

May 20, 2016

To the Administration for Children and Families, U.S. Department of Health and Human Services,

We, the undersigned organizations, appreciate both the effort and significance of this policy statement on early childhood career pathways, as well as the opportunity to provide our collective comments to the U.S. Department of Health and Human Services. With a shared focus on the need to support the professional advancement, learning and practice of early childhood educators and program directors, we strongly support this thorough and thoughtful statement and the support it will provide to states and local programs. We are particularly appreciative of the statement's commitments to explicitly name, include and build upon existing standards, resources and models to inform both the overview and the recommendations.

We have, however, identified three main topics that we believe could be integrated and enhanced in a way that would strengthen the approach and impact of the entire document: (1) workforce diversity and equity; (2) compensation; and (3) professional development and higher education. We elaborate on each of these topics below.

Increase Focus on Workforce Diversity and Equity

The need for a diverse early childhood profession that reflects and respects the increasing diversity of this country's children and families has been well-researched and well-documented. The Administration has made significant and important efforts to prioritize issues of equity and diversity in early childhood. We believe this policy statement can do more to reflect this priority and assert a stronger commitment to ensuring that career pathways support an early childhood workforce that is inclusive of professionals with respect to race, culture, gender, language, age, geography, socio-economic status, and setting, and that addresses the specific strengths, needs and constraints within the tribal, migrant and seasonal workforce.

- The "Purpose" section would benefit from the inclusion of data points that illuminate the disparities experienced by professionals along racial, linguistic and socio-economic lines, as it does for teachers of infants and toddlers. These data would set the stage for additional language regarding the need to focus on diversity and equity in the goals of the policy statement so that, for example, one goal would become to "provide recommendations for state agencies to create the policies and resources to provide a career advancement pathway that is equitably accessible and equipped with the meaningful supports needed for racially, linguistically and culturally diverse individuals working in a range of settings to succeed as early education professionals."
- While the statement addresses the importance of ensuring that family child care providers are included in the profession and in career pathways models, we are concerned that the specific recommendations do not fully reflect either the practices of

family child care nor the policy landscape in order to make it possible to practically ensure and support the participation of family child care providers. For example, recommendations should be clear that states should structure their Quality Rating and Improvement Systems to include family child care in a meaningful way; that professional development content needs to be accessible and relevant to those working in home settings; and that discussions of program leadership, pathways and systems need to intentionally include family child care. In addition, a full discussion of career pathways must address those who are currently caring for children outside of the licensing systems, and provide opportunities to bring them into a pathway that enhances their ability to support children's learning and development wherever they are.

- In the last bullet point before the recommendations, the statement notes that a career pathway includes “tracking the progress of individuals as they enter and at each step in the pathway, with attention to diversity of the workforce at each step of the pathway.” Data are indeed a critical part of the ability to pay attention to the diversity of the workforce, but it is important to note that we also need data that provide information about the workforce as a whole, more than the tracking of individuals, so that we can collectively aggregate and then disaggregate data in ways that identify and illuminate issues of equity within the system.
- In 2015, NAEYC conducted research with current and potential early childhood educators; one finding was that educators of color expressed more concerns about mentoring, training and college affordability than white educators. Forty-eight percent of educators of color identified a “lack of mentoring and career guidance” as a major challenge to remaining in the field and 51 percent said college inaccessibility was a major barrier to entering the field, compared to 37 percent of white educators on both measures. We encourage the Administration to specifically address the importance of mentoring and college affordability as an issue of equity and workforce diversity within the sections on career and academic advising and coaching and increasing access to professional development and higher education.
- We support the statement's recognition of the need for professional development providers and institutions of higher education to respond to “growing language and cultural diversity,” and we believe it can go deeper in encouraging states to support PD providers' and IHE's capacity to help diverse students at different stages in life with varying educational backgrounds and preparation enroll in and successfully complete their programs. Along these lines, we recommend adding language to the first sentence in the second paragraph within the “Increasing Access” section so that it would read, “In addition to financial considerations, professional development providers and higher education degree programs need to respond to the growing language and cultural diversity, geographic distances, the full-time work schedules, *and, in many cases, the family obligations and child care needs* of early childhood teachers and directors.” While we anticipate that online coursework and coursework in other languages will and should be part of the response to support a range of students, the statement could also use this

section to elevate additional evidence-based opportunities to support diverse students such as cohort and peer support networks, faculty training, guidance and mentorship programs, targeted scholarships and grants.

