jobs. The solution is not to withhold good jobs from ECE teachers, but for state leaders to address the entirety of the ECE system, creating good jobs and stable programs in all parts.

Respectfully Submitted,



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<sup>7</sup>California Commission on Teacher Credentialing. (2021b). District Intern Credential.  
[https://www.ctc.ca.gov/credentials/leaflets/district-intern-credential-\(cl-707b\)](https://www.ctc.ca.gov/credentials/leaflets/district-intern-credential-(cl-707b))

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