

TO: California Commission on Teacher Credentialing

FROM: CA EC Baccs Coordinating Team

DATE: August 23, 2022

RE: Written Comment on Educator Preparation Committee, August 25, 2022, Item: [2B: Discussion and Potential Adoption of Proposed Precondition Changes Related to the Subject Matter Competence Requirement](#) (Action Item)

We, CA EC Baccs coordinating faculty, have continued to collaborate with the Commission on many related workgroups. Throughout this process, we have advocated for and demonstrated the depth, breadth, strength, and value of child development/early childhood preparation for teachers of California's children. However, based on CTC Item 2B and the June 17, 2022 Commission meeting Item 3I ([Proposed Adoption of Regulations Regarding Options for Meeting the Subject Matter Competence Requirement](#)), we are concerned about the lack of child development/early childhood majors being specifically mentioned as a subject matter for the Multiple Subject Credential. We argue that this missing subject matter area will present barriers for excellent teachers of children and will not support children's learning and development.

We would like clarity on the language in Item 2B. For instance, it is not clear on what is being proposed related to changes in subject matter preconditions.

Page 6 (EPC 2B-6) reads:

"For Education Specialist programs, the candidate provides evidence of having demonstrated subject matter competence through one of the following methods:

"Successful completion of a baccalaureate or higher degree from a regionally accredited institution of higher education with either a major in one of the subject areas in which the Commission credentials candidates or a liberal studies or other major that includes coursework in the content areas pursuant to subdivision (b) of Education Code section 44282 and Title 5 section 80096*."

Since the ECE/CD major is the subject matter of the CTC-proposed and endorsed PK-3 Early Childhood Education Specialist Instruction Credential, to us this paragraph indicates that ECE/CD would qualify as subject matter for the Multiple Subject Credential, also.

Does this say that the ECE/CD baccalaureate majors qualify as a "subject area?" If it does, we support this proposed change. We also argue that Child Development and Early Childhood baccalaureate majors be added in the above statement after Liberal Studies and on page 5 (EPC 2B-5) item A, 4, II added in addition to Liberal Studies.

However, if CTC does not intend to recognize CD/EC as an additional approved subject matter area for the Multiple Subject Credential, we have the following serious concerns.

- By failing to reexamine and reconceptualize CTC's interpretation of AB 130 to include Early Childhood and Child Development majors as meeting Multiple Subject Credential Subject Matter, CTC policy
 - severely limits the pipeline and numbers of teacher preparation candidates for TK and PK-3rd grade.
 - perpetuates an inequitable barrier to CD/EC baccalaureate students' access to Multiple Subject Credential preparation programs. Many of these students have worked with children in ECE programs since high school or entering community college and four-year ECE/CD programs.
 - de-values and dismisses a highly sophisticated, research-based, early childhood development and teacher-preparation field that was professionalized in 1926 by the formation of the National Association of the Education of Young Children. An organization formed out of a concern about the proliferation of educational programs for preschool children staffed by individuals without adequate knowledge about child development and effective strategies for teaching young children.

The Coordinating Team of CA EC Baccs, a statewide group of Child Development and Early Childhood baccalaureate faculty, are eager to help CTC move forward and recognize our majors as approved subject matters for the multiple subject credential.

CA EC Baccs Coordinating Team

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