Increase Integrated Mentions of Compensation

With the understanding that this statement is not about the compensation of the workforce, we nevertheless recognize that the Administration has successfully integrated mentions of wages and compensation at critical points, including the definition of “career pathways” as including “family-supporting wages.” We believe there are additional, important opportunities to elevate the issue of compensation and compensation parity within the context of the statement and ensure that states are asked and supported to adequately finance the system in which our early educators work and learn.

- From the very first paragraph, we recommend identifying compensation and professional growth as part of this statement’s research base and purpose. Within this frame, and reflecting the importance of equity and diversity, as identified above, the first sentence could become, “A strong body of research ties the competencies, stability, *diversity and compensation* of teachers and program directors directly to the quality of children’s development and learning in out-of-home programs,” while the second sentence could include a nod to the fact that career pathways support the “professional learning, practice *and growth* of early childhood educators and program directors.”
- In the systems comparison between Head Start and the Department of Defense, the paragraph on the DoD already includes a mention of the fact that staff salaries are tied to a wage scale that ensures above-adequate compensation. There is an additional opportunity here to acknowledge real-world differences between these two systems, noting that the wage scale in DoD has meant that increased educational attainment leads to increased compensation, which is not the case in either Head Start or for other early childhood systems.
- In the section on “increasing access to professional development and higher education,” the statement rightly notes that “as states raise requirements for staff...they need to consider investing concurrently and robustly in scholarships, financial aid loan cancellation and forgiveness, and tax credit strategies.” It is important here to add “increasing compensation” as a strategy for states to invest in the workforce in order to “help individuals meet higher qualification requirements” and “help retain them after graduation.” This could also be a place to provide encouragement to states to leverage state and community workforce investment resources to support the career advancement of early childhood educators.
- Because “compensation parity” often takes on different meanings in different contexts, we recommend clarifying the use of the phrase “parity of compensation” in the section on QRIS to ensure that it is understood here by states to mean that higher

reimbursement rates provide a structural solution that require funds dedicated to providing increased compensation at increased levels of the system, with the goal of ensuring compensation parity across sectors including Head Start, child care and PreK. We further recommend including stronger language about the link between reimbursement rates and teacher compensation, and the need to examine overall rates and the full amount of the differential for higher-quality care that would be required to retain highly credentialed early educators.

Elevate Importance of Quality in Professional Preparation and Development

Acquiring credentials and degrees along a career pathway is important but not sufficient; the quality of those credentials and degrees are the determining factors regarding whether the early childhood profession is able to deliver the best outcomes for children and families. Therefore, we recommend enhancing the statement's focus on how to support and increase the quality and availability of programs and coursework, as well as the quality of instruction that early childhood educators receive.

- Overall, we encourage the Administration to provide recommendations to states encouraging them to focus on investing in and strengthening existing yet under-resourced systems, including but not limited to institutions of higher education, which deliver professional development so that they can raise their capacity to fully meet the goals of increasing the quality and accessibility of that professional development.
- Within higher education, we can learn from K-12 research indicating that key components of preparation that correlate with stronger student learning outcomes are subject matter expertise; the pedagogical knowledge to teach it; and the opportunity to practice it. In addition to orienting programs around the competencies, there needs to be a focus on strengthening the practice supports, preparation and induction of educators, and it would be powerful for this statement to call for stronger partnerships between higher education and practice settings to improve the quality and diversity of field experiences and mentor teachers.
- The section on creating a coherent sequence of credentials highlights the importance of both foundational and specialized knowledge and competencies. The *Transforming the Workforce* report strongly supports this need and states that foundational competencies “be augmented by shared specialized knowledge and competencies within a type of profession, as well as further differentiated competencies that depend on specialty or discipline and age group” (2015, p.494). Leveraging national foundational standards is an important and efficient action for states that this statement raises in the section on promoting credentials. We recommend that this guidance be expanded to explicitly include using national specialized criteria to also help advance quality and consistency, and suggest that the second paragraph in that section be amended as follows:
 - “One way to make recognition easier is to base the credential and the aligned competencies on national standards, such as the National Association for the

