

TO: California Commission on Teacher Credentialing

FROM: CA EC Baccs Coordinating Team (Ca EC Baccs is a statewide group of Child Development and Early Childhood baccalaureate faculty)

DATE: August 23, 2022

RE: Written Comment on Educator Preparation Committee, August 26, 2022  
5A: Proposed Regulations Pertaining to Credential Requirements for the PK-3 Early Childhood Education Specialist Instruction Credential (Information/Action Item)

We, CA EC Baccs Coordinating Team, have continued to argue that the PK-3 ECE Specialist Instruction Credential requires subject matter depth and breadth in Child Development/Early Childhood Education; PK-3 teacher preparation must go beyond introductory Child Development content. However, based on CTC Item 5A, we argue that this current proposal will not support young children's learning and development.

Some of our concerns are summarized below:

**Diluted Child Development/Early Childhood Education Subject Matter Content Requirement:**

While CTC has repeatedly stated that the proposed PK-3 Early Childhood Education Specialist Instruction Credential **subject matter requirement** is in Child Development/Early Childhood Education bachelor's degree, this statement does not seem a priority for the credential. It is the case that Item 5A states that candidates **may** meet the PK-3 Specialist Instruction Credential's subject matter requirement by completing a baccalaureate in CD/ECE. It also gives a primary pathway that does not include a baccalaureate in child development/early childhood. Subject matter can be met by

Completion of 24 semester units or the equivalent quarter units of non-remedial, degree-applicable coursework at a regionally accredited institution of higher education in early childhood education and/or child development (CTC 5A-3).

Item 5A language and concepts dilute CD/ECE subject matter for this credential and continue to "push down" K-12 standards, language, and metrics. How can 24 units of lower division or scattered coursework be equal to a baccalaureate? This lack of understanding of what upper division higher education work accomplishes is concerning. Item 5A makes it clear that this Credential is not structured to ensure ECE-centric preparation of teachers. CTC's proposal for this Credential does not serve the needs of California's young children and families.

**CTC-proposed preliminary credential clinical practice requirement has may loopholes so the PK-3 teacher will not necessarily have clinical experience with young children before entering the classroom:**

**Lack of DLL and MLL content for Multiple Subject Credential Holders' Pathway to This Credential:**

Item 5A cites CTC's English Learner Authorization for Multiple Subject Credential holders who seek this new Credential (CTC 5A-4-5). The CTC website definition of "English Learner Authorization"

does not adequately incorporate supporting DLL/MLL children and families. The expectation of teachers' mere "help" for DLL/MLL learners does not demonstrate teachers' knowledge, understanding, and appreciation of the essential roles of children's home language nor an understanding of what is required to be a teacher of DLL/MLL children.

We, Child Development and Early Childhood higher education baccalaureate faculty, are eager to help CTC move away from a "push down" model to a more comprehensive ECE-centric model that supports our young children and their families.

#### CA EC Baccs Coordinating Team

Ayumi Nagase, Sonoma State University  
Denise Kennedy, California State Polytechnic University, Pomona  
Guadalupe Díaz Lara, California State University, Fullerton  
Jan Fish, California State University, Northridge  
Linda Platas, San Francisco State University  
Nancy Hurlbut, California State Polytechnic University, Pomona  
Sharon Seidman, California State University, Fullerton