Education of Young Children Initial and Advanced Standards for Early Childhood Professional Preparation, the National Board for Professional Teaching Standards for Early Childhood Generalists working with students ages 3-8, *and the Council on Exceptional Children's Personnel Standards and the Division of Early Childhood's Specialty Set Personnel Standards. Specialty, role, and age-group specific credentials can also increase their portability by using national competencies and recommended practices that support meeting the global national standards, such as the Division of Early Childhood's Recommended Practices in Early Intervention/Early Childhood Special Education and ZERO TO THREE's Critical Competencies for Infant-Toddler Educators.* Aligning credentials with national professional *criteria* makes it easier for sectors and states to accept the credential because there is a common understanding of the knowledge base and demonstration of that knowledge. States should crosswalk credentials with these *national standards, specialized competencies and guidance*, and different levels of competencies to ensure that the stacking of credentials scaffolds professional knowledge from foundational skills to highest levels.”

- The section on strengthening professional preparation and ongoing development should also address the availability, content and quality of coursework and the need for states to work with and invest in institutions of higher education to recruit, train and support highly-qualified, diverse instructors for two- and four-year programs. The statement could specifically identify the need for coursework that addresses critical areas of practice but which are often neglected by institutions of higher education, including cultural competence, social-emotional development, family engagement, infant-toddler development and learning, and supporting children with special needs and multi-language learners. Finally, the statement could elaborate on the need for professional development to move away from isolated workshops and courses to reflect best practices in adult learning, including tight connections to classroom practice (job-embedded learning); opportunity for peer-to-peer learning, and ongoing reflection and feedback.
- In the section on supporting teachers with degrees in other fields coming into early childhood education, we recommend two changes. First, we recommend one clarifying edit to be consistent in reflecting the importance of foundational and specific competencies, and realistic expectations for content coverage in a single certificate program, changing the following sentence to read as follows: “To reflect the specialized knowledge of early childhood development and learning, States could adopt a single early childhood education certificate, spanning teaching children from birth through age eight that incorporates the *foundational* competencies and skills necessary to effectively and appropriately teach young children. This would ensure educators have *a baseline of specialized* professional development in early childhood education.” In addition, while Teach for America is one important pathway, we recommend including alternate examples of high-quality professional development and preparation for individuals with degrees in other fields coming into early childhood education in the same footnote

towards the end of the document. One option is to present a teacher residency model such as that in operation at Lesley University or Montclair State University. Like TFA, this model is directed towards individuals who have a bachelor's degree, but it operates as a 12-18 month program in which individuals are simultaneously taking coursework while working in the classroom from day one under the supervision of a mentor teacher.

We also believe it is very important for this statement to clarify the way it addresses two additional issues: (1) the focus on the 0-5 workforce within the context of a 0-8 developmental frame, and an explicit recognition that we need to create professional preparation pathways that better link the content and requirements for the entire 0-8 workforce; and (2) the relationship between federal, state and local actions.

In a specific example of the second point, in the recommendations for state action, the statement begins by encouraging states to “create a shared terminology for different roles and credentials that cross settings, sectors and auspices.” While we think it is critical to encourage shared terminology so that roles and credentials can cross settings, sectors and, indeed, state lines, the work of creating that shared terminology needs to happen at the national level as well – indeed, the second paragraph in this section identifies the activities of the federal government related to these questions. Therefore, we recommend including language in this section indicating that states’ efforts to develop and refine competencies and career pathways should reflect a national conversation and consensus, a process which is underway, and happening in collaboration with national organizations, scholars, practitioners and others.

Thank you again for the opportunity to provide comments on this important policy statement. We look forward to continuing to work with the Department, and with states and local programs, on the planning, development, funding and implementation of well-designed, integrated, equitable and financed career pathways that support early childhood professionals across all settings, sectors and states.

Build Initiative
Center for Law and Social Policy
Center on Enhancing Early Learning Outcomes
Child Care Aware of America
Early Care and Education Consortium
Early and Elementary Education Policy at New America
First Five Years Fund
National Association for the Education of Young Children
National Association for Family Child Care
National Head Start Association
National Women’s Law Center
Ounce of Prevention Fund
T.E.A.C.H. Early Childhood® National Center
Zero to Three